

**REQUEST FOR EXTENSION OF TIME TO COMMENT**

**FAA Order 8130.21J (DRAFT)**

*Completion of FAA Form 8130-3 under Part 21*

Submitted to the FAA via email to:

[joshua.ctr.warren@faa.gov](mailto:joshua.ctr.warren@faa.gov)

[tracy.r.szczepaniak@faa.gov](mailto:tracy.r.szczepaniak@faa.gov)

March 28, 2025

**Submitted by**

Aeronautical Repair Station Association  
Aircraft Owners & Pilots Association (AOPA)  
Airlines for America  
Aviation Suppliers Association  
Aviation Technician Education Council  
Cargo Airline Association  
Commemorative Air Force  
Experimental Aircraft Association  
International Air Transport Association  
Modification and Replacement Parts Association  
National Air Carrier Association  
National Air Transportation Association  
National Business Aviation Association

For more information,  
please contact:  
Jason A. Dickstein  
(202) 628-6777



## REQUEST FOR EXTENSION OF TIME TO COMMENT

### FAA Order 8130.21J (DRAFT) *Completion of FAA Form 8130-3 under Part 21*

Submitted to the FAA via email  
March 28, 2025

Tracy Szczepaniak  
Joshua Warren  
Federal Aviation Administration  
Aircraft Certification Service, AIR-600  
800 Independence Ave, SW  
Washington, DC 20024

Dear Ms. Szczepaniak and Mr. Warren:

Thank you for your work on the Draft Order 8130.21J. That draft has been made available for public comment for a roughly 30 day period, through April 21, 2025.

The undersigned trade associations request an extension of time of an additional 60 days for the comment period. We request extension of the comment period through June 23, 2025.

Members of the undersigned trade associations rely on the FAA Form 8130-3 as a traceability element that serves in a critical role of communicating safety information on which the industry relies.

Upon initial review by industry, it appears that the changes to this important order may be significant. This requires significant coordination and review among the industry in order to identify whether comments are necessary, and to craft comments that will be positive in their effect.

Past experience with unintended consequences arising from 8130-3 guidance has shown that the industry can be dramatically affected (and consequently safety is affected) by choices in



the related guidance. The entire industry wants to help the FAA avoid unintended consequences arising from 8130.21J.

The undersigned associations therefore request extension of the comment period for 8130.21J through June 23, 2025.

Respectfully Submitted,

Brett Levanto  
Vice President of Operations  
Aeronautical Repair Station Association

David Oliver  
President / CEO  
Commemorative Air Force

Murray Huling, Ed.D  
Vice President, Regulatory Affairs  
Aircraft Owners & Pilots Association  
(AOPA)

Robert Hackman  
Vice President, Government Affairs  
Experimental Aircraft Association

Robert L Ireland  
Vice President – Safety, Maintenance and  
Engineering  
Airlines for America

Douglas E. Lavin  
Vice President, Member and External  
Relations – North America  
International Air Transport Association

Michele Dickstein  
President  
Aviation Suppliers Association

Jason Dickstein  
President  
Modification and Replacement Parts  
Association

Crystal Maguire  
Executive Director  
Aviation Technician Education Council

George D. Novak II  
President & CEO  
National Air Carrier Association

Jennifer Thibodeau  
Managing Director, Safety and Regulatory  
Policy  
Cargo Airline Association

Jenny Ann Urban  
Vice President of Regulatory Affairs  
National Air Transportation Association

Stewart D'Leon, CAM  
Director, Environmental & Technical  
Operations  
National Business Aviation Association

CC: [caitlin.locke@faa.gov](mailto:caitlin.locke@faa.gov)