Ms. Sarah MacLeod  
Executive Director  
Aeronautical Repair Station Association  
121 North Henry Street  
Alexandria, VA  22314

Tracking Number: L340-8000.1-P-1508-0291

Dear Ms. MacLeod:

In reference to your July 9, 2015 letter on Continue-in-Service Processes, the Aircraft  
Maintenance Division, Repair Station Branch, has reviewed your request for information  
and provides the following responses:

**QUESTION 1:** Does a repair station’s rating allow it to make a determination of whether  
internal or attached articles (“sub-articles”) contained in a “top assembly” may continue in  
service? That is, may an appropriately rated repair station review, inspect, check, or test  
sub-articles to determine if they are “serviceable as removed” and therefore eligible for  
installation (i.e., can continue in service without further maintenance steps)?

**RESPONSE:** Yes. The privileges and limitations of repair stations, under Title 14 Code of  
Federal Regulations (14 CFR) sections 43.3(c), 43.7(c), and 145.201, allow for the  
performance of maintenance on all articles for which they are rated. Holding ratings for  
those articles (“top assembly”) also signifies that same repair station is qualified and  
authorized to maintain all “sub-articles” associated with the “top assembly”. Since 14 CFR  
section 1.1 defines inspection as part of maintenance, if the subcomponents you referenced  
are inspected in accordance with 14 CFR section 43.13(a), then the repair station may make  
an approval for return to service, per 14 CFR section 43.9(a). This approval for return to  
service will state the “sub article” was inspected, tested, cleaned, etc., in accordance with an  
acceptable document identified in 14 CFR 43.13(a) and approved for return to service with  
respect to the work performed.

**QUESTION 2:** If the answer to question one (1) is yes, can the repair station implement  
procedures that allow it to place the sub-article into stock for future use?

**RESPONSE:** Repair stations can place procedures into their Repair Station/Quality Control  
Manual (RSM/QCM) covering the placement of sub-articles into repair station stores for  
future use. A repair station must ensure proper custody is maintained at all times for sub- 
articles/component parts they receive into stores. Current guidance within FAA Order 8900.1,  
Volume 6, Chapter 9, Section 9; Volume 2, Chapter 11, Section 4; and Advisory Circular 20-
154, states sub-articles placed into stores must be identified to show basic part information, serviceability status, and rejected parts. Determining serviceability can be accomplished before the sub-article is placed into stores or prior to installation. Either way, since it is the installer’s responsibility to determine installation eligibility, that serviceability determination must be accomplished in accordance with 14 CFR section 43.13, per the top assembly maintenance instructions or repair station quality procedures found in the RSM/QCM (other methods, techniques, and practices acceptable to the Administrator) and documented to show compliance with 14 CFR section 43.9.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact Patricia K. Williams, Manager, Repair Station Branch, AFS-340, at (202) 267-1684.

Sincerely,

[Signature]

Timothy W. Shaver
Acting Manager, Aircraft Maintenance Division