

August 9, 2024

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RE: Comment Period Extension Request
Draft Advisory Circular 43-9D

Dear Ms. Hill,

The undersigned organizations request a 90-day extension to the published comment period for Draft AC 43-9D, "Maintenance Records."

The document contains changes that must be reviewed carefully to ensure compliance with both parts [43](#) and [91](#), while accommodating the proper method for completing an FAA Form 8130-3.

To use an FAA Form 8130-3 as a maintenance record, information on its completion must be reconciled with the elements required by § [43.9](#) and multiple bilateral agreements, maintenance implementation documents, and other advisory material. The time it is taking to perform the necessary analysis, reconciliation, and to provide comments on the draft will extend beyond the current deadline for comments.

The undersigned therefore request a 90-day extension to the published comment period to provide substantive review of an advisory circular, which when final will have an immediate and significant impact on small businesses and international aviation regulatory compliance.

Sincerely,

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