



## MODIFICATION AND REPLACEMENT PARTS ASSOCIATION

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David D Magruder  
Aircraft Certification Service, Production and Airworthiness Division  
Federal Aviation Administration  
800 Independence Ave., SW, Room 815  
Washington, DC 20591

Mr. Magruder:

Thank you for your hard work in updating Order 8120.2. We have reviewed the proposed revisions to the "F" version and appreciate your efforts.

The sample language in the letter of figure 2-10 includes the following paragraph:

The above-named manufacturer is hereby authorized to use the approved (type design) data noted in the third column herein to manufacture replacement components noted in column 1. This certification may be used as part of the application for PMA (14 CFR § 21.303).

The language concerning authorization to manufacture appears to be somewhat misleading in a way that may cause some misconceptions in the industry. In particular, it may lead some people who review these letters to believe that the manufacturer signing the letter has the authority to authorize manufacturing of aircraft parts. Under 14 CFR 21.303 that authority remains vested in the FAA. In order to clarify the letter, we suggest changing the language in figure 2-10 as follows:

The above-named manufacturer is hereby authorized by the approved design holder (represented by the signature below) to use the approved data noted in the third column herein to apply for FAA PMA to manufacture replacement components noted in column 1. This certification may be used as part of the application for PMA (14 CFR § 21.303).

Thank you again for your efforts!

Very Truly Yours,

Jason Dickstein  
MARPA President