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Richard E. Jennings
Acting Manager
Aircraft Certification Service Design
Manufacturing & Airworthiness Division, AIR-100
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, DC 20591

Re: Engine-influencing parts: FAA Policy Memorandum [AIR100-16-160-PM09](#) and
Advisory Circular [33.70-1](#).

Dear Mr. Jennings:

The undersigned represent certificated repair stations and air carriers that are directly and significantly impacted by changes in regulations, policy and other guidance issued by the agency.

Both organizations strongly object to the inclusion of any requirements relating to “engine-influencing parts” in the above-referenced documents or indeed any internal or external guidance material. As required by Order [IR8100.16](#), policy statements cannot create or change regulations; this is particularly apropos when the new “requirement” is not directly linked to or “firmly based in a rule.” We could find no specific requirement or definition for these so-called “influencing parts” in the regulation or existing guidance.

The referenced policy memorandum erroneously states that the term “engine-influencing parts” is defined in an Advisory Circular (AC). It is not defined and it should not be added. Indeed, if any change is to take place in the referenced AC it should be to remove the term and its vague narrative¹ as it is not based upon any specific or “reasonable interpretation” of a requirement in 14 CFR part [33](#).

¹ [Advisory Circular 33.70-1](#), para. (8)(h), Influencing Parts, p. 19 (July 31, 2009).

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Re: Engine-influencing parts

We request the agency withdraw the memorandum and take no further steps to add any requirements for "influencing parts" without specific regulatory authority or further input from the public as required by FAA Memorandum [PS-ANM100-2001-00060](#), Public Involvement in Policy and Guidance Developed by Aircraft Certification Directorate Standards Staffs, SMT01-01 (Mar. 27, 2001).

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

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