



Aviation

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Subject Response to Federal Register Notice of Intent to Request Extension From the Office of Management and Budget of a Currently Approved Information Collection Activity, Request for Comments, Certification Procedures for Products and Parts Posted in FR June 25, 2010

Dear Ms Scott

GE believes the FAA's data regarding the frequency of information collection and estimated average burden hours is extremely inaccurate GE understands the 17 minutes per response is an average of the time it takes to complete all forms listed in the FR notice Additionally, in email discussions with your office GE understands the time to complete the form should include any activity leading up to actually putting "pen to paper" An example is, some inspection of a part may take 15 minutes and an additional 5 minutes to actually put pen to paper in completing the form Therefore the time per response should be 20 minutes in such an example Based upon those understandings here are GE's comments form-by-form

- 1 FAA Form 8110-12, Application for Type Certificate, Production Certificate, or Supplemental Type Certificate GE completes the form when applying to have a new engine model added to GE's Production Certificate or when GE applies for a new Type Certificate The activities to obtain a new engine Type Certificate could take 18-24 months on average Completing the form could take 10 minutes The activities to add a new engine model to GE's Production Certificate could take 1-2 days Completing the form takes 5 minutes GE completes the form on average 4 times a year
- 2 FAA Form 8130-1, Application for Export Certificate of Airworthiness Under 14 CFR Part 21 effective April 14, 2010 the form is only used for the export of aircraft GE does not export aircraft, however based upon my experience preparing an aircraft for export could take 1-5 days Completing the form would take 10 minutes
- 3 FAA Form 8130-3, Authorized Release Certificate This is a multi-purpose form which, depending on the use could take varying amounts of time to complete The major uses are (1) Domestic airworthiness approvals of aircraft, engines, propellers and articles, (2) Export airworthiness approvals of engines, propellers and articles, and (3) Return to Service of aircraft, engines propellers and articles after maintenance Before a domestic or export approval can



be issued by the FAA or one of the FAA's Designees, GE has to determine the engine or article conforms to the type design and is in condition for safe operation. On average GE would take 2-3 days to make the airworthiness determination for an engine. The FAA Designee at GE would take 1-2 days to verify GE's determination. GE Designees issue ~1-2 8130-3's for export of an engine daily. For an individual part and without GE's automated quality systems, GE may take 1 day to make the airworthiness determination. The FAA Designee at GE may take the same amount of time to verify GE's determination. Using GE's automated quality and IT systems, approximately 150-200 8130's for new parts are issued daily. To overhaul an average turbofan engine and return it to service takes 30-45 days. To overhaul an individual part may take 7 days. Completing the 8130-3 may take 30-60 minutes. GE has about 25 repair stations worldwide performing maintenance on aircraft engines and parts, and some repair stations aircraft parts only, therefore completion of the 8130-3 as a Return to Service document is a daily occurrence.

4. FAA Form 8130-6, Application for US Airworthiness Certificate. GE has the same comments regarding this form as the 8130-1.
5. FAA Form 8130-9, Statement of Conformity. To conduct a conformity inspection of an engine it could take GE 3-5 days. A conformity inspection of a part could take 1 day. Actual completion of the form could take one day of research for an engine and one hour for a part. Currently GE has 34 engine certification projects. Each project could have from 5 to 180 Requests for Conformity, which would result in the completion of an 8130-9 for each Request. GE believes completion of the 8130-9 happens at least twice a week.
6. FAA Form 8130-12, Eligibility Statement, Amateur-Built Aircraft. No comment.

GE does not believe FAA Forms 8130-1, 8130-3 or 8130-6 are necessary for the proper performance of the functions of the Department nor do the forms have a practical utility. GE does not believe the Department's estimates of the burden of the information collection is accurate. The FAA's practice of averaging all forms together and the time to complete does not present an accurate picture because depending on the usage and purpose of the form there are extreme variations in the time to complete. GE believes elimination of FAA Forms 8130-1, 8130-3 for domestic or export approvals only, and 8130-6 would not have an adverse impact on safety.

Please ask your staff to call me should they have any questions.

Sincerely,

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