



U.S. Department
of Transportation
**Federal Aviation
Administration**

800 Independence Ave., SW
Washington, DC 20591

DEC 10 2007

Ms. Sarah MacLeod
Executive Director
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903

Dear Ms. MacLeod:

Subject: Limitations on Issuance of Repairman Certificates

Thank you for your recent inquiry on behalf of the Aeronautical Repair Station Association (ARSA). ARSA requests removal of the prohibition contained within Flight Standards Information Management Systems (FSIMS) paragraph 5-1193C.1, which prohibits a repairman certificate being issued for an airframe and/or a powerplant rating.

The Federal Aviation Administration (FAA) has established, through the regulatory process, requirements for issuance of a repairman certificate. The current regulatory requirements are less stringent than the requirements established for the issuance of an FAA mechanic certificate with airframe and/or powerplant ratings. Therefore, the repairman certificates by regulation are more limited and/or restrictive to a specific work function as noted herein and as required by Title 49 United States Code section 44703(b)(1)(D) .

Removal of the prohibition contained in paragraph 5-1193C.1 would not have the intended purpose for which you have suggested.

Title 14 Code of Federal Regulations (14 CFR) section 65.79, Skill requirements, states, "Each applicant for a mechanic certificate or rating must pass an oral and a practical test on the rating he seeks. The tests cover the applicant's basic skill in performing practical projects on the subjects covered by the written test for that rating. An applicant for a powerplant rating must show his ability to make satisfactory minor repairs to, and minor alterations of, propellers."

In contrast, applicants for repairman certification under 14 CFR section 65.103, employed by repair stations or air carriers, are not required to pass an FAA knowledge or skill test. The regulations only require practical experience of at least 18 months or formal training appropriate for the position, as well as to the satisfaction of the Administrator, as the basis for issuance of a repairman certificate.

Additionally, per FAA Order 8900.1, repairman certificates are stated to be reserved for applicants who have special skills, such as:

- Argon heliarc welding
- Cylinder plating
- Nondestructive testing
- Propeller overhaul
- Electrical system analysis and repair (this type of certificate should be reserved for specific systems only, such as flight guidance data bus and power distribution)
- Radio and/or instrument repair (for these repairman certificates, the applicable privileges may be entered as “radio and instrument” or “radio” or “instrument”)

As noted in the proposal provided by ARSA to revise paragraph 5-1197 B, the reference to use of “Pending” for the purpose of recording requirements found in 14 CFR part 43 will be removed in a subsequent revision and applied to the correct section of FAA Order 8900.1, section 6, entitled, “Certificate Repairman for Light - Sport Aircraft.”

Sincerely,



James J. Ballough
Director, Flight Standards Service