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November 21, 2007

Via E-mail to: [edmund.hawley@dhs.gov](mailto:edmund.hawley@dhs.gov)

Mr. Edmund Hawley  
Administrator, TSA-1  
Transportation Security Administration  
601 South 12<sup>th</sup> Street  
Arlington, VA 22202-4220

RE: Expedited Issuance of Repair Station Security Regulations

Dear Mr. Hawley:

The Aeronautical Repair Station Association (ARSA) represents the international aviation maintenance and alteration community. It finds itself in the ironic position of requesting the Transportation Security Administration (TSA) expeditiously issue a notice of proposed rulemaking for repair station security rules as mandated under Section 1616 of Public Law 110-53.

As you are well aware, the 9/11 Commission Recommendation Act of 2007 (H.R. 1) punishes the industry if the TSA fails to enact a final rule within the law's timeframe. If the TSA cannot issue a final rule by August 3, 2008, the Federal Aviation Administration (FAA) will be prohibited from issuing foreign repair station certificates. Although there is an exception for renewals and applications in process, there will be dire consequences levied upon the nation's businesses and upon international relations.

The Association certainly recognizes that TSA is confronted with a myriad of more pressing issues with only limited resources. Indeed, ARSA also recognizes that the security threat represented by repair stations is certainly not high. However, the severe penalty necessitates immediate attention.

We stand ready to comment on the TSA's notice of proposed rulemaking in a timely manner and look forward to working with the agency in developing a sensible and rational final rule.

Your Servant,

A handwritten signature in blue ink that reads "Sarah MacLeod". The signature is fluid and cursive, with the first and last names clearly legible.

Sarah MacLeod  
Executive Director