



April 30, 2014

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John S. Duncan
Director
Flight Standards Service
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20553-0002

Re: Consistency and Standardization Initiative (CSI)
Airframe ratings and line maintenance authorizations

Dear Mr. Duncan:

The Aeronautical Repair Station Association (ARSA) and AJETON Inc., jointly submit this letter under the Federal Aviation Administration's (FAA) Consistency and Standardization Initiative (CSI) due to a significant impact on the repair station industry.

(I) Issue

(A) Regulatory summary

- (1) An appropriately certificated and rated repair station must perform maintenance, preventive maintenance or alterations in accordance with part 43 on any article for which it is rated within the limitations placed on its operations specifications (OpsSpecs).
- (2) To become certificated, an applicant must provide (among other things):
 - (a) A principle place of business as the fixed location.
 - (b) Housing, facilities, equipment, materials, data and personnel consistent with its ratings.
 - (c) For an airframe rating, arrangements for *suitable* permanent housing to enclose the largest type and model of aircraft upon which it will work. (There is no requirement that a repair station provide "exclusive" housing.)
- (3) Once certificated, a repair station may—
 - (a) Perform maintenance, preventive maintenance, or alterations on articles outside of its housing if it provides *suitable* facilities that are acceptable to the FAA and meet the requirements of § 145.103(a)

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so that the work can be done in accordance with the requirements of part 43 of this chapter.

- (b) Temporarily transport material, equipment, and personnel needed to perform work on an article for which it is rated to a place other than the repair station's fixed location on a recurring basis.

(B) FAA perspective on the issue

- (1) The Los Angeles (LAX) Flight Standards District Office's (FSDO) position is that—

- (a) To be issued a paragraph D-100 OpsSpecs, the repair station must have permanent and exclusive access to a hangar—use of an “as needed or available” hangar is not fulfilling the obligation to have suitable permanent housing under § 145.103(b).
- (b) In the LAX FSDO jurisdiction, there are two ways to obtain suitable *permanent* housing: a repair station can own a hangar or it can lease a hangar (usually for annual terms), both must include a provision for exclusive use. Renting a hangar on an “as or space availability” basis is unsuitable because it is not permanent for § 145.103(b) compliance purposes. (All similarly situated repair stations at LAX have a paragraph D-107 authorization and are operating out of big trucks on the ramp.)
- (c) Similarly, the repair station cannot perform work on “part 91” aircraft including aircraft that belong to leasing companies under its part 145 certificate because it does not have exclusive use of *suitable permanent* housing.
- (d) The repair station cannot work away from its fixed location (have an OpsSpecs D-100 authorization) because it does not have exclusive use of a hangar.

(2) Issues Specific to AJETON

- (a) According to the LAX FSDO, upon initial certification, the office issued the OpsSpecs paragraph D-100 to AJETON pending a contract for exclusive use of a hangar. AJETON never provided such a contract; therefore, the LAX FSDO removed OpsSpecs D-100 and issued the repair station a line maintenance authorization under OpsSpecs D-107.
- (b) AJETON asked the FAA about working on the San Bernardino, California airport, as the company could obtain exclusive use of a hangar on that airport. That activity would take the operation out of

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the LAX district and into Riverside FSDO jurisdiction requiring a change of location.

- (c) The FAA states that AJETON uses its hangar on the San Bernardino California airport to perform maintenance under part 65 mechanic certificates with airframe and powerplant ratings. The mechanics use repair station forms with the air agency certificate number removed.
- (d) In August 2013, the FAA issued the company a Letter of Investigation (LOI) because the company did not have a contract with an air carrier as required to maintain an OpsSpecs D-107 authorization. According to the LAX FSDO the enforcement case is currently being coordinated with the Chief Counsel's Office.
- (e) In response to a query from AJETON, the FAA issued a letter dated April 1, 2013, regarding the removal of OpsSpec D-100 (See Exhibit 2). In that letter, the FAA stated that after investigation of the complaint, it was determined that AJETON did not provide evidence demonstrating compliance with the regulatory requirements for the issuance of OpsSpecs paragraphs D-100 and D-107.
- (f) LAX FSDO currently performs repair station audits on AJETON because the company still has a valid air agency certificate although it is not currently exercising the privileges of that certificate.

(C) Certificate holder's perspective on the issue

- (1) AJETON was issued a part 145 certificate, No. 3AJR 398B, on Nov. 30, 2009 with Limited Airframe and Powerplant ratings and OpsSpecs paragraphs A003, A004 and D-100 (see Exhibit 1).
- (2) During the certification process, to satisfy the requirement of 14 CFR § 145.103(b) relating to "suitable permanent housing", the repair station was required to obtain written confirmation from an operator that its hangar was available if the need arose (See May 9, 2013 email, Exhibit 2).
- (3) The repair station has not changed its operation and practices since certification; between the end of 2009 and sometime in 2011, LAX FSDO conducted normal oversight without significant issue. During 2011, the LAX-FSDO underwent management changes that prompted a revision to the AJETON's certificate, specifically, OpsSpecs paragraph D-100.

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- (4) The repair station has a fixed location with adequate facilities for storing necessary equipment, materials and personnel, including office space. Indeed, these premises were found acceptable for issuance of the original certificate.
 - (5) The repair station's primary business relates to work on part 91 privately owned and leased aircraft. Work, which would have been previously performed under the repair station certificate, is now conducted by appropriately rated part 65 mechanics.
 - (6) Currently, the LAX FSDO has authorized AJETON to only use its repair station certificate to perform contract maintenance for a part 121 air carrier (See Nov. 13, 2013 email, Exhibit 2).
 - (7) AJETON is aware that the LAX FSDO issued an LOI to AJETON for not having a contract with an air carrier. Mr. Albert has not heard any more from the FAA regarding the status of the LOI or enforcement case. Mr. Albert stated that AJETON presented a contract with a part 121 air carrier to the LAX FSDO; it performs line maintenance under contract for a part 121 charter operator.
 - (8) In February 2013, AJETON's attorney sent a letter to the FAA requesting resolution of the rescinded OpsSpecs paragraph D100 issue. The FAA response states that the agency investigated the complaint and determined that AJETON did not provide evidence validating compliance with 14 CFR §§ 145.103(b) and 145.205(d) for the issuance of OpsSpecs D-100 and D-107 (see April 1, 2013 letter, Exhibit2).
- (D) Industry perspective on the issue:
- (1) Before a repair station may be issued a line maintenance *authorization*, it must be issued a repair station certificate with appropriate ratings.
 - (2) While the regulations do not dictate the rating under which line maintenance may be authorized, logically, an airframe rating with limitations appropriate to the housing, facilities, equipment, personnel, data and materials would be necessary.¹
 - (3) Notwithstanding the rating, the basic requirements for a repair station certificate must be shown, that is—
 - (a) Fixed location for official communication between the agency and the certificate holder. While the location need not be the same as

¹ The definition of line maintenance in section 145.3 indicates that the work will be performed on completed aircraft and could include annual inspections of general aviation aircraft up to and including C-checks on part 121, 129 and 135 aircraft. Therefore, limited airframe would be the appropriate rating for obtaining a line maintenance authorization since that rating contemplates work on a completed aircraft.

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the housing, facilities, equipment, materials, data and personnel; the fixed location must be the company's principle place of business where administrative functions take place.

- (b) Housing, facilities, equipment, materials and data necessary to work on completed aircraft within the limitations requested and issued. These items must be fully described in the repair station manual with appropriate quality control and procedures manual procedures for conducting of work in accordance with part 43.
- (c) To become certificated, airframe repair stations must establish access to a hangar that can house the largest aircraft on its certificate—once the rating is issued, the repair station can work outside its housing.
- (d) Since a repair station must always perform work in accordance with part 43, which requires the necessary accruments, knowledgeable personnel and data,² the repair station's limitations could be—
 - (i) Line maintenance in accordance with the air carrier's program; and,
 - (ii) Parts 91, 129 and 135 aircraft inspections and corrective actions.
- (e) In this case, the FAA seems to have mixed and matched the regulations after issuance of an appropriate certificate. An appropriate analysis of the certification process would acknowledge:
 - (i) The appropriate ratings for the work performed by this particular repair station is limited to the airframe and powerplant; to obtain and maintain the rating, the repair station established it has—
 - ✓ A principle place of business for storage and dispensing facilities, equipment, personnel, materials and data appropriate to the work—part 91 inspections and corrective actions and “line maintenance” activities for large aircraft.
 - ✓ Accessible permanent housing for the largest aircraft that will be worked upon. Most of the work is performed outside in accordance with part 43; the “as-needed”

² See 14 CFR § 145.201(b).

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availability of the hangar is specifically appropriate for this type of activities.

- (ii) The line maintenance definition is only applicable during the original certification process to determine the nature and extent of housing, facilities, equipment, personnel and data is needed for the *limited airframe rating* performing line maintenance type activities.
- (iii) As long as the repair station has a fixed location, it may work away from that location on a recurring basis.

(E) Summary of communication between the agency and the certificate holder

- (1) Exhibit 2 contains the communications between the agency and the certificate holder beginning in August 2009 and concluding November 2013.
- (2) The early communications relate to the establishment of a fixed location and an “as needed” hangar necessary for issuance of the limited airframe and powerplant ratings, and the disputed OpsSpecs paragraphs.
- (3) Later communication indicates the change in requirements to hold the disputed OpsSpecs paragraph(s).

(II) Applicable regulations and guidance

(A) Title 14 Regulations

- (1) § 145.53(a) entitles a person meeting the requirements of part 145 to a repair station certificate with *appropriate ratings* prescribing such operations specifications and limitations as are necessary in the interest of safety.
- (2) § 145.61(a) Limited ratings - allows the FAA to issue a limited rating for the maintenance or alteration of only a particular type of airframe, powerplant, propeller, radio, instrument, or accessory, or part thereof, or performs only specialized maintenance requiring equipment and skills not ordinarily performed under other repair station ratings. Such a rating may be limited to a specific model aircraft, engine, or constituent part, or to any number of parts made by a particular manufacturer.
- (3) § 145.101(a) requires each certificated repair station to provide housing for the facilities, equipment, materials, and personnel consistent with its ratings.

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- (4) § 145.103(b) requires a certificated repair station with an airframe rating to provide *suitable permanent housing* to enclose the largest type and model of aircraft listed on its operations specifications.
- (5) § 145.103(c) allows a certificated repair station to perform maintenance, preventive maintenance, or alterations on articles outside of its housing if it provides suitable facilities that are acceptable to the FAA and meet the requirements of § 145.103(a) so that the work can be done in accordance with the requirements of part 43 of this chapter.
- (6) § 145.201 sets forth the privileges and limitations of a repair station certificate. Specifically a repair station may—
 - ✓ Perform maintenance, preventive maintenance, or alterations in accordance with part 43 on any article for which it is rated and within the limitations in its operations specifications.
 - ✓ Arrange for another person to perform the maintenance, preventive maintenance, or alterations of any article for which the certificated repair station is rated. If that person is not certificated under part 145, the certificated repair station must ensure that the non-certificated person follows a quality control system equivalent to the system followed by the certificated repair station.
 - ✓ Approve for return to service any article which it is rated after it has performed maintenance, preventive maintenance, or an alteration in accordance with part 43.
 - ✓ Not maintain or alter any article for which it is not rated, and may not maintain or alter any article for which it is rated if it requires special technical data, equipment, or facilities that are not available to it.
 - ✓ Not approve for return to service—
 - Any article unless the maintenance, preventive maintenance, or alteration was performed in accordance with the applicable approved technical data or data acceptable to the FAA.
 - Any article after a major repair or major alteration unless the major repair or major alteration was performed in accordance with applicable approved technical data; and
- (7) § 145.203 allows a certificated repair station to temporarily transport the material, equipment, and personnel needed to perform maintenance, preventive maintenance, alterations, or certain specialized services on an article for which it is rated to a place other than the repair station's fixed location if:

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- ✓ The work is necessary due to a special circumstance, as determined by the FAA; or
- ✓ It is necessary to perform such work on a recurring basis, and the repair station's manual includes the procedures for accomplishing maintenance, preventive maintenance, alterations, or specialized services at a place other than the repair station's fixed location.

(8) Section 145.205(d) provides that notwithstanding the housing requirement of § 145.103(b), the FAA may grant approval for a certificated repair station to perform line maintenance for an air carrier certificated under parts 121 or 135, or a foreign air carrier or foreign person operating a U.S.-registered aircraft in common carriage under part 129 on any aircraft of that air carrier or person, provided—

- ✓ The certificated repair station performs such line maintenance in accordance with the operator's manual, if applicable, and approved maintenance program,
- ✓ The certificated repair station has the necessary equipment, trained personnel, and technical data to perform such line maintenance; and
- ✓ The certificated repair station's operations specifications include an authorization to perform line maintenance.

(B) Public guidance

(1) Housing and facilities requirements under § 145.103. AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals, paragraph 4-2, states that the repair station manual should include a description of the housing and facilities, including a drawing showing the floor plan of the facility and a description of heating, lighting, equipment location, shop areas, electrical, and compressed air outlets.

(2) Work performed at another location under § 145.203:

- ✓ AC 145-9, paragraph 4-5, entitled Work Performed at Another Location states, that the a repair station may perform work away from its fixed location on temporary basis, when a special circumstance arises, or when it is necessary to perform such work on a recurring basis.
- ✓ A repair station may work away from a repair station's fixed location when it is necessary to perform such work on a recurring basis.

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- ✓ The AC goes onto state that a repair station manual procedure for work performed is required if the repair station performs work at another location on a recurring basis.

The repair station manual must include procedures for accomplishing maintenance, preventive maintenance, alterations, or specialized services at a place other than the repair station's fixed location.

- ✓ Work performed at another location does not include other authorizations, such as having a line maintenance authorization. Repair stations must still maintain a permanent fixed location even if the majority of their work is done at another facility.

- (3) Maintenance, preventive maintenance, and alterations performed for certificate holders under parts 121, 125, and 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under part 129—§ 145.205. AC 145-9 paragraph 4-6 entitled *Maintenance, Preventative Maintenance, and Alterations performed for Air Carriers under Parts 121, 125, 129 and 135*, states that the FAA may authorize a certificated repair station to perform line for an air carrier conducting operations under parts 121, 129, and 135, provided that:

- ✓ The repair station performs the maintenance in accordance with the operator's manual, if applicable, and approved maintenance program.
- ✓ The repair station has the necessary equipment, trained personnel; land technical data to perform the line maintenance.
- ✓ The repair station's OpSpecs include an authorization to perform line maintenance

If the repair station is going to perform line maintenance, its manual must include procedures to ensure that the necessary equipment, technical data, and trained personnel are available before the maintenance can be performed. The repair station should also maintain a list of individuals who are trained by the air carrier to perform line maintenance.

(C) FAA internal guidance

- (1) FAA 145 Repair Station Certification Guidance—FAA Order 8900.1 (revision date 4/15/13) Volume 2, Air Operator and Air Agency Certification and Application Process, Chapter 11, Certification of a Title 14 CFR Part 145 Repair Station.

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- ✓ Section 1, Introduction - defines relevant terms for Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair stations and explains the policies and procedures applicable to a repair station, regardless of its geographic location (see, Exhibit 3).
 - ✓ Section 2: Procedures for Certifying Part 145 Repair Stations/Satellites Located Within the United States and Its Territories. This section provides guidance for evaluating an applicant for certification under Title 14 of the Code of Federal Regulations (14 CFR) part 145 as a repair station. The section describes the certification process, each phase and activities associated with the phases (see, Exhibit 4).
 - ✓ Section 4: Evaluate a Part 145 Repair Station Manual and Quality Control Manual or Revision. This section provides guidance for evaluating, accepting, or rejecting all Title 14 of the Code of Federal Regulations (14 CFR) part 145 Repair Station Manual (RSM) and/or Quality Control Manual (QCM) original submissions or revisions. Including the requirement for procedures in the repair station manual when performing work away from the repair station's fixed location and line maintenance procedures (see, Exhibit 5).
 - ✓ Section 5: Evaluate Part 145 Repair Station Facilities and Equipment. This section provides evaluation and inspection guidance for a Title 14 part 145 repair station for original certification, change in rating, change in location, or adding facilities (see, Exhibit 6).
- (2) FAA 145 Repair Station Inspection Guidance—FAA Order 8900.1 (revision date 2/10/14) Volume 6, Surveillance, Chapter 9, Part 145 Inspections.
- ✓ Section 1: Introduction to Repair Station Risk-Based Oversight System explains the System Safety Process and its use of integrated and data driven to eliminate or reduce risk (see, Exhibit 7).
 - ✓ Section 4: Inspect a Part 145 Repair Station's Certificate Requirements section guides the aviation safety inspector (ASI) in inspecting a repair station's certificate requirements per Title 14 of the Code of Federal Regulations (14 CFR) part 145 (see, Exhibit 8).
 - ✓ Section 8: Inspect a Part 145 Repair Station's Housing and Facilities provides guidance for inspecting the adequacy of repair station facilities (see, Exhibit 9).

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- ✓ Section 16: Inspect a Part 145 Repair Station and its Authorization for Work Away From its Fixed Location provides guidance for authorization and surveillance of a Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair station performing aircraft maintenance away from its fixed location. It also lists circumstances by which personnel of a part 145 repair station may work away from a permanent fixed location (see, Exhibit 10).
- ✓ Section 18: Inspect a Part 145 Repair Station's § 145.205 Maintenance/Alterations Requirements guides the ASI through inspecting a repair station's compliance with Title 14 of the Code of Federal Regulations (14 CFR) part 145, § 145.205 (see, Exhibit 11).
- ✓ Section 18, paragraph 6-1997, Procedures, item E, Line Maintenance (Repair Station Within the United States) provides instruction on what the inspector should look for regarding The repair station's OpSpec D107 (see, Exhibit 11).
- ✓ Section 19: Inspect Part 145 Repair Stations Within the United States guides ASI through inspecting Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair stations for Flight Standards Service (AFS) personnel involved in certificate management (see, Exhibit 12).
- ✓ Section 19, paragraph 6-2016, General, (B): Work Away From a Fixed Location allows the a district office to inspect repair stations working away from a fixed location and instructs the ASI from the geographical office performing the inspection to maintain good communications with the parent facility's certificate-holding district office (CHDO) regarding such items as procedures, manuals, equipment, and personnel, (see, Exhibit 12).

(D) Ambiguities or inconsistencies in regulations, guidance or correspondence

Neither the public advisory materials nor the internal guidance define "suitable permanent housing." The regulations are also silent on this term. However, the agency has created a reasonable interpretation of the requirement to have "*suitable permanent housing*" through its public advisory material and its Orders to inspectors.

FAA Order 8900.1, Volume 2, Air Operator and Air Agency Certification and Application Process, Chapter 11, Section 5, Evaluate Part 145 Repair Station Facilities and Equipment (revision date 9/13/07), paragraph 2-1320, entitled Repair Station Inspections, states that repair stations must provide housing

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for the facilities, equipment, materials, and personnel consistent with its ratings, i.e., sufficient work space and areas for the proper segregation and protection of articles during all maintenance, preventive maintenance, or alterations with suitable racks, hoists, trays, stands, etc.

Paragraph 2-1320 (B), states that a certificated repair station with an airframe rating must provide suitable permanent housing to enclose the largest type and model of aircraft listed on its OpSpecs. The NOTE below that statement requires each certificated repair station to have a fixed location where materials, equipment, tools and data are stored. That NOTE recognizes that when the majority of the work will be done away from the fixed location the repair station must have a base from which it operates.

While the Agency recently revised its Repair Station Inspection Guidance FAA Order 8900.1 (revision date 2/10/14) Volume 6, Surveillance, Chapter 9, Part 145 Inspections, the update doesn't walk an ASI through the certification and surveillance processes in a standard or consistent method. Indeed, the information in the certification sections does not align nor is it consistent with the surveillance procedures. The information provided for both certification and surveillance it is awkwardly written and isn't clearly aligned with the basic regulatory requirements.

The guidance is not consistent regarding the parameters established by the regulation vis-à-vis the work expected to be performed under each particular rating. It also does not consistently apply "limitations as are necessary in the interest of safety." 14 CFR § 145.53(a). Many operations specifications "limitations" are a list of what the repair station "can" do, not what limitations are necessary to ensure work is performed in accordance with part 43.

(III) AJETON's Relationship with the FAA

(A) Prior FAA history with the certificate holder (issues, decisions, etc.)

The company has no history of other disputes or disagreements with the agency.

(B) Offices, regions, or directorates that have dealt with this stakeholder on this or other issues

AJETON has not dealt with any other FAA offices on this issue.

(C) Precedent (prior FAA history or decisions with other stakeholders on this or similar issues)

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There is no indication that the agency otherwise requires any certificate holder with an airframe rating to have exclusive use of a hangar.

Similarly, there is no prohibition against an appropriated rated repair station from working on an aircraft based upon its operation, e.g., part 91 or 121.

(IV) Conclusion

A review of the initial certification process documentation establishes that the repair station met the requirements for issuance of its original air agency certificate that contained the appropriate ratings, authorizations and limitations.

It appears the local office initiated a revision to the OpsSpecs (and thus the repair station certificate) based upon a different “interpretation” of § 145.103(b), i.e., requiring airframe rated repair stations to have exclusive use of a hangar. Since the repair station did not have exclusive use of a hangar, the agency removed the ability to “work away from the fixed location” under § 145.203.

The local interpretation may have come from the 2012 Repair Station Notice of Proposed Rulemaking (NPRM) that would require “each certificated repair station...provide and maintain—[s]uitable permanent housing for the facilities, equipment, materials, and personnel consistent with its ratings.” Repair Stations, 77 Fed. Reg. 30081 (proposed May 21, 2012) (to be codified at 14 CFR pt. 145).

The current regulations do not justify such a result—the rating was correctly issued as limited airframe and powerplant. The company has an appropriate and suitable fixed location from which to initiate work, store materials, equipment and conduct business. While it does not have exclusive use of a hangar, it does have access to one when the need arises. By establishing compliance with § 145.103(b), a repair station can work outside its housing (as allowed by § 145.103(c)) or it can work away from its fixed location on a recurring basis under appropriate procedures in its repair station and quality manual.

Furthermore, an appropriately certificated repair station may work on any article for which it is rated provided the work can be performed under part 43; there is no prohibition based upon the article’s operational environment.

Finally, there is no regulation that requires a contract with an air carrier before a repair station is issued a line maintenance authorization. While the guidance material seems to indicate this “necessity,” the regulations do not.

(V) Recommendation

We suggest that to reduce the confusion and mitigate the inconsistent application of policy in the area of limited ratings with line maintenance authorization, the agency—

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- (A) Issue an Info bulletin that outlines the requirements for obtaining a limited airframe and/or powerplant rating that allows the issuance of authority to perform line maintenance services. The bulletin can reiterate—
- (1) That for a repair station to be issued a line maintenance authorization it must first have the housing, facilities, equipment, materials, personnel and data to obtain a limited airframe and/or powerplant rating. That means it must have access to—
 - ✓ Permanent housing, suitable for performing “line maintenance” for an air carrier; that is, a hangar available on an “as needed” basis to enclose the largest aircraft upon which it will be working.
 - ✓ A fixed location with facilities for storing equipment, materials and data and from which work at another location is dispatched.
 - (2) In order to obtain the limited airframe and/or powerplant rating with authority to perform line maintenance for an air carrier, the applicant must show it can perform the work contemplated by the definition of “line maintenance” in § 145.3. However, after the rating and OpsSpecs paragraphs are issued, the repair station must ensure it can perform the work required by the air carrier under its instructions (as required by § 145.205).
 - (3) The repair station’s must explain how it will ensure it has the housing, facilities, equipment, material, knowledgeable personnel and data necessary for performing the work in accordance with part 43 and § 145.205, including when the aircraft may need to be ferried to the hangar and how that housing will be made available when necessary.
 - (4) Review and align the verbiage in Order 8900.1 for certification and surveillance, and standardize requirements for original certification and certificate management.
- (B) Query the LAX FSDO on the AJETON matter to ensure this CSI sets for the facts necessary to resolve the issue in accordance with enumerated and applicable regulations.
- (C) If the situation is as reported, revise AJETON’s OpSpecs by reinstating paragraph D-100.

We appreciate the FAA’s prompt consideration of this request. Please let us know if you have any questions or desire additional information.

Mr. John Duncan

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Sincerely,



Greg Albert
AJETON, Inc.



Marshall S. Filler
Counsel for the Aeronautical Repair Station Association

Exhibits:

- 1: AJETON Part 145 Certificate, No. 3AJR398B, dated Nov. 30, 2009
- 2: Ajeton/FAA communications (August 2009 – November 2013)
- 3: FAA Order 8900.1, Vol. 2, Ch. 11, Sec. 1 (as of 4/15/13)
- 4: FAA Order 8900.1, Vol. 2, Ch. 11, Sec. 2 (as of 4/15/13)
- 5: FAA Order 8900.1, Vol. 2, Ch. 11, Sec. 4 (as of 4/15/13)
- 6: FAA Order 8900.1, Vol. 2, Ch. 11, Sec. 5 (as of 4/15/13)
- 7: FAA Order 8900.1, Vol. 6, Ch. 9, Sec. 1 (as of 2/10/14)
- 8: FAA Order 8900.1, Vol. 6, Ch. 9, Sec. 4 (as of 2/10/14)
- 9: FAA Order 8900.1, Vol. 6, Ch. 9, Sec. 8 (as of 2/10/14)
- 10: FAA Order 8900.1, Vol. 6, Ch. 9, Sec. 16 (as of 2/10/14)
- 11: FAA Order 8900.1, Vol. 6, Ch. 9, Sec. 18 (as of 2/10/14)
- 12: FAA Order 8900.1, Vol. 6, Ch. 9, Sec. 19 (as of 2/10/14)

cc: Steven Douglas, AFS-300
Nicholas Reyes, AWP-200
Marc Warren, AGC-1

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nicholas.reyes@faa.gov
marc.warren@faa.gov

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

RECEIVED
NOV 21 2013

Air Agency Certificate

Number 3AJR398B

This certificate is issued to

AJETON, INC.

whose business address is

6201 WEST IMPERIAL HWY
LOS ANGELES, CALIFORNIA 90045

*upon finding that its organization complies in all respects
with the requirements of the Federal Aviation Regulations
relating to the establishment of an Air Agency, and is
empowered to operate an approved* REPAIR STATION

with the following ratings:

LIMITED AIRFRAME (11-30-09)

LIMITED POWERPLANT (11-30-09)

*This certificate, unless canceled, suspended, or revoked,
shall continue in effect* INDEFINITELY

By direction of the Administrator

Date issued:

NOVEMBER 30, 2009

Robyn L. Miller

for RICHARD A. FALCON

MANAGER, LAX-FSDO

This Certificate is not Transferable, and ANY MAJOR CHANGE IN THE BASIC FACILITIES, OR IN THE LOCATION THEREOF,
SHALL BE IMMEDIATELY REPORTED TO THE APPROPRIATE REGIONAL OFFICE OF THE FEDERAL AVIATION ADMINISTRATION

Any alteration of this certificate is punishable by a fine of not exceeding \$1,000, or imprisonment not exceeding 3 years, or both

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Part A

	HQ CONTROL DATE	EFFECTIVE DATE	AMENDMENT NUMBER
001 Issuance and Applicability	11/16/2004	11/30/2009	0
002 Definitions and Abbreviations	11/16/2004	11/30/2009	0
003 Ratings and Limitations	01/30/2004	11/30/2009	0
004 Summary of Special Authorizations and Limitations	09/23/1998	11/30/2009	0
007 Designated Persons	12/19/2006	11/30/2009	0
449 Antidrug and Alcohol Misuse Prevention Program	07/17/2009	11/30/2009	0

A001 . Issuance and Applicability

HQ Control: 11/16/2004

HQ Revision: 050

a. These operations specifications are issued to AJETON INC, a Domestic Repair Station, pursuant to Title 14 Code of Federal Regulations (CFR) Section 145.53. The repair station certificate holder shall conduct operations in accordance with CFR Part 145 and these operations specifications.

The certificate holder's address:

Fixed Location:
6201 West Imperial Highway
Los Angeles, California 90045

Mailing Address:
12021 Wilshire Blvd, Suite 720
Los Angeles, California 90025

b. The holder of these operations specifications is the holder of Certificate Number 3AJR398B and shall hereafter be referred to as the certificate holder.

c. These operations specifications are issued as part of this Repair Station Certificate, and are in effect as of the Date Approval is effective. This certificate and operations specifications shall remain in effect until the domestic repair station certificate is surrendered, suspended, or revoked.

The certificate holder is authorized to use only the business name which appears on the certificate to conduct the operations described in subparagraph a.

Delegated authorities: None

U.S. Department
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Administration

Operations Specifications

1. Issued by the Federal Aviation Administration .
2. Support information reference:
3. These Operations Specifications are approved by direction of the Administrator.



2009.11.30 13:17:18 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E. Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

A002 . Definitions and Abbreviations

HQ Control: 11/16/2004

HQ Revision: 050

Unless otherwise defined in these operations specifications, all words, phrases, definitions, and abbreviations have identical meanings to those used in the Title 14 Code of Federal Regulations (CFR) Regulations and Title 49 United States Code as cited in Public Law 103-272, as amended. Additionally, the definitions listed below are applicable to operations conducted in accordance with these operations specifications.

**Bilateral Aviation
Safety Agreement
(BASA)**

An executive agreement concluded between the United States and a foreign country for the purpose of promoting aviation safety; also known as an Agreement for the Promotion of Aviation Safety.

Certificate Holder

In these operations specifications the term "certificate holder" shall mean the holder of the repair station certificate described in these operations specifications in Part A paragraph A001 and any of its officers, employees, or agents used in the conduct of operations under this certificate.

CFR

Code of Federal Regulations

Class rating

As used with respect to the certification, ratings, privileges, and limitation of aircraft within a category having similar operating characteristics.

**Domestic Repair
Station**

A certificated repair station located in the United States.

Exemption

An authorization that permits an alternate means of compliance with a specific CFR. The exemption must meet the procedural requirements of CFR 14, Part 11.

**FAA Accountable
Manager**

A person designated by the certificated repair station who is responsible for and has authority over all repair station operations that are conducted under 14 CFR Part 145, including ensuring that the repair station's personnel follow the regulations and serving as the primary contact with the FAA.

FAA Form 8000-4-1

The FAA Form 8000-4-1 has been replaced with the form contained within this operations specifications application (OPSS) for the generation of the 14 CFR Part 145 Repair Station Operations Specifications.

Foreign Repair Station

A certificated repair station located outside of the United States.

**Geographic
Authorization**

An approval provided to a foreign repair station to perform maintenance support under contract for a U.S. air carrier, or operator of U.S. - registered aircraft under 14 CFR Part 129, at a location other than the repair station facility. A geographic authorization is issued by the FAA to respond to the need of a U.S. air carrier or Part 129 foreign operator for maintenance at a station where the frequency and scope of that maintenance does not warrant permanently staffing and equipping the

station for its accomplishment.

EASA

European Aviation Safety Agency

EASA Accountable
Manager

The manager who has corporate authority for ensuring that all maintenance required by the customer can be financed and carried out to the standard required by the EASA full member Authority.

Limited Rating

Rating issued to repair stations for the performance of maintenance on particular makes and models of airframes, powerplants, propellers, radios, instruments, accessories, and/or parts.

Limited Ratings -
Specialized Services

Rating issued for a special maintenance function when the function is performed in accordance with a specification or data acceptable to the Administrator.

Line Maintenance

Any unscheduled maintenance resulting from unforeseen events; or scheduled checks where certain servicing and/or inspections do not require specialized training, equipment, or facilities.

Maintenance

The inspection, overhaul, repair, preservation, and the replacement of parts, but excludes preventive maintenance.

Maintenance
Implementation
Procedures (MIP)

Procedures for implementing the provisions of a BASA that apply to maintenance.

MOE

Maintenance Organization Exposition - Pertains to European Aviation Safety Agency member countries that use an MOE in place of a Repair Station Manual and a Quality Control Manual.

Preventive
Maintenance

As defined in Appendix A subparagraph (c) of 14 CFR Part 43.

QCM

Quality Control Manual

RSM

Repair Station Manual

Substantial
Maintenance

Any activity involving a C-check (routine airframe maintenance) or greater maintenance; any engine maintenance requiring case separation or teardown; and/or major alterations or major repairs performed on airframes, engines, or propellers.

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Operations Specifications

1. Issued by the Federal Aviation Administration .
2. Support information reference:
3. These Operations Specifications are approved by direction of the Administrator.



2009,11,30 13:18:39 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E. Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

A003 . Ratings and Limitations

HQ Control: 01/30/2004

HQ Revision: 010

The Certificate Holder is authorized the following Ratings and/or Limitations:

Class Ratings

None authorized

Limited Ratings

<u>Rating</u>	<u>Manufacturer</u>	<u>Make/Model</u>	<u>Limitations</u>
Airframe	Boeing	727 (all series) and 737 (all series maintenance through C-Check	See Note 1
Powerplant	Pratt & Whitney	JT8D (through -17) and CFM56 (-3 and -7) through C-Check	See Note 1

Limited Ratings - Specialized Services

<u>Rating</u>	<u>Specifications</u>	<u>Limitations</u>
---------------	-----------------------	--------------------

NOTE 1: The Certificate Holder is authorized to perform maintenance, preventive maintenance, and major/minor alterations through C-Check level maintenance on airframe and powerplants for which they are rated. When work is performed for which Part 43 applies, it must be accomplished in accordance with the Air Carriers Continuous Airworthiness Maintenance Program (CAMP), Operators FAA Approved Maintenance Program and/or Maintenance Manual, or the 129 Operators Approved Maintenance Program when operating US registered aircraft and any Data approved by the Administrator.

U.S. Department
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Administration

Operations Specifications

1. Issued by the Federal Aviation Administration .
2. Support information reference:
3. These Operations Specifications are approved by direction of the Administrator.



2009.11.30 13:19:52 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E. Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

A004 . Summary of Special Authorizations and Limitations

HQ Control: 09/23/1998

HQ Revision: 010

- a. The certificate holder, in accordance with the reference paragraphs, is authorized to:

	Reference Paragraphs
Conduct operations choosing to have an antidrug and alcohol misuse prevention program.	A449
Perform work, excluding continuous operations, at additional locations other than at its primary Fixed Location.	D100

- b. The certificate holder is *not* authorized and *shall not*:

	Reference Paragraphs
Use Exemptions.	A005
Use an approved electronic recordkeeping system, electronic/digital signature, and/or electronic media.	A025
Perform maintenance with NAA ratings where the scope of work is authorized by a BASA/MIP.	A060
Perform work, including continuous operations, at additional locations other than at its primary fixed location.	A101
Perform maintenance in accordance with foreign repair station geographic authorizations.	B050
Perform line maintenance for cert. holders conducting operations under Parts 121 and 135 and for foreign carriers/persons operating U.S. registered aircraft in common carriage under Part 129, apart from D100 which authorizes that work away from station.	D107

U.S. Department
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Administration

Operations Specifications

1. Issued by the Federal Aviation Administration .
2. Support information reference:
3. These Operations Specifications are approved by direction of the Administrator.



2009,11,30 13:21:16 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

A007 . Designated Persons

HQ Control: 12/19/2006

HQ Revision: 030

- a. The personnel listed in the following table are designated to officially apply for and receive operations specifications for the certificate holder indicated below.

Table 1 – Designated Persons to Apply for and Receive Authorizations

Title	Name	Parts Authorized
FAA Accountable Manager, 145 / CEO	Albert, Greg	A,D
Director of Quality Control	Shamsai, Steve	A,D

- b. The following personnel listed in Table 2 are designated by the certificate holder to receive Information for Operators (INFO) messages for the certificate holder as indicated below. A receipt for the information by an operator or person is not required.

Table 2 – Designated to Receive INFO Messages

Name	Email Address	Telephone No.	Type of Information to Receive
Albert, Greg	galbert@scpaircraft.com	310-568-3783	ALL
Willis, Christopher	cwillis@scpaircraft.com	310-568-3783	ALL
Shamsai, Steve	seva@ajeton.com	310-568-3783	ALL

U.S. Department
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Federal Aviation
Administration

Operations Specifications

1. Issued by the Federal Aviation Administration .
2. Support information reference:
3. These Operations Specifications are approved by direction of the Administrator.



2009.11.30 13:22:58 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E. Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

A449 . Antidrug and Alcohol Misuse Prevention Program

HQ Control: 07/17/2009

HQ Revision: 00a

- a. The Part 145 repair station certificate holder has elected to implement an Antidrug and Alcohol Misuse Prevention Program, because the certificate holder performs safety-sensitive functions for a 14 CFR Part 121, and 135 certificate holder and/or for a 14 CFR Part 91 operator conducting operations under Section 91.147.
- b. The certificate holder certifies that it will comply with the requirements of 14 CFR Part 120 and 49 CFR Part 40 for its Antidrug and Alcohol Misuse Prevention Program.
- c. Antidrug and Alcohol Misuse Prevention Program records are maintained and available for inspection by the FAA's Drug Abatement Compliance and Enforcement Inspectors at the location listed in Table 1 below:

Table 1

	Location & Telephone of Antidrug and Alcohol Misuse Prevention Program Records:
Telephone Number:	A1 310-568-3783
Address:	6201 West Imperial Highway
Address:	N/A
City:	Los Angeles
State:	CA
Zip code:	90025

d. Limitations and Provisions.

- (1) Antidrug and Alcohol Misuse Prevention Program inspections and enforcement activity will be conducted by the Drug Abatement Division. Questions regarding these programs should be directed to the Drug Abatement Division.
- (2) The certificate holder is responsible for updating this operations specification when any of the following changes occur:
 - (a) Location or phone number where the Antidrug and Alcohol Misuse Prevention Program Records are kept.
 - (b) If the certificate holder's number of safety-sensitive employees goes to 50 and above, or falls below 50 safety-sensitive employees.
- (3) The certificate holder with 50 or more employees performing a safety-sensitive function on January 1 of the calendar year must submit an annual report to the Drug Abatement Division of the FAA.
- (4) The certificate holder with fewer than 50 employees performing a safety-sensitive function on January 1 of any calendar year must submit an annual report upon request of the Administrator, as specified in the regulations.

The certificate holder has fewer than 50 safety-sensitive employees.

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Operations Specifications

1. Issued by the Federal Aviation Administration .
2. Support information reference:
3. These Operations Specifications are approved by direction of the Administrator.



2009.11.30 13:24:25 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E. Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

Table of Contents

Part D

	HQ CONTROL DATE	EFFECTIVE DATE	AMENDMENT NUMBER
100 Work to be Performed at a Place Other Than the Repair Station Fixed Location(s)	11/16/2004	11/30/2009	0

D100 . Work to be Performed at a Place Other Than the Repair
Station Fixed Location(s)

HQ Control: 11/16/2004

HQ Revision: 050

- a. The certificate holder may perform work at a place other than its Fixed Location (as listed in paragraph A001, and paragraph A101 if issued, of these operations specifications) provided it has the facilities, material, equipment and technical personnel to perform the work authorized in the following table.

Table 1

Work Authorized	Repair Stations Manual References	Quality Control Manual References
All work for which the Repair Station is rated in paragraph A003 of these Operation Specifications.	Chapter's 7 through 9	N/A

- b. The certificate holder may not perform continuous operation at a facility other than the station's Fixed Location listed in paragraph A001, and paragraph A101 if issued.
- c. Line Stations. Privileges of a line station, as set forth by the EASA certificate and scope of work and located within the country where the main facility is domiciled are listed in Table 1 are authorized.
- d. Work may be due to a special circumstance or on a recurring basis. If on a recurring basis, the repair station must have procedures in its manual.

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Operations Specifications

1. Issued by the Federal Aviation Administration .
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2009.11.30 13:25:25 Central Standard Time
Location: WebOPSS
Digitally signed by Charles E Johnson,
Principal Maintenance Inspector

4. Date Approval is effective: 11/30/2009

Amendment Number: 0

5. I hereby accept and receive the Operations Specifications in this paragraph.

Albert, Greg, CEO

Date: 11/30/2009

Ajeton/FAA Communications Summary
August 2009 – November 2013

Date	Sender	Recipient	Summary
August-December 2009	Greg Albert, AJETON, Inc.	Charles E. Johnson, PMI LAX-FSDO	Correspondence regarding AJETON's initial part 145 certification.
March-May 2011	Charles E. Johnson, PMI LAX-FSDO	Greg Albert, AJETON, Inc.	Correspondence regarding AJETON's OpSpecs amendment and FAA's regulatory interpretation (access to hangar at all times is required).
05/22/2012	Greg Albert, AJETON, Inc.	Charles E. Johnson, PMI LAX-FSDO	Mr. Albert provides a copy of AJETON's lease agreement to use a hangar at San Bernardino Airport on an "as-available" basis.
02/22/2013	Charles E. Johnson, PMI LAX-FSDO	Greg Albert, AJETON, Inc.	Mr. Johnson states that D-107 requires AJETON to have a contractual arrangement authorizing the performance of specified maintenance. In order to maintain AJETON's certificate, AJETON must comply with the requirements for operating a repair station with only D-107 line maintenance provisions for part 121, 135, or 129 operators. Comply or surrender license pending review.
03/20/2013	Charles E. Johnson, PMI LAX-FSDO	Greg Albert, AJETON, Inc.	Letter stating AJETON is required to provide "proof positive" documentation that the company meets the current part 145 requirements for providing suitable permanent housing to enclose the largest type/model listed in its OpSpecs.
04/01/2013	Nicholas Reyes, Manager, Flight Standards Division Western-Pacific Region	Michael J. Pangia, Esq. Counsel to AJETON, Inc.	Response to AJETON complaint regarding rescinded OpSpecs.
05/03/2013	Greg Albert, AJETON, Inc.	Charles E. Johnson, PMI LAX-FSDO	AJETON is in contact with airports and customers to acquire facilities necessary for LAX-FSDO "policy".
05/03/2013	Charles E. Johnson, PMI LAX-FSDO	Greg Albert, AJETON, Inc.	Mr. Johnson indicates the FAA guidance is "quite clear" that C-Checks are not allowed. He attached portions of FAA Order 8900.1 and notes AJETON does not meet the environmental aspects described in the Order.
05/09/2013	Greg Albert, AJETON, Inc.	Charles E. Johnson, PMI LAX-FSDO	Mr. Albert provides the email chain—which was provided to the LAX-FSDO during initial certification—showing AJETON has as-needed/as-available access to an AA hangar.
11/13/2013	Charles E. Johnson, PMI LAX-FSDO	Greg Albert, AJETON, Inc.	Mr. Johnson denies capabilities change request. Any work on this type of aircraft must be accomplished utilizing A&P sign-offs.

From: Charles.E.Johnson@faa.gov <Charles.E.Johnson@faa.gov>

To: galbert@scpaircraft.com

Cc: David.Minnis@faa.gov

Date: Wednesday, August 05, 2009 09:51 am

Subject: Re: Ajeton status

Mr. Galbert,

Please provide this office with a copy of the [REDACTED] lease, [REDACTED] hangar agreement, [REDACTED] paperwork and any documents which can verify access to required tooling from [REDACTED] and [REDACTED] (manuals not included). After review and confirmation of these documents and after the Repair Station has been set up and ready for operation, we will schedule and Facility (Compliance) Inspection to confirm your operation is in accordance with the applicable CFR's, RS/QCM and Training Manual. This will include a simulation of how the RS will process Work Orders (forms and data inputs), Receiving Inspection through Return to Service operations (documentation). Inspection of Part Storage area and dispositioning and routing of parts, all Required Rosters, stamps (if applicable), and tracking systems used (computer demonstrated access). And last a reviewed of all employee Training Folders.

If you have any questions/concerns please contact me at the number listed below.

Charles E. Johnson, PMI
LAX-FSDO
2250 E. Imperial Hwy, Suite 140
El Segundo, CA. 90245
310-215-2150 ext. 138

galbert@scpaircra
ft.com
To
08/03/2009 07:18 Charles E Johnson/AWP/FAA@FAA
PM cc
747@verizon.net,
mperry@scpaircraft.com
Subject
Ajeton status

Mr. Johnson,
I wanted to send this email to you to give you the current status of our company in the items we still have open with you for our repair station certificate. When Steve Shamsai and myself left there, we had three items which were to be provided to you for our company to move to the next step (inspection) for our certificate: 1) A copy of the lease with [REDACTED]; 2) Hangar use agreement; 3) Corrected and printed final RSM, QCM, Forms and Training manuals. I am pleased to inform you that the paperwork from [REDACTED] and the City Attorney's office was received by me today and has been delivered to [REDACTED], and we will be signing the lease on Wednesday, August 5, 2009. I have also received an agreement with [REDACTED] to be able to utilize their hangar facility on an as needed basis, and all of the manuals have been corrected with the changes needed, as well as reprinted and bound.

After discussing how to proceed with Steve, we have concluded that we will

begin to set up the office, receiving inspection area, tooling area, library and all other necessary areas for proper operation of or facility, and then present you with all of the documents. The logic behind this is that we dont want to present you with all of the documents on Wednesday and then have you schedule an inspection on Thursday and we are not ready. Do you agree with this logic? If you would like us to proceed this way or if you have another way in which you would like us to proceed could you please advise me so I can make the neccesary arrangements. I am anticipating that it will take us one week to have our facilities in order and be ready for presentment of documents as well as inspection. If you have an concerns or comments please let me know and I will address them immediately. Thank you for all of your help and guidance through this process. I can assure you that we will be a top notch repair station and you will not be disappointed to be our PM1.
Greg Albert
Ajeton, Inc.
661-794-0780

Attachments:

From: galbert@scpaircraft.com <galbert@scpaircraft.com>

To: Charles.E.Johnson@faa.gov

Cc:

Date: Saturday, August 29, 2009 05:18 pm

Subject: Re: Missing page.

Mr. Johnson,
Please find attached a scanned copy of page 12 of Exhibit F. I made an error when I informed you I had an electronic copy of the [REDACTED] agreements. I am scanning them now and will forward them to you at the beginning of the week. Please let me know if you need any additional documents.

Greg Albert
661-794-0780

-----Original Message-----

From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov]

Sent: Thursday, August 27, 2009 02:53 PM

To: galbert@scpaircraft.com

Subject: Missing page.

Mr. Albert, Please include page 12 of the [REDACTED] Exhibit F document when you forward me the [REDACTED] documents. This page is missing from the previous copy. Thank you. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138

Attachments:  LAWA exh f page 12.pdf (593KB)

From: Charles.E.Johnson@faa.gov <Charles.E.Johnson@faa.gov>

To: [REDACTED]

Cc: David.Minnis@faa.gov

Date: Wednesday, September 02, 2009 03:31 pm

Subject: Sub-Lease

Mr. [REDACTED],

As you know, I have sent the lease agreement between [REDACTED] and Ajeton Inc. to the FAA Legal Council for review. I have attached the concerns from our legal representative for your review.

1. Page 11 of the Consent to Sublease is not signed and dated by the Executive Director. This agreement is not valid until executed by the Executive Director.
2. Page 1 of the Office Space sublease agreement, Item 1 states as per Exhibit A with dimensions of 17' by 17' with three parking spaces. Page 8 Exhibit A is blank, this renders this agreement invalid.

Please make the required correction and resubmit for further Legal review.

Charles E. Johnson, PMI
LAX-FSDO
2250 E. Imperial Hwy, Suite 140
El Segundo, CA. 90245
310-215-2150 ext. 138

----- Forwarded by Charles E Johnson/AWP/FAA on 09/02/2009 01:16 PM -----

Charles E
Johnson/AWP/FAA@F
AA To
Charles E Johnson/AWP/FAA@FAA
09/02/2009 01:01 cc
PM
Subject

(See attached file: Document.pdf)

Attachments:  Document.pdf (729KB)

From: [REDACTED]
To: greg@ajeton.com
Cc:
Date: Thursday, May 09, 2013 03:01 pm
Subject: Fwd: Contacts for LAX, new acct 130366 [REDACTED]
Attachments:  image001.gif (264B)
 image002.jpg (9KB)

-----Original Message-----

From: [REDACTED]
Sent: Friday, September 4, 2009 01:47 AM
To: 'Cheng, Ivy'
Subject: Re: Contacts for LAX, new acct 130366 [REDACTED]

Ivy,

Our FAA inspector has requested we provide a brief letter to him from [REDACTED] letterhead stating that we do have an account (130633 [REDACTED]) and that we are able to contact [REDACTED] for rent of hangar or ramp space at LAX on an as needed / as available basis as previously discussed through [REDACTED]. Could you provide me this letter, so I can satisfy his requirement. Thank you for your assistance in this.

Greg Albert

-----Original Message-----

From: [REDACTED]
Sent: Thursday, September 3, 2009 02:52 PM
To: [REDACTED]
Subject: RE: Contacts for LAX, new acct 130366 [REDACTED]

Thanks for the information. I will make a note of that and update our system.

Thanks.

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 03, 2009 1:49 PM
To: Cheng, Ivy
Subject: Re: Contacts for LAX, new acct 130366 [REDACTED]

Ivy,

I prefer to use the scp@aircraft.com email since that email is already set up in the system and long established. Ajeton and SCP are same companies with Boeing.

Greg Albert

Sent from my Verizon Wireless BlackBerry

From: "Cheng, Ivy"
Date: Thu, 3 Sep 2009 13:30:57 -0500

[REDACTED]
Subject: RE: Contacts for LAX, new acct 130366 [REDACTED]

Greg,

Can you please confirm if SCP Aircraft and Ajeton are the same company? I am showing 2 email accts (the other is ggreg@ajeton.com). Please let me know which email acct you want use.

Thanks.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Sent: Friday, August 28, 2009 6:31 AM

[REDACTED]
Subject: RE: Contacts for LAX, new acct 130366 [REDACTED]

[REDACTED]
The acct has been set up, 130633 [REDACTED] Attached is the information for wire transfer. If they want to send a check, please remit to:

[REDACTED]
Please advise Greg that [REDACTED] term is net 30. If any invoice is past due, we will start taking from the deposit and will notify LAX to immediately stop any service.

Thanks.

From: [REDACTED]
Sent: Thursday, August 27, 2009 3:06 PM

[REDACTED]
Subject: RE: Contacts for LAX

[REDACTED]
To whom or to where would he make that deposit?

Bets Regards

[REDACTED]
Sent: Thursday, August 27, 2009 1:22 PM

Subject: RE: Contacts for LAX

[REDACTED]
Ajeton was approved but they need to put 2500.00 on deposit. When credit has been established with [REDACTED] then we will dispense with the deposit.

Thanks

[REDACTED]
Sent: Thursday, August 27, 2009 12:21 PM

To: galbert@scpaircraft.com

[REDACTED]
Subject: Contacts for LAX

[REDACTED]
I am awaiting a reply from [REDACTED] re the credit application.

In the mean time, here is the contact list for the personnel in LAX. You should establish contact with [REDACTED]

[REDACTED] to introduce yourself. [REDACTED] is the regional manager. Once you establish contact with LAX, they can direct you to whom you should contact after hours should the need arise.

As for hangar or ramp space, again please contact LAX in the future should the need arise and if LAX has available space they will coordinate with you to assist you.

LAX will fill out a VAR (visiting aircraft report) for invoicing purposes.

From: Charles.E.Johnson@faa.gov <Charles.E.Johnson@faa.gov>

To: galbert@scpaircraft.com

Cc: David.Minnis@faa.gov

Date: Thursday, October 08, 2009 05:00 pm

Subject: Insp & Demo Phase

Mr. Albert,

Upon conclusion of the facility inspection conducted today for completion of the inspection and demonstration phase of Ajetons, inc certification for a part 145 Repair Station, the following items of concern were identified.

1. Per Part 145.161 the required Rosters and Employment Summaries were not available.
2. Calibration List, completed/due dates for Torque Wrench s/n 004 did not match. Corrected on the spot.
3. [REDACTED] Contract for accessibility is not current and not with Ajeton, Inc. [REDACTED] Terms and Condition requires a confirmation letter from [REDACTED] for Materials and Services.
4. Receiving storage containers for Sups and quarantined parts need to be separated from serviceable parts and shelf life materials. (new cabinet?)
5. Training records are not current.
 - a. Mr. Willis has wrong position indicated on his training summary.
 - b. Mr. Shamski file did not contain a training summary.
 - c. No RSM/QCM Training Indicated for employees.
6. Page 11 of Consent to Sublease not signed by City Attorney (on going) for execution of lease.
7. Subcontractors list needs to be submitted.
8. [REDACTED] agreement letter for available hangar space not available (on going).
9. Certificate for Mrs. Patricia Willis (Haz Mat training) to be provided for office files.

Upon correction of the above items, call this office to schedule an follow up inspection for confirmation and completion of this phase of certification.

If you have any questions, call this office at the number listed below.

Regards,

Charles E. Johnson and David Minnis ASI's
LAX-FSDO
2250 E. Imperial Hwy, Suite 140
El Segundo, CA. 90245
310-215-2150 ext. 138

Attachments:

Greg Albert

From: Charles.E.Johnson@faa.gov
Sent: Monday, November 30, 2009 10:26 AM
To: greg@ajeton.com
Subject: Ops Specs



Document.pdf (2 MB)

Review draft operation specification and amend as required. Which e-mail addresses do you want, provides Steve's e-mail unless he want to use ajeton's. If no changes, Certificate and Ops Specs will be ready at 1:00 P.M. as stated.

C. J.

----- Forwarded by Charles E Johnson/AWP/FAA on 11/30/2009 10:23 AM -----

Charles E
Johnson/AWP/FAA@F
AA

11/30/2009 10:18
AM

To
Charles E Johnson/AWP/FAA@FAA
cc
Subject

(See attached file: Document.pdf)

Greg Albert

From: Greg Albert [greg@ajeton.com]
Sent: Monday, November 30, 2009 10:53 AM
To: 'Charles.E.Johnson@faa.gov'
Subject: RE: Ops Specs

CJ,

Upon review I have the following questions/comments:

--Phone number on A007-1 and A449-1 should be changed to 310-568-3783 for all numbers

--Steve's email address is seva@ajeton.com and should be listed on the INFO

-- Should we not have a D100 since it was written into the approved manual for offsite work with your (or PMI's) approval? The D100 would apply and not the D107 since the work could be anywhere. It is not for continuous work, but for work to go and prepare and aircraft for ferry, or one time work at a location off site. With the D100 and D107 restrictions we are not authorized to go anywhere even if we notify you and you concur.

Everything else looks great. I will see you at 1pm. Thank you for all of your help and patience.

Greg Albert

-----Original Message-----

From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov]
Sent: Monday, November 30, 2009 10:26 AM
To: greg@ajeton.com
Subject: Ops Specs

Review draft operation specification and amend as required. Which e-mail addresses do you want, provides Steve's e-mail unless he want to use ajeton's. If no changes, Certificate and Ops Specs will be ready at 1:00 P.M. as stated.

C. J.

----- Forwarded by Charles E Johnson/AWP/FAA on 11/30/2009 10:23 AM -----

Charles E
Johnson/AWP/FAA@F
AA

11/30/2009 10:18
AM

Charles E Johnson/AWP/FAA@FAA

To

cc

Subject

(See attached file: Document.pdf)

Greg Albert

From: Charles.E.Johnson@faa.gov
Sent: Thursday, December 10, 2009 9:32 AM
To: galbert@scpaircraft.com
Subject: Manual acceptance/approval



Document.pdf (1
MB)

Place these documents in the appropriate manuals.

Charles E. Johnson, ASI
LAX-FSDO

----- Forwarded by Charles E Johnson/AWP/FAA on 12/10/2009 09:30 AM -----

Charles E
Johnson/AWP/FAA@F
AA

12/10/2009 08:08
AM

To
Charles E Johnson/AWP/FAA@FAA
cc
Subject

(See attached file: Document.pdf)

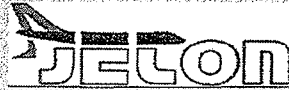
No virus found in this message.

Checked by AVG - www.avg.com

Version: 2013.0.2904 / Virus Database: 2641/6212 - Release Date: 03/29/13

**AJETON, INC.
QUALITY CONTROL MANUAL
CRS # 3AJR398B**

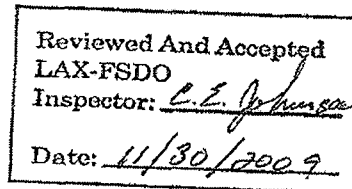
**EXCEEDING
EXPECTATIONS**



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**AJETON, INC.
QUALITY CONTROL MANUAL
CRS # 3AJR398B**

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1

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Reviewed And Accepted

LAX-FSDO

Inspector: C.E. Johnson

Date: 11/30/2009

**AJETON, INC.
REPAIR STATION MANUAL
CRS # 3AJR398B**

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Reviewed And Accepted
LAX-FSDO
Inspector: *C. E. Johnson*
Date: *11-30-2009*

**AJETON, INC.
REPAIR STATION MANUAL
GRS # 3AJR398B**

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Reviewed And Accepted
LAX-FSDO
Inspector: *C. Z. John*

Date: *11-30-2009*

Date: 11-30-2004

EXCEEDING
EXPECTATIONS



LIST OF EFFECTIVE PAGES

[illegible]

Reviewed And Accepted
LAX-FSDO
Inspector: E. E. Johnson
Date: 11-30-2009

From: greg@ajeton.com <greg@ajeton.com>

To: Charles.E.Johnson@faa.gov

Cc:

Date: Friday, March 25, 2011 12:38 am

Subject: Re: Ops Spec Meeting

Attachments:

CJ,

I am out of town, evaluating a 737, and Seva will be out of town doing an A320 on March 30. Is it possible to participate in this meeting telephonically through speakerphone? Why is this becoming an issue at LAX FSDO? Is there something that has driven this? I am confused as to the reasoning behind the proposed change. The D100 has always been used to perform any work which is not conducted at the station, and the D107 has always been used to conduct operations at a known off site location where recurring maintenance is conducted. Why the sudden change at LAX? Thanks.

Greg Albert

-----Original Message-----

From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov]

Sent: Thursday, March 24, 2011 03:51 PM

To: greg@ajeton.com

Subject: Ops Spec Meeting

Greg, This office is conducting a meeting on Operation Specifications for Repair Stations located at LAX for conducting Line Maintenance. At this time you have D100 which is work away from Home Base. This does not apply to line maintenance, you should have D-107. If D-107 is granted, this over rides D-100. D-107 requires you to list all customers/carries that you have contract work for and removes the requirement to have a Hangar large enough for the largest aircraft worked. Management's interpretation of the regulation is if you do not have an Lease Agreement stating that you have access to their hangar at any time (not if available you can not be issued D-100 for C-Checks. No outside work, and this would be annotated on A-003 with limitations. See 14 CFR Part 145.3 (d). The meeting is scheduled for Wednesday the 30th at 9:00 A.M. If you can not make the meeting, send a representative. This will impact your ability to function as a 145 doing Line Maintenance. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138

From: greg@ajeton.com <greg@ajeton.com>

To: Charles.E.Johnson@faa.gov

Cc:

Date: Monday, April 11, 2011 03:56 pm

Subject: Re: Ops Specs

Attachments:

CJ,

I am taking a class for training in Air Legislation and will not be back in LA until April 29. Can we try and coordinate a meeting time after that when we get closer. I have to finish this class to get my certification and qualification. Thank you. Please advise.

Greg Albert

-----Original Message-----

From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov]

Sent: Monday, April 11, 2011 03:13 PM

To: greg@ajeton.com

Cc: James.M.Magill@faa.gov

Subject: Re: Ops Specs

Greg, You need to make a appointment ASAP. I am out of the office on 4/12/11 and my supervisor is off on 4/15. 4/13-14/11 are fine and all of next week. Need to close this out. As stated before, the issue is having a Permanent Facility to house the largest aircraft to be worked. Your hangar in SB is out of our district. D107 (Line Maintenance) does not allow for C-Checks. Must have a permanent facility for this, If you are going to conduct C-Checks with a permanent facility then your not conduction line maintenance as described in 145.3(d). The D100 operation specification can not be issued with D107. Your operations Specifications has been revised to delete D100 and issue D107, Make the appointment to discuss this. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138 From: greg@ajeton.com To: Charles E Johnson/AWP/FAA@FAA Cc: 747@verizon.net Date: 04/02/2011 10:51 AM Subject: Re: Ops Specs CJ, I have to say that all of this is suprising and upsetting. It is also a little concerning that this has happened so quickly with minimal notice. As per our conversation the day we met with you and Dave to get the ops specs revised, we have now entered into a contract with the owners of the 747 to perform maintenance, deposits have been paid, and the aircraft has a schedule for it be moved to Los Angeles. How does this new ruling from the manager affect my contract and business? I could suffer severe financial repercussions from the owners of the aircraft if I default on the contract. As I stated in the previous email, both myself and Seva would like to come into the FSDO to discuss and review this but we are not available to do so until sometime after April 18. I will be able to firm up scheduling in another weeks or so. Please advise. Greg Albert -----Original Message----- From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov] Sent: Thursday, March 31, 2011 05:59 PM To: greg@ajeton.com Subject: Re: Ops Specs Greg, I can make the appointment because I'm the one issuing the Ops Specs. Management's view on C-checks is that you must have a Permanent facility large enough to house the largest aircraft to be inspected. And that performing a C-Check could require the removal of Landing Gears, Flaps, Horizontal elevators, ect that would require specials equipment and indoor facility. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138 From: greg@ajeton.com To: Charles E Johnson/AWP/FAA@FAA Date: 03/31/2011 02:35 PM Subject: Re: Ops Specs CJ, I would like to schedule an appointment, for I concur and see the points raised, with exception to the last that C-Checks do not meet the definition of 145.3 (D)(2). A C-Check is a scheduled service, and doesnt require specialized training, equipment or facilities. Would the appointment be scheduled with you or would it be with someone else. Thank you. Greg Albert -----Original Message----- From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov] Sent: Thursday, March 31, 2011 02:22 PM To: greg@ajeton.com Cc: James.M.Magill@faa.gov Subject: Ops Specs Greg, Due to the Regulation and Guidance pertaining to "Line Maintenance" , Ajeton, Inc Ops Specs will be amended to reflect the following; 1. Operations Specification D107, Line Maintenance Authorization will be issued (thru B-Check with Limitations). 2. Operations Specification D100, Work Away from Home Base will be rescinded as stated in Order 8900.1, Vol 3, Chap 18, Sec 6, paragraph OPSPEC D107 D, third Note. If D107 is issued, D100 can not be issued. 3. Operations Specification A003, Ratings and Limitations will be amended to remove C-Check authorization and add Line Maintenance only thru B-Check. Removal of C-Check authorization will result in compliance with 14 CFR Part 145.103 (B) (Permanent Facility). At this time Ajeton, Inc. does not have a Contract or Lease agreement that is permanent. As stated, "if available" does not meet the rule as interpreted by Management. C-Checks are not considered Line Maintenance as identified in 14 CFR Part 145.3 (d)(2). If you would like to further clarification, contact this office an schedule an appointment. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138 ----- Forwarded by Charles E Johnson/AWP/FAA on 03/31/2011 11:02 AM ----- From: Charles E Johnson/AWP/FAA@FAA To: Charles E Johnson/AWP/FAA@FAA Date: 03/31/2011 10:56 AM Subject: (See attached file: Document.pdf)

From: greg@ajeton.com <greg@ajeton.com>

To: Charles.E.Johnson@faa.gov

Cc:

Date: Wednesday, May 04, 2011 09:40 am

Subject: Re: Revised Ops Specs

Attachments:

CJ,

The 14th is a saturday. Did you mean the 16th? Please advise. Thank you.

Greg Albert

-----Original Message-----

From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov]

Sent: Wednesday, May 4, 2011 10:33 AM

To: greg@ajeton.com

Cc: James.M.Magill@faa.gov

Subject: Re: Revised Ops Specs

Mr. Albert, You and your party has been scheduled for 9:00 A.M., 5/14/2011 for issuing Ajeton's revised operation specifications in accordance with 14 CFR Part 145.3(d)(2), 145.103(b) and FAA Order 8900.1, vol 3, chapter 18, section 6, paragraph 3-921, page 18, sub paragraph OPSPEC D107, Line Maintenance Authorization. Please review these references prior to your appointment. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138 From: greg@ajeton.com To: Charles E Johnson/AWP/FAA@FAA, greg@ajeton.com Cc: James M Magill/AWP/FAA@FAA Date: 05/03/2011 11:40 PM Subject: Re: Revised Ops Specs CJ, I will be back in Los Angeles on May 14 and would like to schedule an appointment for May 16, for myself and Steve to come in and have a meeting with you and the required persons for the review of the position of the FSDO on its decisions that have been made. Thank you. Please advise. Greg Albert -----Original Message----- From: Charles.E.Johnson@faa.gov [mailto:Charles.E.Johnson@faa.gov] Sent: Tuesday, May 3, 2011 11:58 AM To: greg@ajeton.com Cc: James.M.Magill@faa.gov Subject: Revised Ops Specs Mr. Albert, As a follow up to message sent 4/11/2011 regarding issuance of revised operation specification, if you are back in town, you can schedule and appointment to receive these documents or I can mail them to you for your signature. Please advise for closure as stated in the previous message. Charles E. Johnson, PMI LAX-FSDO 2250 E. Imperial Hwy, Suite 140 El Segundo, CA. 90245 310-215-2150 ext. 138

From: greg@ajeton.com <greg@ajeton.com>

To: charles.e.johnson@faa.gov

Cc:

Date: Tuesday, May 22, 2012 07:23 pm

Subject: [REDACTED] hangar

Attachments: [REDACTED] contract.pdf (1MB)

Hi CJ,

Here is a copy of a letter i was able to obtain a copy of. As you can see in par 1) it is clearly for "as-available" no matter how it is worded, since after 15 days notice, it has to be approved. [REDACTED] is the parent company of [REDACTED], which is a 145 which holds the actual lease of the hangar [REDACTED] [REDACTED] [REDACTED].

Greg Albert

Accountable Manager

Ajeton, Inc

FAA CRS #3AJR398B

EASA Approval 145.6327

Los Angeles International Airport

6201 West Imperial Highway

Los Angeles, California 90045

+1-310-568-3783 begin_of_the_skype_highlighting+1-310-568-

3783end_of_the_skype_highlighting (office)

+1-310-568-3747 (fax)

+1-661-794-0780 begin_of_the_skype_highlighting+1-661-794-

0780end_of_the_skype_highlighting (USA Mobile)

+971509564250

begin_of_the_skype_highlighting+971509564250end_of_the_skype_highlighting (UAE Mobile)

[REDACTED]

April 18, 2012

[REDACTED]

Attention: [REDACTED]

Re: Clarification of Certain Matters under Facility Use & License Agreement dated May 1, 2012 ("License Agreement") between [REDACTED] as Licensors and [REDACTED] Related to Hangar [REDACTED] located at the San Bernardino International Airport

Dear Mike:

As we have discussed, there are a few items set forth in the License Agreement that the parties have agreed to resolve in a manner that is different than set forth in the License Agreement. The purpose of this letter is to memorialize how the parties have agreed to handle these particular items. By signing this letter below, we are certifying to each other that we have agreed that this letter will be effective and binding on both [REDACTED] as to the matters set forth in this letter, and that there is no need to prepare, and have the parties sign, a formal modification to the License Agreement. The items and their resolution are described as follows:

- 1) License Term Start Date. Paragraph 1 of the License Agreement states that the license term start date will be May 1, 2012. [REDACTED] will not immediately take possession of the hangar, but will retain a right to access and use the hangar facility upon providing fifteen (15) days' notice [REDACTED] and then, approval from [REDACTED] to use the hangar facility.
- 2) Commercial Activity. [REDACTED] shall use the hangar facility for the commercial purpose of providing aircraft heavy maintenance to its customers. This letter shall fulfill the separate written agreement requirement of Paragraph 14 of the License Agreement.
- 3) License Fees. [REDACTED] shall pay Lasera \$1,000.00 per month for an office at the hangar facility location, with a \$1,000.00 security deposit. [REDACTED] shall only be required to pay for the time that the hangar facility is actually used by [REDACTED], at \$1000.00 per day.

[REDACTED]
April 18, 2012
Page 2

I believe that is all of the items that require clarification. Let me know if you have any other issues. Please countersign this letter below to indicate your approval of these items on behalf of [REDACTED]

Very truly yours,

[REDACTED]
I ACKNOWLEDGE AND AGREE TO THE FOREGOING TERMS ON BEHALF OF
LASERA TECHNOLOGIES.

[REDACTED] _____

[REDACTED]

From: Charles.E.Johnson@faa.gov <Charles.E.Johnson@faa.gov>

To: greg@ajeton.com

Cc: James.M.Magill@faa.gov

Date: Friday, February 22, 2013 11:22 am

Subject: D107

Attachments:  Document.pdf (895KB)

Greg,

A office review of repair station operation specification D107 with "line maintenance only" listed on A003, D107 requires Ajeton to have a air carrier contractual arrangement authorizing the performance of specified maintenace. Ajeton has not performed any repair station work since the United 737 issue. In order to maintain your certificate you must comply with the requirements for operating a repair station with D107 line maintenance only provisions for part 121, 135 or 129 operators operating N-registered aircraft.

Please review D107 guidance from the 8900.1 as attached. A formal letter will follow requesting Ajeton to comply with these requirements or surrender the certificate until this issue is resolved. If you require a meeting with management, please call for a appointment.

Charles E. Johnson, PMI
LAX-FSDO
15000 Aviation Blvd, Suite 2000
Lawndale, CA. 90261-1000
310-725-6643

----- Forwarded by Charles E Johnson/AWP/FAA on 02/22/2013 08:11 AM -----

From: Charles E Johnson/AWP/FAA@FAA
AWP-LAX-FSDO-23, Los Angeles, CA
To: Charles E Johnson/AWP/FAA@FAA,
Date: 02/22/2013 08:08 AM
Subject:



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

Los Angeles Flight Standards District Office
15000 Aviation Boulevard, Suite 2000
Lawndale, California 90261-1000
Phone: (310) 725-6600, Facsimile (310) 725-6670

March 20, 2013

CERTIFIED MAIL – RETURN RECIEPT REQUESTED

Mr. Greg Albert
FAA Accountable Manager
Ajeton, INC.
6201 West Imperial Hwy
Los Angeles, CA. 90045

Dear Sir:

This letter is to inform you that as holder of a certificated repair station 3AJR398B, with Limited Airframe and Powerplant ratings, you have requested issuance of Operation Specification D100, Work to be Performed at a Place Other Than the Repair Station Fixed Location(s), before this authorization can be granted, you must comply with current regulations.

You are required to provide this office with proof positive documentation that the repair station meets the current 14 CFR part 145 requirements for providing suitable permanent housing to enclose the largest type and model of aircraft listed on its operation specifications.

Please provide this office with the required documentation in order to confirm that Ajeton, Inc. has obtained a permanent facility as required by current regulations.

If you have any questions/concerns, please contact me at the number listed above.

Regards,

Charles E. Johnson
Principal Maintenance Inspector



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

Western-Pacific Region
Office of the Regional Administrator

P.O. Box 92007
Los Angeles, CA 90009-2007

APR 01 2013

Michael J. Pangia, Esq.
Anderson Pangia & Associates, PLLC
1717 N. Street N.W.
Washington D.C. 20036

Dear Mr. Pangia:

This letter is in response to a complaint dated February 18, 2013, regarding the removal of Operations Specifications (OpSpecs) D100 and ratings from a domestic repair station, Ajeton, Inc., 3AJR398B, located in Los Angeles, California.

The Federal Aviation Administration (FAA) has investigated your complaint and determined that Ajeton has not provided evidence validating their compliance with regulatory requirements as a domestic repair station for the issuance of OpSpecs D100 and D107 per the U.S. Code of Federal Regulations (CFR), specifically 14 CFR part 145.103(b) and 14 CFR part 145.205(d). Los Angeles Flight Standards District Office (LAX FSDO) Aviation Safety Inspectors (ASIs) conducted the investigation and notified Ajeton, through various emails and letters that they may be operating contrary to part 145 regulations.

Our records indicate that on September 26, 2011, the LAX FSDO rescinded OpSpecs D100 as a result of an evaluation of Ajeton's housing and facilities. A determination was made that they did not meet the requirements to hold OpSpecs D100 due to the absence of a supporting contractual agreement or any other documentation. The determination to rescind Ajeton's OpSpecs D100 was validated after consultation with the Repair Station Branch (AFS-340). Furthermore, AFS-340 concluded that repair stations with line maintenance ratings must continue to meet certification requirements as a domestic repair station as required in 14 CFR 145.51(b). Additionally, 14 CFR 145.103(b), states that "a certificated repair station with an airframe rating must provide a suitable permanent housing to enclose the largest type and model listed on its operations specifications."

On March 8, 2013, a letter was sent from LAX FSDO to Greg Albert, Accountable Manager at Ajeton, stipulating OpSpecs D107 (Line Maintenance Authorization) was incomplete and required a contractual arrangement with an air carrier. Ajeton has yet to provide LAX FSDO any air carrier information in order to maintain this OpSpec. On March 22, 2013, LAX FSDO issued another letter to Mr. Albert requesting documentation that fulfills part 145 regulatory requirements for a permanent housing facility which has not been received to date.

If you have any questions or require additional information, please contact Mr. Nicholas Reyes, Manager, Flight Standards Division, AWP-200 at (310) 725-7200.

Sincerely,

for 

Nicholas Reyes
Manager, Flight Standards Division

cc: John Allen

From: greg@ajeton.com <greg@ajeton.com>

To: charles.e.johnson@faa.gov

Cc:

Date: Friday, May 03, 2013 02:05 pm

Subject: capabilities list

Attachments:

Hi CJ,

Please find attached Rev 1 Capabilities list for Ajeton, Inc. for powerplant and airframe. I have also spoken with [REDACTED] LAX and they are working on a reproduction and verification of documents provided in Nov 2009. The Manager of Production says she was there in 2009, and procedures have always been the same. The hangar space is on an "as-available" basis and a visiting aircraft form is submitted. She is going to verify that Ajeton is in the [REDACTED] system. The licensing agreement will have to be done by [REDACTED] and if they will even consider it, will take months to get approved. But I am going to submit it and see.

I am also working with Hawthorne Airport, Torrance Airport and Santa Monica (again). If I can get a hangar which will house the operations (faciliteis), the G3 and the fuselage (except vertical) of 737, will that suffice for LAX FSDO needs and put these issues to bed so that we can move on? I am willing to invest the funds required to be in compliance, but want to make sure I am not just throwing money away. I would also appreciate the flow charts you were refring to in regards to the needs assessment. I have been working on the items which came up in the audit. Please advise. Thanks.

Greg Albert

Accountable Manager

Ajeton, Inc

FAA CRS #3AJR398B

EASA Approval 145.6327

Los Angeles International Airport

6201 West Imperial Highway

Los Angeles, California 90045

+1-310-568-3783 begin_of_the_skype_highlighting +1-310-568-3783

end_of_the_skype_highlighting begin_of_the_skype_highlighting+1-310-568-3783

end_of_the_skype_highlighting (office)

+1-310-568-3747 (fax)

+1-661-794-0780 begin_of_the_skype_highlighting +1-661-794-0780

end_of_the_skype_highlighting begin_of_the_skype_highlighting+1-661-794-0780

end_of_the_skype_highlighting (USA Mobile)

+971509564250 begin_of_the_skype_highlighting +971509564250

end_of_the_skype_highlighting begin_of_the_skype_highlighting+971509564250

end_of_the_skype_highlighting (UAE Mobile)

From: Charles.E.Johnson@faa.gov <Charles.E.Johnson@faa.gov>

To: greg@ajeton.com

Cc: 747@verizon.net, Richard.Snyder@faa.gov

Date: Friday, May 03, 2013 04:39 pm

Subject: Facilities and equipment

Attachments:  Document.pdf (3MB)

Greg,

This is where you will find C-checks outside are no allowed. Unless you get acceptance from the FAA. Guidance is quit clear, Ajeton does not meet this requirement, especially the enviornmental aspects as highlited.

Still reseaching ability for line station transfers. (IFO). Here is the contact info;

Hardie H. DeGuzman, Manager

William J. McGowan, Front Line Manager

Viet Q. Tran, Front Line Manager

Phone Numbers:

Phone: (310) 725-7330

Fax: (310) 725-6679

Charles E. Johnson, PMI

LAX-FSDO

15000 Aviation Blvd, Suite 2000

Lawndale, CA. 90261-1000

310-725-6643

----- Forwarded by Charles E Johnson/AWP/FAA on 05/03/2013 02:33 PM -----

From: Charles E Johnson/AWP/FAA@FAA

AWP-LAX-FSDO-23, Los Angeles, CA

To: Charles E Johnson/AWP/FAA@FAA,

Date: 05/03/2013 02:24 PM

Subject:

9/13/07

8900.1 CHG 0

**VOLUME 2 AIR OPERATOR AND AIR AGENCY CERTIFICATION AND APPLICATION
PROCESS****CHAPTER 11 CERTIFICATION OF A TITLE 14 CFR PART 145 REPAIR STATION****Section 5 Evaluate Part 145 Repair Station Facilities and Equipment****2-1316 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY
CODES.****A. Maintenance. 3378.****B. Avionics. 5378.**

2-1317 OBJECTIVE. This section provides evaluation and inspection guidance for a Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair station for original certification, change in rating, change in location, or adding facilities.

2-1318 GENERAL.

A. When determining the suitability of permanent housing or other facilities used for the maintenance of an aeronautical article, the inspector should consider climatic conditions. This is to determine if high or low temperatures, excessive dust or sand, or other conditions will adversely affect worker efficiency. The inspector should also consider the maintenance being performed to determine if work processes are adversely affected by environmental conditions.

B. Applications for a repair station certificate, amendment to, transfer of, or an additional rating must be made in a format acceptable to the Federal Aviation Administration (FAA) and conform to the requirements of part 145. Additional guidance for the certification and operation of a part 145 repair stations may be found in other chapters of this order as well as the current version of Advisory Circular (AC) 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.

2-1319 SATELLITE REPAIR STATION INSPECTION.

A. A certificated repair station may apply for additional facilities or locations to become satellites of the repair station with managerial control. If practical, the satellite repair station may use all or portions of the managerial repair station's manuals to develop its own manuals. Each satellite must satisfy all requirements of part 145 for each rating sought. Ratings for the satellite may not exceed the rating of the managerial repair station.

1) Personnel and equipment from the repair station with managerial control and each certificated satellite repair station under its control may be shared.

NOTE: Procedures must be included in the manual to describe how tools will be recalibrated or removed from service if calibration is compromised during their transport between facilities.

2) Inspection personnel must be designated for each satellite repair station and be available at the repair station anytime a determination of airworthiness or return to service is made. In other circumstances, inspection personnel may be away from the premises but must be available by telephone, radio, or other electronic means.

3) The satellite repair station may not hold a rating that is not held by the certificated repair station with managerial control.

4) The satellite repair station must be located in the same domicile country as the certificated repair station with managerial control.

B. A satellite facility inspection is conducted in the same manner as a repair station facility inspection.

2-1320 REPAIR STATION INSPECTION.

NOTE: The following procedures apply to all repair stations regardless of their geographic location.

A. Each certificated repair station must provide the following:

- 1) Housing for the facilities, equipment, materials, and personnel consistent with its ratings.
- 2) Facilities for properly performing the maintenance, preventive maintenance, or alterations of articles, or the specialized services for which it is rated. Facilities must include the following:
 - a) Sufficient work space and areas for the proper segregation and protection of articles during all maintenance, preventive maintenance, or alterations;
 - b) Segregated work areas enabling environmentally hazardous or sensitive operations such as painting, cleaning, welding, avionics work, electronic work, and machining to be done properly and in a manner that does not adversely affect other maintenance or alteration articles or alterations;
 - c) Suitable racks, hoists, trays, stands, and other segregation means for the storage and protection of all articles undergoing maintenance, preventive maintenance, or alteration;
 - d) Space sufficient to segregate articles and materials stocked for installation from those articles undergoing maintenance, preventive maintenance, or alteration; and
 - e) Ventilation, lighting, and control of temperature, humidity, and other climatic conditions sufficient to ensure personnel perform maintenance, preventive maintenance, or alterations to the standards required by this part.

B. A certificated repair station with an airframe rating must provide suitable permanent housing to enclose the largest type and model of aircraft listed on its operations specifications (OpSpecs).

NOTE: Each certificated repair station must have a fixed location where materials, equipment, tools, and data are stored. While consideration can be given for certain operating situations, aviation safety inspectors (ASI) must not authorize "virtual" or completely "mobile" repair stations. Even though the majority of the work is done away from the fixed location, each repair station must have a permanent, fixed base from which it operates the repair station.

1) ASIs should evaluate the housing needs of the repair station based upon the depth and complexity of the work the repair station will perform. For example, if an airframe-rated repair station will only be doing interior refurbishment or interior electrical work that does not require the aircraft to

be completely housed, a nose dock or other similar housing may suffice for the housing requirement. Any work done on removed aircraft components must be accomplished in an appropriate housing, back shop, or other permanent structure.

2) Repair stations that frequently work away from their fixed location must ensure another certificate holder's housing and facilities are adequate and meet the requirements of the regulations for the ratings that they hold. Procedures should be included in their manuals that describe how they will evaluate a certificate holder's facilities prior to performing maintenance under the privileges of their certificate at the facility.

3) Some repair stations, such as internal fuel tank repair stations, do not require housing that will enclose the largest aircraft listed on their OpSpecs. Most of this type of work is performed in the aircraft wing, and protection from the elements should not be a major consideration. The use of mobile coverings to protect articles being installed or removed from the wing should provide sufficient protection from the elements.

C. A certificated repair station may perform those maintenance functions for which it is rated on articles outside of its housing if it provides suitable facilities that are acceptable to the FAA. The facility must meet the requirements of § 145.103(a), and the work must be done in accordance with the requirements of part 43 of this chapter.

D. A certificated repair station may perform maintenance, preventive maintenance, or alterations for the following certificated operators or carriers:

1) A 14 CFR part 121 or part 135 air carrier or commercial operator that has a continuous airworthiness maintenance program and the repair station must follow their program and applicable sections of their maintenance manual.

2) A 14 CFR part 125 operators and the repair station must follow the operator's FAA-approved inspection program.

3) A foreign air carrier or foreign person operating a U.S.-registered aircraft and the repair station must follow the operator's FAA-approved maintenance/inspection program.

E. A certificated repair station may be authorized to perform line maintenance for an air carrier certificated under part 121 or 135, a foreign air carrier, or a foreign person operating a U.S.-registered aircraft in common carriage under 14 CFR part 129, provided:

1) The repair station performs such line maintenance in accordance with the operator's manual and approved maintenance program;

2) The repair station has the necessary equipment, trained personnel, and technical data to perform such line maintenance; and

3) The repair station OpSpecs includes an authorization to perform line maintenance.

NOTE: All certificated repair stations must have suitable permanent housing and facilities. Although § 145.205(d) allows some deviation from the housing requirement, that requirement is based upon the repair station having suitable housing at another location that meets the requirements of part 145. If line maintenance is the only maintenance a repair station is certificated to perform, the repair station must still meet the housing and all other applicable requirements of part 145. Housing need not be on the

airport where the line maintenance is performed, but the street address must be listed on the repair station OpSpecs.

F. A repair station may have the need to perform maintenance away from its permanent fixed base of operation. This requirement may be necessary due to a special circumstance, as determined by the FAA, or may be recurring based on a repair station's need. Such work may include, but not be limited to:

- Aircraft recovery;
- Biennial testing of systems on aircraft operating under Instrument Flight Rules (IFR);
- Fuel cell maintenance;
- Nondestructive Testing (NDT) inspections; and
- Interior modifications.

1) A repair station performing maintenance away from its fixed location may transport the materials, equipment, and technical personnel to the aircraft location or facility to facilitate the required maintenance.

2) At no time while performing work away from its fixed base will the work scope exceed the capabilities for which the repair station is rated.

3) A repair station that performs maintenance functions away from its fixed location on a recurring basis must ensure the temporary facility it uses meets the requirements of § 145.103(a).

4) The repair station must ensure that its repair station manual includes the procedures for accomplishing maintenance, preventive maintenance, alterations, or specialized services at a place other than the repair station's fixed location.

G. A repair station may need to perform maintenance at multiple fixed locations (i.e., additional facilities/localized within a defined area).

1) A repair station does not require a geographic authorization or satellite certificate if it is seeking to work at another site within a localized area. A localized area may be defined as several buildings or hangars, which may be on or near an airport or at or near the primary fixed base address as stated on the repair station OpSpecs. Repair stations using multiple fixed locations under a single air agency certificate need not have all the tools, equipment, data, or personnel at each location. The repair station's primary fixed base and any additional fixed locations are considered a single repair station. Each facility address must be listed in the repair station OpSpecs. This situation is not considered work away from the station.

2) The repair station manual must incorporate procedures that reflect how the repair station will meet the requirements of part 145 at each of its facilities. The procedures must include any supplemental operations (i.e., movement of articles, equipment, or tools required to perform the work) that may affect the repair station's ability to ensure the airworthiness of the articles maintained by the repair station. The repair station remains directly in charge of the work performed at all fixed locations.

3) All fixed location addresses must be listed on the repair station's OpSpecs. The repair station must submit a written request/application to use additional locations prior to exercising the privileges of its certificate and ratings at the additional fixed locations. The FAA must inspect and approve each location and update the OpSpecs with the address for each additional location.

4) There also may be instances where an engine test cell facility is located away from the

primary facility but operates under the same certificate as the primary facility. This may occur when:

a) The FAA determines that the separate locations do not have any significant impact on the maintenance performed, and the separate locations are under the full control of the primary facility; and

b) The separate facilities must be in a defined area relative to the primary facility, and located within the same country. An FAA inspector must be able to use ground transportation to get from one facility to another without major expense or inconvenience.

5) OpSpec A101 must contain the address of all of the repair station's additional fixed locations.

2-1321 COORDINATION REQUIREMENTS. This task may require coordination with another specialty or district office, and the certificated repair station.

2-1322 REFERENCES, FORMS, AND JOB AIDS.

A. References.

- 14 CFR parts 43, 65, 91, 121, 125, and 135,
- AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals,
- This handbook,
 - Volume 2, Chapter 11, Certification of a Title 14 CFR Part 145 Repair Station,
 - Section 1,
 - Section 2,
 - Section 3, and
 - Section 4; and
 - Volume 6, Chapter 11, Section 20, Evaluate Special Equipment or Test Apparatus.

B. Forms. FAA Form 8310-3, Application for Repair Station Certificate and/or Rating

C. Job Aids. None.

2-1323 PROCEDURES.

A. Review Documentation. Review the Repair Station Certificate Manuals/Revision, Capabilities Listing, and OpSpecs for accuracy to determine that ratings are appropriate for work being performed, for accuracy. Also determine if maintenance functions will be contracted out, and contracted persons will meet the requirements of part 145, § 145.217.

B. Evaluate the Housing and Facilities. Inspect the following:

- 1) Housing and shop areas to ensure the following:
 - a) Adequate housing includes sufficient workspace for maintenance functions to be accomplished.
 - b) If a repair station holds an airframe class rating or limited airframe (specific model

aircraft) rating, that housing includes suitable permanent housing for the largest type and model aircraft listed on its OpSpecs.

NOTE: If climatic conditions allow, the repair station may perform maintenance, preventive maintenance, or alterations outside of its housing if these facilities are acceptable to the FAA and meet the requirements of § 145.103(a).

c) Proper storage and protection of:

- Materials,
- Parts, and
- Supplies.

d) Proper identification and protection of parts and subassemblies during:

- Disassembly,
- Cleaning,
- Inspection,
- Repair,
- Alteration, and
- Assembly.

e) Segregation of the following:

- Incompatible work areas (e.g., metal shop, battery charging area, or painting area next to an assembly area);
- Unpartitioned parts cleaning areas; and
- Articles and materials stocked for installation from those articles undergoing maintenance or alteration.

f) Proper ventilation, lighting, and temperature and humidity for the type and complexity of work being accomplished.

2) Technical documents to ensure that they are current and accessible when relevant work is being performed:

- Airworthiness Directives (AD),
- Instructions for Continued Airworthiness (ICA),
- Maintenance manuals,
- Overhaul manuals,
- Standard practice manuals,
- Service Bulletins, and
- Other applicable data acceptable to or approved by the FAA.

3) Equipment, tools, and test equipment, to ensure:

a) Required types and quantities are available and under the control of the repair station during performance of the work function.

b) All test and inspection equipment and tools used to make airworthiness

determinations are calibrated to a standard acceptable to the FAA.

NOTE: The part 145 rule states that tooling is calibrated to a standard acceptable to the Administrator. That may be a standard derived from the National Institute of Standards and Technology (NIST), or a standard provided by the equipment manufacturer. International agreements may also be accepted as a means of compliance. A list of international agreements referred to as Memorandum of Understanding (MOU) or Mutual Recognition Agreement (MRA) may be accessed from the NIST Web site (<http://www.nist.gov>). Also, the National Voluntary Laboratory Accreditation Program (NVLAP) provides third-party accreditation to testing and calibration laboratories. NVLAP's accreditation programs are established in response to Congressional mandates, administrative actions by the Federal government, or requests by private-sector organizations. NVLAP is in full conformance with the standards of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), including ISO/IEC 17025 and Guide 58. NVLAP identifies its accredited laboratories in a published directory, NIST Special Publication 810, which is published on the NIST Web site. Additionally, for foreign equipment, the standard of the country of manufacture may be used if approved by the Administrator. An Exemption Authorization is required if a repair station uses equipment of a foreign manufacturer and the method of calibration it will use is not addressed through a MOU or MRA, or the FAA inspector cannot obtain the validity of the Calibration Laboratory. Exemption authorizations are granted through the issuance of an exemption per 14 CFR part 11 guidance. Currently, exemptions of this type are issued for a 2-year period and can be renewed if requested by the repair station.

c) A repair station may substitute manufacturers' tooling with one that is of its equivalent. If the repair station uses equivalent tooling it is responsible for the determination of equivalency. The repair station must provide a means to the FAA that will demonstrate that the tool meets the manufacturer's standards and specifications with all respects regarding tolerances and accuracy.

1. The special equipment or test apparatus must be capable of performing all normal tests and checking all parameters of the equipment (article) under test. The level of accuracy should be equal or better than that recommended by the manufacturer.

2. The equivalency can only be made based upon an evaluation of a technical data file. The repair station will establish a technical data file for each piece of equivalent tooling. The file will contain, but is not limited to, data, drawings, specifications, instructions, photographs, templates, certificates, and reports.

a. In the case of calibration equipment, the technical data file should also include data sheets attesting to the accuracy when calibration standards are necessary, as well as any special manufacturing processes that are used, including gauges and recording equipment in the controlling process.

b. If calibration equipment is involved, adequacy of that calibration system shall be established with documented procedures to evaluate the adequacy of that calibration equipment and its traceability to one of the previously listed standards.

3. A demonstration of the functionality of the special equipment or test apparatus may be necessary to determine its equivalency.

NOTE: Designated Engineering Representatives (DER) may not approve or determine equivalency of tooling and test equipment. Furthermore, neither the FAA nor a DER may approve equipment and/or test apparatus. The FAA and DERs may only make an acceptance of functional equivalency for special equipment or test apparatus. It is important to emphasize that the burden of demonstrating equivalency is borne by the repair station and not the FAA.

C. Analyze Findings. If deficiencies were found, meet with the certificate holder to discuss possible corrective actions.

2-1324 TASK OUTCOMES.

A. Complete PTRS.

B. Complete the Task. Completion of this task will result in one of the following:

- 1) If the facilities were found acceptable:
 - An entry into the PTRS stating satisfactory/or entries in the comment section; and
 - A letter to the repair station acknowledging the successful completion of the inspection (optional).
- 2) If the facilities were found unacceptable:
 - A letter describing any deficiencies that must be corrected; and
 - A followup evaluation to ensure that the repair station is in compliance with regulations.

C. Document Task. File all supporting paperwork in the certificated repair station's office file.

2-1325 FUTURE ACTIVITIES. Perform followup inspection, as appropriate.

RESERVED. Paragraphs 2-1326 through 2-1340.

From: greg@ajeton.com <greg@ajeton.com>

To: charles.e.johnson@faa.gov

Cc: 747@verizon.net

Date: Thursday, May 09, 2013 03:34 pm

Subject: Fwd: Contacts for LAX, new acct 130366 [REDACTED]

Attachments:  image001.gif (264B)
 image002.jpg (9KB)

Mr Johnson,

Please find below the email chain which was provided to, and accepted by the LAX FSDO as displaying evidence that Ajeton has the ability to utilize hangar space at LAX from [REDACTED] on an as needed/as available basis. These are the documents I have been referring to that I had received prior to Ajeton being certified by LAX FSDO, from [REDACTED]. This account is current and in standing. I am awaiting response from [REDACTED] to demonstrate such as will provide that document when it is received in the next day or so. The other document which was provided at certification was a printed copy of the computer screen which demonstrated the below data (Ajeton was approved in [REDACTED] system). This is clearly demonstrated in a few of the emails below.

Greg Albert

-----Original Message-----

From: Greg Albert [mailto:galbert727@hotmail.com]

Sent: Thursday, May 9, 2013 04:08 PM

To: greg@ajeton.com

Subject: FW: Contacts for LAX, new acct 130366 AAMT

Greg Albert

310-568-3784 begin_of_the_skype_highlighting	310-568-3784
end_of_the_skype_highlighting (Office)	
520-429-4187 begin_of_the_skype_highlighting	520-429-4187
end_of_the_skype_highlighting (USA Mobile)	
520-260-9060 begin_of_the_skype_highlighting	520-260-9060
end_of_the_skype_highlighting (World Mobile)	
+971509564250 begin_of_the_skype_highlighting	+971509564250
end_of_the_skype_highlighting (UAE Mobile)	

From: galbert@scpaircraft.com

To: galbert727@hotmail.com

Date: Thu, 9 May 2013 20:06:15 +0000

Subject: Fwd: Contacts for LAX, new acct 130366 [REDACTED]

-----Original Message-----

From: galbert@scpaircraft.com [mailto:galbert@scpaircraft.com]

Sent: Friday, September 4, 2009 01:47 AM

Subject: Re: Contacts for LAX, new acct 130366 [REDACTED]

Ivy,

Our FAA inspector has requested we provide a brief letter to him from [REDACTED] letterhead stating that we do have an account (130633 [REDACTED]) and that we are able to contact [REDACTED] rent of hangar or ramp space at LAX on an as needed / as available basis as previously discussed through [REDACTED]. Could you provide me this letter, so I can satisfy his requirement. Thank you for your assistance in this.

Greg Albert

-----Original Message-----

From: [REDACTED]
Sent: Thursday, September 3, 2009 02:52 PM
To: galbert@scpaircraft.com
Subject: RE: Contacts for LAX, new acct 130366 [REDACTED]

Thanks for the information. I will make a note of that and update our system.

Thanks.

[REDACTED]

From: galbert@scpaircraft.com [mailto:galbert@scpaircraft.com]
Sent: Thursday, September 03, 2009 1:49 PM
[REDACTED]
Subject: Re: Contacts for LAX, new acct 130366 [REDACTED]

Ivy,

I prefer to use the scpaircraft.com email since that email is already set up in the system and long established. Ajeton and SCP are same companies with Boeing.

Greg Albert

Sent from my Verizon Wireless BlackBerry

[REDACTED]
Date: Thu, 3 Sep 2009 13:30:57 -0500
To: galbert@scpaircraft.com<galbert@scpaircraft.com>
Subject: RE: Contacts for LAX, new acct 130366 [REDACTED]
Greg,

Can you please confirm if SCP Aircraft and Ajeton are the same company? I am showing 2 email accts (the other is greg@ajeton.com). Please let me know which email acct you want use.

Thanks.

[REDACTED]

[REDACTED]
[REDACTED]
Sent: Friday, August 28, 2009 6:31 AM

[REDACTED]
Subject: RE: Contacts for LAX, new acct 130366 [REDACTED]

[REDACTED]
The acct has been set up, 130633 [REDACTED]. Attached is the information for wire transfer. If they want to send a check, please remit to:

[REDACTED]
[REDACTED]
Please advise Greg that [REDACTED] term is net 30. If any invoice is past due, we will start taking from the deposit and will notify LAX to immediately stop any service.

Thanks.
[REDACTED]

From: [REDACTED]
Sent: Thursday, August 27, 2009 3:06 PM
To: [REDACTED]
Cc: galbert@scpaircraft.com
Subject: RE: Contacts for LAX

[REDACTED]
To whom or to where would he make that deposit?

Bets Regards
[REDACTED]

From: [REDACTED]
Sent: Thursday, August 27, 2009 1:22 PM
To: [REDACTED]
Subject: RE: Contacts for LAX

[REDACTED],
Ajeton was approved but they need to put 2500.00 on deposit. When credit has been established with [REDACTED] then we will dispense with the deposit.

Thanks
[REDACTED]
[REDACTED]

<http://mail.ajeton.com/edgedesk/cgi-bin/viewmail.exe?id=01a4902ab443fd3a032706da6fb...> 11/8/2013

From: [REDACTED]
To: greg@ajeton.com
Cc: [REDACTED]
Date: Tuesday, May 21, 2013 07:24 am
Subject: RE: Ajeton 130633 [REDACTED] \$2500 deposit
Attachments:  image001.png (8KB)

Greg, Thank you for sending your deposit. You can now contact the Manager on Duty to see if Hangar space is available for the day you need the hangar.

Thanks.

Sent: Tuesday, May 21, 2013 4:37 AM
To: greg@ajeton.com; [REDACTED]
Subject: RE: Ajeton 130633 [REDACTED] \$2500 deposit

Received 2500.00 this morning

From: greg@ajeton.com [mailto:greg@ajeton.com]
Sent: Monday, May 20, 2013 12:44 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Ajeton 130633 [REDACTED] \$2500 deposit

[REDACTED]
The wire should have been processed by BofA today for transfer to [REDACTED] in the amount of \$2500.00. [REDACTED] should get an auto email generated from BofA when it is sent. Please let me know if it does not come in. Please let me know when it DOES come in. Thanks.

Greg Albert

-----Original Message-----

[REDACTED]
Sent: Monday, May 20, 2013 06:43 AM
To: greg@ajeton.com<mailto:greg@ajeton.com>, [REDACTED]
Cc: [REDACTED]
Subject: RE: Ajeton 130633 [REDACTED] \$2500 deposit
Nothing today on wire

From: greg@ajeton.com<mailto:greg@ajeton.com> [mailto:greg@ajeton.com]
Sent: Friday, May 17, 2013 12:02 PM

[REDACTED]
Subject: Re: Ajeton 130633 [REDACTED] \$2500 deposit

[REDACTED]
Yes, I will be sending the wire. I got tied up in some things that needed to get finished, but will send it today or Monday if I don't make the cutoff from the bank.

Greg Albert

-----Original Message-----

[REDACTED]
Sent: Friday, May 17, 2013 09:07 AM
To: greg@ajeton.com<mailto:greg@ajeton.com>
Subject: RE: Ajeton 130633 [REDACTED] \$2500 deposit
Greg,

I want to follow up if you will be wiring the deposit?

Thanks.

[REDACTED]

From: Charles.E.Johnson@faa.gov <Charles.E.Johnson@faa.gov>

To: greg@ajeton.com

Cc:

Date: Wednesday, November 13, 2013 06:46 pm

Subject: Re: capabilities list revision

Attachments:

Mr. Albert,

Your request for capabilities for a G-11159A (GIII) can not be approved unless this aircraft in on a 121/135 certificate as stated in paragraphs A and B of operation specification D-107. As a repair station with Line Maintenance Only, Ajeton can only accomplished maintenance as stated in this operation specification. Any work performed on this type aircraft must be accomplished by utilizing A&P licenses sign offs.

Charles E. Johnson, PMI
LAX-FSDO
15000 Aviation Blvd, Suite 2000
Lawndale, CA. 90261-1000
310-725-6600

From: greg@ajeton.com

AWP-LAX-FSDO-23, Los Angeles, CA

To: Charles E Johnson/AWP/FAA@FAA,

Date: 11/08/2013 12:09 PM

Subject: capabilities list revision

Mr. Johnson,

Please find attached Rev 2 to Ajeton's capabilities list for Airframe and power plant. The additions are for G-1159A (GIII) airframe for overnight and service checks, and for Spey 511-8 same limitations as are already accepted for the other engines. These copies are being provided in accordance with Ajeton's RSM/QCM procedures. Thank you.

Greg Albert

Accountable Manager

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[attachment "Ajeton_airframe_cap_list.pdf" deleted by Charles E Johnson/AWP/FAA]

[attachment "Ajeton_powerplant_cap_list.pdf" deleted by Charles E Johnson/AWP/FAA]

VOLUME 2 AIR OPERATOR AND AIR AGENCY CERTIFICATION AND APPLICATION PROCESS

CHAPTER 11 CERTIFICATION OF A TITLE 14 CFR PART 145 REPAIR STATION

Section 1 Introduction

2-1181 PURPOSE. This chapter defines relevant terms for Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair stations. It also explains the policies and procedures applicable to a repair station, regardless of its geographic location.

2-1182 GENERAL.

A. Definitions.

1) Air Agency Certificate. Federal Aviation Administration (FAA) Form 8000-4, Air Agency Certificate, is the authority granted by the FAA for a repair station to conduct business. The certificate states the following information:

- Repair station number;
- What the repair station's ratings are to include;
- Class ratings;
- Limited ratings;
- Limited specialized service ratings;
- The name (and any doing business as (DBA)) and location of the repair station;
- Date the certificate was issued; and
- The expiration date, as applicable.

2) Accountable Manager. The certificated repair station (CRS) designates the accountable manager as responsible for, and having authority over all repair station operations conducted under part 145. This person's duties include ensuring that repair station personnel follow the regulations and serving as the primary contact with the FAA.

NOTE: The FAA's definition of an accountable manager may differ from the European Aviation Safety Agency's (EASA) definition of an accountable manager; however, one person may serve both positions. The FAA has revised the operations specifications (OpSpecs) and enhanced Vital Information Database (eVID) to include both.

3) Article. For the purposes of part 145, an article is an aircraft, airframe, aircraft engine, propeller, appliance, or component part.

4) Capability List (CL). A CL is a list of articles on which the repair station is rated to perform maintenance, preventative maintenance, or alterations.

5) Certificated Repair Station (CRS). A CRS is a maintenance provider that has a fixed main base location, has met the certification requirements of part 145, and is engaged in the maintenance, preventive maintenance, inspection, and alteration of aircraft and aircraft products as defined in 14 CFR part 43. In addition, a repair station may have:

- Additional fixed locations located close to and within the same geographic area as the main base,
- Satellite facilities, and
- Line maintenance authorization.

6) Class Ratings. Class ratings are issued if the repair station can prove its capability to maintain a representative number of products under this rating. After issuance of a class rating, it should not have restrictions to a specific product added. For such a case, issue a limited rating.

7) Contracting. Contracting means entering into an agreement between the originating repair station and another person to perform maintenance functions on an article. The originating repair station will exercise the privilege of its certificate and assume responsibility for the work performed by the contracted person.

8) Correction. A correction is an action to eliminate a detected nonconformity as it relates to the articles or the maintenance processes.

9) Corrective Action. Corrective action is an action to eliminate the cause of a detected nonconformity or other undesirable condition to prevent its recurrence.

10) Correspondence Acceptable to the FAA—Documents, Manual or a Revision Submitted to the FAA for Acceptance. The air agency may immediately initiate and use the submitted correspondence contents without formal FAA acceptance. The FAA considers a document, manual, or revision acceptable. There is no requirement for the FAA to acknowledge receipt of or initiate a formal letter of acceptance upon review of the submitted correspondence. Submission of this document may be as a written or electronic document.

11) Directly in Charge. The person directly in charge is responsible for the work of a CRS that performs maintenance, preventive maintenance, alterations, or other functions affecting aircraft airworthiness.

a) A person directly in charge does not need to physically observe and direct each worker constantly, but must be available for consultation on matters requiring instruction or decision from a higher authority.

b) A person designated as “directly in charge” of maintenance, preventive maintenance, or alterations must hold an appropriate airman certificate.

NOTE: This provision is not required for repair stations certificated outside the United States.

c) The repair station is responsible for providing adequate personnel who can perform, supervise, and inspect the work for which the station is rated. Additionally, each repair station determines the abilities of its supervisors and ensures that there are enough supervisory personnel for all phases of its activities.

12) Geographic Authorization. A CRS outside the United States is issued geographic authorization to maintain U.S.-registered aircraft where an appropriately rated repair station is not available. This provision is limited to repair stations located solely outside the United States that hold an airframe rating for an aircraft of the same make and model for which the repair station is rated.

13) Limited Ratings. Repair stations are issued limited ratings for the performance of maintenance on particular makes and models of airframes, powerplants, propellers, radios, instruments, accessories, and/or parts.

14) Limited Specialized Service Ratings. Limited specialized service ratings are issued for a special maintenance function when the function is performed in accordance with a specification approved by the FAA. The OpSpecs must include the specifications used by the repair station to perform that service in accordance with part 145, § 145.61(c). No function of a limited rating for specialized service may be contracted out. Hydrostatic testing of pressure cylinders falls under Title 49 of the Code of Federal Regulations (49 CFR) part 180. This testing does not receive ratings. Direct questions regarding hydrostatic testing of pressure cylinders to the Department of Transportation Pipeline and Hazardous Materials Safety Administration (<http://www.phmsa.dot.gov>).

NOTE: The repair station may request a limited rating for specialized services utilizing a civil or Military Specification (MIL-SPEC) currently used by industry. The principal inspector (PI) should carefully consider if this specification covers all areas required for the repair prior to approval. Will this repair, when completed, allow approval for return to service for the article? In some cases, the PI may need assistance from the Aircraft Certification Office (ACO) to determine if the specification is adequate for the rating requested. The PI is responsible for verifying the applicant can accomplish the work outlined in the specification. If the specification does not meet the requirements of part 43, § 43.13, then the PI should inform the applicant that the specification may be used as part of a process the applicant can develop under the provisions of § 145.61(c)(2). The PI must evaluate if the process is appropriate for the article. The PI should note the need for additional limitations, if any, in the limitation section of the OpSpecs. Many civil and MIL-SPECs currently used by industry are generic. The PI should verify the repair station has provisions in its manual for evaluation of the article to determine if anything would prohibit the specification utilization.

15) Line Maintenance. Line maintenance is unscheduled maintenance resulting from unforeseen events, or scheduled checks that contain servicing and/or inspections that do not require specialized training, equipment, or facilities. Line maintenance is not a rating but an authorization to provide a service to an air carrier certificated under 14 CFR parts 121 or 135, or

a foreign air carrier or foreign person operating a U.S.-registered aircraft in common carriage under 14 CFR part 129 on any aircraft of that air carrier or person.

a) A repair station certificated to provide maintenance on the complete aircraft or engine under a class or limited rating will have the line maintenance authorization listed on OpSpec D107, if located at a site other than the main base. For a repair station authorized to have multiple locations across geographic boundaries, the PI must develop a surveillance program that encompasses all facilities of the repair station regardless of location.

b) If the repair station has line maintenance authorization, then the repair station main base must have certification on the complete airframe or engine. OpSpec A003 would list the Manufacturer (e.g., Boeing), Make/Model (e.g., B737), or engine, and under the additional limitations, the statement, "Line maintenance is authorized at the main base and any location listed on OpSpec D107." Unless the repair station has aircraft limited to line maintenance only listed, OpSpec D107 does not require listing of the main base location.

c) A repair station with only a line maintenance authorization cannot provide work away from station from the line maintenance location(s). The FAA gives line maintenance authorization to the repair station to provide line maintenance for a specific air carrier, at a specific location, for a specific job. It is not a blanket approval. By granting this approval, the FAA certifies that the repair station is capable of performing that specific maintenance. This is an authorization granted to the repair station; therefore, all regulations governing the repair station will apply except for housing. Section 145.205(d) provides relief for housing.

NOTE: A U.S. domestic repair station issued an OpSpec D107, and holding an EASA approval may perform line maintenance in accordance with its EASA Repair Station Manual (RSM) supplement.

16) Maintenance Function. For the purposes of part 145 repair stations, a maintenance function is a step or series of steps in the process of performing maintenance, preventive maintenance, or alterations. Only persons authorized under §§ 145.157(a) and 145.213(d) may approve an article for return to service, perform a final inspection, or sign a maintenance release.

17) Operations Specifications (OpSpecs). The FAA issues OpSpecs to indicate the authorizations and limitations to ratings as specified on the Air Agency Certificate.

18) Quality Control Manual (QCM). The QCM describes the inspection and quality control (QC) system and procedures used by the repair station.

19) Repair Station Manual (RSM). The RSM describes the procedures and policies of a repair station's operations.

20) Satellite Repair Station. A satellite repair station is an additional certificated facility or location under the managerial control of another CRS.

a) The main base must have procedures in the RSM that cover the management of the satellite, and a procedure on how the repair station will assure the satellite is following the quality system acceptable to the FAA.

b) The satellite may use the RSM and quality system of the main base repair station. If the satellite elects to use the main base RSM and quality system, then the satellite manual and quality system must define any differences between the two locations. The certifying PI for the satellite repair station must review the differences between the managerial and satellite repair stations to assure the satellite repair station meets the requirement of the regulation.

21) Supervisor. Supervisors must oversee the work performed by any individuals who are unfamiliar with the methods, techniques, practices, aids, equipment, and tools used to perform the maintenance, preventive maintenance, or alterations. Each supervisor must, if employed by a repair station located inside the United States, hold a certificate issued under 14 CFR part 65.

a) The preamble to part 145 (refer to § 145.153) indicates a difference between a “supervisor” and a “person directly in charge.” A supervisor physically observes and directs a worker when needed. A person directly in charge does not need to physically observe and direct each worker constantly but must be available for consultation on matters requiring instruction or a decision from a higher authority.

NOTE: This does not preclude the repair station from assigning one supervisor to multiple shops or areas provided the supervisor is properly certificated and qualified. The supervisor’s workload should allow adequate time to oversee the work.

b) Part 145 does not dictate the ratio of supervisors to individuals under supervision. The repair station establishes this ratio. However, § 145.153 states in part that a CRS must ensure it has a sufficient number of supervisors to direct the work performed under the repair station’s certificate and OpSpecs.

c) Part 43 identifies persons authorized to perform maintenance, preventative maintenance, rebuilding, and alterations. Section 43.3(d) states in part that a person working under the supervision of a mechanic or repairman certificate holder may perform the maintenance, preventive maintenance, and alterations that the supervisor is authorized to perform, if:

- The supervisor personally observes the work being done to the extent necessary to ensure that it is being done properly, and
- The supervisor is readily available, in person, for consultation.

NOTE: The definition of “in person” is “in one’s bodily presence.” An example of this is “applicants are requested to apply in person.”

B. Capability List (CL). A CRS with a limited rating may perform maintenance, preventive maintenance, or alterations on an article if listed on a current CL acceptable to the FAA or on the repair station’s OpSpecs.

1) If the repair station chooses to use a CL, the RSM must:

- Contain procedures for revising the list and notifying the certificate-holding district office (CHDO),
- Include how often the CHDO will be notified of revision,
- Contain procedures for the self-evaluation required under § 145.215(c) for revising the CL,
- Describe the methods and frequency of such evaluations, and
- Contain procedures for reporting the results to the appropriate manager for review and action.

2) The CL itself may be a separate document or part of the RSM; however, the manual must contain the procedures for revising the list and for performing the self-evaluation.

3) If the repair station elects to maintain a separate CL, it must perform a self-evaluation before adding an article to the CL. The individual(s) performing the self-evaluation should be familiar with the repair station processes and be able to perform an audit to determine compliance with part 145. The self-evaluation procedures in the RSM should ensure that the repair station has:

- The appropriate limited rating;
- Adequate housing and facilities;
- The recommended tools, equipment, and materials;
- Current technical data; and
- Sufficient qualified personnel.

4) The repair station must report the results of the self-evaluation to the appropriate repair station manager for review. If the self-evaluation was satisfactory, the CL may undergo revision. The repair station can submit the revised list and any other necessary technical data with a transmittal document to the PI at the CHDO.

NOTE: Transmittal documents include cover letters, memos, e-mails, faxes, or any other media acceptable to the CHDO.

5) If the capabilities are maintained on the OpSpecs, each article will be listed by make, model, or manufacturer's name under each limited rating. If the repair station maintains a separate CL, the OpSpecs will indicate that the certificate holder has the authorization to use a CL as revised.

6) A repair station that chooses to use a CL must maintain a current CL acceptable to the FAA, identifying each article by make and model or other nomenclature designated by the manufacturer. A CL should not use the term "all" to denote the make or model. "Series" may describe the model, provided the term does not denote a broad classification that is not well-defined. For example, "Cessna 150 series aircraft" may be an appropriate entry; whereas "Cessna 100 series aircraft" is a broad classification which includes many substantially different models.

7) If the repair station does not maintain or have the necessary tools, equipment, housing, facilities, and trained personnel to perform the required maintenance on the article(s) listed on the CL, delete the article(s) from the CL.

NOTE: The repair station must maintain, or have written evidence that it can obtain the tools and equipment required to maintain the articles on the CL.

C. Additional Fixed Locations. A repair station may have additional fixed locations (facilities) without certificating each facility as a stand-alone or satellite repair station. The FAA may grant this authorization if all of the facilities are localized and within a defined area, such as several buildings or hangars, which may be on or near the same airport or at or near the address stated on the repair station certificate. All locations will operate under the authority of a single repair station certificate, each within the same geographic location as the main base and CHDO.

1) Additional locations are not separate facilities and must collectively be considered one repair station. A geographic authorization or other repair station certificate is not required. However, the repair station must have procedures in its manual to describe how it will operate in this manner and remain compliant with its manual and the requirements of part 145. The FAA does not consider this situation work away from the station. The OpSpecs must list each fixed location.

NOTE: The aviation safety inspector (ASI) and repair station accountable manager must collaborate when making a determination that repair station operations require additional locations. The FAA's primary concern is that all the facilities are localized and within a defined area of operation. The repair station must assure ASIs reasonable access to all locations, without the inconvenience of extended travel distances. Extended travel between facilities may have an adverse impact on FAA oversight and surveillance capabilities. Surveillance for the CRS must include all facilities.

2) Additional locations may be particularly useful when other federal laws or local ordinances require a repair station to use remote sites when performing some maintenance actions, such as functional testing of turbine engines. Local laws and noise abatement programs may force a repair station to another work site. The FAA may find that the additional locations do not have a significant impact on the maintenance performed, provided the manual has sufficient procedures to ensure the airworthiness of articles being maintained.

3) The primary facility must have full control over all additional locations. It is not necessary that each location be completely equipped since tools, equipment, parts, etc., can be transported between facilities.

4) The repair station must apply and be approved for the use of additional locations before exercising the privileges of its certificate and ratings at these facilities. The application must list each facility and its physical address. The repair station must submit a revision to its manuals detailing the procedures it will follow when transporting equipment or parts, how it will ensure adequate and appropriate personnel are available at each site when needed, and how it will continue to meet the requirements of part 145.

NOTE: Under normal circumstances, repair stations should not have additional fixed locations authorized across CHDO or regional boundaries since ASIs are responsible for overseeing the entire operation. Consideration of additional fixed locations outside the CHDO's area of responsibility requires coordination with the regional AFS-230 branches. Additional fixed locations that cross regional boundaries require coordination with each region and AFS-300. Additional fixed locations outside regional boundaries should be coordinated with each regional Flight Standards Division with concurrence from the Repair Station Branch, AFS-340.

D. Maintenance Functions. The FAA must approve maintenance functions before a CRS contracts out the performance of maintenance, preventative maintenance, or alterations of an article. Maintenance functions requiring approval are those items for which a repair station is rated to maintain, but chooses to contract out that maintenance, as referenced in § 145.201(a) to any maintenance provider.

E. Contract Maintenance. A repair station must have the material and equipment necessary to perform the functions appropriate to its rating. However, it does not need to have the tools and equipment for functions it has authorization to contract out according to its FAA-approved list of maintenance functions. The repair station must request and obtain approval before it can contract out a maintenance function. If the FAA approves the contracted maintenance function, the repair station can determine who will perform the maintenance.

NOTE: A repair station may contract maintenance functions to both FAA-certificated and non-FAA-certificated facilities. The FAA must approve all maintenance functions for both certificated and noncertificated providers. Only those functions that are within the scope of the repair station's ratings may receive approval. Purchase of parts maintained and approved for return to service from another certificated repair station or work performed outside the scope of the originating repair stations ratings are not contracting. These actions may be considered brokering in that the originating repair station does not or cannot exercise the privilege of its certificate on the article.

1) If a repair station contracts out a maintenance function to another FAA-CRS, the originating repair station must determine that the contracted repair station has the proper rating to perform the maintenance. The repair station doing the maintenance is responsible for approving the work function performed; the originating repair station is responsible for approval for return to service of the article. The repair station must properly process articles received from a certificated facility through its own receiving inspection procedures before performing further maintenance.

2) If the repair station contracts to non-FAA-certificated facilities, the repair station must include provisions that allow the FAA to inspect and observe the work performed on those articles at the noncertificated facilities. The individual in charge of the contract maintenance program may have to accompany the FAA during these inspections. These inspections may determine if the repair station is able to continue to contract the maintenance functions to this source and ensures that:

- The non-FAA-certificated facility follows a QC program equivalent to the FAA-CRSs system with respect to the work performed for the CRS.
- Testing and/or inspection verify the work performed on the article.
- The article is airworthy with respect to the work performed by the noncertificated source.
- The RSM includes a procedure ensuring that contracts contain a provision for FAA inspections.

3) The repair station is responsible for approving for return to service any article which has had work performed on it and for ensuring the article's airworthiness. Inspection procedures within the manual must enable the repair station to determine the airworthiness of the work performed on each article received. If the repair station cannot determine the quality of the contracted work by inspection or test, it can contract the work to only an FAA-certificated facility that is able to inspect the performed work for compliance with part 43.

NOTE: It is not enough for the contracting repair station to give its QCM to the noncertificated contractor and assume the contractor will follow proper procedures. The CRS must provide adequate surveillance to ensure the contractor follows its QC procedures.

4) Section 43.17(c) authorizes an Approved Maintenance Organization (AMO) whose system of QC Transport Canada has approved to perform maintenance on U.S. aeronautical products. Section 43.17(d) requires the maintenance, preventive maintenance, or alteration is performed such that the affected product complies with the applicable requirements of part 36.

a) These are the same regulations that a U.S.-CRS must follow. Section 43.17(e)(1) requires the AMO to approve the article for return to service after performing maintenance. Section 43.17(d) states that the AMO must perform and record the work in accordance with part 43. The Canadian form, Transport Canada Civil Aviation (TCCA) Form One, Authorized Release Certificate, is similar to FAA Form 8130-3, Authorized Release Certificate, Airworthiness Approval Tag, and meets the recording requirements when filled out properly.

b) Although not FAA-CRSs, Canadian AMOs performing work per § 43.17 comply with the same requirements that U.S. repair stations must when performing maintenance, preventive maintenance, or alterations. Part 43 authorizes a certificated mechanic to provide approval for return to service after performing maintenance, preventive maintenance, or alterations. The same performance requirements as the repair station also hold for this person. The mechanic approves the article for return to service by providing documentation that complies with § 43.9. The repair station would have no requirement to conduct an on-site inspection of the mechanic's facilities.

F. Maintenance Performed at Another Location. A repair station may perform work away from its fixed location for a one-time special circumstance or on a recurring basis. Section 145.203(a) states that the FAA determines these special circumstances.

1) A repair station may perform maintenance away from its fixed location for special circumstance, such as an aircraft on the ground or in preparation for a ferry flight. (OpSpec D100 is not required.)

a) If the repair station does not include a procedure in its manual for work away from station for emergency repairs, then it must submit each request to the PI for evaluation on a case-by-case basis. The PI will make a determination and inform the repair station of any parameters that it must follow to perform the requested maintenance. The repair station may elect to put a procedure in its manual to cover special circumstances for emergency repair (aircraft on ground, preparation for special flight permit, etc.).

b) The CHDO will review the manual procedure to verify it contains information on how the repair station will notify the PI when it must perform work away from station. The PI must verify this procedure is for emergency purposes only and not on a recurring basis or extended work away from station.

2) A repair station may perform maintenance away from its fixed location for extended periods of time if it meets certain criteria. Section 145.203(a) states that the FAA determines these special circumstances. Additionally, this type of operation does not constitute the establishment of another repair station or a satellite repair station because it is temporary in nature. After completion of the contracted maintenance, the repair station must transport its tools, equipment, and personnel back to its fixed location. The repair station must submit this request to the PI for evaluation on a case-by-case basis. The PI will keep a copy of the request, the repair station's procedure, and the PI's approval document in the repair station file. (OpSpec D100 is not required.) The repair station must meet the following criteria to provide maintenance away from its fixed location for extended periods of time:

a) Extended contracted work away from station must not exceed one year.

b) The repair station must furnish its own tools and equipment unless it has procedures for leasing or contracting tools and equipment that comply with the regulations and the procedures in the RSM.

c) The repair station must ensure its personnel understand that they must follow repair station procedures when performing maintenance away from station.

d) The repair station must have all required data to complete the contracted maintenance at the location.

e) The request to the CHDO must include the aircraft (make/model/series), the project to accomplish, the duration of the maintenance, the location of the maintenance, and a statement that the temporary facilities are suitable for the repair station's maintenance.

f) Housing that is suitable for one repair station's use may not automatically be suitable for the purposes and scope of maintenance for another repair station's ratings, privileges, or limitations. The repair station requesting to provide maintenance away from its fixed location for extended periods of time must evaluate the housing and facilities where the maintenance will take place to ensure the location meets the requirements of the rule.

3) As stated in § 145.203(b), a repair station may perform maintenance away from its fixed location on a recurring basis when necessary, such as to perform mobile field services. This will allow maintenance away from the repair station's fixed location as a part of everyday business rather than under special circumstances only. (OpSpec D100 is required.)

a) If the repair station intends to perform maintenance on a recurring basis at places other than its fixed location, the manual must include procedures for accomplishing the maintenance, preventive maintenance, alterations, or specialized services.

b) The procedures must address issues related to transportation, tools, equipment, personnel, technical data, and records. These procedures should ensure the repair station at the remote location remains in compliance with part 145 and its manual, just as if it performed the maintenance at the repair station's fixed location.

c) Should the repair station elect to use mobile repair units, the RSM must have clear procedures on:

1. How it will control the work away from station and will be clear in that the mobile units will bring no work into them;
2. Identifying where the PI may find each unit, should the PI need to provide surveillance on them and spot check the work they perform;
3. Providing a contact person for each unit, along with contact information (telephone/e-mail);
4. How it will control all calibrated equipment and technical data in each unit;
5. How often the repair station will audit each unit and make the findings available to the PI. The repair station should provide the PI with a schedule of audits so the PI may accompany an audit as part of the surveillance program; and
6. Any other requirement the PI deems necessary for the type of operation requested.

G. Transfer of a Part 145 Certificate From One CHDO to Another. Part 145 prescribes that the FAA must approve, in writing, any change of a repair station location, housing, or facilities.

1) The application for change of location is FAA Form 8310-3, Application for Repair Station Certificate and/or Rating. The applicant will complete Form 8310-3 and select "Change in Location or Housing and Facilities," located in block 2, Reason for Submission.

2) The PI or the PI's representative at the office from which the certificate holder is leaving (losing office) will coordinate the repair station change in location with the Regional Office (RO). The RO will further coordinate with the office to which the certificate holder is transferring (gaining office if in the same region). If the gaining office is in a different region, the losing RO will coordinate with the gaining RO. The FAA encourages direct communication between the two field offices.

3) After regional coordination, the current CHDO will approve or deny in writing, a decision on the repair station's request for change of location, and provide it to the repair station as required by § 145.105. If the CHDO denies the request, further activity supporting the change of location ceases until the RO is satisfied with the resolution of the issues causing the denial.

4) The PI at the losing office will identify items in that office pertaining to the repair station that he or she must close, revise, transfer, archive, or otherwise administer in block 6 of the applicant's submitted Form 8310-3 (or in a separate document). Note the completion of each of the required activities for those items. Once the transfer is complete, the losing office will provide all affected FAA offices with a copy noting all completed actions.

5) If the repair station intends to operate during the change in location, it will present the losing office a transition plan to identify and address potential gaps in the repair station's quality system. The PI at the losing office will coordinate with the gaining office, provide a copy of the transition plan, and note in block 6 any conditions or limitations under which the repair station must operate. The PI must provide a copy of the limitations to the repair station, which must acknowledge its receipt. The PI at the losing office or the PI's representative will provide oversight for compliance with those conditions or limitations applicable to the repair station at the original location.

6) The gaining office will assign a PI to provide oversight of the repair station change in location activity. The new office PI or the PI's representative will identify in block 6 of the applicant's submitted Form 8310-3 (or in a separate document) those items in the gaining office that pertain to the repair station that he or she must open, revise, transfer, or otherwise administer. Note when the required activities for those items are complete. Upon the completion of all items, the PI will provide a copy of the document to affected ROs.

7) If the repair station intends to operate during the change in location, the gaining office PI or the PI's representative will provide oversight for compliance with any conditions or limitations under which the repair station must operate at the new location.

8) The procedures for transferring a certificate will include assurances of consideration of at least the following:

- a) Coordinating with any affected RO (losing and gaining field and ROs).
- b) Transferring of current and complete office files (losing office).
- c) Ensuring updating of the eVID (losing office).

d) Administering any open required surveillance tasks in accordance with the current edition of FAA Order 1800.56, National Flight Standards Work Program Guidelines (losing office).

e) Ensuring placement of appropriate conditions and limitations on the repair station during the relocation (losing office coordinating with the gaining office).

f) Inspecting the new housing and associated facilities, equipment, materials, and data (gaining office).

g) Ensuring that appropriate ratings and OpSpecs continue, or receive amendments as necessary. Concerns regarding ratings held should be coordinated with the losing office before being presented to the operator (gaining office coordinating with losing office).

h) Ensuring the repair station certifies, in writing, compliance with the hazardous materials (hazmat) requirements of § 145.53(c) or (d), as appropriate. A previous compliance statement may continue to be valid (gaining office).

i) Reviewing repair station and quality manuals for revisions, if necessary (gaining office).

j) Updating all necessary repair station file documents with current information, paying particular attention to the air agency certificate, OpSpecs, eVID, and repairmen certificates (gaining office).

k) Establishing normal surveillance in accordance with Order 1800.56 (gaining office).

H. Taking Corrective Actions on Deficiencies. Section 145.211(c)(1)(ix) states that the QCM must include procedures used for taking corrective action on deficiencies. A corrective action is an action to remedy an undesirable situation. The correction of deficiencies is normally an integral part of a repair station's improvement process, and could include revisions to procedures that were not working properly. (For additional guidance, refer to the current edition of Advisory Circular (AC) 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.)

NOTE: The FAA does not require the repair station, at this time, to have an Internal Evaluation Program (IEP), quality assurance program, or a continuous improvement program.

1) Corrective action requires that a fact-based investigation determine the root cause or causes in order to eliminate them. Corrective action is applicable in two situations: before the article receives approval for return to service, and after the article has received approval for return to service.

2) Upon detection of a deficiency before the article receives approval for return to service, the repair station should follow its procedures describing how to accomplish the corrective work. Upon detection of a deficiency after the article has received approval for return to service, the repair station should follow its procedures to notify the CHDO and the owner/operator of any potential problems and recall any unairworthy article. The objective of the investigation into the cause of the deficiency, and the corrective actions taken, is to prevent a recurrence of the same or similar problems.

3) The procedures in the QCM should include a system for documenting any deficiencies and the corrective actions taken to prevent a recurrence. The system should provide the ability to track any open corrective action requests and the date the corrective action is due. The program should also include audits of the corrective action(s) taken to ensure effectiveness. The program should also track these audits to ensure their completion in a timely fashion.

2-1183 COORDINATION REQUIREMENTS.

A. Coordination. These tasks require coordination among the ASIs (maintenance and avionics) and may require regional coordination.

B. Electronic Media. Air agencies that elect to use electronic media (CD-ROM, LAN-based, or internet-based systems) must be allowed to use those systems without interference or extra procedures. The air agency is responsible for ensuring equipment of its CHDO for the media it selects to ensure that delays or other hindrances do not occur. Transmittal documents will replace the requirement for signing the title page or revision page to ensure a consistent approach to document and manual submissions and revisions.

NOTE: Transmittal documents include cover letters, memos, e-mails, faxes, and any other media acceptable to the CHDO.

1) Repair stations and applicants must follow this procedure for the remaining submissions discussed in this section.

2) Repair stations and applicants will submit documents for FAA acceptance or approval (as required) accompanied by a transmittal document with the information captured in the note below.

3) PIs will approve or reject, if necessary, submissions using a transmittal document with the information mentioned in the note below.

NOTE: A transmittal document describing the submission and signed by the appropriate manager must accompany the repair station document submissions. PIs will receive submissions using a transmittal document indicating the date, document, manual, or revision number. The PI will provide approval or rejection (if required) after review. Additionally, PIs will, if the document is rejected, reject a certificate holder's submission using a transmittal document that indicates the date, document, manual, or revision number, and a detailed explanation of the noted discrepancies or nonconformance. Maintain office copies of correspondence transmittals in the certificate holder's folder or electronically, if equipped.

4) PIs will accept or reject document submissions using the information mentioned in the note below.

NOTE: Regulatory language defines certain document submittals by an air agency. RSM, QCM, CL and others must be acceptable to the FAA. The FAA, unless it provides a list of discrepancies to the air agency explaining the unacceptability of the submitted correspondence, considers a document, manual, or revision acceptable. The FAA has no requirement to acknowledge receipt of or initiate a formal letter of acceptance upon review of the submitted correspondence. A transmittal document that indicates the date, document, manual, or revision number, and a detailed explanation of the discrepancies, may initiate a rejection of a certificate holder's submission. Maintain office copies of correspondence transmittals in the certificate holder's file or electronically, if equipped.

C. Use of Electronic Transmissions (E-mail or Facsimile). E-mail or fax responses are an acceptable alternative to the cover letter if the repair station is equipped to transmit and receive any necessary attachments. This may include the use of electronic signatures. The repair station's procedures should address this method and be acceptable to the FAA.

2-1184 CL.

A. Review the Air Agency's CL.

1) Review the CL to verify the repair station has ratings for the articles identified on the list.

2) Review the RSM procedure for:

- The revision process, including CHDO notification;
- Where and how the list will be maintained;
- Frequency and method of revising the list; and
- Reporting self-evaluation results to the appropriate manager.

3) Review the self-evaluation process for:

- Records of training of persons performing the self-evaluations;
- Performance of the self-evaluation before modifying the CL; and
- Adequate identification of the tools, equipment, materials, technical data, adequate housing and facilities, and qualified personnel that are available before modifying the CL.

B. Post the CL. If the submission or revision is acceptable, ASIs will:

1) If a paper revision, remove the affected pages and insert the revised pages in the CL or replace the list in its entirety, if that is the method the repair station uses, and file the transmittal documents in the appropriate office file.

2) If in electronic format, replace the outdated disk or file with the current CL or revised pages in the certificate holder's office file.

C. Reject the CL. If the submission or revision is not acceptable, the ASI will:

1) Initiate a transmittal document indicating the date, document, and revision number of the rejected CL or revision.

2) Return all copies to the applicant with an explanation of discrepancies requiring correction and instructions for resubmitting the documents.

2-1185 ADDITIONAL FIXED LOCATIONS.

A. Submit Application. A repair station may request the addition of additional fixed locations to its OpSpecs by submitting the request on Form 8310-3. The repair station must:

1) List the physical address of all additional fixed locations for addition to its OpSpecs.

2) Submit repair station and QCM revisions, to include how it will continue to meet the requirements of part 145 and its manual at each additional location.

3) Supply any additional information needed by the FAA to consider the request. ASIs must approve the additional locations before the repair station exercises the privileges of its certificate at the additional facility.

B. Review Application. The PI receives the application, manual revisions, and any other information necessary to determine the appropriateness of the request. The inspector must:

1) Review the manual revisions that detail how the repair station will perform maintenance at the additional location.

2) Review any other material or information submitted to assist the inspector in completing his or her review.

3) Inspect the additional location to verify that:

- It is within the local commuting area and does not pose an inconvenience to the inspector for traveling to all locations,
- Accomplishment of the work is appropriate under the repair station's certificate and ratings as listed on the OpSpecs, and
- It is under the full control of the repair station.

C. Approve Additional Fixed Location. The PI approves the additional fixed location address by adding it to the repair station's OpSpecs.

2-1186 CONTRACT MAINTENANCE.

NOTE: The removal of appendix A from part 145, also removed the prohibition against limited-rated repair stations contracting out work. However, the FAA does not intend to allow “virtual repair stations” that provide only the approval for return to service. This means that ASIs must be attentive to the maintenance functions they are approving for each facility. Although a list such as appendix A was a convenient way to maintain certain levels of maintenance for each repair station, it was impossible to maintain it in a current status without this rule being in constant revision. A Limited Rating for Specialized Service requires processes or functions of a specialized nature. Since the rating is based on this special function or process it would not be appropriate to allow it to be contracted. No function of a Limited Rating for Specialized Service may be contracted out.

A. Maintenance Functions. A repair station can submit its maintenance functions in any manner acceptable to the FAA. A certificated repair station may contract a maintenance function pertaining to an article to an outside source provided the FAA approves the maintenance function to be contracted to an outside source. RSMs must contain a procedure that describes how the repair station will submit its maintenance functions to the CHDO. The RSM must also describe how the repair station will revise the list of maintenance functions. The repair station rating must cover each approved function.

1) Repair stations will submit the list of maintenance functions for approval to the CHDO with a transmittal document that describes the submitted document and shows the date and/or revision number of the document. The repair station may also wish to provide a method for adding a maintenance function to its FAA-approved list on an emergency basis. ASIs should verify the procedure in the RSM, regarding these emergency procedures, sufficiently addresses how to add the maintenance function, and how to obtain FAA approval in a short period of time.

2) ASIs will approve or reject the maintenance function list by:

- Initiating a transmittal document identifying the document, date, revision number, and stating either approval or rejection of the function.
- Filing a copy of the transmittal in the repair station folder and providing a copy to the CRS by mail or electronic media.

NOTE: Regulatory language defines certain document submittals by a repair station (e.g., RSM, QCM, CL and others) and must be acceptable to the FAA. The FAA, unless it provides a list of discrepancies to the repair station explaining the unacceptability of the submitted correspondence, considers a document, manual or revision acceptable. The FAA has no requirement to acknowledge receipt of or initiate a formal letter of acceptance upon review of the submitted correspondence. A transmittal document that indicates the date, document, manual, or revision number and a detailed explanation of the discrepancies may initiate a rejection of a certificate holder’s submission. Maintain office copies of correspondence transmittals in the certificate holder’s file or electronically, if equipped.

3) To assist repair stations in determining which functions to allow, ASIs should provide a reason for rejecting the maintenance functions. Some reasons for rejecting maintenance functions include:

- Too much contracting out of “core business,” leaving the repair station to provide little, if any, actual maintenance on the articles for which it holds ratings to work on;
- Continually using contracting out as a means to keep staffing below adequate levels for the work the repair station is obligated to accomplish; and
- Contracting out a maintenance function without prior approval.

NOTE: A repair station should not use contracting out maintenance functions to replace the need for adequately staffed and trained maintenance personnel. ASIs should be cautious of repair stations that constantly revise the maintenance function list on an emergency basis in order to complete work in a timely manner. ASIs should verify a repair station has the necessary trained personnel for the scope and complexity of the ratings it holds.

A. Contract Maintenance. Repair stations that do not intend to contract out maintenance functions must have the housing, facilities, material, and equipment necessary to perform the functions appropriate to its ratings. The tools, equipment, and technical data must be available at the time the repair station performs the work. Repair stations wishing to contract maintenance functions out to noncertificated providers must submit a list of those maintenance functions to the FAA for approval.

NOTE: A repair station with a limited rating for specialized services may not contract out any function required in the specification listed in the OpSpec.

1) The repair station must make available a list that includes the maintenance functions, the name of the contractor that will perform the function(s), and the contractor’s physical address.

2) To approve or reject a list of contracted maintenance functions, the ASI must determine:

- That the RSM has adequate procedures that dictate how the maintenance functions will be submitted and revised,
- How the repair station will qualify and/or inspect noncertificated contractors, and
- How the repair station will apply approval for return to service once an article returns from a contractor’s facility.

3) A CRS may not provide only approval for return to service of a type certificated (TC) article following maintenance, preventive maintenance, or alterations.

NOTE: A CRS may not contract out to a noncertificated person unless it provides in its contract that the FAA may conduct inspections or observe

maintenance functions performed for the repair station. If a noncertificated person refuses to allow the FAA access, the CRS cannot approve the articles for return to service.

2-1187 MAINTENANCE PERFORMED AT ANOTHER LOCATION. Repair stations may:

- Elect not to perform maintenance away from the main base station.
- Need to perform maintenance away from station for special circumstances.
- Need to perform maintenance on a recurring basis away from station.

NOTE: The PI should consider the need of the repair station carefully.

A. No Maintenance Away From Main Base Station. Should the repair station determine it never has a need to perform maintenance away from the main base station, it would not need the requirements for a procedure in its manual and OpSpec D100. However, the PI should inform the repair station that if a need arises, the repair station must notify the CHDO and wait for a determination from the PI.

B. Maintenance Away From Main Base Station Due to Special Circumstances. If the repair station determines it needs to perform maintenance away from the main base station for special circumstances, it may put a procedure in its manual for the types of special circumstances that it may need to perform, stating how it will control the work, material, equipment, personnel, data inspection procedure, etc., and stating how it will notify the PI.

1) If the PI determines these procedures meet the requirements of § 145.203(a), the repair station would not have to wait for a reply from the PI before performing the work.

2) The PI will send the repair station a letter stating that the procedure meets the requirements of § 145.203(a). The CHDO will keep a copy of the letter in the repair station file.

C. Extended Maintenance Away From Main Base Station. If the repair station should have a special circumstance such as a need to perform maintenance for an extended period of time, then it must present this request to the PI for determination. (OpSpec D100 is not required.) The repair station must present to the PI a plan, for review, on how the repair station will control the maintenance. The PI will verify the following:

1) That the repair station request clearly states the time required to complete the project. If it needs additional time, the repair station must apply for an extension. Granting of the extension should only be for the time necessary for completion.

2) That the repair station furnishes its own tools and equipment, unless it has procedures for leasing or contracting tools and equipment that comply with the regulations and with the procedures in the RSM.

3) How the repair station will assure that its personnel understand that they must follow the repair station procedures when performing maintenance away from station.

4) How the repair station will have all required data to complete the contracted maintenance at the location.

5) That the request to the CHDO includes the aircraft (make/model/series), the project to accomplish, the duration of the maintenance, the location of the maintenance, and a statement that the temporary facilities are suitable.

6) That the repair station can perform the work requested. The PI will send the repair station a letter stating the procedure meets the requirements of § 145.203(a). The CHDO will keep a copy of the letter in the repair station file.

D. Recurring Maintenance Away From Main Base Station. If the repair station is performing maintenance away from the main base station on a recurring basis (part of everyday business rather than under special circumstances) there must be a procedure in the manual on how the repair station controls the work away from station. This type of work could include fuel cell repair, nondestructive testing, etc. where most, if not all, of the work is completed away from the base station. (OpSpec D100 is required.)

2-1188 AIRFRAME RATINGS AND CLASSIFICATIONS UNDER § 145.59.

NOTE: Any product that is non-TC'd or used on a non-TC'd aircraft, such as certain military aircraft, need not receive ratings. Section 145.57(a) requires a repair station to perform maintenance in accordance with part 43. Section 43.1(a) states, in part, that "This part prescribes rules governing the maintenance, preventative maintenance, rebuilding, and alterations of any aircraft having a U.S. airworthiness certificate."

NOTE: Section 145.59 defines ratings. Adding or removing an aircraft, engine, or component to a rating is an amendment to the rating, not an added rating. The addition or removal of an aircraft, engine, or component is a change to the limitations under the rating.

A. Airframe Maintenance or Alteration.

1) Repair stations require an appropriate airframe rating when performing maintenance or alterations on articles (refer to Table 2-19, Airframe Ratings and Classifications under § 145.59) such as:

- Seats,
- Seat belts,
- Berths,
- Galleys,
- Lavatories,
- Cabinetry,
- Cabin/cockpit interior foam and fabric upholstered parts,
- Dividers,
- Curtains,

- Windows, and
- Any other interior structure.

2) Additionally, repair stations require an appropriate airframe rating when performing maintenance or alterations on external aircraft structures or fuselage articles such as:

- Aircraft composite components,
- Aircraft painting,
- Electrical wiring harnesses,
- Landing gear removal and installation,
- Doors and the attaching components,
- Fuselage repairs or alterations, or
- Flight controls and attaching hardware.

3) Similarly, articles of all-cargo configured aircraft are considered part of the airframe and require an appropriate airframe rating. These include:

- Unit loading devices (ULD),
- Cargo pallets or containers,
- Bulkheads,
- Ball mats,
- Floor roller tracks, and
- Floor or side locks.

4) Performing maintenance or alterations on articles associated with an emergency medical support installation, such as stretchers, litters, and supporting hardware or structures also require an appropriate airframe rating.

5) Repair stations performing a similar maintenance function, but using different processes, could conceivably hold different limited ratings. Refer to Table 2-24, Authorized Repair Station Ratings for 14 CFR part 91, §§ 91.411 and 91.413 Testing, for examples of ratings and limited ratings that would authorize a repair station to complete § 91.411 and § 91.413 testing.

B. Ratings.

1) A revised or amended rating is not an added rating. If the repair station desires to add an additional aircraft under the present rating, it will be an amendment to the rating and will not require a reissue of the certificate. If the repair station uses a CL as authorized by § 145.215, then the CHDO will receive a copy of the change, and the OpSpecs will not need changing. If the repair station does not use the provisions of § 145.215, then an amendment to the rating will require submission of Form 8310-3 and changing of the OpSpecs to add the aircraft. Whenever there is a change to the rating in the OpSpecs, the repair station must submit a new Form 8310-3. For example:

a) A repair station currently holds a Limited Airframe rating, limited to Cessna 150 series aircraft. They would like to add Piper PA-28 series aircraft. The repair station does not use a CL.

1. The repair station submits Form 8310-3 to the CHDO with the request to add the Piper aircraft.

2. The ASI verifies that the repair station meets all of the applicable requirements and then adds the Piper PA-28 series aircraft to the OpSpecs. The Air Agency Certificate would not change.

b) A repair station currently holds a Limited Airframe rating and would like to add a Limited Powerplant rating.

1. The repair station submits Form 8310-3 to the CHDO with the request to add the Limited Powerplant rating.

2. After the ASI verifies that the repair station meets all of the applicable requirements, the certificate will receive a change to add the limited powerplant rating and the OpSpecs will receive an amendment to add limited powerplant.

C. Limited Ratings.

1) Limited ratings listed in § 145.61 have long been interpreted as being limited to all the functions on a particular make and model of aircraft, powerplant, or propeller. Although this interpretation was appropriate in the 1950s, during the development of the current rating system, the repair and maintenance industry has developed numerous “niche” businesses that are limited to not only a particular article make or model, but also to certain maintenance functions on a particular make or model.

2) The current OpSpecs allow the proper identification of the limitation of make and models, as well as maintenance functions in the “Limitations” section. Limitations must not be vague and undefined. It is important that the repair station clearly understand its privileges and any associated limitations. When issuing a limited rating, the PI must adequately describe the scope of the rating and any associated limitations in a clearly understood manner. Vague or misunderstood OpSpecs could lead to operations outside the intended scope of the certificate. When necessary, use of the limitations column may further limit the intended scope of the rating. If additional limitations are not necessary to adequately describe the intended scope, the PI should enter “None.” The PI should use good judgment and carefully consider possible unintended consequences of not specifying limitations. If painting, for instance, is the only maintenance function a repair station intends to perform, the limitation should read, “Limited to painting airframe structure and components on Boeing 737 series aircraft,” or similar language. If the repair station’s limitation is performing maintenance on only a certain part of the airframe, that language should specify the manufacturer, make, and model of the component, and describe exactly what the repair station is limited to do.

NOTE: Painting of aircraft may also involve other maintenance functions such as balancing of flight controls. The repair station should have the ability or be authorized to contract out those functions.

3) OpSpecs should identify the manufacturer and the make/model. In certain rare occasions, the term “all” may be appropriate when identifying the make/model. When using “all” to denote the make/model, the PI must use good judgment and carefully consider potential unintended consequences. If the inspector is not careful, use of the word “all” could inadvertently authorize work beyond the desired intent. For example, use of the word “all” may seem appropriate to authorize structural repairs on all models of aircraft manufactured by Mooney. However, unless the PI excludes several early production models, this authorization may inadvertently allow structural repairs on both wood and metal primary structures. The use of “all” provides that the rating will include any future products that may be developed that fall within the listed limitation as well as all past products.

NOTE: ASIs must ensure that the limitations of repair stations adequately address the capabilities of the repair station both by the make and model of the aircraft, powerplant, propeller, or component part of those articles, and by the maintenance capabilities for which it has the tools, equipment, housing, data, and trained personnel to maintain. At no time should a repair station receive a rating if it does not have the required supporting components (tools, equipment, etc.) to perform the maintenance required of the rating.

NOTE: Limited ratings may incorporate a CL if the repair station has elected to employ one. For example, a repair station without a CL might receive a limited airframe rating for the performance of transponder testing on a specific make/model aircraft, in accordance with part 43 appendix F. A repair station that employs a CL when the transponder make/model and aircraft make/model are listed on the CL (the holder of a limited radio rating would not have removal/reinstallation privileges) could receive a limited airframe or a limited radio rating for the performance of transponder testing.

4) A repair station may apply for and receive a repair station certificate and rating for a limited airframe for line maintenance.

a) The performance of inspections and minor flight line repairs to air carrier aircraft needs the limited airframe. The OpSpecs should list all the aircraft, the airlines which contracted the repair station to perform line maintenance, and the locations where line maintenance is to take place.

NOTE: A repair station must not perform line maintenance on articles that are outside the scope of its repair station certificate and ratings. Additionally, a repair station that has certification to perform line maintenance must not operate at a location that its OpSpecs do not list.

b) Repair stations certificated to perform only line maintenance must meet all of the eligibility requirements of the rule, including the requirement for suitable housing. The

housing need not be on the airport grounds, but must adequately support the maintenance that the repair station is authorized to accomplish. However, the housing should adequately hold the repair station's tools, equipment, technical data, and any owner's/operator's spare parts for installation in aircraft.

NOTE: All CRS' must have suitable housing and facilities. Although § 145.205(d) allows some deviation from the housing requirement, that requirement is based on the repair station having suitable housing at another location that meets the requirements of part 145. If line maintenance is the only maintenance a repair station has certification to perform, the repair station must still meet the housing and all other requirements of part 145.

D. Limited "Other" Category. The implementation of the final part 145 rule on January 31, 2004 eliminated the limited "other" category rating. This action was necessary because no limitations directed ASIs to ensure that they directed this rating to articles to which part 43 applied. ASIs need to be aware that all repair station ratings must apply to an aircraft, powerplant, propeller, or component part thereof to which part 43 applies. If an applicant's request does not meet these criteria, a repair station certificate and rating is not appropriate.

NOTE: Repair stations and applicants are receiving requests from air carriers, Department of Defense (DOD) maintenance contractors, or other repair stations to obtain part 145 certification. Although these requests may seem reasonable, part 145 certification is not necessary and does not apply to public aircraft operated by Federal, State, or local governments. Also, air carriers are requesting part 145 certification for the performance of certain functions on articles where part 43 doesn't apply using engineering orders or other documents as "approved data." Although the operator may carry on or use these items in its aircraft during revenue flights, this does not mean these items meet the part 43 applicability requirements. These items may include galley utensils/items, portable medical oxygen bottles, and so forth.

E. Line Maintenance Authorization.

1) A repair station may apply for and, if it meets the eligibility requirements for the rule, receive a line maintenance authorization within the scope of their airframe or powerplant rating. A repair station must have an airframe or engine class rating, or a limited airframe or engine rating for the complete aircraft or engine make and model (Boeing B737 or P&W JT8D) to perform inspections and minor flight line repairs to aircraft listed on its OpSpecs.

2) The repair station must have a rating for the aircraft or engine on their OpSpec A003 and may only have authorization for line maintenance for those makes and models listed. The line maintenance authorization allows the repair station to inspect powerplants installed on aircraft and to install powerplants, but does not authorize maintenance that exceeds the scope of its ratings.

3) OpSpec D107 should list all aircraft makes and/or models, the operators which contracted the repair station to perform line maintenance, and the location(s) where the line maintenance is to take place.

NOTE: A repair station must not perform line maintenance on articles that are outside the capabilities of its ratings or the limitations listed in its OpSpecs. Additionally, a repair station certificated to perform line maintenance can only do so at the main base or those locations listed on OpSpec D107.

a) Inspectors should not rely solely on manual procedures to detail a repair station's privileges and limitations. The appropriate sections of the repair station's OpSpecs should include privileges and limitations detailed enough to identify the capabilities of the certificate holder.

b) Inspectors should review the maintenance or inspection cards to verify the requirements that the repair station must meet are within the scope and definition of line maintenance. For example, some repair stations have submitted requests to perform "B" checks for air carriers under a line maintenance authorization. Some "B" checks are more complex than others and could result in exposure of critical areas of the airframe to the environment or other contamination if the repair station has no housing or facilities available at the location. Performance of these inspections must be in an enclosed environment to avoid introducing collateral damage into the aircraft, airframe, powerplant, or components.

4) Repair stations certificated to perform line maintenance must meet all of the eligibility requirements of the rule, including the requirement for suitable housing. The housing need not be on the airport, but must adequately support the maintenance that the repair station has authorization to perform.

a) The repair station's housing should provide adequate storage for the repair station's tools, equipment, technical data, and any owner/operator spare parts or components for installation on aircraft.

b) Repair stations performing line maintenance do not need a hangar. Housing facilities located near the airport are acceptable, provided they meet the requirements of § 145.103.

NOTE: All CRS' must have suitable permanent housing and facilities. Although § 145.205(d) allows some deviation from the housing requirement, the basis of that requirement is upon the repair station having suitable housing at another location that meets the requirements of part 145. The repair station must still meet the housing and all other applicable requirements of part 145. Housing need not be on the airport where the line maintenance takes place, but the repair station's OpSpecs must list the street address.

c) The granting of line maintenance authorization is only to maintain the aircraft of U.S. air carriers certificated under part 121/135 or a foreign air carrier or a foreign person operating a U.S.-registered aircraft in common carriage under part 129. A repair station cannot receive line maintenance authorization to provide maintenance on foreign air carriers that do not

have U.S.-registered aircraft. The OpSpec D107 cannot list foreign air carriers and persons operating under part 129 that do not have U.S.-registered aircraft.

NOTE: U.S. domestic repair stations that have received an OpSpec D107 and hold an EASA approval may perform line maintenance in accordance with their EASA RSM supplement.

5) Repair stations must maintain the tools and equipment needed to perform line maintenance. Repair stations may lease seldom-used or unique tools as specified in § 145.51(b) and not maintain them if the repair station has a signed contract from the owner of the tool or equipment. As with all repair stations, the required tools and equipment must either be on the premises and in use during the performance of the work, or the repair station must have a contract that stipulates that the recommended tools are available.

6) Authorizing a repair station to perform line maintenance will follow, as appropriate, the same certification procedures found in Volume 2, Chapter 11, Section 2; Section 3; or Section 7.

7) Repair stations that may desire to perform line maintenance at more than one location must apply for, and provide the airport and operator information for each. This is limited to repair stations with authorization to provide maintenance on the complete aircraft.

8) The repair station's OpSpec D107 will list locations where the repair station performs line maintenance.

9) OpSpec D107 authorizes a part 145 repair station to perform line maintenance functions that apply only to the certificate holders conducting operations under parts 121 and 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under part 129.

a) The addition to the OpSpecs of authorization of line maintenance can only be for repair stations that provide line maintenance for air carriers as defined in the regulation. General Aviation (GA) operators do not have authorization for line maintenance.

b) The authorization for providing line maintenance through the issuance of OpSpec D107 is not a rating.

c) The OpSpec D107 authorization is a limitation to a rating, and as such, the limitation section must clearly state the types of aircraft the repair station has authorization to maintain and the location of the line station.

d) The ASI must review the scope of work the repair station will provide for each air carrier, which becomes the limitation added to OpSpec D107. Repair stations cannot receive a blanket authorization. The PI must complete the review as required for each location and determine if the repair station can complete the requested maintenance for the air carrier at each location.

e) Repair stations not limited to line maintenance should not receive OpSpec D107 for line maintenance at their home location or airport. However, if they need to perform line maintenance away from the home location, then all of the provisions of the line maintenance apply, and they receive OpSpec D107 listing each location.

f) The PI must complete the review as required for each location and determine if the repair station can complete the requested maintenance for the air carrier at each location.

F. Other Issues.

1) A repair station that is only authorized line maintenance should be carefully evaluated before receiving OpSpec D100. A repair station only receives a line maintenance authorization based upon a demonstrated ability to perform the scope of work for a specific air carrier at a specified location. It may not be capable of properly performing work away from that location.

2) This does not prevent an appropriately rated repair station from doing work away from station.

3) Additionally, several repair stations had multiple locations for line maintenance all under separate certificates. If a repair station requests to have multiple locations, the rating on OpSpec A003 would remain the same, but OpSpec D107 records the additional location(s) specific to the air carrier and the scope of work for that air carrier.

a) Each location must receive an evaluation to determine if the repair station meets all requirements from the scope of work for each air carrier and the parts, equipment, and personnel to support the requested maintenance for each air carrier at that location.

b) The PI for the parent repair station will assume the responsibility for all certification and surveillance of the additional locations. Certification at each CHDO is not a requirement.

NOTE: During surveillance activities, ASIs must verify repair stations performing line maintenance are using the correct data from the correct operator, are operating from a location authorized in their OpSpecs, and are in compliance with part 145. The RSM must reflect how it operates at each location and, if the repair station has elected to use other rule provisions such as work away from the fixed location, that procedures in the manual detail these operations.

Table 2-19. Airframe Ratings and Classifications Under § 145.59

Class	Definitions
Class 1	Composite construction of small aircraft. Gross takeoff wt (GTOW) 12,500 lbs or less which a major portion of the airframe is of composite construction.
Class 2	Composite construction of large aircraft. GTOW more than 12,500 lbs which a major portion of the airframe is constructed of composite material (e.g. Boeing 787, Airbus A380).
Class 3	All-metal construction of small aircraft. GTOW 12,500 or less, which a major portion of the airframe is all metal construction.
Class 4	All-metal construction of large aircraft. GTOW more than 12,500 lbs which a major portion of the airframe is all metal construction.

NOTE: An airframe rating provides the privilege of performing maintenance and alterations of airframes and airframe components in accordance with part 43 on any article for which it is rated and within the limitations in its OpSpecs. This rating also allows the removal and installation of powerplants, propellers, radios, instruments, and passenger convenience items, but not the performance of maintenance to internal sections of these components.

NOTE: Airframe includes: Fuselage, booms, nacelles, cowlings, fairings, airfoil surfaces (including rotors but excluding propellers and rotating airfoils of engines) and landing gear of an aircraft and its accessories and controls.

NOTE: A repair station may maintain and alter any airframe or part thereof for which it has a rating. However, it may not maintain any TC'd products (engine or propeller) installed on the aircraft without the appropriate rating. Nor may it maintain or alter any part thereof unless it has evaluated its capability and assured it has the tool, equipment, data, and personnel to do so. Maintaining powerplants, propellers, radios, and instruments requires additional ratings.

2-1189 POWERPLANT RATINGS AND CLASSIFICATIONS UNDER § 145.59.

A. Articles Included. Articles included in the powerplant rating are turbo-superchargers, magnetos, carburetors, appurtenances, and other articles necessary for the proper operation of the powerplant. Although the regulations do not define “powerplant”, they do define “aircraft engine.”

NOTE: The guidance on limited ratings provided in subparagraph 2-1188C also applies to limited powerplant ratings.

B. Limited Powerplant Ratings. Limited powerplant ratings must identify the powerplant manufacturer and the make/model of the powerplants the repair station intends to maintain. This type of rating, unless it includes limitations, allows complete repair or alteration of the powerplants listed.

1) Powerplant maintenance has also found numerous “niche” businesses that may include the performance of a specific maintenance function on a wide variety of powerplants. In this case, the OpSpecs would identify the manufacturer, but the make/model column could contain “all models” instead of identifying each model. The limitations column would identify any limitations to its maintenance capabilities, such as, “Limited to plasma spray operations on Pratt and Whitney series turbine blades.” This rating allows the repair station to plasma spray all Pratt and Whitney turbine blades, regardless of the powerplant model the blades were from. The OpSpecs would also need to list additional manufacturers if the repair station has the technical data, tools, and equipment to perform this maintenance function on those additional powerplants.

2) OpSpecs should identify the manufacturer and make/model authorized. Use of the term “all” may be appropriate when denoting the make/model in certain rare occasions. However, the PI must use good judgment and carefully consider potential unintended consequences. If the inspector is not careful, use of the word “all” could inadvertently authorize work beyond the desired intent. For example, use of the word “all” may be appropriate to authorize maintenance on certain Lycoming engines when used with a qualifier such as “all horizontally opposed reciprocating engines.” Without such a qualifier, it is unclear if the PI intended to authorize maintenance on all Lycoming engines, including Lycoming turbine engines and Lycoming radial engines.

NOTE: Because maintenance procedures, tools, equipment, and technical data may differ between manufacturers, ASIs must verify a repair station obtains the appropriate supporting requirements for the capabilities it is requesting.

C. Auxiliary Power Units (APU). Currently, confusion exists when determining the appropriate rating for APU. An APU is an accessory by virtue of its function of providing power to the aircraft when the aircraft is not in flight. However, some of the newer models of aircraft also use APUs as powerplants, which further blurs the lines between GA and corporate or commuter aircraft. Until development of a new rating system, ASIs should consider those articles used as the primary means of propulsion for these newer aircraft as powerplants, not APUs, and should rate repair stations appropriately. However, repair stations performing maintenance or alterations on APUs used strictly to produce auxiliary power for transport-category aircraft should obtain an accessory rating.

Table 2-20. Powerplant Ratings and Classifications Under § 145.59

Class	Definitions
Class 1	Reciprocating engines of 400 horsepower or less
Class 2	Reciprocating engines of more than 400 horsepower
Class 3	Turbine engines

NOTE: A powerplant rating provides the privilege of performing maintenance and alterations of powerplants, but not to adjoining airframe or propeller components. Repair stations may remove access panels, doors, and nacelles, as needed, to gain access to the powerplant

2-1190 PROPELLER RATINGS AND CLASSIFICATIONS UNDER § 145.59. Refer to Table 2-21, Propeller Ratings and Classifications Under § 145.59.

NOTE: The guidance on limited ratings provided in paragraph 2-1188C also applies to limited propeller ratings.

NOTE: Because maintenance procedures, tools, equipment, and technical data may differ between manufacturers, ASIs must verify repair stations obtain the appropriate supporting requirements for the capabilities that the repair station is requesting.

Table 2-21. Propeller Ratings and Classifications Under § 145.59

Class	Definitions
Class 1	All fixed pitch and ground adjustable propellers of wood, metal, or composite construction
Class 2	All other propellers, by make

NOTE: A propeller rating provides the privilege of performing maintenance and alterations on propellers, but not to adjoining airframe or powerplant components. A propeller, powerplant, or airframe-rated repair station may accomplish installation of propellers.

2-1191 PROPELLER RATINGS. A repair station certificated as a propeller, powerplant, or airframe-rated repair station may install propellers and the attaching hardware. Because the process of installing a propeller does not significantly differ between aircraft and powerplants versus a propeller test bench, repair stations with an airframe, powerplant, or propeller rating with appropriate privileges and limitations may install propeller assemblies.

2-1192 RADIO AND INSTRUMENT RATINGS AND CLASSIFICATIONS UNDER § 145.59.

A. Radio Rating. The radio rating divides into communication, navigation, and radar classes (refer to Table 2-22, Radio and Instrument Ratings and Classifications Under § 145.59). The basis of the first two classes, communication and navigation, is the intended function in the aircraft, whereas the basis of the radar class is a specific technology or mode of operation. Modern avionics equipment typically integrates communications and navigation functions into a single appliance. Also, radar equipment or a radio that operates using pulse technology also serves communication and/or navigation functions. The combination of functionality and

operations of these articles may require the repair station to attain a rating for all three classes, depending on the complexity of the article.

B. Instrument Rating. The instrument rating divides into four classes—mechanical, electrical, gyroscopic, and electronic—based on the article’s general principles of operation. Multiple class ratings may be necessary to perform repairs on these articles.

NOTE: ASIs must verify that a repair station obtains the appropriate supporting requirements for the capabilities it is requesting.

NOTE: The guidance on limited ratings provided in paragraph 2-1188C also applies to limited radio and instrument ratings.

Table 2-22. Radio and Instrument Ratings and Classifications Under § 145.59

Class	Definitions
Radio	
Class 1	Communication equipment: Radio transmitting and/or receiving equipment used in an aircraft to send or receive communications in flight, including auxiliary and related aircraft inter-phone systems, electrical or electronic inter-crew signaling devices, and similar equipment. Does not include equipment for navigating or aiding navigation of aircraft.
Class 2	Navigational equipment: A radio system used in an aircraft for en route or approach navigation. This does not include equipment operated on pulsed radio frequency principles, or equipment used for measuring altitude or terrain clearance.
Class 3	Radar equipment: An aircraft electronic system operated on radar or pulsed radio frequency principles.
Instrument	
Class 1	Mechanical: A diaphragm, bourdon tube, aneroid, optical, or mechanically-driven centrifugal instrument used on aircraft or to operate aircraft, including tachometers, airspeed indicators, pressure gauges drift sights, magnetic compasses, altimeters, or similar mechanical instruments.
Class 2	Electrical: Self-synchronous and electrical indicating instruments and systems, including remote indicating instruments, cylinder head temperature gauges, or similar electrical instruments.
Class 3	Gyroscopic: An instrument or system using gyroscopic principles and motivated by air pressure or electrical energy, including automatic pilot control units, turn and bank indicators, directional gyros, and their parts, and flux gate and gyrosyn compasses.
Class 4	Electronic: An instrument whose operation depends on electron tubes, transistors, or similar devices, including capacitance type quantity gauges, system amplifiers, and engine analyzers.

NOTE: A repair station with a radio rating may install complete radio systems in aircraft. An instrument rated repair station may install instruments. The function of installation includes fabrication of instrument panels and other installation structural components. Radio installation requiring alterations to the aircraft structure must be performed, supervised, and inspected by qualified personnel.

2-1193 ACCESSORIES RATINGS AND CLASSIFICATIONS UNDER § 145.59. The accessory rating divides into mechanical, electrical, and electronic classes, based on an article's principle of operation (refer to Table 2-23, Accessories Ratings and Classifications Under § 145.59). The combination of functionality and operations of these articles may require the repair station to attain a rating for all three classes, depending on the complexity of the article.

NOTE: ASIs must verify that a repair station obtains the appropriate supporting requirements for the capabilities it is requesting.

NOTE: The guidance on limited ratings provided in paragraph 2-1188C also applies to limited accessory ratings.

Table 2-23. Accessories Ratings and Classifications Under § 145.59

Class	Definitions and Notes
Class 1	Mechanical: An accessory that depends on friction, hydraulics, mechanical linkage, or pneumatic pressure for operation, including aircraft wheel brakes, mechanically driven pumps, carburetors, aircraft wheel assemblies, shock absorber struts, and hydraulic servo units.
Class 2	Electrical: An accessory that depends on electrical energy for its operation, and a generator, including starters, voltage regulators, electric motors, electrically driven fuel pumps, magnetos, or similar accessories.
Class 3	Electronic: An accessory that depends on the use of an electron tube transistor, or similar device, including supercharger, temperature, air conditioning controls, or similar electronic controls.

2-1194 LIMITED SPECIALIZED SERVICE RATINGS, § 145.61. An applicant or a CRS that performs unique processes associated with the maintenance, preventive maintenance, or alteration of articles may receive a limited rating for specialized services. Generally, the rating is process based, not article based. If the applicant intends to perform maintenance functions on a specific article, it may be more appropriate to issue a limited rating appropriate to the article and not a limited rating for specialized services. Maintenance performed in accordance with an approved specification need not receive a limited rating for specialized services solely based on the performance of maintenance in accordance with such specification (e.g. repair of a mechanical accessory under an approved specification developed by the applicant in lieu of using manufacturer's instructions would still fall under a limited or class 1 accessory rating).

A. Limited Specialized Service Rating. All repair stations that have a limited rating for specialized services use approved military, civilian, or applicant developed specifications, when performing maintenance or alterations. However, just because a repair station uses a specification does not mean the repair station needs a limited specialized service rating. It is inappropriate for an ASI to initiate action to alter a repair station's ratings and OpSpecs based solely on the repair station's use of a specification.

B. Processes. The specification must involve a repair process or work scheme that is novel, unique, or unusual in application, which does not use the manufacturer's data for approving an article to its original condition, and that specifies repair limits. The repair station's OpSpecs must contain the specification used in performing that specialized service. The specification could be an FAA-approved military, civil, or applicant-developed specification. Specialized services would include, but not be limited to, welding, heat treating, plating, and plasma spraying.

C. Materials and Personnel. The limited specialized service rating would require a repair station to have the housing, facilities, equipment, tools, trained personnel, and data to perform the process on an aviation article. The specification on the OpSpecs would set forth the minimum standards for performing the generic process (specialized service). For example, the specification would include an explanation of the housing, facilities, equipment, tools, trained personnel, and data necessary for the overall process. The applicable manufacturer's maintenance manual, air carrier manual, or other FAA-accepted or FAA-approved data would define the specific parameters associated with performing the process on the particular aviation article.

D. Reclassification of Rating. At the onset of the performance of a new, unusual, and unique process a limited specialized service rating may be appropriate if the repair station performs the process as described in paragraph 2-1194B. The process may eventually become common and more appropriately identified by a rating other than a limited rating for specialized services. In these cases future repair station ratings will be issued in the more appropriate class. Ratings for currently rated repair stations can only be changed by application from the repair station or as a result of enforcement action. A repair station with a limited rating for specialized services in this circumstance should be advised of the change in classification. The FAA may recommend to the repair station that they apply for a change of rating.

2-1195 RATING EXAMPLE. Specific ratings issued to a repair station are dependent on the equipment, personnel, technical data, and housing and facilities of the repair station. Depending on how a repair station intends to perform a maintenance function, it may require multiple and or different ratings. For example, to perform air traffic control (ATC) transponder testing and inspections as described in part 43 appendix F, or altimeter system tests and inspections as described in part 43 appendix E, the following conditions in Table 2-24, Authorized Repair Station Ratings for §§ 91.411 and 91.413 Testing, would prescribe the requirement for different ratings.

Table 2-24. Authorized Repair Station Ratings for §§ 91.411 and 91.413 Testing

Authorized Repair Station Rating(s)	
Condition	Rating(s)
§ 91.411	
Component removed or installed by repair station.	Instrument Class I. Limited Instrument rating appropriate to appliance (unless limited from this function). Airframe Class (), appropriate to airplane or helicopter tested. Limited Airframe, appropriate to airplane or helicopter tested.
Integrated system tested on aircraft without removal or installation, normal operation of system without disassembly of aircraft.	Instrument rating Class I. Limited Instrument rating appropriate to appliance. Airframe Class (), appropriate to airplane or helicopter tested. Limited Airframe, appropriate to airplane or helicopter tested.
Specific components tested on the bench (may not satisfy all requirements).	Instrument rating Class I. Limited Instrument rating appropriate to appliance. Airframe Class (), appropriate to airplane or helicopter tested. Limited Airframe, appropriate to airplane or helicopter tested.
§ 91.413	
Component removed or installed by repair station.	Radio rating Class III. Limited Radio rating appropriate to appliance (unless limited from this function). Airframe Class (), appropriate to airplane or helicopter tested. Limited Airframe, appropriate to airplane or helicopter tested.
Integrated system tested on aircraft without removal or installation, normal operation of system without disassembly of aircraft.	Radio rating Class III. Limited Radio rating appropriate to appliance. Airframe Class (), appropriate to airplane or helicopter tested. Limited Airframe, appropriate to airplane or helicopter tested.
Specific components tested on the bench (may not satisfy all requirements).	Radio rating Class III. Limited Radio rating appropriate to appliance. Airframe Class (), appropriate to airplane or helicopter tested. Limited Airframe, appropriate to airplane or helicopter tested.

RESERVED. Paragraphs 2-1196 through 2-1210.

VOLUME 2 AIR OPERATOR AND AIR AGENCY CERTIFICATION AND APPLICATION PROCESS

CHAPTER 11 CERTIFICATION OF A TITLE 14 CFR PART 145 REPAIR STATION

Section 2 Procedures for Certifying Part 145 Repair Stations/Satellites Located Within the United States and Its Territories

2-1211 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. Maintenance: 3230.

B. Avionics: 5230.

2-1212 OBJECTIVE. This section provides guidance for evaluating an applicant for certification under Title 14 of the Code of Federal Regulations (14 CFR) part 145 as a repair station. This section also provides guidance for evaluating an applicant for a satellite repair station under the managerial control of a certificated repair station. This guidance may be applied to a certificated repair station/satellite repair station transitioning to the Repair Station Manual (RSM)/Quality Control Manual (QCM) and training program currently used by the repair station with managerial control.

2-1213 THE CERTIFICATION PROCESS. This process provides for interaction between the applicant and the Federal Aviation Administration (FAA), from initial inquiry to issuance or denial of a repair station certificate within the territories of the United States. It ensures that programs, systems, and intended methods of compliance are thoroughly reviewed, evaluated, tested, and integrated throughout the repair station(s). The certification process consists of five phases:

- Preapplication phase,
- Formal application phase,
- Document compliance phase,
- Demonstration and inspection phase, and
- Certification phase.

A. Preapplication Phase.

1) The preapplication meeting should be held in the certificate-holding district office (CHDO) that will have oversight responsibility for the repair station. This will allow the applicant to become familiar with CHDO personnel. If the certification project manager (CPM) determines that a preview of the applicant's housing and facility is necessary, the CPM may request to hold the preapplication meeting at the applicant's facility to verify that it meets the requirements for the ratings requested.

2) The applicant should provide the FAA with a point of contact (POC) at this meeting. Open discussion of the applicant's intent should take place, and the FAA should help

by answering any questions the applicant has regarding the application process. During the preapplication meeting, discuss the following items:

a) FAA Form 8400-6, Preapplication Statement of Intent. The applicant's submittal of the Preapplication Statement of Intent (PASI) shows intent to initiate the certification process.

1. An applicant should conduct a thorough review of the appropriate regulations and advisory material to obtain guidance for personnel, facility, equipment, and documentation requirements.

2. The manager of the CHDO, or their designee, will use the PASI to evaluate the complexity of the proposed operation. This allows the complexity of the certification to be the basis for the establishment of the certification team. The FAA will designate a CPM as its principal spokesperson during certification.

NOTE: If the application includes satellite repair stations located in another district or region, the certificating office will initiate coordination with its region and other affected districts or regions as early as possible. Further coordination, will then be directed by the region identified with the managerial repair station CHDO. The certification coordination process will follow the applicable process found in paragraph 2-1214F, Transition to Satellite Repair Station System.

b) How to complete FAA Form 8310-3, Application for Repair Station Certificate and/or Rating.

c) Formal Application Attachments. These include:

1. RSM. This manual will establish how a certificated repair station will conduct business on a daily basis and comply with part 145, §§ 145.207 and 145.209.

2. QCM. This manual will ensure that any article(s) repaired or maintained by a repair station or its contractors will meet the airworthiness criteria established in § 145.211.

3. Training Program. The training program is approved by the FAA and must ensure that each employee assigned to perform maintenance, preventative maintenance, alterations, and inspection functions is capable of performing the assigned task.

4. Letter of Compliance. Although not required by part 145, encourage the applicant to complete a letter of compliance. The letter of compliance will ensure that the part 145 regulatory requirements are addressed during the certification process. This is accomplished by listing, in sequence, each section of part 145. After each section include a brief narrative or specific reference to a manual/document that describes how the applicant will comply with that regulation. Review the letter of compliance to ensure that the applicant has a clear understanding of the regulation and that the proposed method of compliance meets the intent of the regulation.

5. Hazardous Material (hazmat). If the repair station and/or its contractors and subcontractors perform a job function concerning transportation of dangerous goods (hazmat), the repair station must train its employees on the hazmat standards. The repair station must also provide the FAA with a letter certifying the training of the appropriate employees. Retain this letter with the certification report and file. This letter is only required at the time of initial certification or anytime the repair station applies for a change to its certificate as defined in § 145.57, if not previously submitted.

NOTE: The CPM, at the time of application, will notify the repair station applicant that the repair station must address the requirements of § 145.53. The CPM should review the letter of compliance to assure the applicant has addressed the requirements of §§ 145.53 and 145.57. The FAA is required to have the certifying letter on file. However, the burden of surveillance and qualifications of hazmat requirements falls on the FAA Office of Security and Hazardous Material (ASH).

d) RSM and QCM Advisory Circular (AC). Encourage the applicant to use the current edition of AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals, for guidance in developing the manuals. It is the applicant's responsibility to develop manuals and procedures that ensure safe operating practices and compliance with the rules. The manual should allow the user to understand its content without further explanation and must not contradict any regulatory requirements. The certification team can offer suggestions for improvement but must not "write" the material.

3) Personnel Requirements (§ 145.151).

a) Each repair station must have the management personnel necessary for the scope and complexity of its organization. The regulation requires an accountable manager, supervisory personnel, inspection personnel, and certificated personnel to approve the articles it maintains for return to service. The accountable manager for multiple satellite locations will typically be located at the repair station with managerial control. Whether the accountable manager is at the managerial repair station or at another repair station within the system, their manual should include how the accountable manager will operate. It may be necessary for the repair station to have other management or supervisory personnel that are not regulatory.

b) The repair station may use training, knowledge, experience, or practical testing of noncertificated employees performing maintenance functions as the basis for determining their abilities.

c) Qualifications of supervisory and inspection personnel, and those personnel authorized to approve an article for return to service, must meet the requirements of 14 CFR part 65 and §§ 145.153, 145.155, and 145.157. These personnel must be able to read, write, and understand English.

d) Inspection personnel not authorized to approve articles for return to service need only read, write, and understand English (see § 145.155).

B. Formal Application Phase. To begin the formal application phase, the team will receive the application and attachments. As a rule, the team will meet with the applicant after receiving the formal application package. Resolve all questions about the proposed operation, formal application, and attachments at this time. The meeting should consist of the certification team members and all key management personnel from the applicant's organization.

NOTE: Determine the legal name and address of the owner at this point.

C. Document Compliance Phase. In this phase, the application receives a thorough review for approval or disapproval, and the manual and related attachments undergo review to ensure conformity to the applicable regulations and safe operating practices. The CHDO certification team completes this phase. The aviation safety inspector (ASI) will follow the guidelines as defined in Volume 3, Chapter 1, Section 1, when a document requires an acceptance and/or approval.

D. Demonstration and Inspection Phase. In this phase, the certification team ensures that the applicant's proposed procedures are effective and that facilities and equipment meet regulatory requirements. The CPM must decide if demonstrations are necessary.

E. Certification Phase.

1) Issuance. Once the applicant meets the regulatory requirements of part 145, the certification team will issue the repair station certificate and operations specifications (OpSpecs) with the appropriate ratings.

2) Duration. A certificated repair station located in the United States has no expiration date.

2-1214 SATELLITE REPAIR STATIONS SYSTEM.

A. General.

1) A certificated repair station under the managerial control of the parent certificated repair station may operate as a satellite repair station if it meets all the requirements of § 145.107. If the applicant or person/corporation of multiple part 145 repair stations elects not to have all their repair stations under the satellite repair station system, the repair stations not incorporated into the repair station system will be stand-alone repair stations. For example, a corporation has six repair stations; five are under a satellite repair station system—one is the parent managerial repair station and the other four are satellite repair stations. The sixth will be a stand-alone repair station.

2) While a repair station may be authorized to temporarily perform work at another location under § 145.203, as described in Volume 6, Chapter 9, Section 13, such work on a permanent basis will require the location to be authorized as an additional fixed location in accordance with Volume 2, Chapter 11, Section 1, paragraph 2-1182, or certified as a satellite repair station.

3) A satellite repair station is intended to be a permanent extension of the managerial repair station operating under a common manual system. The intent is to provide standardization of processes and procedures that are applicable to the repair station with managerial control and all associated satellites within the system. Acceptance of manuals and approval of the employee training program will be accomplished by the managerial repair station CHDO.

B. Satellite System Oversight Structure.

1) The CHDO for the repair station with managerial control has overall authority and coordination responsibility for acceptance/approval of the satellite repair station system manual(s) and employee training program, and coordination responsibility for the issuance of OpSpecs and repairman certificates. Additional responsibility includes the coordinated resolution of issues identified by satellite CHDO(s) and keeping satellite CHDO(s) informed of any certificate management issues relative to the satellite repair station system.

2) Repair station certificates, including satellites, are normally assigned to the CHDO with geographic responsibility, while a satellite CHDO has normal oversight of the satellite repair station to include Repair Station Assessment Tool (RSAT) accomplishment and issuing OpSpecs and repairman certificates. The satellite CHDO may recommend changes to the repair station's manual(s) by contacting the CHDO of the managerial repair station; only the CHDO for the managerial repair station may accept/approve the change. The satellite CHDO also has the responsibility to coordinate with the managerial CHDO on issues relating to the associated satellite repair station encompassing the issuance of OpSpecs, repairman certificates, and surveillance findings. Disagreements between a satellite CHDO and the CHDO of the managerial repair station will be resolved before the issue is presented to the repair station. All RSM/QSM changes must be coordinated with each affected repair station. A formal risk management process (RMP) will be initiated if significant issues are identified or if the CHDO of the managerial repair station and the CHDO of any affected satellite cannot reach consensus.

3) Certification and oversight of the repair station with managerial control and its satellites will be accomplished using one of the following models:

a) Each repair station certificate is held by the CHDO having geographic responsibility;

b) All associated satellite repair station certificates are held by a certificate management unit (CMU) located near the repair station with managerial control. All ASIs may be assigned to and located at the CMU, or a Remotely Sited Geographic Aviation Safety Inspector (RSI) may be assigned to the CMU and located near one or more of the satellites. A CMU is defined as a CHDO that has complete oversight responsibility for satellite repair stations located outside of its geographical boundaries; or

c) A combination of the above. In this case, the repair station with managerial control and one or more satellites are located within the geographic area of responsibility of the managerial repair station CHDO, while additional satellites are located outside this geographic area and managed by the local geographic CHDO(s).

4) Regardless of the model used, the CHDO for the repair station with managerial control has overall responsibility for the acceptance/approval of the satellite repair station system manual(s), and coordination responsibility for the issuance of OpSpecs, repairman certificates, and document control. An additional responsibility includes the mitigation of issues identified by satellite CHDO(s). The managerial repair station CHDO will keep the satellite CHDO(s) informed of any issues related to certificate management applicable to the satellite repair station system.

5) A satellite repair station CHDO has responsibility for oversight of the satellite repair station, including the coordination of manual changes, coordinating the issuance of OpSpecs, coordinating document and training program revisions, and notifying the managerial repair station CHDO of any issues related to certificate management.

6) The acceptability or approval of required manuals will be coordinated with each responsible principal maintenance inspector (PMI)/principal avionics inspector (PAI). Differences should be coordinated and resolved between CHDO(s). Issues that cannot be resolved between CHDO(s) will be resolved at the regional level. A formal RMP will be initiated if significant issues are identified or if the CHDO of the managerial repair station and the CHDO of any affected satellite cannot reach consensus.

NOTE: Significant issues identified by either the satellite repair station CHDO or the managerial repair station CHDO require use of the RMP to clearly document the issues.

C. Formation of a CMU. A CMU is a CHDO that has complete oversight responsibility for satellite repair stations located outside the CHDO's geographic area of responsibility. The FAA, not the repair station, will determine when a CMU is appropriate. The formation of a CMU is limited to certain situations that leverage the FAA's ability to provide efficient and effective oversight of the managerial repair station and numerous associated satellite repair stations. Formation of a CMU requires Regional Office (RO) concurrence and coordination with the Aircraft Maintenance Division (AFS-300).

1) The initial request for the formation of a CMU is generated by the managerial repair station CHDO and must include justification. The formal written request will be forwarded to the region and should address the following:

- a) Why the CMU is desired.
- b) How the managerial repair station CHDO plans to establish the CMU.
- c) Benefit to FAA, including a cost-benefit analysis.
- d) How the CMU will affect standardization for participating repair stations.
- e) Manpower requirements necessary to establish the CMU and provide continuing oversight of all affected repair stations.

f) How the CMU will provide effective and efficient certificate management and oversight/surveillance.

g) Staffing structure.

h) Timeline and logistics.

2) The responsible region(s) will evaluate the package for validity and acceptance. The controlling region has responsibility for creation and acceptance of the CMU. Regional concurrence should be based on current and future assurance that the necessary resources are available to provide adequate oversight. After obtaining regional concurrence, the CHDO for the repair station with managerial control may complete the certification, add or amend ratings, and perform surveillance. When necessary, the CHDO for the repair station with managerial control may request certification assistance from the satellite repair station's geographic CHDO.

NOTE: When a proposed CMU crosses regional boundaries, the managerial repair station's CHDO RO will coordinate the formation of the CMU with all affected regions.

D. Certification Considerations for Satellite Repair Stations. The repair station certification process described in this chapter also applies to the certification of a satellite. Each satellite repair station will have its own air agency certificate issued by the FAA, but will operate under the managerial control of the parent certificated repair station.

1) An application for a satellite repair station will require coordination between the FAA office with geographic responsibility and the CHDO of the repair station with managerial control.

2) The repair station with managerial control shall specify the work to be performed by its satellite(s) and provide the manuals in the form of a RSM/QCM. Ratings issued to the satellite station are based upon the facilities, materials, equipment, and personnel at that location and are controlled by the RSM/QCM, which the managerial repair station has provided. The satellite repair station must meet the regulatory requirements for each rating that it seeks; however, it may not hold a rating that is not held by the repair station with managerial control unless an exemption is granted. The repair station with managerial control may hold additional ratings not held by its satellites.

3) The manual system including the RSM and QCM may be contained in one document or as separate manuals. Each satellite repair station will use the same manual system as its managerial repair station. The RSM/QCM should be nearly identical to that used by the repair station with managerial control, except it may include information/procedures detailing operational differences applicable to the satellite. Minor differences, such as the description of housing, are acceptable when annotated in an appendix or a similar manner.

4) The training program submitted by the satellite repair station should be the same program used by the repair station with managerial control, except it may include information/procedures detailing training differences applicable to the satellite(s). A separate manual is not required for the training program; however, if the training program is contained in

another manual, it must be segregated in such a way as to facilitate FAA approval of only the training program section.

5) When certificated repairmen are necessary to satisfy applicable personnel requirements, a completed FAA Form 8610-2, Airman Certificate and/or Rating Application, and a letter of recommendation should be submitted for each repairman. Repairman certificates issued listing the certificate number of the repair station with managerial control allow the repairman to exercise the privileges of their certificate at any satellite repair station associated with the managerial repair station. If the repairman certificate is issued listing the satellite certificate number, the repairman may only exercise the privileges of the certificate for the satellite listed.

6) Personnel and equipment from the certificated repair station with managerial control and from each of the satellite repair stations may be shared in accordance with § 145.107(b). When applicable, the RSM/QCM should contain procedures for sharing personnel and the transfer of equipment between facilities. Shared personnel must be qualified and familiar with any procedural differences for each assigned location.

7) A satellite repair station may not be located in a country other than the domicile country of the certificated repair station with managerial control.

8) Whenever possible, a satellite repair station designator will contain the same first three characters as the repair station with managerial control. However, an existing repair station transitioning to a satellite is not expected to change its designator to comply. When obtaining a precertification number for a new satellite, advise the Aviation Data Systems Branch (AFS-620) that a satellite repair station number is required.

E. Personnel. Unless the FAA indicates otherwise, a repair station with managerial control and each of its satellite repair stations may share personnel provided:

- Inspectors, supervisors, and return-to-service personnel are identified and authorized on the appropriate station roster;
- The repairman certificates of shared personnel contain the certificate number of the repair station with managerial control if the repairman will exercise the privileges of their certificate; and
- Inspection personnel are designated and available at the satellite station any time a determination of airworthiness or return to service is made.

F. Transition to Satellite Repair Station System. A person holding two or more repair station certificates may transition to the satellite repair station system. The satellite system will consist of one or more satellite repair stations operating under the managerial control of the parent certificated repair station. The repair station with managerial control and each satellite will use a common RSM/QCM and training program. When necessary, the RSM/QCM and training program may contain an appendix or similar method of identifying operational differences. If the person of multiple part 145 repair stations elects not to transition all their repair stations to the satellite repair station system, the non-transitioning repair stations will be stand-alone repair stations. Example: A person/corporation has six repair stations; three transition to a satellite repair station system, one is the parent managerial repair station, and two are satellite repair stations. The remaining three will be stand-alone repair stations.

NOTE: Many corporations with multiple repair stations are consolidating their operations, quality control (QC) systems, manuals, and recordkeeping systems. It is essential that principal inspectors (PI) coordinate their efforts when notified that the certificated repair station with managerial control and its satellite facilities desire standardized systems.

1) Upon receiving an Application for Repair Station Certificate and/or Rating (FAA Form 8310-3) for transition to the satellite repair station system, the CHDO will review the request and identify all affected certificates. The certificate holder will designate the repair station with managerial control in coordination with the FAA.

2) The CHDO will, when appropriate (the transition is complex, involving multiple facilities and or crossing office/regional boundaries), forward a copy of the application package to the region for coordination and assistance. If the satellite system will cross regional boundaries, the region responsible for the managerial repair station will coordinate with other affected regions to assist in the transition process.

3) The region will assist the CHDO to establish a transition team consisting of at least one member from each CHDO holding certificates. Team participants will normally be the PIs assigned to each affected certificate. The responsible regions, with headquarters (HQ) assistance when required, will provide facilitation and briefings of the processes as necessary.

NOTE: If the satellite repair station holds or desires to hold a rating that the repair station with managerial control does not hold, an exemption from § 145.107(a)(1) must be obtained under 14 CFR part 11.

4) The FAA transition team will establish a transition plan and bridging document with milestones and definitive timelines to ensure an orderly transition. The plan should be based on the number and complexity of certificates involved and include sufficient detail to identify any hazards that require mitigation. The following items will be considered when developing the transition plan and bridging document:

- Evaluation of each facility to include ratings, OpSpecs, and capability;
- Transition period/length;
- Geographic locations;

- Complexity;
- FAA budget for transition;
- FAA personnel required;
- Tasking/assignment;
- Regional coordination;
- CHDOs coordination;
- Meeting logistics; and
- Contingency plans—forward-looking decision plan based on the operator’s capability to adhere to their transition plan.

5) The applicant should also establish a transition plan and bridging document in collaboration with the FAA to establish milestones and definitive timelines for the orderly transition. The plan should include sufficient detail to identify any hazards that require mitigation. The following items should be considered:

- Geographic locations,
- Complexity,
- Training needs,
- Changes to management structure,
- Personnel requirements, and
- Standardization of procedures (forms, manuals, etc.).

2-1215 AMENDMENT TO OR TRANSFER OF CERTIFICATE. Sections 145.51 and 145.57 require a repair station to submit a new application in the following situations:

A. Certificate Change. The holder of a repair station certificate must apply for a change to its certificate if the certificate holder changes the location of the repair station or requests to add or amend a rating. The FAA must receive notification in advance and may prescribe conditions that the repair station must follow while moving to the new address/location.

1) When preparing an amended or changed certificate, the “Date issued” field will retain the original certification date. For added ratings, the effective date of each rating will be in parentheses adjacent to the rating. The “Current Issue Date” entered in the Vital Information Subsystem (VIS) should reflect the most recent date the certificate was amended or changed.

2) A revised or amended rating does not require a change to FAA Form 8000-4, Air Agency Certificate. If a repair station only desires to amend its present rating by adding an additional aircraft type, the associated OpSpecs and capability list will undergo revision as necessary.

3) A simple name change without a change of ownership or transfer of asset does not require a new certificate number. The ASI must ensure the certificate holder is not using the name change to circumvent initial certification requirements.

B. Sale or Transfer of Assets. The privileges of a repair station certificate are not transferable. If the holder of the repair station certificate sells or transfers its assets, the new owner must apply for an amended certificate in accordance with § 145.51. There are occasions

when repair station ownership changes without a corresponding change in location, facilities, or personnel.

1) The inspector should recommend a new certificate number due to the Freedom of Information Act (FOIA) and liability issues. ASIs should inform prospective owners that they may be held liable for the work performed under previous management if they keep the same certificate number. New owners must stipulate in writing that they clearly understand the potential of release of information under the FOIA before receiving permission to retain the old certificate number.

2) If the new owner elects to retain the original certificate number, the revised air agency certificate (FAA Form 8000-4) will show the original certification date in the “Date issued” field. If issuing a new certificate number, prepare a new air agency certificate using the effective date of the new certificate. The “Date issued” should always reflect the original certification date for the certificate number identified on the air agency certificate.

3) A change in ownership may or may not affect the status of a satellite repair station. If the operational relationship that established a repair station as a satellite continues unchanged, a change to the certificate number may not be required. If that relationship no longer exists, the certificate number identifying the repair station as a satellite cannot be retained by the new owner.

4) ASIs should contact their regional general counsel office when faced with questions concerning whether limited liability corporations or changes in stockholder ownership constitute a transfer of repair station assets.

2-1216 COORDINATION REQUIREMENTS. This task requires coordination among the ASIs (Airworthiness) and may require coordination with multiple regions.

2-1217 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Title 14 CFR parts 21, 39, 43, 45, 65, 91, 121, 125, and 135.
- AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.
- Volume 2, Chapter 11, Certification of a Title 14 CFR Part 145 Repair Station:
 - Section 1, Introduction;
 - Section 4, Evaluate a Part 145 Repair Station and Quality Control Manual or Revision; and
 - Section 5, Evaluate Part 145 Repair Station Facilities and Equipment.
- Volume 6, Chapter 9, Section 16, Inspect Part 145 Repair Stations Within the United States.

B. Forms:

- FAA automated repair station OpSpecs;
- FAA Form 8000-4, Air Agency Certificate;
- FAA Form 8060-4, Temporary Airman Certificate;
- FAA Form 8310-3, Application for Repair Station Certificate and/or Rating;
- FAA Form 8400-6, Preapplication Statement of Intent; and
- FAA Form 8610-2, Airman Certificate and/or Rating Application, if applicable.

C. Job Aids. None.**2-1218 PREAPPLICATION PHASE.**

A. Response to Initial Inquiry. Respond to an initial inquiry for a repair station certificate or satellites.

NOTE: Applications for a new repair station certificate will be managed in accordance with the Flight Standards Certification Service Oversight Process (CSOP). See the current edition of FAA Order 8000.92, AFS Certification Services Oversight Process.

B. Previously Surrendered or Revoked Certificate. If an applicant requests certification less than 1 year after surrender or revocation of its previous certificate, a formal RMP will be initiated to identify and evaluate any potential associated risk.

C. Topics for Discussion. Discuss with the applicant the following subjects:

1) The necessary technical expertise required by the applicant's proposed organization, to include the following:

- Aviation-related experience,
- Proposed organizational structure, and
- Knowledge of the specific maintenance functions to perform.

2) The rating required for the type of work to accomplish.

3) The requirements for sufficient personnel to meet the demands of the proposed repair station. This includes at least one certificated person with appropriate ratings that coincide with the ratings sought.

NOTE: For repair stations located within the United States, the supervisor and the person authorized to approve an article for return to service must be certificated under part 65. In a small organization, the certificated person could perform both functions.

4) Facility requirements for the ratings sought, to include:

- The need for ventilation, lighting, and control of temperature, humidity, and other climatic conditions to ensure personnel can perform maintenance as required by this part;
- The size of the facility;
- Manufacturers' recommended or equivalent test equipment; and
- Special tools, etc.

5) The requirements for current technical data appropriate for the work to perform. The following receive consideration as technical data:

- Airworthiness Directives (AD),
- Instructions for continued airworthiness (ICA),
- Maintenance manuals,
- Overhaul manuals,
- Standard practices manuals,
- Service Bulletins (SB), and
- Other applicable data acceptable to or approved by the FAA.

NOTE: Appliance manufacturers' maintenance manuals or instructions, though not specifically approved by the FAA, receive consideration as in compliance with part 43, § 43.7; part 65, § 65.95; part 121, § 121.379(b); part 135, § 135.437(b); and § 145.201.

6) The requirement to provide the FAA with a POC.

D. Paperwork and Timeframe. The CHDO will give FAA Form 8400-6 to the applicant with instructions for completion. Advise the applicant to submit the completed PASI to the CHDO. Inform the applicant that the certification process cannot continue until the review and acceptance of the PASI.

1) The FAA should advise the applicant of the complexity of the process and provide the applicant with an estimated timeframe for the completion of the project. (This is a recommendation only; the timeframe allows the applicant the ability to make the appropriate business decisions and is also dependent on the applicant's ability to comply with the requirements.)

2) Advise the applicant to develop a time line so that all involved are aware of their commitments and obligations.

NOTE: The ASI should advise the applicant that there are time restrictions for processing applications due to FAA resource availability. An application for certification must not remain dormant. A lack of applicant activity for 90 days during the certification process will result in termination of the application.

E. Initiate the Certification Process.

1) The CHDO will review the PASI for acceptance and completeness.

2) The inspector will obtain the precertification number from AFS-620. For a satellite repair station, advise AFS-620 that a satellite repair station number is desired. Normally, the precertification number is the same as the final certificate number except it ends with the letter “P” denoting its precertification status. The applicant may require the certificate number to develop documents such as return to service tags for inclusion in the RSM.

3) In section 2 of the PASI, the inspector will check the “Information only” block and enter the date the office received and reviewed the PASI.

4) The CHDO manager or designee will assign an inspector or a team of inspectors (depending on the complexity of the application) to the certification process. The manager will also designate an inspector as the CPM.

5) Satellite repair station certification requires coordination between the office with geographic responsibility and the CHDO of the certificated repair station with managerial control. See paragraph 2-1214, Satellite Repair Station System, for additional information.

6) A certificate management office (CMO) with oversight responsibilities for a part 121 air carrier that has a part 145 repair station(s) will be assigned certification and surveillance responsibilities for its part 145 repair station(s) and satellite(s), if applicable. The CMO must also provide adequate personnel to oversee the part 145 repair station(s) and its satellite(s) work activities appropriate to their size and complexity.

7) The CPM will contact the applicant to arrange a preapplication meeting.

F. Conduct Preapplication Meeting. Meet with the applicant to discuss questions concerning the certification process, regulatory requirements, the formal application and attachments, etc. Accomplish the following during the meeting(s):

1) Discuss the regulations applicable to the proposed maintenance operation.

2) Provide the applicant with the following material:

- A copy of AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals;
- A copy of AC 145-10, Repair Station Training Program;
- A copy of FAA Form 8310-3, Application for Repair Station Certificate and/or Rating; and
- Copies of FAA Form 8610-2, Airman Certificate and/or Rating Application, if applicable.

3) Inform the applicant that a formal application package for a repair station certificate within the United States and its territories must contain the following material:

- a) A completed FAA Form 8310-3.

b) A copy of the RSM and QCM in a format acceptable to the FAA. If the manual or manuals submitted are in electronic media format, they must be compatible with FAA electronic capabilities and free of any programs that would adversely affect that capability.

NOTE: Electronic media must be compatible with the CHDO's system. If an applicant's media is not compatible, then the FAA cannot consider it acceptable. The current version of AC 120-78, Acceptance and Use of Electronic Signatures, Electronic Recordkeeping Systems, and Electronic Manuals, provides guidance for the use of electronic media.

c) A training program applicable to employees assigned to perform maintenance, preventative maintenance, alterations, and inspection functions.

d) A letter requesting processing of the application, indicating when facilities, equipment, material, and data will be ready for formal inspection.

e) A letter of compliance.

f) An application for a repairman certificate and letter of recommendation, if applicable.

g) When requesting a limited rating, the make and model of the particular item(s) to be maintained and the nature of the work to be performed.

h) When seeking approval of a Class 2 propeller rating, a list by make of the propeller.

i) When making a request for a limited specialized services rating, and the applicant develops the specification, advise the applicant that the CHDO and the Aircraft Certification Office (ACO) must review the specification, which may cause some delay in the repair station certification process. If the specification contains data that is a major repair or major alteration, then that data must be FAA-approved.

NOTE: The repair station may request a limited rating for specialized services utilizing a civil or military specification currently used by industry. The PI should carefully consider if this specification covers all areas required for the repair prior to approval. Will this repair, when completed, allow approval for return to service for the article? In some cases, the PI may need assistance from the ACO to determine if the specification is adequate for the rating requested. However, it is ultimately the PI's responsibility to assure that the applicant can accomplish the work specified by the specification even though the ACO concurs with the specification. If the specification does not meet the requirements of § 43.13, then the PI should inform the applicant that the specification may be used as part of a process the applicant can develop under the provisions of § 145.61(c)(2). The PI should not accept the process at face value, but must evaluate if the process is appropriate for the article. The PI should annotate the need for additional limitations, if any, in the limitation section of the OpSpecs. Many civil and military specifications currently used by industry are generic. The PI should

verify that the repair station has provisions in its manual for evaluation of the article to determine if anything would prohibit the specification utilization.

j) Repair stations are not issued ratings and/or limitations for hydrostatic testing of pressure cylinders. Certification of hydrostatic testing facilities (initial or renewal) is the responsibility of the Department of Transportation (DOT), Pipeline and Hazardous Materials Safety, Administration, Special Permits and Approvals, 1200 New Jersey Ave. SE, Washington, DC, 20590, 800-467-4922.

4) If the applicant requested certification of a repair station with managerial control in conjunction with certification of one or more satellites, the CPM should advise the applicant of the privileges, limitations, and responsibilities of each. The applicant must submit an application package for each repair station and identify which repair station will have managerial control. The repair station with managerial control is determined by the applicant, not FAA. Ownership, size of facility, or other factors may not necessarily indicate managerial control. This is also true when an applicant applies for a satellite repair station certificate under the managerial control of an existing certificated repair station.

5) The FAA inspector/team will evaluate the results of the preapplication meeting; if acceptable, continue to next phase.

2-1219 FORMAL APPLICATION PHASE.

A. Receive the Formal Application. Ensure submission and completeness of all documents.

B. Evaluate the Application Package. Based on the initial survey of the application package, make a decision whether or not to continue with the certification process.

C. Conduct an Application Meeting. Answer any open questions concerning the package before proceeding to the next phase. Do this in the most effective way possible; e.g., meetings or correspondence.

2-1220 DOCUMENT COMPLIANCE PHASE.

A. Review the Application Package. Review the content of each submitted document for regulatory compliance. The documents for review include:

- A completed FAA Form 8310-3. For a satellite repair station, the request should not include any ratings not held by the managerial repair station unless an exemption is obtained.
- RSM.
- QCM.

NOTE: One document may contain the RSM/QCM manuals. They do not have to be separate manuals. If a satellite repair station certificate is sought, the RSM/QCM should be the manual(s) submitted by the repair station with

managerial control to include information/procedures detailing operational differences applicable to the satellite.

- Training program. If a satellite repair station certificate is sought, the training program submitted by the satellite should be the same program submitted by the repair station with managerial control to include information/procedures detailing training differences applicable to the satellite(s).
- Letter of compliance.
- Hazmat training certification. When required, this must be submitted prior to certificate issuance.
- Application for a repairman certificate and letter of recommendation, if applicable. For a satellite repair station, if a repairman certificate is issued with the certificate number of the repair station with managerial control, that repairman may also exercise the privilege of their certificate at any of the associated satellite repair stations, provided they are authorized by the repair station. If the repairman certificate is issued with the satellite certificate number, that repairman is limited to the satellite.
- The list of makes and models of the particular item(s) to be maintained and the nature of the work to be performed for any limited ratings.

NOTE: Normally, the FAA will not issue a class rating on an initial certification. All new applications should receive a limited rating until the repair station performs enough work to establish a representative number of make and models that would qualify the repair station for a class rating. The PI should exercise discretion when using the term “representative number,” as this will vary with the type of application and the depth and complexity of the work performed. An applicant would normally receive an airframe Class 4 rating after demonstrating the ability to maintain one of each make in that class (i.e., Boeing 747, Airbus A300, or MD-11). An accessory, radio, instrument, etc., class rating would differ from the airframe rating because of the various makes/models of valves, radios, instruments, and other articles that are very similar in design and function. The issuance of a class rating would be at the discretion of the applicant and agreeable to the ASI when the applicant has demonstrated the capability to maintain several different articles. When a repair station with managerial control is issued a class rating, § 145.107(a)(1) is not intended to preclude the satellite from holding an associated limited rating. For example, it is acceptable for the repair station with managerial control to hold an airframe Class 4 rating, while the associated satellite holds a limited airframe rating.

- The list, by make, of the propeller for a Class 2 propeller rating.
- A copy of the acceptable/approved specification for the work to be performed for a specialized service rating, when applicable.
- A copy of a capability list, if appropriate (§ 145.215).

B. Document Deficiencies. If any document has deficiencies, return it to the applicant with a letter outlining the deficient areas. Inform the applicant that the certification process will not continue until all deficiencies are resolved.

2-1221 DEMONSTRATION AND INSPECTION PHASE. During the demonstration and inspection phase, the CPM should verify that the repair station meets the requirements of § 145.51(b). Although the repair station is allowed to contract a maintenance function to an outside source, the CPM must verify that the repair station is capable of performing the maintenance under the rating requested. Contracted maintenance functions must not circumvent the certification requirements. Unless the FAA indicates otherwise, personnel and equipment from the certificated repair station with managerial control and from each of the satellite repair stations may be shared in accordance with § 145.107(b). Shared personnel must be qualified and familiar with any procedural differences at each assigned location.

A. Coordinate and Schedule Inspection. Coordination is required between the CPM, team members, and the applicant.

1) During the inspection phase, the team should verify that the RSM and the QCM are followed.

2) The team should also use the repair station letter of compliance to confirm that the facility meets all the requirements of the regulations.

B. Perform a Housing and Facility Inspection. During the demonstration and inspection phase, inspect the repair station facilities to ensure that the work performed has protection from weather elements, dust, and heat. Ensure that the control of temperature, humidity, and other climatic conditions allow personnel to perform maintenance functions to the standards required by this part (see Volume 2, Chapter 11, Section 5). In addition, inspect for the following:

1) Tooling and equipment are properly stored and maintained in good working order:

a) Calibration is performed at established intervals and meets the requirements of § 145.109.

b) If the repair station obtains special equipment and tools as needed in accordance with § 145.109, verify that a contract is available for review to ensure that the tools and equipment will be available upon the repair station's request.

NOTE: All tools and equipment must be in place at the time of initial certification or rating approval by the FAA (§ 145.51(b)).

2) Material. Ensure that all materials needed for the rating are on the premises and under the repair station's control during work performance.

a) Ensure that the repair station has the proper controls for stored material and a recordkeeping system that has document traceability back to the place of purchase.

b) Traceability of all materials in the supply room must have documentation to show the material qualification (e.g., invoice, process specifications, and supplier qualifications).

c) If necessary, a repair station surveillance program of its suppliers to meet the above will meet these requirements.

3) Calibration Standards.

a) The calibration standards of all test and measuring equipment manufactured in the United States, except those used in continuity checks for troubleshooting, will receive testing at regular intervals to a standard derived from the National Institute of Standards and Technology (NIST) or a standard provided by the manufacturer.

b) Foreign-manufactured measuring and test equipment must meet the calibration standards of the manufacturer.

NOTE: The part 145 rule states that tooling is calibrated to a standard acceptable to the Administrator. Those standards may be derived from the NIST, or to a standard provided by the equipment manufacturer. International agreements may also be acceptable as a means of compliance. A list of international agreements referred to as Memorandums of Understanding (MOU) or Mutual Recognition Agreements (MRA) is accessible from the NIST Web site (<http://www.nist.gov>). In addition, the National Voluntary Laboratory Accreditation Program (NVLAP) provides third-party accreditation to testing and calibration laboratories. NVLAP establishes its accreditation programs in response to Congressional mandates, administrative actions by the Federal Government, or from requests by private-sector organizations. NVLAP is in full conformance with the standards of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), including ISO/IEC 17025 and ISO/IEC 17011. NVLAP identifies its accredited laboratories in a directory published on the NIST Web site. Additionally, for foreign equipment, a repair station may use the standard of the country of manufacture if approved by the Administrator. A repair station must have an exemption authorization if it uses equipment of a foreign manufacturer and an MOU or MRA does not address the method of calibration the repair station will use, or the FAA inspector cannot obtain the validity of the calibration laboratory. The issuance of an exemption per part 11 guidance grants exemption authorizations. Currently, exemptions of this type last for 2 years and are renewable if requested by the repair station.

c) Test and inspection equipment and special tooling (equivalent) manufactured by a repair station must meet the calibration standards recommended by the manufacturer of the article being measured or tested. This type of test equipment calibration will be traceable to a NIST standard or a standard acceptable to the FAA.

NOTE: Designated Engineering Representatives (DER) may not approve or determine equivalency of tooling and test equipment. Furthermore, neither the FAA nor a DER may approve equipment and/or test apparatus. The FAA and

DERs may only make an acceptance of functional equivalency for special equipment or test apparatus. It is important to emphasize that the burden of demonstrating equivalency is borne by the repair station—not the FAA.

- 4) Facilities are adequate to perform the functions as defined in the RSM and QCM.

C. Evaluate Maintenance Organization. Ensure the following:

- 1) The inspection system is in place (see Volume 2, Chapter 11, Section 4) to ensure:
 - a) Employees are familiar with and are capable of performing their assigned duties,
 - b) The system for reporting serious defects or unairworthy conditions is in place to ensure compliance with § 145.221,
 - c) The maintenance recordkeeping system is in place to ensure compliance with part 43 and § 145.219, and
 - d) The repair station has a QC system in place that ensures the articles upon which the repair station or any of its contractors perform a maintenance function are Airworthy.
- 2) There are a sufficient number of personnel to satisfy the volume and type of work to perform, as required by part 145 subpart D:
 - a) Ensure the repair station designates an employee as the accountable manager;
 - b) Ensure the repair station provides qualified personnel to plan, supervise, perform, and approve for return to service the work for which it is rated;
 - c) Ensure it has a sufficient number of employees with training or knowledge and experience in accomplishing the work being performed; and
 - d) Determine the abilities of its noncertificated employees performing maintenance functions based on training, knowledge, experience, or practical tests.
- 3) A personnel roster(s) is available that includes management, supervisory, and inspection personnel responsible for the repair station operations, oversight of maintenance functions, and personnel authorized to sign a maintenance release for approving an article for return to service (see § 145.161); and
- 4) Management, supervisory, and inspection personnel employment summaries for those persons listed above are available (see § 145.161).

D. Analyze Deficiencies.

- 1) If you note deficiencies, notify the applicant in writing. If appropriate, meet with the applicant to review deficiencies in detail.

2) The applicant must take corrective action and notify the CPM in writing in order for the certification process to continue. Fully document and record each deficiency and corrective action in the certification file.

2-1222 CERTIFICATION PHASE.

A. Prepare Certificates. When the applicant has met all regulatory requirements, the CPM will accomplish the following:

- 1) Complete blocks 6–10 of FAA Form 8310-3, to show:
 - Findings and recommendations,
 - Any remark or discrepancy noted during inspection,
 - Date of inspection, and
 - Office and signature of the CPM.
- 2) Prepare FAA Form 8000-4, which the CHDO manager must sign.
- 3) Prepare FAA automated OpSpecs. The appropriate Airworthiness ASI will sign the OpSpecs showing the limitations issued. Separate OpSpecs pages may list these limitations.
- 4) If applicable, issue FAA OpSpecs with appropriate ratings.

NOTE: Air agency certificates and OpSpecs are legal documents. Language should clearly specify the authorizations, ratings, and/or limitations being approved. When filling out these forms, there must not be any erasures, strikeovers, or typographical errors on the completed document.

B. Prepare Air Agency Certificates. The certificate will include the following information (also see Volume 2, Chapter 1, Section 4):

- 1) After “Number,” insert the certificate number assigned to the facility. This will be in accordance with the current air agency numbering system. For a satellite repair station, ensure that the certificate number listed is appropriate for the satellite. For additional information on certificate number construction, see Volume 2, Chapter 1, Section 3.
- 2) Under “This certificate is issued to,” insert the official name of applicant’s business. This must be the same as shown on the application form. The acronym “DBA” (doing business as) will precede any additional business names listed.
- 3) Under “whose business address is,” insert the address/location of the applicant’s business. This must be the same as shown on the application form.
- 4) After “to operate an approved,” insert the words “repair station” or “satellite repair station” as appropriate.
- 5) Under “with the following ratings,” insert the ratings issued. List the ratings by the general category, such as airframe, powerplant, radio, etc.

6) If a repair station is issued a limited rating (e.g., limited radio), then the certificate must list it as such.

7) When ratings are added or amended, show the date of each issuance in parentheses following the added or amended rating.

8) After “must continue in effect,” for repair stations located in the United States, insert the word “indefinitely.”

9) Under “Date issued,” insert the issuance date of the certificate. This will be the date of original certification. Future changes or amendments to the certificate will not affect this date unless a new certificate number is issued.

10) Under “By direction of the Administrator,” insert the signature of the office manager and office identifier.

C. Prepare OpSpecs.

1) Following “The rating(s) set forth on Air Agency Certificate Number,” insert the air agency certificate number from the respective certificate.

2) Following “is/are limited to the following,” insert, as applicable:

- Class ratings;
- Limited ratings, to include makes, models, or parts;
- Limited rating for specialized services, to include the specification used;
- Line maintenance authorization (the repair station must meet the requirements of § 145.205(d));
- Following “Delegated authorities,” insert “none”;
- Under “Date issued or revised,” insert the date the inspection was satisfactorily completed; and
- Under “For the Administrator,” insert the signature block of the assigned inspector.

D. Prepare Certification Report. Ensure preparation of a certification report. The report must include the name and title of each ASI on the certification team. The CPM signs the report, which contains at least the following:

- A copy of the PASI;
- FAA Form 8310-3, completed;
- A letter of compliance;
- A copy of the air agency certificate issued;
- A copy of the issued OpSpecs;
- A copy of the hazmat letter if required;
- A copy of any Temporary Airman Certificate issued; and
- A summary of all discrepancies encountered during the inspection.

2-1223 TASK OUTCOMES.**A. Complete the PTRS Record.**

B. Complete the Task. Completion of the certification task will result in one of the following:

- Issuance of a certificate and OpSpecs, or
- A letter to the applicant indicating denial of the certificate, or
- A letter to the applicant confirming termination of the certification process.

C. Distribute Certification Report. Retain the original certification report in the CMO/CHDO.

D. Document the Task. File all supporting paperwork in the certificate holder/applicant's office file and update the VIS.

2-1224 FUTURE ACTIVITIES. The CHDO must ensure that there is an orderly transition from the certification process to certificate management. Perform followup and surveillance inspections as required.

RESERVED. Paragraphs 2-1225 through 2-1240.

VOLUME 2 AIR OPERATOR AND AIR AGENCY CERTIFICATION AND APPLICATION PROCESS

CHAPTER 11 CERTIFICATION OF A TITLE 14 CFR PART 145 REPAIR STATION

Section 4 Evaluate a Part 145 Repair Station Manual and Quality Control Manual or Revision

2-1291 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. Maintenance: 3230, 3371, 3372.

B. Avionics: 5230, 5371, 5372.

2-1292 OBJECTIVE. This section provides guidance for evaluating, accepting, or rejecting all Title 14 of the Code of Federal Regulations (14 CFR) part 145 Repair Station Manual (RSM) and/or Quality Control Manual (QCM) original submissions or revisions.

2-1293 GENERAL.

A. Currency of a QCM. Before issuing an Air Agency Certificate, the applicant's RSM and/or QCM must reflect the applicant's current procedures and be acceptable to the Federal Aviation Administration (FAA).

NOTE: If the training program required by part 145, § 145.163 is included in either of these manuals, that portion must be FAA-approved.

B. Revision of an Existing Manual. The certificate-holding district office (CHDO) must be notified when a certificate holder revises an existing manual.

C. Manual Content. The manuals submitted by a certificate holder or applicant may be separate or may be combined into a single manual. The format should be consistent and all regulatory requirements must be included. The aviation safety inspector (ASI) must ensure that the procedures used in the performance of maintenance, preventive maintenance, or alterations are reflected accurately in the manuals. It is expected that, to fully describe the repair station's inspection/quality system, there will be some procedures that may not be regulatory.

D. Original Certification Versus Revision. When evaluating a manual as part of an original certification, each entire manual will be submitted prior to certification. If this task is performed as a revision, only the portion of the manual that is revised must be submitted.

E. RSM and QCM. Each certificated repair station must maintain a current RSM and QCM.

F. Accessibility of Manual. A certificated repair station's current RSM/QCM must be accessible for use by repair station personnel. All repair station employees on all shifts must have access to the manual, regardless of the media used (electronic, CD-ROM, etc.).

G. CHDO. A certificated repair station must provide to its CHDO the current RSM/QCM in a format acceptable to the FAA. If the manuals or manual submitted are in electronic media format, they must be compatible with FAA electronic capabilities and free of any programs that would adversely affect that capability.

H. Recommendations for Manual Development. There are some recommendations included in this handbook referenced from the current edition of Advisory Circular (AC) 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals, which are not required by the regulations. They have been included to assist the inspector and certificate holder/applicant in developing a more complete description of the repair station's overall functions, responsibilities, and quality control (QC) procedures.

I. Maintenance and Alterations in Accordance With an Air Carrier's Manuals. For certificate holders under 14 CFR parts 121, 125, and 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under 14 CFR part 129, maintenance, preventive maintenance, and alterations must be performed in accordance with applicable sections of that air carrier's manuals.

2-1294 REPAIR STATION AUTHORIZATION TO MAINTAIN CANADIAN AIRCRAFT.

A. Maintenance, Preventive Maintenance, and Modifications. The repair station may perform maintenance, preventive maintenance, and modifications to aircraft certificated in Canada. To perform this work, the repair station must continue to comply with part 145 and the special conditions imposed by the Bilateral Aviation Safety Agreement (BASA) Maintenance Implementation Procedures (MIP).

B. Implementing Required Procedures. The MIP agreement requires U.S. air agencies and Canadian Approved Maintenance Organizations (AMO) to develop and implement stringent controls and procedures at their repair stations. These procedures must become a part of the RSM or a supplement to the manual. The requirements for the supplement are contained in the current United States—Canadian BASA/MIPs.

C. Transport Canada Civil Aviation (TCCA) Inspections. The repair station must allow TCCA, or the FAA on behalf of TCCA, to inspect it for continued compliance with part 145 and MIP special conditions. The repair station must make its manual and the required supplement available for inspection.

NOTE: Investigations and enforcement by the TCCA may be undertaken in accordance with TCCA rules and directives. The repair station must cooperate with any investigation or enforcement action.

2-1295 PREREQUISITES AND COORDINATION REQUIREMENTS. This task may require coordination with other specialties, regions, or district offices.

2-1296 REFERENCES, FORMS, AND JOB AIDS.**A. References (current editions):**

- Title 14 CFR parts 1, 39, 43, 65, 91, 121, 125, 129, 135, and 145;
- Canadian Aviation Regulations (CAR) parts IV and VII;
- AC 145-9;
- AC 43-10, United States—Canadian BASA/MIP Maintenance;
- United States—Canadian BASA/MIPs; and
- Volume 2, Chapter 11, Sections 2, 3, and 5.

B. Forms. None.**C. Job Aids.** None.**2-1297 RSM PROCEDURES.**

A. Acceptable Formats. Receive the certificate holder or applicant's manual or revision as required by §§ 145.51, 145.207, and 145.211(c).

B. Manual or Revision Content. Review the submitted manual or revision to ensure that it meets the regulatory requirements of §§ 145.209 and 145.211. The manual or revision must include the following:

1) An organizational chart that identifies:

a) Each management position with authority to act on behalf of the repair station.

1. The organizational chart required by § 145.209 may identify management positions by title only.

2. Management includes, but is not limited to, the executive functions of planning, organizing, coordinating, directing, controlling, and supervising.

3. This does not eliminate the requirement in § 145.51 for an applicant to submit the names and titles of its management and supervisory personnel at the time of application.

b) The area of responsibility assigned to each management position, which is the area(s) in the repair station that the manager is directly accountable for and maintains decision authority over.

c) The duties, responsibilities, and authority of each management position.

2) Procedures for maintaining and revising the rosters required by § 145.161.

NOTE: Within 5 business-days of the revision, the rosters required by this section must reflect changes caused by termination, reassignment, change in duties, scope of assignment, or addition of personnel.

3) A description of a repair station's operations describing how the repair station performs maintenance, where it would start, and how it progresses through the entire repair cycle for approval for return to service (RTS). Also include:

a) A description of the housing, which may include dimensions, construction method, heating and ventilation systems, lighting, door openings, and physical address.

b) A description of the facilities including the layout of the shop, hangar, or other work areas.

c) A description of the equipment, tooling, and materials used to perform maintenance.

NOTE: The "description of materials used to perform maintenance" should not be a physical description of the material, but rather an explanation of the repair station's handling and storage of the materials. If materials require specific environmental controls or cannot be stored next to certain chemicals or solvents, these should be identified. For example, it would not be acceptable to store oxygen equipment near petroleum products.

1. If the repair station does not own the equipment, the manual must include procedures that describe how the repair station will obtain the equipment (lease, rentals, etc.). The manual must also include where repair station personnel will use the equipment, how it will train personnel on the proper use of the equipment, and how the repair station will ensure that it addresses calibration issues, if any, after transporting the equipment.

2. If the repair station chooses to use equipment, tools, or materials other than those recommended by the manufacturer, the manual must include a procedure used by the repair station to determine the equivalency of that equipment, tool, or material.

NOTE: When the repair station is adding a rating or an applicant has applied for certification, all required equipment for the rating it seeks must be in place for inspection by the FAA. This provides the ASI with the opportunity to evaluate its placement and use, and to verify that repair station personnel are trained to operate it.

4) Capability list procedures used to:

a) Revise the capability list provided in § 145.215 and notify the CHDO of revisions to the list, including how often the repair station will notify the CHDO of revisions; and

b) Develop and perform the self-evaluation required by § 145.215(c) for revising the capability list, including the methods and frequency of such evaluations and procedures for reporting the results to the appropriate manager for review and action.

5) Procedures for revising the training program and submitting revisions to the CHDO for approval, which should include:

- The title of the person authorized to make a training program revision;
- The method of submitting a revision (electronic, hardcopy, disk, etc.); and
- A procedure for recording a revision and a method of identifying the revised material or text.

6) Procedures for accomplishing work performed at a location other than the repair station's fixed location, which should contain the following:

a) Title of the person responsible for determining that the location is appropriate for the work performed.

b) Title of the person responsible for initiating such work and assigning the personnel necessary to perform inspections and supervise the work.

c) Procedures for communication between responsible repair station personnel at the fixed location and the maintenance personnel working away from the station. This should include the transfer of parts, supplies, tools/equipment, technical data, and trained personnel.

d) Procedures that maintenance personnel will use when away from the repair station if they deviate from established procedures used at the fixed location. The repair station must ensure that maintenance personnel accomplish all work performed while exercising the privileges of its certificate, per the appropriate maintenance manual and its RSM or QCM. The determination for performing work at another location must meet the following requirements:

1. The work is necessary due to a special circumstance, such as a one-time occurrence, as determined by the FAA; or

2. It is necessary to perform such work on a recurring, but not continuous, basis and the RSM includes the procedures for accomplishing maintenance, preventive maintenance, alterations, or specialized services at a place other than the repair station's fixed location.

NOTE: The FAA must make the determination regarding the performance of work at another location prior to the performance of any maintenance, preventive maintenance, or alterations away from the repair station's fixed location unless the manual includes an acceptable procedure.

7) Procedures for performing maintenance, preventive maintenance, and alterations for certificate holders under parts 121, 125, and 135 and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under part 129.

a) The FAA requires that maintenance under a Continuous Airworthiness Maintenance Program (CAMP) be performed in accordance with the operator's manual. It is the operator's responsibility to ensure that the work performed on its behalf is in accordance with its approved maintenance program.

b) The certificated repair station that performs maintenance, preventive maintenance, or alterations for an air carrier or commercial operator that has a CAMP under part 121 or 135 must follow the air carrier or commercial operator's maintenance program or applicable sections of its maintenance manual.

c) A certificated repair station that performs inspections for a certificate holder conducting operations under part 125 must follow the operator's FAA-approved inspection program.

d) A certificated repair station that performs maintenance, preventive maintenance, or alterations for a foreign air carrier or foreign operator operating a U.S.-registered aircraft under part 129 must follow the operator's FAA-approved maintenance program.

e) The FAA may authorize a certificated repair station to perform line maintenance on any aircraft of an air carrier certificated under part 121 or 135, or of a foreign air carrier or foreign operator operating a U.S.-registered aircraft in common carriage under part 129, provided the certificated repair station:

- Has the appropriate ratings to perform the maintenance or preventive maintenance on transport-category aircraft;
- Performs such line maintenance in accordance with the operator's manual and approved maintenance program;
- Has the necessary equipment, trained personnel, and technical data to perform such line maintenance; and
- Has operations specifications (OpSpecs) that include an authorization to perform line maintenance.

NOTE: A repair station must be appropriately rated to perform line maintenance for an air carrier. This would normally require an airframe rating to accomplish scheduled checks, daily inspections, or the servicing of articles. However, a repair station with the appropriate ratings may accomplish unscheduled maintenance and repairs. This could include avionics facilities limited to avionics functions such as troubleshooting electrical or electronic systems, or replacing defective electronic articles.

8) Procedures for performing maintenance, preventive maintenance, and modifications on Canadian aeronautical products.

a) An FAA-certificated repair station may perform maintenance, preventive maintenance, and modifications (with the exception of annual inspections) on a civil aeronautical product under the regulatory control of TCCA. The repair station may approve that product for

RTS if the repair station complies with the special conditions stated in the BASA/MIPs between the United States and Canada.

b) In addition to the other requirements specified in the MIPs, a repair station performing maintenance, preventive maintenance, or modifications on aircraft operating in commercial air service under TCCA CAR part IV or VII must include in its manual a supplement describing the procedures listed in AC 43-10, appendix 3, paragraph 3.2, or explain where in the RSM those procedures are described. These procedures must be accepted by the FAA.

9) Procedures for maintaining and revising the contract maintenance information, including the submission of revisions to the CHDO for approval and how often the repair station will notify the FAA of revisions.

a) The FAA must approve the maintenance functions contracted to noncertificated providers.

b) The repair station must maintain a list of each facility that it contracts maintenance functions with, including the type of certificate and ratings (if any) held by each facility.

c) The manual does not need to include the maintenance function list, but the manual should include the location or office where the repair station maintains the list.

NOTE: Maintenance functions are a step or series of steps in the process of performing maintenance, preventive maintenance, or alterations that result in approving an article for RTS. It is not the intent of this rule to create “virtual repair stations” that provide only an approval for RTS. ASIs must evaluate the amount of work a repair station desires to contract out versus the work it performs in-house.

10) A description of the recordkeeping system used by the repair station to obtain, store, and retrieve the records required by part 43. These records must be in English.

11) Procedures for revising the RSM and notifying its CHDO of revisions to the manual, including how often the repair station will notify the FAA of revisions. The procedure must include:

- The title of the person authorized to make a revision;
- The method of submitting a revision (electronic, hard copy, disk, etc.);
- A procedure for recording a revision and a method of identifying the revised material or text; and
- A description of the system used to identify and control sections of the RSM.

C. Service Difficulty Reports (SDR) and Suspected Unapproved Parts (SUP). The manual should include the following:

1) Procedures for submitting an SDR; a certificated repair station must report to the FAA within 96 hours after it discovers any serious failure, malfunction, or defect of an article in accordance with § 145.221 and in a format acceptable to the FAA. This is usually in the form of an SDR. If the repair station performs maintenance, preventive maintenance, or alterations for an air carrier, the manual should also contain procedures on how it will notify the operator when submitting reports. The reporting requirement of part 121, § 121.703(d) will be served when an aircraft is scheduled out of service for more than 72 hours due to maintenance, preventive maintenance, or alteration activities. Occurrences and deficiencies must be reported 96 hours after the work on the aircraft is approved for RTS, unless the condition has been reported under another part or section of 14 CFR (e.g., 14 CFR part 21, § 21.3 or § 145.221).

2) Procedures for detecting and reporting SUP.

2-1298 QCM PROCEDURES.

NOTE: The QCM may be separate from the RSM or included in that manual as a separate section or volume.

A. Documentation, Inspections, and Training. A certificated repair station must prepare and keep current a QCM in a format acceptable to the FAA. Depending upon the size, complexity, and rating(s) of the repair station, that manual should include a description of the system and procedures used for:

- 1) Receiving and documenting articles, standard parts, and raw materials.
- 2) Performing incoming inspections of raw materials and standard parts that check for:
 - Proper documentation, identification, and traceability;
 - Conformity to a specification and acceptable quality;
 - Shelf life;
 - Contamination;
 - Shipping damage; and
 - State of preservation.
- 3) Performing a preliminary inspection of all articles that are maintained or altered to check for:
 - Proper documentation, identification, and traceability;
 - Shipping damage and contamination;
 - State of preservation;
 - Life limits;
 - Airworthiness Directives (AD) and Service Bulletins (SB);
 - Functional test or tear-down inspections;

- FAA approval of new articles; and
- Determination of what repairs are necessary.

4) Inspecting all articles that have been involved in an accident for hidden damage before maintenance, preventive maintenance, or alteration is performed. Ensure that items are disassembled as necessary and inspected for hidden damage in adjacent areas.

5) Performing in-progress inspections to ensure inspections, testing, and/or calibration are conducted at various stages while the work is in progress.

6) Performing final inspections and approvals for RTS.

a) Ensures that inspection, testing, and/or calibration of articles, including documentation, is accomplished at the completion of maintenance or an alteration.

b) The manual must include a procedure for approval for RTS.

7) Ensuring continuity of inspection responsibility.

a) Include procedures for ensuring that the responsibilities of any inspector are properly performed in their absence.

b) If the repair station has multiple shifts, include procedures to ensure the continuing responsibility for maintenance in progress through the use of a status book, shift turnover log, or similar documents.

8) Calibrating measuring and test equipment used in maintaining articles, including the intervals at which the equipment will be calibrated.

9) Taking corrective action on deficiencies related to repair station operation.

a) Section 145.211(c)(1)(ix) states that the QCM must include procedures used for taking corrective action on deficiencies. A corrective action is taken to remedy an undesirable situation. The correction of deficiencies is normally an integral part of a repair station's improvement process, and could include revisions to procedures that were not working properly (refer to AC 145-9, paragraph 4-13 for additional guidance).

NOTE: The repair station is not required at this time to have an Internal Evaluation Program (IEP), quality assurance (QA) program, or a continuous improvement program.

b) Corrective action requires that a fact-based investigation determine the root cause or causes to eliminate them. Corrective action would be applicable in two situations: before the article is approved for return for service and after the article has been approved for RTS.

c) If a deficiency is found before the article is approved for RTS, the repair station should follow its procedures describing how rework will be accomplished. If the deficiency is noted after the article is approved for RTS, the repair station should follow its procedures to notify the CHDO and the owner/operator of any potential problems and recall any unairworthy parts or products. The objective of the investigation into the cause of the deficiency and the corrective actions taken is to eliminate any potential safety threats posed by unapproved or improperly maintained parts or products and to prevent a recurrence of the same or similar problems.

NOTE: When the CHDO receives notification of a deficiency found after the article is approved for RTS, it shall be investigated for possible violations of parts 43 and/or 145. The investigation should be conducted in accordance with the current edition of FAA Order 2150.3, FAA Compliance and Enforcement Program. If improper maintenance is found, the ASI shall complete the PTRS records using code 3776/5776 as applicable. If unapproved parts are found, the ASI shall complete the PTRS records using code 3775/5775 as applicable. If the unapproved parts lead to an outside facility that manufactured the parts, an FAA Form 8120-11, Suspected Unapproved Parts Report, should be filed so an Aircraft Certification Service (AIR) investigation can be conducted. If the deficiency is found as a result of an inspection, audit, or evaluation of a maintenance facility located outside of the region, the inspector should contact the region or Flight Standards District Office (FSDO) responsible for the facility that completed the work. The investigating inspector completing the investigation on that facility shall complete the PTRS records using code 3776/5776, as applicable.

d) The procedures in the QCM should include a system for documenting any deficiencies and the corrective actions taken to prevent a recurrence. The system should let employees track any open corrective action requests and the date the corrective action is due. The program should also be tracked to include audits of the corrective action(s) taken to ensure it was effective. These audits should also be tracked to ensure that they are completed in a timely fashion.

10) Establishing and maintaining the proficiency of inspection personnel.

a) The procedure should ensure that inspection personnel are familiar with the applicable regulations and are proficient at inspecting the articles they are assigned to inspect.

b) Testing, formal training, recurrent training, or a combination of these methods could be used to maintain the proficiency of inspection personnel.

11) Establishing and maintaining current technical data for maintaining articles.

12) Revising the repair station's quality manual and notifying its CHDO of revisions to the manual, including how often the FAA will be notified of revisions. The procedure must include:

- The title of the person authorized to make a revision;
- The method of submitting revisions (electronic, hard copy, disk, etc.); and
- A procedure for recording revisions and a system for identifying revised material or text.

13) Qualifying and surveying noncertificated persons who perform maintenance, preventive maintenance, or alterations for the repair station. A certificated repair station may contract a maintenance function pertaining to an article to a noncertificated person, provided that:

- The noncertificated person follows a QC system equivalent to the system followed by the certificated repair station;
- The certificated repair station remains directly in charge of the work performed by the noncertificated person;
- The certificated repair station verifies, by testing and/or inspecting, that the work has been performed satisfactorily and that the article is Airworthy before approving it for RTS; and
- The noncertificated person's contract allows the FAA to inspect or observe work being performed on any articles for the certificated repair station.

NOTE: The ability to inspect a noncertificated person can only be accomplished while the contract is in force. This requirement does not give ASIs access to non-FAA-certificated facilities if there is no work being performed under contract for a certificated repair station.

B. Manual References. Where applicable, the manual should contain references to the instructions for continued airworthiness (ICA), maintenance manuals, inspection standards, or other approved or accepted data specific to the article being maintained.

C. Inspection and Maintenance Forms. A sample of each of the inspection and maintenance forms used in the performance of maintenance and the instructions for completing those forms.

NOTE: These forms may be addressed in a separate accepted manual that is submitted to the CHDO and maintained in current condition by the repair station.

2-1299 TASK OUTCOMES.

A. Complete PTRS Records.

B. Complete the Task. Completion of this task will result in the following actions:

- If no regulatory conflicts were found, the FSDO may send a transmittal document acknowledging receipt of the manuals.
- If conflicts with the rule are noted, the principal inspector (PI) will detail those discrepancies in writing to the certificate holder.

NOTE: ASIs may inform the certificate holder that no deficiencies were noted. This should not be mistaken as an “acceptance” of the manuals.

NOTE: Federal agencies can no longer refuse electronic versions of manuals, forms, record systems, etc. Federal law prohibits agencies from making the use of electronic media more difficult, or from requiring additional steps or procedures for users of electronic media. Therefore, all repair station document submissions must be accompanied by a transmittal document that describes the submission and is signed by the appropriate manager.

1) Approve the training program or a revision by sending the certificate holder a letter indicating the date; document, manual, or revision number; and an approval statement. The PI should sign the transmittal document.

2) Accept the Canadian supplement or revision to the appropriate manual sections by sending the certificate holder a letter indicating the date; document, manual, or revision number; and an acceptance statement. The ASI should sign the transmittal document. If the repair station elects to imbed their Canadian MIP requirements in their manual, the acceptance conveyance letter must quote each section of the manual where the Canadian requirements are found. The ASI is only accepting the Canadian requirements of the manual.

NOTE: A certificate holder using electronic media such as CD-ROM disks, local area network (LAN)-based manual systems, or internet-based manual systems may scan the cover letters and insert them electronically into the applicable document if they do not wish to maintain a file of acceptance or approval letters.

C. Use of Electronic Transmissions (Email or Facsimile). Email or fax responses are an acceptable alternative to the cover letter if the repair station is equipped to transmit and receive any necessary attachments; this may include the use of electronic signatures. This method should be addressed in the repair station’s procedures and found acceptable to the FAA.

D. Rejection. Reject the manual(s) or revisions by doing the following:

1) Initiate a cover letter indicating the date and document, manual, or revision number of the document or manual being rejected.

2) Return all copies to the applicant with an explanation of discrepancies that must be corrected and instructions for resubmitting the documents in order to proceed with the certification or revision process.

E. Posting Revisions. The applicant/certificate holder must provide revisions to the RSM and/or QCM, and the approved training program and/or manual, to the CHDO. The PI will file the revision in the certificate holder/applicant’s office file.

1) If in a paper revision, the ASI will remove the affected pages and insert the revised pages in the manuals or the training program. The ASI will update the manual control system and file the cover letters in the appropriate office file.

2) If in an electronic format, the ASI will replace the outdated office copy version with the current submission in the format it was submitted.

F. Document the Task. File all supporting documents in the certificate holder/applicant's office file.

2-1300 FUTURE ACTIVITIES. None.

RESERVED. Paragraphs 2-1301 through 2-1315.

VOLUME 2 AIR OPERATOR AND AIR AGENCY CERTIFICATION AND APPLICATION PROCESS

CHAPTER 11 CERTIFICATION OF A TITLE 14 CFR PART 145 REPAIR STATION

Section 5 Evaluate Part 145 Repair Station Facilities and Equipment

2-1316 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. Maintenance. 3378.

B. Avionics. 5378.

2-1317 OBJECTIVE. This section provides evaluation and inspection guidance for a Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair station for original certification, change in rating, change in location, or adding facilities.

2-1318 GENERAL.

A. When determining the suitability of permanent housing or other facilities used for the maintenance of an aeronautical article, the inspector should consider climatic conditions. This is to determine if high or low temperatures, excessive dust or sand, or other conditions will adversely affect worker efficiency. The inspector should also consider the maintenance being performed to determine if work processes are adversely affected by environmental conditions.

B. Applications for a repair station certificate, amendment to, transfer of, or an additional rating must be made in a format acceptable to the Federal Aviation Administration (FAA) and conform to the requirements of part 145. Additional guidance for the certification and operation of a part 145 repair stations may be found in other chapters of this order as well as the current version of Advisory Circular (AC) 1459, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.

2-1319 SATELLITE REPAIR STATION INSPECTION.

A. A certificated repair station may apply for additional facilities or locations to become satellites of the repair station with managerial control. If practical, the satellite repair station may use all or portions of the managerial repair station's manuals to develop its own manuals. Each satellite must satisfy all requirements of part 145 for each rating sought. Ratings for the satellite may not exceed the rating of the managerial repair station.

1) Personnel and equipment from the repair station with managerial control and each certificated satellite repair station under its control may be shared.

NOTE: Procedures must be included in the manual to describe how tools will be recalibrated or removed from service if calibration is compromised during their transport between facilities.

2) Inspection personnel must be designated for each satellite repair station and be available at the repair station anytime a determination of airworthiness or return to service is made. In other circumstances, inspection personnel may be away from the premises but must be available by telephone, radio, or other electronic means.

3) The satellite repair station may not hold a rating that is not held by the certificated repair station with managerial control.

4) The satellite repair station must be located in the same domicile country as the certificated repair station with managerial control.

B. A satellite facility inspection is conducted in the same manner as a repair station facility inspection.

2-1320 REPAIR STATION INSPECTION.

NOTE: The following procedures apply to all repair stations regardless of their geographic location.

A. Each certificated repair station must provide the following:

1) Housing for the facilities, equipment, materials, and personnel consistent with its ratings.

2) Facilities for properly performing the maintenance, preventive maintenance, or alterations of articles, or the specialized services for which it is rated. Facilities must include the following:

a) Sufficient work space and areas for the proper segregation and protection of articles during all maintenance, preventive maintenance, or alterations;

b) Segregated work areas enabling environmentally hazardous or sensitive operations such as painting, cleaning, welding, avionics work, electronic work, and machining to be done properly and in a manner that does not adversely affect other maintenance or alteration articles or alterations;

c) Suitable racks, hoists, trays, stands, and other segregation means for the storage and protection of all articles undergoing maintenance, preventive maintenance, or alteration;

d) Space sufficient to segregate articles and materials stocked for installation from those articles undergoing maintenance, preventive maintenance, or alteration; and

e) Ventilation, lighting, and control of temperature, humidity, and other climatic conditions sufficient to ensure personnel perform maintenance, preventive maintenance, or alterations to the standards required by this part.

B. A certificated repair station with an airframe rating must provide suitable permanent housing to enclose the largest type and model of aircraft listed on its operations specifications (OpSpecs).

NOTE: Each certificated repair station must have a fixed location where materials, equipment, tools, and data are stored. While consideration can be given for certain operating situations, aviation safety inspectors (ASI) must not authorize “virtual” or completely “mobile” repair stations. Even though the majority of the work is done away from the fixed location, each repair station must have a permanent, fixed base from which it operates the repair station.

1) ASIs should evaluate the housing needs of the repair station based upon the depth and complexity of the work the repair station will perform. For example, if an airframe-rated repair station will only be doing interior refurbishment or interior electrical work that does not require the aircraft to be completely housed, a nose dock or other similar housing may suffice for the housing requirement. Any work done on removed aircraft components must be accomplished in an appropriate housing, back shop, or other permanent structure.

2) Repair stations that frequently work away from their fixed location must ensure another certificate holder’s housing and facilities are adequate and meet the requirements of the regulations for the ratings that they hold. Procedures should be included in their manuals that describe how they will evaluate a certificate holder’s facilities prior to performing maintenance under the privileges of their certificate at the facility.

3) Some repair stations, such as internal fuel tank repair stations, do not require housing that will enclose the largest aircraft listed on their OpSpecs. Most of this type of work is performed in the aircraft wing, and protection from the elements should not be a major consideration. The use of mobile coverings to protect articles being installed or removed from the wing should provide sufficient protection from the elements.

C. A certificated repair station may perform those maintenance functions for which it is rated on articles outside of its housing if it provides suitable facilities that are acceptable to the FAA. The facility must meet the requirements of § 145.103(a), and the work must be done in accordance with the requirements of part 43 of this chapter.

D. A certificated repair station may perform maintenance, preventive maintenance, or alterations for the following certificated operators or carriers:

1) A 14 CFR part 121 or part 135 air carrier or commercial operator that has a continuous airworthiness maintenance program and the repair station must follow their program and applicable sections of their maintenance manual.

2) A 14 CFR part 125 operators and the repair station must follow the operator’s FAA-approved inspection program.

3) A foreign air carrier or foreign person operating a U.S.-registered aircraft and the repair station must follow the operator’s FAA-approved maintenance/inspection program.

E. A certificated repair station may be authorized to perform line maintenance for an air carrier certificated under part 121 or 135, a foreign air carrier, or a foreign person operating a U.S.-registered aircraft in common carriage under 14 CFR part 129, provided:

- 1) The repair station performs such line maintenance in accordance with the operator's manual and approved maintenance program;
- 2) The repair station has the necessary equipment, trained personnel, and technical data to perform such line maintenance; and
- 3) The repair station OpSpecs includes an authorization to perform line maintenance.

NOTE: All certificated repair stations must have suitable permanent housing and facilities. Although § 145.205(d) allows some deviation from the housing requirement, that requirement is based upon the repair station having suitable housing at another location that meets the requirements of part 145. If line maintenance is the only maintenance a repair station is certificated to perform, the repair station must still meet the housing and all other applicable requirements of part 145. Housing need not be on the airport where the line maintenance is performed, but the street address must be listed on the repair station OpSpecs.

F. A repair station may have the need to perform maintenance away from its permanent fixed base of operation. This requirement may be necessary due to a special circumstance, as determined by the FAA, or may be recurring based on a repair station's need. Such work may include, but not be limited to:

- Aircraft recovery;
- Biennial testing of systems on aircraft operating under Instrument Flight Rules (IFR);
- Fuel cell maintenance;
- Nondestructive Testing (NDT) inspections; and
- Interior modifications.

1) A repair station performing maintenance away from its fixed location may transport the materials, equipment, and technical personnel to the aircraft location or facility to facilitate the required maintenance.

2) At no time while performing work away from its fixed base will the work scope exceed the capabilities for which the repair station is rated.

3) A repair station that performs maintenance functions away from its fixed location on a recurring basis must ensure the temporary facility it uses meets the requirements of § 145.103(a).

4) The repair station must ensure that its repair station manual includes the procedures for accomplishing maintenance, preventive maintenance, alterations, or specialized services at a place other than the repair station's fixed location.

G. A repair station may need to perform maintenance at multiple fixed locations (i.e., additional facilities/localized within a defined area).

1) A repair station does not require a geographic authorization or satellite certificate if it is seeking to work at another site within a localized area. A localized area may be defined as several buildings or hangars, which may be on or near an airport or at or near the primary fixed base address as stated on the repair station OpSpecs. Repair stations using multiple fixed locations under a single air agency certificate need not have all the tools, equipment, data, or personnel at each location. The repair station's primary fixed base and any additional fixed locations are considered a single repair station. Each facility address must be listed in the repair station OpSpecs. This situation is not considered work away from the station.

2) The repair station manual must incorporate procedures that reflect how the repair station will meet the requirements of part 145 at each of its facilities. The procedures must include any supplemental operations (i.e., movement of articles, equipment, or tools required to perform the work) that may affect the repair station's ability to ensure the airworthiness of the articles maintained by the repair station. The repair station remains directly in charge of the work performed at all fixed locations.

3) All fixed location addresses must be listed on the repair station's OpSpecs. The repair station must submit a written request/application to use additional locations prior to exercising the privileges of its certificate and ratings at the additional fixed locations. The FAA must inspect and approve each location and update the OpSpecs with the address for each additional location.

4) There also may be instances where an engine test cell facility is located away from the primary facility but operates under the same certificate as the primary facility. This may occur when:

a) The FAA determines that the separate locations do not have any significant impact on the maintenance performed, and the separate locations are under the full control of the primary facility; and

b) The separate facilities must be in a defined area relative to the primary facility, and located within the same country. An FAA inspector must be able to use ground transportation to get from one facility to another without major expense or inconvenience.

5) OpSpec A101 must contain the address of all of the repair station's additional fixed locations.

2-1321 COORDINATION REQUIREMENTS. This task may require coordination with another specialty or district office, and the certificated repair station.

2-1322 REFERENCES, FORMS, AND JOB AIDS.

A. References.

- 14 CFR parts 43, 65, 91, 121, 125, and 135,
- AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals,
- This handbook,
 - Volume 2, Chapter 11, Certification of a Title 14 CFR Part 145 Repair Station,
 - Section 1,
 - Section 2,
 - Section 3, and
 - Section 4; and
 - Volume 6, Chapter 11, Section 20, Evaluate Special Equipment or Test Apparatus.

B. Forms. FAA Form 8310-3, Application for Repair Station Certificate and/or Rating

C. Job Aids. None.

2-1323 PROCEDURES.

A. Review Documentation. Review the Repair Station Certificate Manuals/Revision, Capabilities Listing, and OpSpecs for accuracy to determine that ratings are appropriate for work being performed, for accuracy. Also determine if maintenance functions will be contracted out, and contracted persons will meet the requirements of part 145, § 145.217.

B. Evaluate the Housing and Facilities. Inspect the following:

1) Housing and shop areas to ensure the following:

a) Adequate housing includes sufficient workspace for maintenance functions to be accomplished.

b) If a repair station holds an airframe class rating or limited airframe (specific model aircraft) rating, that housing includes suitable permanent housing for the largest type and model aircraft listed on its OpSpecs.

NOTE: If climatic conditions allow, the repair station may perform maintenance, preventive maintenance, or alterations outside of its housing if these facilities are acceptable to the FAA and meet the requirements of § 145.103(a).

c) Proper storage and protection of:

- Materials,
- Parts, and

- Supplies.
- d) Proper identification and protection of parts and subassemblies during:
- Disassembly,
 - Cleaning,
 - Inspection,
 - Repair,
 - Alteration, and
 - Assembly.
- e) Segregation of the following:
- Incompatible work areas (e.g., metal shop, battery charging area, or painting area next to an assembly area);
 - Unpartitioned parts cleaning areas; and
 - Articles and materials stocked for installation from those articles undergoing maintenance or alteration.
- f) Proper ventilation, lighting, and temperature and humidity for the type and complexity of work being accomplished.
- 2) Technical documents to ensure that they are current and accessible when relevant work is being performed:
- Airworthiness Directives (AD),
 - Instructions for Continued Airworthiness (ICA),
 - Maintenance manuals,
 - Overhaul manuals,
 - Standard practice manuals,
 - Service Bulletins, and
 - Other applicable data acceptable to or approved by the FAA.
- 3) Equipment, tools, and test equipment, to ensure:
- a) Required types and quantities are available and under the control of the repair station during performance of the work function.
- b) All test and inspection equipment and tools used to make airworthiness determinations are calibrated to a standard acceptable to the FAA.

NOTE: The part 145 rule states that tooling is calibrated to a standard acceptable to the Administrator. That may be a standard derived from the National Institute of Standards and Technology (NIST), or a standard provided by the equipment manufacturer. International agreements may also be accepted as a means of compliance. A list of international agreements referred to as Memorandum of

Understanding (MOU) or Mutual Recognition Agreement (MRA) may be accessed from the NIST Web site (<http://www.nist.gov>). Also, the National Voluntary Laboratory Accreditation Program (NVLAP) provides third-party accreditation to testing and calibration laboratories. NVLAP's accreditation programs are established in response to Congressional mandates, administrative actions by the Federal government, or requests by private-sector organizations. NVLAP is in full conformance with the standards of the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), including ISO/IEC 17025 and Guide 58. NVLAP identifies its accredited laboratories in a published directory, NIST Special Publication 810, which is published on the NIST Web site. Additionally, for foreign equipment, the standard of the country of manufacture may be used if approved by the Administrator. An Exemption Authorization is required if a repair station uses equipment of a foreign manufacturer and the method of calibration it will use is not addressed through a MOU or MRA, or the FAA inspector cannot obtain the validity of the Calibration Laboratory. Exemption authorizations are granted through the issuance of an exemption per 14 CFR part 11 guidance. Currently, exemptions of this type are issued for a 2-year period and can be renewed if requested by the repair station.

c) A repair station may substitute manufacturers' tooling with one that is of its equivalent. If the repair station uses equivalent tooling it is responsible for the determination of equivalency. The repair station must provide a means to the FAA that will demonstrate that the tool meets the manufacturer's standards and specifications with all respects regarding tolerances and accuracy.

1. The special equipment or test apparatus must be capable of performing all normal tests and checking all parameters of the equipment (article) under test. The level of accuracy should be equal or better than that recommended by the manufacturer.

2. The equivalency can only be made based upon an evaluation of a technical data file. The repair station will establish a technical data file for each piece of equivalent tooling. The file will contain, but is not limited to, data, drawings, specifications, instructions, photographs, templates, certificates, and reports.

- a. In the case of calibration equipment, the technical data file should also include data sheets attesting to the accuracy when calibration standards are necessary, as well as any special manufacturing processes that are used, including gauges and recording equipment in the controlling process.

- b. If calibration equipment is involved, adequacy of that calibration system shall be established with documented procedures to evaluate the adequacy of that calibration equipment and its traceability to one of the previously listed standards.

3. A demonstration of the functionality of the special equipment or test apparatus may be necessary to determine its equivalency.

NOTE: Designated Engineering Representatives (DER) may not approve or determine equivalency of tooling and test equipment. Furthermore, neither the FAA nor a DER may approve equipment and/or test apparatus. The FAA and DERs may only make an acceptance of functional equivalency for special equipment or test apparatus. It is important to emphasize that the burden of demonstrating equivalency is borne by the repair station and not the FAA.

C. Analyze Findings. If deficiencies were found, meet with the certificate holder to discuss possible corrective actions.

2-1324 TASK OUTCOMES.

A. Complete PTRS.

B. Complete the Task. Completion of this task will result in one of the following:

1) If the facilities were found acceptable:

- An entry into the PTRS stating satisfactory/or entries in the comment section; and
- A letter to the repair station acknowledging the successful completion of the inspection (optional).

2) If the facilities were found unacceptable:

- A letter describing any deficiencies that must be corrected; and
- A followup evaluation to ensure that the repair station is in compliance with regulations.

C. Document Task. File all supporting paperwork in the certificated repair station's office file.

2-1325 FUTURE ACTIVITIES. Perform followup inspection, as appropriate.

RESERVED. Paragraphs 2-1326 through 2-1340.

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 1 Introduction to Repair Station Risk-Based Oversight System****6-1626 INTRODUCTION.**

A. System Safety Processes. The risk-based repair station oversight system bases its goals and objectives on system safety processes. The Federal Aviation Administration (FAA) adopted the system safety approach, recognizing that properly designed, integrated, and implemented data-driven systems can proactively identify hazards. This proactive approach can eliminate or reduce risks before they become incidents or accidents. This system guides and improves traditional methods of equating safe operations with direct product inspection and strict regulatory compliance. This comprehensive and standardized method applies to the aviation safety inspector (ASI), working both air carrier contract maintenance and repair stations. The process enables continuous assessment allowing the principal inspector (PI) to focus on the identified areas of highest risk.

B. Maintenance Rules. One primary initiative of this system is to clearly state Title 14 of the Code of Federal Regulations (14 CFR) part 121, § 121.363; part 135, § 135.413; and part 145, § 145.205. All part 121 maintenance rules take precedence when an air carrier aircraft, operated under part 121 and under a Continuous Airworthiness Maintenance Program (CAMP), enters a certificated part 145 repair station. The repair station becomes an extension of the air carrier's maintenance program in many ways.

C. Closed-Loop Process. The system applies a closed-loop process so inspectors can verify that air carriers and repair stations are meeting regulatory standards, and that the process produces the intended results.

D. Components. The primary components of the enhanced oversight system are:

- Repair Station Assessment Tool (RSAT).
- Contract Oversight Prioritization Tool (OPT).
- Risk management process (RMP).
- PI interface.
- Safety Performance Analysis System (SPAS).
- Surveillance including foreign maintenance providers.
- A part 145 repair station team of repair station ASIs.
- A part 121 air carrier contract maintenance team of air carrier ASIs.

E. Application. PI interface and information sharing are one key to effective application of a risk-based oversight system. Inspectors can share information generated from part 121; § 135.411(a)(2); and part 145 surveillance to identify risk levels in the ASI's area of responsibility. The information in turn adds value to all processes of risk management (RM). For part 121 Certificate Management Teams (CMT) in particular, the Continuing Analysis and

Surveillance System (CASS) enables direct interface with the oversight process, creating an effective control for air carrier maintenance contracting and an excellent resource of information.

F. SPAS Database. The SPAS database lists hazard identification information the ASI uses in the decisionmaking process. Through the risk assessment process for CMTs for part 121; § 135.411(a)(2); and part 145, the ASI can identify the likelihood an issue could happen and the associated severity of that issue. The ASI can use this information to assess the effectiveness of an air carrier in properly contracting a maintenance function, or repair station performance while conducting a carrier maintenance program. The ASI can also gauge the effectiveness of repair station's ability to follow an air carrier's contract maintenance program by combining the SPAS information with a risk assessment. Root cause of risks and proper corrective actions can also be assessed if needed.

6-1627 RSAT.

A. R-Item. Before 2006, each repair station PI performed one required inspection, or R-item, per repair station according to flight standards National Work Program Guidelines (NPG). Inspectors used activity code 3650/5650 of the Program Tracking and Reporting Subsystem (PTRS) to document the results of the inspection. In 2006, the scope and detail of codes 3650/5650 was divided into 14 elements or subsystems with new activity codes. The surveillance data collected for these elements created a baseline for each repair station. In fiscal year (FY) 2007, the subsystem of codes 3607/5607, contract maintenance, was divided into two separate subsystems. The result was codes 3607/5607, contract maintenance to non-certificated repair facilities, and codes 3663/5663, contract maintenance to certificated repair facilities. The division created a total of 15 elements and subsystems. In 2008, an additional subsystem of codes 3669/5669 was added to define surveillance of repair stations located in the United States with European Aviation Safety Agency (EASA) part 145 approval, per the U.S./EU aviation safety agreement. The addition brought the number of repair station subsystems to 16.

B. Basic Elements. The risk-based repair station and air carrier contract oversight system is based on system safety and RM principles. We are going to look at the basic elements of this system and some of the tools and resources available to the ASI for managing and planning a surveillance program using RSAT.

C. RSAT. The ASI uses the RSAT for both surveillance planning and evaluation assessment. This tool helps the PI, other assigned inspectors, supervisors, and managers identify areas of concern or criticality about a specific repair station, and target resources for use in the areas of highest risk.

6-1628 PROCESS DESCRIPTION.

A. Surveillance. The risk-based oversight system outlines a comprehensive and standardized approach, based on system safety, to repair station surveillance. The system consists of a baseline surveillance program, a repair station data package, an RSAT, and an RMP tool.

B. Overall Process. The overall process involves:

- 1) A comprehensive baseline repair station surveillance program.
- 2) A data package generated from SPAS information using current sources. The PI reviews this data before completing the RSAT.
- 3) A completed RSAT, taking into consideration subparagraph 6-1628B in Volume 6, Chapter 9, Section 1, PI expertise, and system design. This consideration also includes operating environment, configuration, and design of the repair station.
- 4) Modification of the surveillance program to reflect the risk level in each subsystem.
- 5) Assessment of the repair station base on a completed RSAT.
- 6) Using an RMP to address high-concern issues.
- 7) Accessing the RMP to identify hazards noted during inspections performed over the course of the year while conducting surveillance. Activity codes identified in PTRS with an assessment of less than 3 must be mitigated using the RMP. This information is fed back into the system and will assist the PI in planning for the next FY work program.
- 8) Repeating the process at the start of the FY, beginning with subparagraph 6-1628B in Volume 6, Chapter 9, Section 1, to generally assess an operator and plan surveillance for the upcoming year, identifying resources to apply to areas of highest risk.

NOTE: This document explains these steps in greater detail in later paragraphs.

6-1629 BASELINE SURVEILLANCE PROGRAM.

A. Purpose. This program helps the ASI cover all aspects of part 145 repair station operations. The new surveillance program divides the current PTRS activity codes 3650/5650 into 16 subsystems with new 36XX/56XX codes. This partition better defines the intent of the FAA guidance and strengthens surveillance structure.

B. ASI Actions. The ASI activates the program using PTRS activity codes 3650/5650. This triggers up to nine required activity codes. Although the ASI only needs the latter five of these activities if applicable, inspectors have conducted a risk assessment of all nine activities and determined that a surveillance interval greater than 1 year (calendar-based risk) would pose an undesired risk. Inspectors will complete four subsystems every year for each certificated repair station. These subsystems are:

- 3608/5608 – Quality Control,
- 3654/5654 – Maintenance Process,
- 3656/5656 – Technical Data, and
- 3661/5661 – Training.

C. Other Subsystems. The ASI must also complete these subsystems (also calendar-based risk) if they apply:

- 3606/5606 – Work Away from Station,
- 3607/5607 – Contract Maintenance—Non-Certificated Repair Facilities,
- 3618/5618 – Air Carrier Requirements,
- 3663/5663 – Contract Maintenance—Certificated Repair Facilities, and
- 3669/5669 – Surveillance of Repair Stations Located in the United States with EASA Part-145 approval under the U.S./EU Aviation Safety Agreement.

NOTE: As a review, if the ASI doesn't use any of these last five subsystems during a surveillance program, the ASI must still complete them once every 3 years. At a minimum, the ASI must complete all subsystem activities at least once every 3 years.

D. Activity Codes. The ASI must complete and close all applicable required activity codes before the ASI closes the 3650/5650 records. Table 6-8, Elements of a Well-Designed Maintenance Organization, shows the 16 subsystems, the chapters in this order that address each subsystem, and the corresponding PTRS activity code:

Table 6-8. Elements of a Well-Designed Maintenance Organization (ordered by PTRS code)

Volume 6, Chapter 9, Section 12 (3601/5601) Parts and Materials.	Volume 6, Chapter 9, Section 10 (3656/5656) Technical Data.
Volume 6, Chapter 9, Section 4 (3604/5604) Certificate Requirements.	Volume 6, Chapter 9, Section 8 (3657/5657) Housing and Facilities.
Volume 6, Chapter 9, Section 6 (3605/5605) Records Systems.	Volume 6, Chapter 9, Section 9 (3658/5658) Tools and Equipment.
Volume 6, Chapter 9, Section 16 (3606/5606) Work away from station.	Volume 6, Chapter 9, Section 13 (3659/5659) Personnel Records.
Volume 6, Chapter 9, Section 23 (3607/5607) Contract Maintenance—Noncertificated Repair Facility.	Volume 6, Chapter 9, Section 7 (3660 /5660) Manuals.
Volume 6, Chapter 9, Section 11 (3608/5608) Quality Control.	Volume 6, Chapter 9, Section 14 (3661/5661) Training.
Volume 6, Chapter 9, Section 18 (3618/5618) Inspect a Part 145 Repair Stations Section 145.205 Maintenance/Alterations Requirements.	Volume 6, Chapter 9, Section 23 (3663/5663) Contract Maintenance—Certificated Repair Facility.
Volume 6, Chapter 9, Section 15 (3654/5654) Maintenance Process.	Volume 6, Chapter 9, Section 24 (3669/5669) Surveillance Of A Repair Station Located In The United States For An EASA Part-145 Approval Under The U.S./EU Aviation Safety Agreement.

6-1630 REPAIR STATION DATA PACKAGE. Inspectors compile the data package using several sources, including the SPAS Profile tab. Although the term “data package” is used, the ASI should review several sources of data when targeting resources. An example of a comprehensive data package is outlined in subparagraph B below.

A. Resources. This information is accessible to inspectors via SPAS and provides an analytical review of a repair station. This data package consists of FAA information resources, which may include surveillance and enforcement data. Inspectors will use:

- Information obtained from the SPAS Profile in the SPAS database. This should include a thorough review of all tabs in the repair station profile;
- Knowledge of the repair station system design, including operating environment, configuration, and design of repair station; and
- Personal expertise in completing the RSAT.

B. Data. SPAS is the FAA’s primary source of comprehensive and integrated safety information. Inspectors, analysts, and managers use SPAS in developing and adjusting field surveillance, investigation, and other oversight programs. SPAS interfaces with key fielded oversight programs such as the Air Transportation Oversight System (ATOS), Surveillance and Evaluation Program (SEP), NPG, and other government and industry sources. SPAS collects raw performance and operational data, analyzes and summarizes it, and outputs critical information via graphs, tables, and reports. Inspectors use these SPAS reports to (1) identify safety hazard and risk areas, (2) target inspection efforts for repair stations and to areas of greatest risk, and (3) monitor the effectiveness of targeted oversight actions. Inspectors have both SPAS repair station profile and the repair station analytical model (RSAM) available for use. This data shows additional information about individual repair station facilities and their performance and risk.

C. Data Review. The ASI can complete a data review by accessing the SPAS home page at <http://home.spas.faa.gov/spas.asp>. Follow the procedure below:

- 1) Access the SPAS repair station link in the drop-down menu of the “Profiles” tab at the top of the SPAS home page.
- 2) Enter the repair station designator in the “designator” field. Set the minimum number of years to “3” at the “Number of years to gather information from” field from the drop-down menu.
- 3) Click the “Go” button at the “Show Profile” prompt.
- 4) Review the profile information for the repair station. The ASI can view the profile information by selecting each of the individual tabs for the repair station, or selecting the “Hide Tabs” button and viewing one continuous page.

D. SPAS Profile Tabs.

- 1) The ASI should pay particular attention to the “Surveillance” tab when reviewing repair station profiles. Using this tab, the ASI can review past surveillance activities conducted on a repair station. The ASI should carefully review “Unfavorable” results – they may reveal

valuable information on known areas of elevated concern. If the ASI sees repetitive findings and corrective actions for those findings, this information will assist the ASI in targeting resources to focus on those high-concern areas.

2) The “Investigations” tab shows any repair station enforcement history, especially pertaining to certificate suspensions, civil penalties, and administrative actions imposed on the repair station.

3) The “Ratings” tab details the ratings held by the repair station. This page shows limited ratings held by a repair station through a link to a limited rating detail page displaying the date and descriptive text of last update of the limited rating. The information source is the National Vital Information Subsystem (NVIS). This resource may assist the ASI in monitoring the growth of a repair station.

4) The “RSAM” tab lists the repair station’s RSAM score. Using information from SPAS data sources, inspectors use RSAM to analyze a repair station’s operation in four areas: oversight, investigation, complexity, and surveillance. The model presents the results of the analysis as calculated scores, detailing its assessment of the level of potential risk in the repair stations operation. The ASI can find additional information on the RSAM tool and use of this tool by clicking on the “Analysis Tools” tab on the SPAS home page.

5) The “FAA Information” tab contains information about the certificate-holding district office (CHDO), and the principal maintenance inspector (PMI) and principal avionics inspector (PAI) assigned to the repair station. NVIS is the source of information for this function.

6) The “Contracted To” tab lists the active air operators and repair stations contracting out maintenance to the repair station the ASI is looking up. Click on the designator code to go to the applicable profile. For each entity the repair station contracts to, SPAS displays surveillances where the selected repair station is listed as the affiliated designator. SPAS counts occurrences of favorable and unfavorable surveillances of the selected repair station. Click on the surveillance count to go to the National Program Tracking and Reporting Subsystem (NPTRS) record list. For ATOS operators, SPAS lists the number of ATOS activities of the selected repair station. The “Yes” column contains activities with “Yes” responses only, and the “No” column shows activities where there are one or more “No” responses. Click on the count to go to the ATOS record list. SPAS also looks at the Web-based Operations Safety System (WebOPSS) information for the repair station and displays the repair station’s work authorized per WebOPSS Paragraph A003.

7) The “Service Difficulty Report” (SDR) tab shows the number of SDRs reported by the repair station over the time period selected on the repair station query screen. SDRs (includes M or D forms) are organized by A4A Group within the make and model maintained by the repair station over the date period. The report displays unknown aircraft makes and models in a separate row. The aircraft make and model links to the aircraft profile. SDRs in each grouping also link to the Record List page of the SDRS Query and Browse section, at which point the ASI can access individual records.

8) The “Personnel” tab contains information about the:

- Repair station's chief executive officer (CEO),
- Company liaison between the repair station and the FAA,
- Accountable manager with authority over all repair station operations, and
- National Aviation Authority (NAA) or Civil Aviation Authority (CAA) contact at foreign repair stations.

NOTE: This section also counts the number of repair station employees by skill specialty. The number of repairmen is a hyperlink that navigates to the Comprehensive Airman Information Subsystem (CAIS) and displays detailed CAIS information about active repairmen.

9) The "Company Information" tab details information about the repair station's physical location. If the repair station is foreign, the country is listed. If the repair station is a satellite activity, active repair station certificates are listed. The designator code is a hyperlink that navigates to a repair station profile for the parent certificate holder. If the repair station is a parent activity, the link lists active satellite repair station certificates. Clicking on the hyperlinked designator code shows a repair station profile for the satellite certificate holder. If the selected repair station is a satellite, SPAS will display related satellite certificates and the parent repair station.

6-1631 RSAT. Inspectors use the RSAT for both surveillance planning and evaluation assessment. This tool helps identify areas of concern or criticality about a repair station for the PI, assigned inspectors, supervisors, and managers. After using the RSAT for an assessment, a PI may modify the baseline surveillance program, generate a RMP if the PI discovers issues, or both. The ASI can also use the RSAT to generally assess the repair station, then prioritize surveillance scheduling for assigned repair stations. The ASI does this by reviewing the overall RSAT assessment value and prioritizing those repair stations with lower scores first.

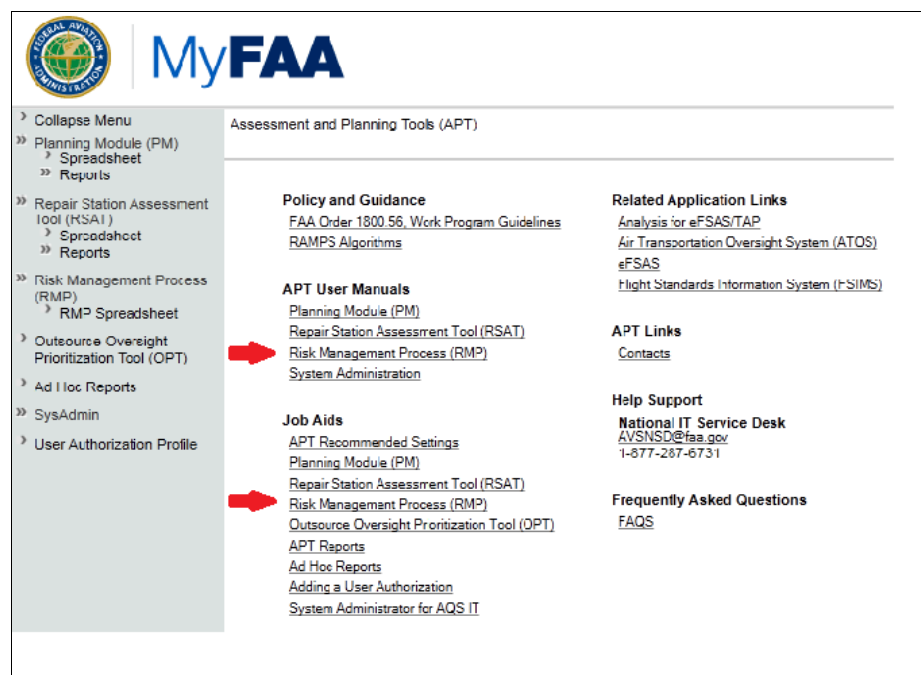
6-1632 MODIFIED SURVEILLANCE PROGRAM. The baseline surveillance program has one required PTRS activity code (3650/5650) for each repair station. This generates up to nine "R" items as listed in paragraph 6-1629. Also, the PI can modify the baseline surveillance program to target potential risks, and also modify an upcoming FY surveillance plan by assigning "R" and additional "P" items as necessary. If areas of concern are identified while conducting work program surveillance activities, the PI can add "P" items to the surveillance program to assist in follow up surveillance and associated documentation.

6-1633 OVERALL ASSESSMENT OF REPAIR STATION. After completing the subsystem assessments in the RSAT, the PI generates an overall assessment of the repair station. This assessment will help the PI prioritize surveillance scheduling among assigned repair stations.

6-1634 RMP. The PI can use an RMP for issues of high concern both after completing the RSAT and throughout the work program year. This process enables PIs to effectively oversee certificate holder management of identified hazards. The PI may use the RMP to address any hazard significant enough to justify intensive analysis and tracking. Systemic hazards are often good candidates for this process. The PI decides when to use the RMP to address an identified hazard, but must use the RMP to reduce risks closed in PTRS with an assessment of less than

“3.” The RMP Job Aid and user manual (Figure 6-115, Assessment and Planning Tool, Risk Management Process User Information) found on the Assessment and Planning Tools Web site at <https://apt.av.faa.gov> shows further detail and instruction on using this tool.

Figure 6-115. Assessment and Planning Tool, Risk Management Process User Information



6-1635 WHEN TO USE THE RSAT. Inspectors should use the RSAT each September after they have incorporated the Regional Automated Management Planning Subsystem (RAMPS) to develop an initial work program for the next FY. Inspectors must complete an RSAT for each repair station every 12 months.

6-1636 RSAT PROCESS DETAILS. This paragraph lists step-by-step details about completing the RSAT. The RSAT creators have designed the below process to help PIs or a Designated Person (DP) complete the RSAT.

A. Step 1: Repair Station Data. Access information about the repair station using the SPAS repair station “profile” (see paragraph 6-1630) as a source of information.

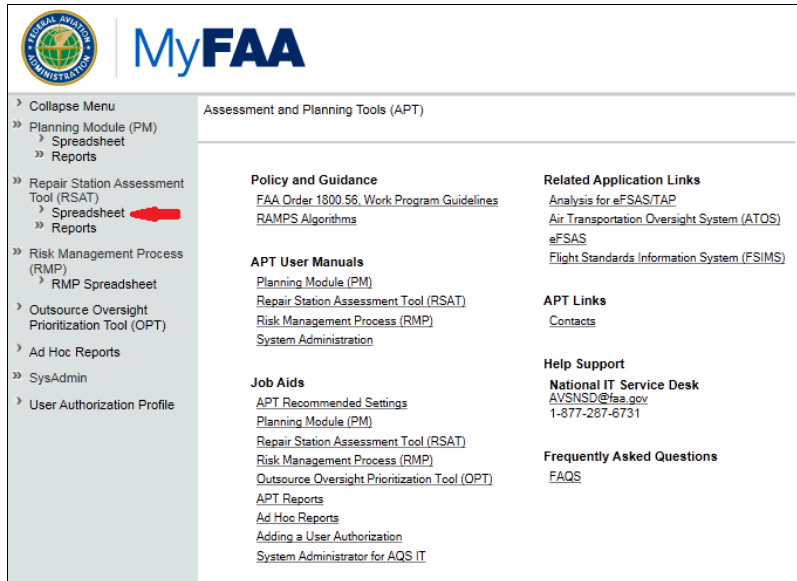
B. Step 2: Identify Trends or Concerns. Review the Step 1 data to assess the status of previous risks and identify new potential issues of concern. Identify trends and concerns, taking into consideration the ASI’s knowledge of the repair station and system design. The repair station design should include operating environment, configuration, and lathe ASIs. The PI may also contact the certificate holder for additional information.

C. Step 3: Complete the RSAT. Complete a new RSAT while considering Step 2 identification of trends or concerns.

1) The ASI can access the RSAT through the Assessment and Planning Tool (APT) at <https://apt.avs.faa.gov>.

2) In the APT, select “RSAT Spreadsheet” from the gray column on the left side of the screen. See Figure 6-116.

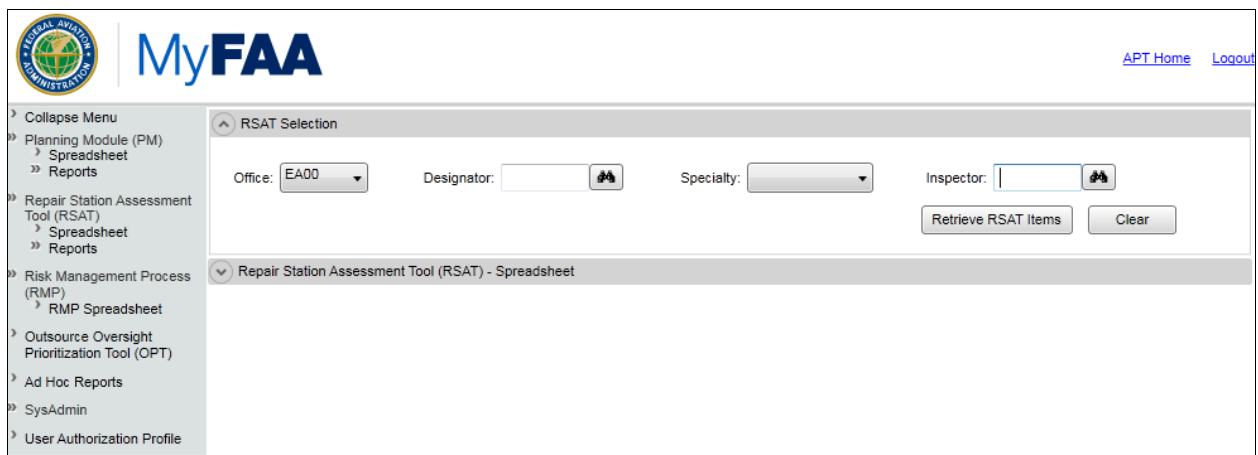
Figure 6-116. Assessment and Planning Tool (APT)



3) See Figure 6-117. Select the office from the drop-down menu. Enter the repair station designator and inspector in the list fields. Click on the “Retrieve RSAT Items” button.

NOTE: For each repair station certificate, RSATs exist separately for maintenance and for avionics. A PI can display all the RSATs for all the PI’s responsible repair station certificates on one sheet by inputting their inspector identification.

Figure 6-117. Repair Station Assessment Tool Main Page



4) The RSAT consists of 16 subsystems (see Figure 6-117A). Use these subsystems to define all aspects of part 145 repair station operations.

Figure 6-117A. Repair Station Assessment Tool

Design	Act	Subsystem Description	Insp	Call Up	Off	SSA	Plan	Com	1-2	3-5	6-7	8-9	10	RMP	R	SSA	R	P	Tot	RMP	MLT
AA1R	3601	Parts and Materials	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	0	7	0	0	0	N	
	3604	Certificate Requirements	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	7	0	0	0	N	
	3605	Records Systems	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	6	0	1	1	N	
	3606	Work away from station	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N	
	3607	Contract Maintenance - Non...	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N	
	3608	Quality control	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	1	6	0	0	1	N	
	3618	Air Carrier requirements	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N	
	3654	Maintenance Process	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	1	7	0	0	1	N	
	3656	Technical data	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	1	7	0	0	1	N	
	3657	Housing and Facilities	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	7	0	0	0	N	
	3658	Tools and equipment	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	7	0	0	0	N	
	3659	Personnel record	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	6	0	1	1	N	
	3660	Manuals	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	6	0	0	0	N	
	3661	Training	DSW	09/01/2013		7	1	1	0	1	0	0	0	0	1	6	0	1	2	N	
	3663	Contract Maintenance - Certi...	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N	
	3669	Domestic EASA Oversight Au...	DSW	09/01/2013		N/A	1	2	0	0	0	0	0	0	1	N/A	0	0	1	N	

NOTE: See Figure 6-119, Column Descriptions for the Repair Station Assessment Tool.

5) For issues of high concern, create an RMP. Information on the use of the RMP can be found in Volume 6, Chapter 9, Section 2. Choose “Yes” in the RMP column. Follow the RMP Job Aid and User Manual at <https://apt.avfs.faa.gov> for further detailed instructions about completing the RMP.

NOTE: The RMP created through the RSAT will indicate “RSAT” in the status box. Once the PI opens an RMP, the PI must process the RMP through to completion after creating the RMP.

6) Assign an overall assessment of the repair station. Use the “Overall Assessment” (see Figure 6-118). The ASI can find this field on the RSAT screen, directly below the “RSAT Spreadsheet” (see Figure 6-117A). When assessing the repair station, consider the repair station data package (see paragraph 6-1630). Also consider the individual subsystem assessments and system design, including repair station operating environment, configuration, and design.

Figure 6-118. Overall Assessment

Overall Assessment of this repair station

AA1R SPAS repair station profile Maintenance

FY 2013 Overall RSAT 7

FY 2012 Overall RSAT 7 3650 3605 AA1R PTRS and RMP

RSAT Legend

The Repair Station Assessment Tool (RSAT) is a surveillance planning and assessment tool that assists in identifying areas of concern or criticality

R	NPG Required Annual Surveillance Item	SSA Subsystem Assessment (Select 1 to 10)	Total	Total Surveillance for Each Subsystem
eVID Based Potential NPG R-Item	R Assessment R-Item	RMP	Risk Management Process	
MLT Multiple R and P Items Assignment	P Assessment P-Item	NPG-R	Number of Inspections Required	

NOTE: The results of the subsystems and overall assessment will be valuable during the next FY's RSAT planning, and also for repair station prioritization.

D. Step 4: Modified Surveillance Plan. After completing the RSAT, modify the baseline surveillance program, indicating the risk level at this particular repair station.

E. Step 5: Completion of the Surveillance Plan. During the next 12 months, complete the surveillance program as determined by the RSAT. While performing surveillance activities throughout the FY, the ASI can access the RMP and identify hazards noted during the inspection. This information automatically feeds back into the system, and the ASI can access it to assist in planning of the next FY's work program. Note that the baseline surveillance program consists of a PTRS 3650/5650 "Required" R-item generated for each repair station. This in turn will generate additional required R-items as listed in paragraph 6-1629. The ASI can't close the PTRS 3650/5650 task until closing and completing all subsystems.

NOTE: If the ASI closes surveillance activities in PTRS with an assessment value of less than "3," the ASI must address the activity using the RMP.

Figure 119. Column Descriptions for the Repair Station Assessment Tool

Desg	Act	Subsystem Description	Insp	Call Up	Off	SSA	Plan	Com	1-2	3-5	6-7	8-9	10	RMP	R	NPG	SSA	R	P	Tot	RMP	MLT
AA1R	3601	Parts and Materials	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	0	7	0	0	0	N		
	3604	Certificate Requirements	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	7	0	0	0	N		
	3605	Records Systems	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	6	0	1	1	N		
	3606	Work away from station	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N		
	3607	Contract Maintenance - Non...	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N		
	3608	Quality control	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	1	6	0	0	1	N		
	3618	Air Carrier requirements	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N		
	3654	Maintenance Process	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	1	7	0	0	1	N		
	3656	Technical data	DSW	09/01/2013		7	1	1	0	0	1	0	0	0	1	7	0	0	1	N		
	3657	Housing and Facilities	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	7	0	0	0	N		
	3658	Tools and equipment	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	7	0	0	0	N		
	3659	Personnel record	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	6	0	1	1	N		
	3660	Manuals	DSW	09/01/2013		7	0	0	0	0	0	0	0	0	0	6	0	0	0	N		
	3661	Training	DSW	09/01/2013		7	1	1	0	1	0	0	0	0	1	6	0	1	2	N		
	3663	Contract Maintenance - Certi...	DSW	09/01/2013		N/A	1	1	0	0	1	0	0	0	1	N/A	0	0	1	N		
	3669	Domestic EASA Oversight Au...	DSW	09/01/2013		N/A	1	2	0	0	0	0	0	0	1	N/A	0	0	1	N		

A. DESG. Lists the designator of the repair station. This column designates those activities that are:

1) NPG-Required (R):

- a) 3608/5608 – Quality Control,
- b) 3654/5654 – Maintenance Process,
- c) 3656/5656 – Technical Data, and
- d) 3661/5661 – Training.

2) Enhanced Vital Information Subsystem (eVID) - based potential R-items (V):

- a) 3606/5606 – Work Away from Station,
- b) 3607/5607 – Contract Maintenance–Non-certificated Repair Facilities,
- c) 3618/5618 – Air Carrier Requirements,
- d) 3663/5663 – Contract Maintenance—Certificated Repair Facilities, and
- e) 3669/5669 – Surveillance of Repair Stations Located in the United States with EASA Part-145 approval under the U.S./EU Aviation Safety Agreement.

B. ACT. The PTRS activity code for each of these 16 subsystems.

C. SUBSYSTEM DESCRIPTION. Provides a short description of each of the 16 subsystems.

D. INSP. Lists the inspector initials.

E. CALLUP. Identifies the callup date for the inspection activity. This field should be used to target a surveillance date based on risk assessment. Higher priority activities should be targeted sooner. By default, however, the date is set to September 1 of the FY. A calendar function is available to set the date.

F. OFF. Identifies any off-hour surveillance activity conducted on this certificate holder. Refer to current National Flight Standards WPG for current guidance for conducting off-hour surveillance.

G. SSA. Prior FY RSAT subsystem assessment.

RSAT - Overall Assessment	
Score	RSAT - Overall Assessment
1	There appears to be little or no evidence of a credible process being in place and/or facilities seem to be inadequate.
2	
3	It appears that the processes and facilities are marginal. Documentation and controls seem to be deficient.
4	
5	
6	It appears that the processes and facilities are adequate, appropriate and well maintained. An adequate control system seems to be in place but some discrepancies were noted and corrected.
7	
8	It appears that the processes and facilities are adequate, appropriate, well maintained, documented and controlled. No deficiencies were observed.
9	
10	It appears that the processes and facilities are well above the minimum industry standards.

H. PLAN. Total number of surveillance planned (prior FY).

I. COM. Total number of surveillance completed (prior FY).

NOTE: Columns 1-2, 3-5, 6-7, 8-9, and 10 show the results of surveillance completed (prior FY).

J. RMP. Number of RMP completed (prior FY).

K. NPG-R. The R column shows the number of inspections required for the upcoming FY and is generated automatically once RAMPS has been incorporated. All applicable RSAT activity codes also have a calendar-based risk associated with them. An R-item is required for subsystems due to inactivity during the past 2 years and R-items for subsystems 3608/5608 (Quality Control), 3654/5654 (Maintenance Process), 3656/5656 (Technical Data), and 3661/5661 (Training) are required annually. Additionally, the following subsystems have also been determined to be calendar-based risk items and must be completed annually, if applicable: 3606/5606 (Work Away from Station); 3607/5607 (Contract Maintenance—Non-certificated Repair Facilities); 3618/5618 (Air Carrier Requirements); 3663/5663 (Contract Maintenance—Certificated Repair Facilities); and 3669/5669 (Surveillance of Repair Stations Located in the United States with EASA Part-145 approval under the U.S./EU Aviation Safety Agreement). As a review of the status, if these subsystems are not applicable, they must be completed once every 3 years.

L. SSA. Assessment of each subsystems in current year. When assessing each subsystem, consider:

- 1) The repair station data obtained from the SPAS RS Profile (see paragraph 6-1630) and issues identified as a result of that review;
- 2) The PI knowledge of the repair station and system design, which includes operating environment; and
- 3) Configuration and design of the repair station.

M. R. R-items are generated automatically if the subsystem assessment (SSA) score is between 1 and 2; however, an R-item is not added in this column if it is already required due to inactivity during the past 2 years and it is a required subsystem due to a calendar-based risk assignment.

N. P. P-items are generated automatically if the subsystem assessment score is 3 to 5. However, a P-item is not added in this column if it is already required due to inactivity during the past 2 years and if it is a required subsystem due to calendar-based risk assignment. Additional P-items can be added by the PI as needed, but the number of P-items cannot be decreased by the PI.

O. TOT. Total Surveillance for Each Subsystem is automatically calculated by adding the “Number of Inspections Required”, “Assessment R-Item”, and “Assessment P-Item”. This represents the total number of surveillance for each of the subsystems.

NOTE: A higher number of total inspections should be planned for subsystems of concern.

Table 6-9. Glossary of Terms

Term	Definition
Baseline Surveillance Plan	The baseline surveillance program is accomplished by Program Tracking and Reporting Subsystem (PTRS) activity code 3650/5650 triggering the 16 subsystem activity codes, ensuring that all aspects of Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair station operations are considered.
Controls	The certificate holder has checks and restraints in place to ensure a desired result.
Documentation	Includes certificate holder documents such as manuals, policies, and procedures.
Subsystem Assessment	Word pictures that allow for the assessment of each of the 16 subsystems.
Overall Assessment	Word pictures that allow for an overall assessment of the repair station as a result of the RSAT.
Repair Station Data (SPAS RS Profile)	This is data accessible to all inspectors via the Safety Performance Analysis System (SPAS) RS profile.
RSAT	Repair Station Assessment Tool.
RMP	Risk management process.
System Design	Includes operating environment, configuration (number of employees, facilities, etc.), and design (type of maintenance performed, ratings, etc.) of the repair station.

RESERVED. Paragraphs 6-1637 through 6-1650.

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 4 Inspect a Part 145 Repair Station's Certificate Requirements****6-1685 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.**

A. Maintenance: 3604.

B. Avionics: 5604.

6-1686 OBJECTIVE. This section guides the aviation safety inspector (ASI) in inspecting a repair station's certificate requirements per Title 14 of the Code of Federal Regulations (14 CFR) part 145.

6-1687 GENERAL. Part 145, §§ 145.5, 145.207, 145.209, and 145.215 require that all Air Agency Certificates, operations specifications (OpSpecs), organizational charts, and capability lists are to be kept current and available for inspection and verification.

6-1688 COORDINATION REQUIREMENTS. If the repair station has an assigned principal maintenance inspector (PMI) and a principal avionics inspector (PAI), both inspectors should coordinate this inspection.

6-1689 PROCEDURES.

A. Review Applicable Information. Before the inspection, the principal inspector (PI) or ASI should carefully review:

- 1) Title 14 CFR parts 43 and 145.
- 2) Repair Station Manual (RSM) or Quality Control Manual (QCM).
- 3) OpSpecs.
- 4) Capability list, as required.
- 5) Repair Station Training Program.
- 6) The Safety Performance Analysis System (SPAS).

NOTE: For additional information on SPAS data, see Volume 6, Chapter 9, Section 1, paragraph 6-1630.

- 7) Enhanced Vital Information Database (eVID).
- 8) Certificate-holding district office (CHDO) file.

9) Repair Station Inspection Checklist referenced in Volume 6, Chapter 9, Section 5 or at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/.

B. Conduct an In-Briefing. Brief the certificate holder on the purpose of the inspection. This in-briefing may take place at the beginning of the inspection or at the beginning of each day. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5.

C. Review Air Agency Certificate. Review the repair station's air agency certificate and OpSpecs and complete the Repair Station Inspection Checklist for PTRS activity code 3604/5604 to verify these items are:

- 1) Available for inspection.
- 2) Identical to those on file at the CHDO and are properly signed.
- 3) Appropriate for the maintenance and alterations that personnel at the facility perform.
- 4) At the same revision level as the one on file at the CHDO, if the repair station uses a capability list.
- 5) Within the prescribed calendar limitation for the certificate of the repair station located outside the United States. (Certificates for repair stations located outside the United States have limited certificate duration. The Federal Aviation Administration (FAA) limits initial certification to 12 months from the date of issue of the certificate. After this initial time period, the FAA will renew the certificate or rating for a 24-month period if the repair station operated in accordance with the applicable requirements of part 145 during the initial 12-month time period. Verify that the duration of the certificate for repair stations located outside the United States is within the prescribed calendar limitations.)

NOTE: Verify the information in the current eVID matches the repair station information.

D. Does Repair Station Hold a Limited Rating? If the repair station holds a limited rating, a capabilities list or the repair station's OpSpecs must identify each article it maintains and alters. Each item on the capabilities list must have documentation to show that a self-evaluation was done to determine that the necessary housing, facilities, tools, test equipment, materials, technical data, processes, and trained personnel were available to accomplish the work. If the repair station uses a capabilities list, verify that it follows the procedures in its RSM or QCM for conducting self-evaluations and revising the list in accordance with § 145.215(c).

E. Review Organizational Chart. Verify that the repair station's organizational chart is current and is the same as the CHDO copy. Verify that the chart matches the duties listed in the RSM. Verify that all required information in the eVID is the same as the management listed in the organizational chart.

F. Does Repair Station Need OpSpec Paragraph A449? If the repair station contracts to perform work for a 14 CFR part 121 or 135 air carrier, or an operator defined in 14 CFR part 91, § 91.147, and conducts an anti-drug and alcohol misuse prevention program authorized by OpSpec A449, the ASI should issue OpSpec A449.

NOTE: OpSpec A449 is not issued to repair stations located outside the United States.

G. Verify Authorization to Perform Line Maintenance for Repair Stations Located Within the Domiciled Country. A repair station must have OpSpec paragraph D107 authorizing them to perform line maintenance for certificate holders conducting operations under part 121 or 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under 14 CFR part 129. At location(s) listed in OpSpec D107, verify that the repair station has the facilities, trained personnel, and technical data to perform such line maintenance. The repair station must keep equipment, tools, and material on the premises and under the repair station's control when performing work. The ASI should be able to determine that the repair station used proper tools and equipment for maintenance performed.

H. Verify Geographic Authorization for Repair Stations Located Outside the United States. If the repair station performs maintenance away from the repair station per geographic authorizations, OpSpec paragraph B050 lists these authorizations. The surveillance requirement for geographic authorization must follow the guidance in Volume 2, Chapter 11, Section 3, subparagraph 2-1268C, Surveillance Requirement for Geographic Authorization.

I. Review Exemptions. If the repair station is authorized to conduct operations per the provisions, conditions, or limitations in an FAA exemption, OpSpec A005 would list that exemption. Review each exemption and verify that the repair station complies with its conditions and limitations.

J. Verify Data for Additional Fixed Locations. If the repair station is authorized to have additional fixed locations, OpSpec A101 must list the locations. Verify that the data is correct.

K. Analyze Findings. Evaluate all deficiencies to determine if corrective actions will be required.

L. Conduct Debriefing. Brief the certificate holder on the inspection results. Discuss any deficiencies and possible corrective actions. The ASI can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5.

6-1690 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Parts 43 and 145,
- Advisory Circular (AC) 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals, and
- AC 145-10, Repair Station Training Program.

B. Forms. None.

C. Jobs Aids. Repair Station Inspection Checklist.

6-1691 TASK OUTCOMES.

A. Complete the PTRS Record.

1) Section IV of the PTRS Record. Enter an “E” in the Primary Area block. List all deficiencies, findings, and irregularities noted during the inspection, using the appropriate keywords in the drop-down menu of the Keyword block. For each keyword used, write a brief description of the concern in the Comment block.

2) PTRS Activity Code 3604/5604 (Overall Subsystem Evaluation). In Section I, the Assessment block, select the appropriate word picture number 1 through 10 in the drop-down menu that best describes the condition of the repair station for the completed inspection. Activities closed with an assessment of less than “3” must be mitigated using the risk management process (RMP). Guidance on the use of this tool can be found in Volume 6, Chapter 9, Section 2.

B. Complete the Task. Completion of this task will result in one or more of the following:

- Opening the appropriate Organizational Technical Administration PTRS record to track deficiency corrective actions.
- Sending a letter to the operator documenting all deficiencies and initiating an Enforcement Investigation Report (EIR), if necessary.
- An assessment rating on the PTRS record of 1 or 2 will require the initiation of an RMP record.
- A satisfactory inspection with no deficiencies.

C. Document the Task. Place all supporting documentation in the certificate holder’s office file, including the completed applicable section (activity code 3604/5604) of the Repair Station Inspection Checklist. This checklist must remain in the certificate holder’s office file until an inspection of this activity code is repeated. Update the eVID, as required.

6-1692 FUTURE ACTIVITIES. Schedule and conduct followup inspections, as applicable.

RESERVED. Paragraphs 6-1693 through 6-1706.

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 8 Inspect a Part 145 Repair Station's Housing and Facilities****6-1773 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.**

A. Maintenance: 3657.

B. Avionics: 5657.

6-1774 OBJECTIVE. This section provides guidance for inspecting the adequacy of repair station facilities.

6-1775 GENERAL.

A. Certificated Repair Station (CRS) Accommodations. The CRS must provide facilities to accommodate equipment, materials, and personnel needed to properly perform maintenance, preventive maintenance, alterations of articles, or the specialized services for the rating it receives. When inspecting the repair station, the aviation safety inspector (ASI) should determine which items apply, based on the complexity of the facility and the level of ratings.

B. Line Maintenance Authorization Locations. Repair stations with line maintenance authorization locations must also meet these requirements, except for Title 14 of the Code of Federal Regulations (14 CFR) part 145, § 145.205(d) exempting repair stations from § 145.103(b).

6-1776 COORDINATION REQUIREMENTS. If the repair station has an assigned principal maintenance inspector (PMI) and a principal avionics inspector (PAI), both inspectors should coordinate this inspection with each other.

6-1777 REFERENCES, FORMS, AND JOB AIDS.**A. References (current editions):**

- Part 145.
- Advisory Circular (AC) 43-15, Recommended Guidelines for Instrument Shops.
- AC 43-214, Repairs and Alterations to Composite and Bonded Aircraft Structure.

B. Forms. None.

C. Job Aids. Repair Station Inspection Checklist at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300.

6-1778 PROCEDURES.

A. Review Applicable Information. Before the inspection, the principal inspector (PI) should carefully review:

- 1) Part 145.
- 2) The Repair Station Manual (RSM)/Quality Control Manual (QCM).
- 3) Operations specifications (OpSpecs), to include OpSpec A101, Additional Fixed Locations, if applicable.
- 4) The Safety Performance Analysis System (SPAS). For additional information on SPAS data, see Volume 6, Chapter 9, Section 1, paragraph 6-1630.
- 5) The enhanced Vital Information Database (eVID).
- 6) The certificate-holding district office (CHDO) file.

B. Verify Segregation and Protection of Parts. Verify that each workspace has areas for the proper segregation and protection of parts and subassemblies during all phases of maintenance, preventive maintenance, or alterations. Use the Repair Station Inspection Checklist to verify the following:

- 1) The differences between serviceable and unserviceable components, parts, and material must be clearly distinguishable throughout each process. Repair stations may accomplish this with suitable racks, hoists, trays, stands, or other means of segregation for storing and protecting all articles.
- 2) Repair stations should situate environmentally hazardous or sensitive operations so they do not adversely affect other maintenance or alteration of articles or activities. Examples of these operations are: avionics work, battery maintenance, painting, cleaning, welding, and machining.
- 3) If the facility deals in non-aircraft parts, materials, or maintenance activities outside those normally performed at the repair station, the facility should segregate the aircraft function from other functions to preclude a repair station using unapproved parts or materials on an aircraft.
- 4) Repair stations must segregate articles and materials stocked for installation from articles and materials undergoing maintenance, preventive maintenance, or alteration.

C. Determine Adequacy of Environmental Conditions. The repair station must have sufficient ventilation, lighting, and control of temperature, humidity, and other climate conditions to ensure personnel perform maintenance, preventive maintenance, or alterations to required standards. In addition to reasonable heating, air conditioning, and lighting requirements, verify the following maintenance environmental conditions:

1) Instrument shop environmental conditions are in accordance with manufacturer standards.

2) Composite layup and clean rooms are environmentally and operationally controlled per the Original Equipment Manufacturer (OEM) or other Federal Aviation Administration (FAA)-approved repair process.

3) Storage areas include proper storage for such items as flammables, sealants, chemicals, tires, or tooling.

4) Lighting is adequate for the type of processes performed in each area.

5) While physically inspecting the repair station, verify that facility diagrams and descriptions in the RSM are accurate. This includes any facilities used for spray painting, avionics, engine or airframe repair, or any other work that would have special requirements. Pay close attention to specific information detailed in the manual, such as:

- The type of heating,
- Lighting,
- Equipment location,
- Electrical, and
- Compressed air outlets.

D. Check Human Factors. Repair stations must create a safe working environment that will help prevent personnel injury and damage to customer property. The housing and facilities should provide adequate security and fire protection. The PI should review the repair station's safety procedures. The PI should also consider that poor housekeeping, or improper maintenance of safety devices such as eyewash stations and fire extinguishers, is a good indicator of the repair station's corporate culture.

NOTE: This inspection focuses on how the repair station follows its safety policies and procedures. Outside the PI's jurisdiction are safety and health rules, codes, and regulations, which vary from one state or county to another.

E. Inspect General Housekeeping. Inspect the repair station to determine that general housekeeping will not contaminate component parts and subassemblies undergoing maintenance. Repair stations should maintain all shops in a clean and orderly manner.

F. Analyze Findings. After completing the inspection, record all deficiencies and determine appropriate corrective actions.

G. Conduct Debriefing. Brief the certificate holder on the inspection results. Discuss any deficiencies and possible corrective actions. The ASI can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5.

6-1779 TASK OUTCOMES.**A. Complete the PTRS Record.**

1) Section IV of the PTRS Record. Enter an “E” in the “Primary Area” block. List all deficiencies, findings, and irregularities noted during the inspection, using the appropriate keywords in the drop-down menu of the “Keyword” block. For each keyword used, write a brief description in the “Comment” block about the concern.

2) PTRS Activity Code 3657/5657, Overall Subsystem Evaluation. In section I, the “Assessment” block, select the appropriate word picture number 1 through 10 in the drop-down menu that best describes the condition of the repair station for the completed inspection. Activities closed with an assessment of less than “3” must be resolved using the risk management process (RMP). Guidance on the use of this tool can be found in Volume 6, Chapter 9, Section 2.

B. Complete the Task. Completion of this task will result in one or more of the following:

- Opening the appropriate Organizational Technical Administration PTRS record to track deficiency corrective actions.
- Sending a letter to the operator documenting all deficiencies and initiating an Enforcement Investigation Report (EIR), if necessary.
- Starting an RMP record for assessment ratings of 1 or 2 on the PTRS record.
- A satisfactory inspection with no deficiencies.

C. Document the Task. Place all supporting paperwork in the certificate holder’s office file, including the completed applicable section (PTRS activity code 3657/5657) of the Repair Station Inspection Checklist. This checklist must remain in the certificate holder’s office file until an ASI repeats an inspection of this activity code. Update the eVID, as required.

6-1780 FUTURE ACTIVITIES. Schedule and conduct followup inspections, as applicable.

RESERVED. Paragraphs 6-1781 through 6-1794.

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 16 Inspect a Part 145 Repair Station and its Authorization for Work Away From its Fixed Location****6-1950 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.**

A. Maintenance: 3606.

B. Avionics: 5606.

6-1951 OBJECTIVE. This section provides guidance for authorization and surveillance of a Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair station performing aircraft maintenance away from its fixed location.

6-1952 GENERAL. This section lists circumstances by which personnel of a part 145 repair station may work away from a permanent fixed location:

A. Special Circumstances. When a special circumstance arises that allows work to be done away from the repair station on a temporary basis.

1) Temporary Basis—Short Term. When a special circumstance arises, such as a blown tire, inoperative radio, or navigation equipment changes.

2) Temporary Basis—Extended. When the repair or alteration requires the repair station to make repairs or alterations over an extended period, such as when an aircraft is in extended maintenance and the operator requests that an interior shop install a new interior at that location.

B. Recurring Basis. When it is necessary to perform work on a recurring basis with operations specification (OpSpec) D100, authority. The aviation safety inspector (ASI) can find D100 in Volume 3, Chapter 18, Section 11, Parts A, B, and D Operations Specifications for Part 145 Repair Station.

NOTE: Working away from the repair station is not equivalent to line maintenance or a geographic authorization. Volume 2, Chapter 11, Section 3, International Field Office Procedures for Certificating/Renewing/Amending a Part 145 Repair Station Located Outside the United States and Its Territories and not under a Maintenance Implementation Procedure, provides geographical authorization guidance.

NOTE: Per the circumstances in subparagraphs A1) and A2), the repair station must submit a request to the aviation safety inspector (ASI) for evaluation on a case by case basis. In the case of emergency short term work, repair station

personnel may perform the work when the repair station has a procedure in its repair station manual. In this case, the repair station only needs to notify the ASI.

6-1953 COORDINATION REQUIREMENTS. If the repair station has an assigned principal maintenance inspector (PMI) and a principal avionics inspector (PAI), the two inspectors should coordinate the inspection between them.

6-1954 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Title 14 CFR Part 145;
- Volume 2, Chapter 11, Section 1, Introduction;
- Volume 2, Chapter 11, Section 3; and
- OpSpec D100 (See Volume 3, Chapter 18, Section 11.)

B. Forms. None.

C. Job Aids. Part 145 Repair Station Inspection Checklist at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/.

6-1955 PROCEDURES.

A. Review Applicable Information. Before inspection, the ASI should carefully review:

- 1) Part 145.
- 2) Repair Station Manual (RSM) or Quality Control Manual (QCM) procedures about work away from the station.
- 3) OpSpec D100, if authorized.
- 4) The Safety Performance Analysis System (SPAS).

NOTE: For additional information on SPAS data, see Volume 6, Chapter 9, Section 1, Introduction to Repair Station Risk-Based Oversight System, paragraph 6-1630.

- 5) Enhanced Vital Information Database (eVID).

NOTE: OpSpec D100 will only be issued for those repair stations performing repairs or alterations on a recurring basis. Examples of these recurring repairs and alterations are an engine-on-wing repair, nondestructive testing, fuel tank or fuel cell repair, or mobile maintenance units.

B. Conduct an In-Briefing. Brief the certificate holder on the purpose of the inspection. This in-brief may take place at the beginning of the inspection or at the beginning of each day.

You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5, In-Depth Team Inspection of a Part 145 Repair Station.

C. Inspection. Inspect a repair station performing work away from the fixed location under special circumstances.

1) Temporary Basis - Short Term.

- a) Review the repair station procedures to verify that procedures are in place to:
 - 1. Control such items as equipment, tools, and required forms.
 - 2. Confirm personnel are qualified for required work.
 - 3. Conduct emergency work away from the station.

NOTE: The emergency work procedure should contain an explanation of emergency work away from the station as it relates to the repair station's ratings. The procedures should detail how the repair station will notify the certificate-holding district office (CHDO) and the ASI. If the procedures need approval, the repair station must notify the CHDO and the ASI before dispatching the work crew.

b) The repair station must prepare written documentation that reflects the air carrier's method for the acceptance of all repair station programs. The written documentation must also show the repair station's standard operating procedures (SOP), to ensure the repair station performs all maintenance per the air carrier's Continuous Airworthiness Maintenance Program (CAMP). The repair station must inform the air carrier of all contracted work, and if the carrier's Continuing Analysis and Surveillance System (CASS) auditors must inspect the maintenance provider and correct all findings before work is performed.

NOTE: The ASI may not need to approve each short-term temporary situation, but the repair station must notify the ASI in all situations.

2) Temporary Basis—Extended.

a) Contracted maintenance authorized by the Federal Aviation Administration (FAA) may take several months to complete. This operation does not establish another repair station or a satellite repair station, because it is temporary in nature.

b) Repair station personnel intending to perform maintenance away from their fixed location for extended time periods must evaluate the housing and facilities where they will perform the maintenance to ensure the location meets the intent of part 145.

c) If they need additional time, repair station personnel must submit another request updating the original information and providing any new details on the contracted maintenance.

d) Review the repair station procedures to verify the procedures will:

1. Control such items as equipment, tools, and required forms.
2. Ensure qualified personnel are available for the required project.
3. Provide the CHDO and the ASI with a plan on how and where personnel

will perform the project, to include:

- Controlling of parts;
- Tools;
- Personnel;
- Required inspectors;
- Length of time the project will take; and
- Title of the person in charge of the project.

NOTE: The ASI must approve extended temporary projects before the repair station sends crews, and must have a start date and estimated completion date. The ASI should only approve this request after ensuring repair station personnel can control the project as if they were completing it at the fixed station.

D. Inspect a Repair Station Doing Work Away From the Fixed Location on a Recurring Basis.

1) Verify that the procedure for performing work away from the station on a recurring basis is clearly defined in the RSM or QCM. OpSpec D100 must reference the section and chapter of these procedures in the RSM or QCM.

2) Review all work packages completed away from station to confirm personnel completed the work per the procedures in the RSM or QCM.

a) Verify that the repair station furnished its own tools and equipment.

NOTE: The repair station can have a lease agreement for tools and equipment if the procedures are contained in the RSM.

b) Verify that the repair station maintained a permanent fixed location even if the majority of its work is done at another facility.

3) Verify the RSM contains procedures for the following:

- Transporting tools and equipment to and from the work site without damage;
- Ensuring that only qualified personnel are assigned to perform, supervise, and inspect the work completed; and
- Ensuring that all air carrier maintenance programs are followed.

4) Verify the repair station is following its quality control system, and confirm that:

- All forms are properly completed per the quality control system;
- The repair station follows their calibration system for calibrated tools; and
- All parts are stored and protected as required in the quality control system.

5) Verify that the repair station only uses approved data.

E. Analyze Findings. After completing the inspection, record all deficiencies, and determine the appropriate corrective action(s).

F. Conduct Debriefing. Brief the certificate holder on the inspection results. Discuss any deficiencies and possible corrective actions. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5.

6-1956 TASK OUTCOMES.

A. Complete the PTRS Record.

1) Section IV of the PTRS Record. Enter an “E” in the Primary Area block. List all deficiencies, findings, and irregularities noted during the inspection, using the appropriate keywords in the drop down menu of the Keyword block. For each keyword used, write a brief description of the concern in the Comment block.

2) Use PTRS Activity Code 3606/5606, Overall Subsystem Evaluation. In Section I, the Assessment block, select the appropriate word picture number 1 through 10 in the drop-down menu that best describes the condition of the repair station for the completed inspection. Activities closed with an assessment of less than “3” must be resolved using the risk management process (RMP). ASIs can find guidance on this tool in Volume 6, Chapter 9, Section 2, Repair Station Risk Management Process.

B. Complete the Task. Completion of this task may result in:

- Sending a letter to the operator documenting all deficiencies and requesting corrective action,
- Initiating an Enforcement Investigation Report (EIR), or
- A satisfactory inspection with no deficiencies.

C. Document the Task. Place all supporting paperwork in the certificate holder’s office file, including the completed applicable section (3606/5606 Activity Code) of the Repair Station Inspection Checklist at

http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/. This checklist must remain in the certificate holder’s office file until an inspection of this activity code is repeated. Update the eVID as required.

NOTE: After completing the 3606/5606 surveillance, and the ASI determines the repair station does not perform work away from the station, close the record as follows:

- Enter “C” (closed) in the Status block and “I” (information) in the Results block.

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- In section IV, Comments, enter “E” in the Primary Area block, enter “973” in the Keyword block, and enter “I” in the Opinion Code block with the following statement, “After completing the surveillance it was determined this repair station does not perform work away from the station.”
- Correct the eVID information.
- Close the Section I Assessment block with a number 10 from the drop down menu.

6-1957 FUTURE ACTIVITIES.

- Open the appropriate PTRS record to track deficiency corrective actions.
- An assessment rating on the PTRS record of 1 or 2 will require the initiation of an RMP record.
- Schedule and conduct follow-up inspections as applicable.

RESERVED. Paragraphs 6-1958 through 6-1971.

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 18 Inspect a Part 145 Repair Station's Section 145.205 Maintenance/Alterations Requirements****6-1992 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.**

A. Maintenance: 3618.

B. Avionics: 5618.

6-1993 OBJECTIVE. This section guides the aviation safety inspector (ASI) in inspecting a repair station's compliance with Title 14 of the Code of Federal Regulations (14 CFR) part 145, § 145.205.

NOTE: This section does not apply to repair stations providing maintenance for part 135, § 135.411(a)(1) operators.

6-1994 GENERAL. The repair station may perform maintenance, preventive maintenance, or alterations for air carriers/air operators conducting operations under parts 121, 125, 129, and part 135, § 135.411(a)(2). In these cases, the Repair Station Manual (RSM) or Quality Control Manual (QCM) must describe procedures ensuring that the repair station performs maintenance per the air carrier's Continuous Airworthiness Maintenance Program (CAMP).

A. CAMP Requirements. Each repair station providing maintenance, preventive maintenance, and alterations – whether for air carriers or air operators - must follow the associated CAMP. This requirement will vary depending on the scope of maintenance contracted. A repair station providing maintenance on the complete aircraft during heavy checks would have to address more of the air carrier's requirements than a repair station that maintains only component parts. Repair stations must clearly understand associated requirements.

B. Engine Gearbox. As an example, a repair station may have been contracted to overhaul an engine gearbox. Air carrier "A" may request the repair station use the manufacturer's maintenance manual, but air carrier "B" may have additional maintenance the repair station must follow. Carrier "A" may request the repair station complete all Airworthiness Directives (AD). Carrier "B" may have an alternative method of compliance (AMOC) to the AD, and must provide the additional maintenance information to the repair station. Carrier "C" may have not only an AMOC for the gearbox AD, but may also list the gearbox as a Required Inspection Item (RII). Now carrier "C" must provide the additional maintenance information, and must also train, qualify, and authorize the repair station inspection personnel on the carrier's RII procedures.

C. Air Carrier's Manual. Repair station personnel must make sure they understand all requirements before maintaining an air carrier product. The air carrier's manual must contain the procedure for contracting work. Refer to part 121, § 121.363(a)(2). A contracted repair station

must verify the currency and correctness of data referenced on the purchase order is current and correct, even if the repair station has received a purchase order from the air carrier. Air carriers must ensure that personnel perform maintenance, preventive maintenance, or alterations per that air carrier's manual. Refer to § 121.367(a). The appropriate parts, changes, and additions of the air carrier's manual must be provided to the contracted person. Refer to § 121.137(a), (b), and (c). If the repair station does not have the appropriate parts of the air carrier's manual, it may not be able to determine whether it is complying with § 145.205(a).

6-1995 COORDINATION REQUIREMENTS. Inspection personnel must coordinate with the appropriate air carrier inspector if they find deficiencies during this inspection.

6-1996 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- Title 14 CFR Parts 43, 121, 125, 129, 135, and 145.
- Volume 2, Chapter 11, Section 1, Introduction.
- Volume 3, Chapter 18, Section 3, Part A Operations Specifications—General, OpSpecs A101.
- Volume 3, Chapter 18, Section 4, Part B Operations Specifications—En Route Authorizations and Limitations, OpSpec B050,
- Volume 3, Chapter 18, Section 6, Parts D and E Maintenance OpSpecs/MSpecs/LODAs, OpSpec D107.
- Volume 3, Chapter 42, Section 1, Initial and Continual Oversight and Evaluation of Essential Maintenance and other Contract Maintenance Provider Programs and Contractual Agreements.

B. Forms. None.

C. Job Aids. Part 145 Repair Station Inspection Checklist at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/.

6-1997 PROCEDURES.

A. Review Applicable Information. Before starting the inspection, the aviation safety inspector (ASI) should review the following:

- 1) Parts 43 and 145.
- 2) The RSM or QCM.
- 3) If applicable, OpSpecs A101, B050, and D107.
- 4) The Safety Performance Analysis System (SPAS). For additional information on SPAS data, see Volume 6, Chapter 9, Section 1, Introduction to Repair Station Risk-Based Oversight System, paragraph 6-1630.
- 5) Enhanced Vital Information Database (eVID).

6) Air carrier's approved programs.

NOTE: The repair station may be performing maintenance for multiple air carriers and aircraft types. The ASI should be aware of the variations in each of the air carrier's approved programs to more effectively plan and schedule surveillance.

NOTE: Personnel must perform any maintenance conducted under § 145.205—whether by the repair station or any facility listed on the air carrier's contract maintenance list - per the air carrier's approved procedures. This applies to all subcontracted maintenance.

7) Conduct an in-briefing. Brief the certificate holder on the purpose of the inspection. This in-brief may take place at the beginning of the inspection or at the beginning of each day. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5, In-Depth Team Inspection of a Part 145 Repair Station.

B. Review the Air Carrier/Repair Station Contractual Agreements. Use the Repair Station Inspection Checklist at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/ to verify that the repair station has the necessary information to verify compliance with the air carrier's approved program and maintenance manual.

NOTE: This information may be on the purchase order or other contractual documents from the air carrier. The documents must clearly state how the repair station will perform the requested maintenance along with any other requirements of its program or maintenance manual. If the repair station has applicable sections of an air carrier's maintenance programs or manuals, verify that they are controlled and current for the maintenance to be performed.

1) Verify that the repair station has procedures for:

a) Performing routine and non-routine maintenance, preventive maintenance, and alterations.

NOTE: The air carrier/air operator may have special maintenance requirements that the repair station must follow when performing maintenance under § 145.205.

b) Meeting the air carrier/air operator requirements for periodic inspection and calibration of precision tools, measuring devices, and test equipment.

c) Preventing an inspector's decision regarding any required inspection from being recalled. Only supervisory personnel of the inspection unit or an administrative person with overall responsibility for both the required inspection and other maintenance and alteration functions can override an inspector's decision. This override can only come from the air carrier.

d) Ensuring that required inspections, maintenance, and alterations not completed because of a work interruption are properly completed before the aircraft is returned to service.

e) Completing work forms, job cards, and detailed procedures for performing inspections and other maintenance.

f) Following the air carrier's or air operator's recordkeeping system and retention of the repair station system if so authorized.

g) Meeting the air carrier's training requirements.

2) In addition, if RIIs are required, verify:

a) If the repair station has a list of designated inspection items.

b) How the repair station will perform required inspections.

c) How the air carrier will designate and authorize repair station personnel performing required inspections.

d) If the repair station has procedures, standards, and limits necessary for required inspections, including identifying RIIs within work forms or job cards, if required.

NOTE: The repair station may use all or some of its own procedures for the above items, if authorized by the air carrier.

C. Review Air Carrier Requirements. Review a sample of maintenance records, work orders or purchase orders the repair station processed. Verify if the repair station is following the air carrier's or air operator's approved program, which may include:

- Requirements for airworthiness release;
- Continuity of inspection program;
- Service difficulty reporting requirements;
- Continuing Analysis and Surveillance (CAS) Program;
- RII requirements, such as authorizations or training;
- Duty time limitations;
- Maintenance recording requirements;
- Additional personnel training the air carrier may require;
- Continuity of inspections;
- Approved data; and
- Deviations.

D. Review OpSpec A449. Verify that the repair station's OpSpec A449, Antidrug and Alcohol Misuse Prevention Program, is current and matches the certificate-holding district office's (CHDO) copy. Repair stations located outside the United States are not issued OpSpec A449.

E. Line Maintenance (Repair Station Within the United States). If the repair station performs line maintenance for air carriers, verify that:

- 1) The repair station's OpSpec D107 includes the types of maintenance authorized. It should list the types of aircraft by make and model for each air carrier with, which it has a contract.
- 2) The repair station has a contract for each air carrier listed on the OpSpec, and that the type of line maintenance is listed on the OpSpec.
- 3) The repair station is only providing maintenance at the location listed on its OpSpec.
- 4) The repair station performed the line maintenance per the air carrier's or air operator's manual and approved program.
- 5) The repair station has the necessary equipment, trained personnel, and technical data to perform the line maintenance.

NOTE: Authorization to perform line station maintenance for an air carrier is not a rating. A certificated repair station must have established housing and facilities. Please note that the only waiver granted per § 145.205(d) is that waiving the requirement to provide suitable housing to enclose the largest type and model aircraft for airframe-rated repair stations.

F. Review Geographic Authorization (Repair Station Outside the United States). If the repair station performs maintenance under geographic authorization for air carriers, verify that:

- The repair station's OpSpec B050, Authorized Areas of En Route Operation, Limitations, And Procedures, includes an authorization to perform maintenance and alterations, and that the repair station is working within the authorization.
- The repair station exercised the geographic authorization per the operator's manual and approved program.
- The repair station has the necessary equipment, trained personnel, and technical data to support the geographic authorization.

G. Analyze Findings. After completing inspection, record all deficiencies. Determine the appropriate corrective action(s). Inspectors should forward any areas of noncompliance to the air carrier's CHDO.

H. Conduct Debriefing. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5, In-Depth Team Inspection of a Part 145 Repair Station.

6-1998 TASK OUTCOMES.

A. Complete the PTRS Record.

1) Section IV of the PTRS Record. Enter an “E” in the “Primary Area” block. List all deficiencies, findings, and irregularities noted during the inspection, using the appropriate keywords in the drop-down menu of the “Keyword” block. For each keyword used, write a brief description of the concern in the “Comment” block.

2) PTRS Activity Code 3618/5618 (Overall Subsystem Evaluation). In Section I, the “Assessment” block, select the appropriate word picture number 1 through 10 in the drop down menu that best describes the condition of the repair station for the completed inspection. Activities closed with an assessment of less than “3” must be resolved using the risk management process (RMP). Inspectors can find guidance on this tool in Volume 6, Chapter 9, Section 2, Repair Station Risk Management Process.

B. Complete the Task.

1) Completion of this task will result in one or more of the following:

- Opening the appropriate Organizational Technical Administration PTRS record to track deficiency corrective actions;
- An assessment rating on the PTRS record of 1 or 2 will require the initiation of a RMP record;
- Sending a letter to the operator documenting all deficiencies and initiating an Enforcement Investigation Report (EIR); or
- A satisfactory inspection with no deficiencies.

2) Discuss areas of noncompliance with the repair station management. Document findings in PTRS. Notify the air carrier’s CHDO of the findings.

3) If inspectors determine that the repair station does not perform maintenance or alterations for air carriers, close the record in the following manner after completing the 3618/5618 surveillance:

a) Enter “C” – closed - in the “Status” block and “I” - information - in the “Results” block.

b) In Section IV, Comments, enter “E” in the “Primary Area” block, enter “973” in the “Keyword” block, and enter “I” in the “Opinion Code” block with the following statement: “After completing the surveillance it was determined this repair station does not perform maintenance or alterations for air carriers.”

c) Correct the eVID information.

d) Close the “Section I” assessment block with a number 10 from the drop down menu.

C. Document The Task. Place all supporting paperwork in the certificate holder’s office file, including the completed applicable section (3618/5618 Activity Code) of the Repair Station

Inspection Checklist at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/. This checklist must remain in the certificate holder's office file until an inspection of this activity code is repeated. Update the eVID as required.

6-1999 FUTURE ACTIVITIES. Schedule and conduct follow-up inspections as applicable.

RESERVED. Paragraphs 6-2000 through 6-2013.

VOLUME 6 SURVEILLANCE**CHAPTER 9 PART 145 INSPECTIONS****Section 19 Inspect Part 145 Repair Stations Within the United States****6-2014 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.**

A. Maintenance: 3650.

B. Avionics: 5650.

6-2015 OBJECTIVE. This section guides aviation safety inspectors (ASI) in inspecting Title 14 of the Code of Federal Regulations (14 CFR) part 145 repair stations for Flight Standards Service (AFS) personnel involved in certificate management.

6-2016 GENERAL.

A. Inspection Initiation. This comprehensive, in-depth inspection is the result of a work program requirement, and encompasses all repair station areas of responsibility. The aviation safety inspector (ASI) should verify, while conducting the inspection, that the facility and personnel are qualified to perform the maintenance functions as listed in the operations specifications (OpSpecs) and capability list (CL).

B. Work Away From a Fixed Location. A district office may inspect repair stations working away from a fixed location. The ASI from the geographical office performing the inspection should maintain good communications with the parent facility's certificate-holding district office (CHDO) regarding such items as procedures, manuals, equipment, and personnel.

6-2017 COORDINATION REQUIREMENTS. If the repair station has an assigned principal maintenance inspector (PMI) and a principal avionics inspector (PAI), the two inspectors should coordinate the inspection between them.

NOTE: If an office completes an in-depth inspection, PTRS 3614/5614, instead of the 3650/5650, they will use the "R" items generated from the Repair Station Assessment Tool (RSAT) to record their findings, and should not create new PTRS records. This enables inspectors to close the 3650/5650 "R" item at the end of the inspection.

6-2018 REFERENCES, FORMS, AND JOB AIDS.**A. References (current editions):**

- Title 14 CFR Parts 43, 65, 121, 125, 129, 135, and 145.
- Advisory Circular (AC) 43-15, Recommended Guidelines for Instrument Shops.
- AC 43-207, Correlation, Operation, Design, and Modification of Turbofan/Jet Engine Test Cells.

- AC 65-31, Training, Qualification, and Certification of Nondestructive Inspection (NDI) Personnel.
- AC 145-5, Repair Station Internal Evaluation Programs.
- AC 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals.
- AC 145-10, Repair Station Training Program.
- Volume 2, Chapter 11, Section 1, Introduction.
- Volume 2, Chapter 11, Section 2, Procedures for Certificating Part 145 Repair Stations/Satellites Located Within the United States and Its Territories.
- Volume 2, Chapter 11, Section 3, International Field Office Procedures for Certificating/Renewing/Amending a Part 145 Repair Station Located Outside the United States and Its Territories and not under a Maintenance Implementation Procedure.
- Volume 2, Chapter 11, Section 4, Evaluate a Part 145 Repair Station Manual and Quality Control Manual or Revision.
- Volume 2, Chapter 11, Section 5, Evaluate Part 145 Repair Station Facilities and Equipment.
- Volume 3, Chapter 15, Evaluate Avionics Test Equipment.
- Volume 3, Chapter 42, Evaluate Part 121/135 (10 or More) Contract Maintenance Program, Contract Agreements, and Contracted Work.
- Volume 6, Chapter 11, Section 17, Inspect Avionics Test Equipment.

B. Forms. None.

C. Job Aids:

- Job Task Analysis (JTA) M2.4.18, Inspect 14 CFR Part 145 Foreign Repair Station/Satellite Located Outside of the United States and its Territories.
- Part 145 Repair Station Inspection Checklist at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/.

6-2019 PROCEDURES.

A. Review Applicable Information. Before inspecting, the ASI should carefully review:

- 1) Parts 43 and 145.
- 2) Repair Station Manual (RSM) or Quality Control Manual (QCM).
- 3) OpSpecs.
- 4) The Safety Performance Analysis System (SPAS) and repair station analytical model (RSAM). For additional information on SPAS data, see Volume 6, Chapter 9, Section 1, Introduction to Repair Station Risk-Based Oversight System, paragraph 6-1630.
- 5) Enhanced Vital Information Database (eVID).

6) Certificate-Holding District Office (CHDO) file.

7) Conduct an In-Briefing. Brief the certificate holder on the purpose of the inspection. This in-brief may take place at the beginning of the inspection or at the beginning of each day. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5, In-Depth Team Inspection of a Part 145 Repair Station.

B. Conduct the Inspection. Using the applicable Part 145 Repair Station Checklist(s) at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/, accomplish repair station oversight using an enhanced baseline surveillance, in which PTRS codes 3650 and 5650 are divided into 16 subsystem sections with corresponding PTRS activity codes. This provides a comprehensive surveillance plan for ASIs inspecting repair stations and ensures that they consider all aspects of part 145 repair station operations. Initiate the baseline surveillance by opening the PTRS activity code 3650/5650 to generate the required activity codes:

- Section 4, (3604/5604) Certificate Requirements.
- Section 6, (3605/5605) Records Systems.
- Section 7, (3660/5660) Manuals.
- Section 8, (3657/5657) Housing and Facilities.
- Section 9, (3658/5658) Tools and Equipment.
- Section 10, (3656/5656) Technical Data.
- Section 11, (3608/5608) Quality Control (QC).
- Section 12, (3601/5601) Parts and Materials.
- Section 13, (3659/5659) Personnel Record.
- Section 14, (3661/5661) Training.
- Section 15, (3654/5654) Maintenance Process.
- Section 16, (3606/5606) Work Away from Station.
- Section 18, (3618/5618) Air Carrier and Air Operator Requirements.
- Section 23, (3607/5607) Contract Maintenance Noncertificated.
- Section 23, (3663/5663) Contract Maintenance Certificated.
- Section 24, (3669/5669) Domestic European Aviation Safety Agency (EASA) Supplement Requirements.

1) These 16 subsystems are a complete repair station inspection. Each subsystem may not require surveillance each year. The RSAT in the planning module generates the calendar based risk surveillance requirements for a repair station.

2) The ASI must complete and close all calendar based “R” items generated activity codes applicable to the repair station before closing the 3650/5650 PTRS record.

3) Using a system safety-based approach, the ASI can use the RSAT to plan additional focused inspections according to the risk level identified in each element. An assessment rating on the PTRS record of 1 or 2 will require the initiation of a risk management process (RMP) record.

4) The 3650/5650 may inadvertently generate one or more of the following activity codes if the eVID is not current and correct:

- Work Away from Station (PTRS 3606/5606),
- Contract Maintenance Certificated (PTRS 3663/5663),
- Contract Maintenance Noncertificated (PTRS 3607/5607),
- Air Carrier and Air Operator Requirements (PTRS 3618/5618), and/or
- Domestic EASA Supplement Requirements (PTRS 3669/5669).

NOTE: If the repair station is performing work for an air carrier, the repair station must be able to provide written documentation showing the air carrier's criteria for accepting all repair station programs, and Standard Operating Procedures (SOP), including specific maintenance manuals, and their performance in accordance with the air carrier's continuous airworthiness maintenance procedures.

NOTE: When completing a focused inspection on one of the 16 subsystems, use the PTRS code for that subsystem, not a 3650/5650 code.

C. Analyze Findings. Evaluate deficiencies to determine if they require corrective action.

D. Conduct Debriefing. Brief the certificate holder on the inspection results. Discuss any deficiencies and possible corrective actions. You can find detailed instructions for conducting this briefing in Volume 6, Chapter 9, Section 5.

6-2020 TASK OUTCOMES.

A. Complete the PTRS Record.

1) PTRS Activity Code 3650/5650, Overall Repair Station Evaluation. In Section I, the "Assessment" block, select the appropriate word picture, numbered 1 through 10, from the drop-down menu that best describes the overall condition of the repair station. You may add comments to support the overall evaluation in Section IV. Activities closed with an assessment of less than "3" must be resolved using the RMP. Guidance on the use of this tool can be found in Volume 6, Chapter 9, Section 2, Repair Station Risk Management Process.

2) Close the PTRS record for activity code 3650/5650 using a result code of "I" (Information), unless the PTRS was terminated (T) or canceled (X). Close the PTRS record for each subsystem using the appropriate result code selected from the drop-down list.

3) Due to the complexity of this PTRS requirement, the ASI can transfer one or more of the "R" item surveillance requirements to another Flight Standards District Office (FSDO)/certificate management office (CMO). However, if the ASI transfers them, the transferring ASI must contact the recipient's office to verify the closure of the transferred PTRS before closing the PTRS record for activity code 3650/5650.

B. Complete the Task. Completion of this task will result in one or more of the following:

- Opening the appropriate Organizational Technical Administration PTRS record to track deficiency corrective actions.
- An assessment rating on the PTRS record of 1 or 2, requiring the initiation of a RMP record.
- Sending a letter to the operator documenting all deficiencies and initiating an Enforcement Investigation Report (EIR); or
- A satisfactory inspection with no deficiencies.

C. Document the Task. Place all supporting paperwork in the certificate holder's office file, including the completed applicable section (3650/5650 Activity Code) of the Part 145 Repair Station Inspection Checklist(s) at http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/. This checklist(s) must remain in the certificate holder's office file until an inspection of this activity code is repeated. Update the eVID as required.

6-2021 FUTURE ACTIVITIES. Schedule and conduct followup inspections as applicable.

RESERVED. Paragraphs 6-2022 through 6-2035.