To whom it may concern;

In regards to the recently published (November 5, 2010 issue of the Federal Register) “Policy Clarifying Definition of ‘Actively Engaged’ for Purposes of Inspector Authorization”, Docket No. : FAA-2010-1060, it appears once again that the FAA has a solution desperately in search of a problem.

If enacted, this policy change will detrimentally change/affect what is and has been the standard by which all renew one’s Inspection Authorization, FAR 65.93. In review, FAR 65.93 is quite specific as to what constitutes ‘Actively Engaged’ leaving no question as to said requirements involved in the IA renewal process. Further interpretation or change to said process is simply not warranted.

As currently written, interpreted and enforced, FAR 65.93 has the neutrality and objectivity needed to keep the IA and the FAA on a detached and professional working relationship. That detached and professional relationship is what helps insure compliance with the FAR’s and appropriate maintenance practices thereby making for a safe and airworthy fleet of aircraft.

If a policy change that seeks to by-pass, by fiat, the regulatory process of NPRM’s in changing the FAR’s (as it appears FAA-2010-1060 is attempting) this modus operandi by the FAA will in the future cause aviation safety to suffer.

If enacted, this proposed policy change will become a classic example of unintended consequences. Allowing an individual ASI to renew (or not renew) one’s Inspection Authorization removes any semblance of objectivity in that renewal process. Instead a very subjective form of IA renewal rife with abuse, prejudice, bigotry and cronyism will become the standard in the aviation industry and aviation safety will most certainly suffer.

Indeed the prejudice mentioned above is already written into FAA-2010-1060. It takes the form of exempting ASI’s from having to comply with the very policy change being foisted upon all other IA’s. It is incredulous to think that one who has not complied with the very regulations they are charged with enforcing, will singularly be allowed the decision as to whether another’s activity qualifies them for renewal of their certificate.

FAA-2010-1060 is quite ill conceived. It’s cause and affect will most likely include a decrease in qualified IA’s and an erosion of aviation safety. It should be withdrawn.

Sincerely;

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A&P (35 years)
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