



Brittnee Kikolski
Continued Operational Safety
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G-AA-25-100866

U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Comments Docket No. FAA-2025-0757; Project Identifier AD-2025-00117-T

Dear All:

Gulfstream Aerospace Corporation has reviewed the subject NPRM and would like to provide the enclosed comments.

If you have any questions or need additional information, please contact
cos.cert@gulfstream.com.

Very Respectfully,

For Brittnee Kikolski

CC: K. Lascell, VP Airworthiness Assurance (via email)
J. Hodges, VP Engineering (via email)
R. Glasscock, VP Gulfstream Compliance Assurance Office and ODA Lead
Administrator (via email)
F. Nuernberger, Chief Engineer Large Cabin (via email)
A. Herron, FAA COS Program Manager, Atlanta ECB (via email)

#	Docket References	Comment	Rationale for Comment	Recommendation
1	Para (g)	Para (g) proposes to mandate previous revisions of the GVI Aircraft Maintenance Manuals (AMM) without accommodating the latest AMM revision which may result in challenges with AD compliance without an Alternative Method of Compliance (AMOC). In addition, the NPRM proposes to mandate the entirety of the AMM whereas only the AMM Section 05-10-10 Airworthiness Limitations (ALS) are required to address the NPRM Unsafe Condition (e). The ALS maintains the specific revision level on each page for traceability.	Operators who have incorporated subsequent AMM revisions cannot comply with the AD as written. The current AMM revisions are: GVI (650) AMM revision 24, dated October 30, 2024, has been revised to Revision 25, dated May 15, 2025. GVI (G650ER) AMM revision 19, dated October 30, 2024, has been revised to revision 20, dated May 15, 2025. The subject Airworthiness Limitations Section (ALS) of the AMM have remained unchanged and are still identified with a release date of October 30, 2024.	Update text in para (g) to: (g) Revise the ALS Within 30 days after the effective date of this AD, revise the existing ALS, as applicable, to incorporate the information specified in GVI (G650 or G650ER) Aircraft Maintenance Manual, Section 05-10-10 Airworthiness Limitations, Chapter 05 Time Limits/Maintenance Checks, dated October 30, 2024. Note to paragraph (g): Table 4 in Section 05-10-10 of the following aircraft maintenance manuals contains the life limits required by paragraph (g) of this AD: Gulfstream GVI (G650) Aircraft Maintenance Manual, Revision 24, dated October 30, 2024; Gulfstream GVI (G650ER) Aircraft Maintenance Manual, Revision 19, dated October 30, 2024; and Gulfstream GVI (G650) Aircraft Maintenance Manual, Revision 25, dated May 15, 2025; Gulfstream GVI (G650ER) Aircraft Maintenance Manual, Revision 20, May 15, 2025.
2	Background	Background statements should be revised for better clarity and alignment with the proposed unsafe condition (e).	Statements within the Background description regarding errors in previous ALS revisions are incorrect. The ALS changes are attributed to expanding aircraft serial number effectivity for GVI Rear Spar Fitting Inspection and clarifying safe life limit part numbers where "& sub" was previously noted in the ALS.	Revise the Background text to align with the proposed unsafe condition (e): The FAA has received a report indicating new and more restrictive airworthiness limitations are necessary within the airworthiness limitations section (ALS) of the aircraft maintenance manual (AMM) for Gulfstream Aerospace Corporation Model G650 and G650ER airplanes. Gulfstream revised the ALS to add additional airplane serial numbers to the effectivity of Rear Spar Fitting PSE and to clarify safe life limit part numbers for the airworthiness limitations section (ALS) where "& Sub" was previously noted.[...]"