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May 15, 2014

BY E-MAIL TO: ernst.biamby@faa.gov

ORIGINAL BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TRACKING NO: 7011 0110 0001 3259 4256

Ernst Biamby
Principal Maintenance Inspector
Federal Aviation Administration
Flight Standards District Office 19
2895 SW 145th Avenue
Miramar, Florida 33027-4226

Re: Part Specific Training

Dear Mr. Biamby:

It has come to the attention of the Aeronautical Repair Station Association (ARSA) that you are requesting repair stations obtain part specific training from original equipment manufacturers (OEMs) despite the fact that this issue was raised and resolved last year. Please find attached (1) a letter from the Federal Aviation Administration's (FAA) policy division in headquarters providing an answer to an ARSA query on the matter and (2) a memorandum to your office specifying that neither the regulation nor FAA internal guidance require "part specific" training.

Apparently, you believe these letters are no longer effective due to the issuance of a memorandum from John Duncan that previous policy statements are no longer applicable unless in the Flight Standards Information Management System (FSIMS), i.e., Order 8900.1, or otherwise available through the FAA's web site. The fact is that violations of regulations must be based upon 14 Code of Federal Regulations (14 CFR), not policy or advisory material. Whether or not the attached letters still carry weight or authority, the regulations certainly continue to be applicable to both the regulator and the regulated.

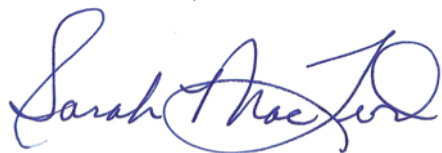
The requirements for personnel knowledge and for approved training programs are set forth quite clearly in 14 CFR part 145. The bottom line is that any individual performing maintenance tasks must (1) be capable of performing those functions and (2) perform the work in accordance with 14 CFR part 43. Your continued insistence that repair stations ensure individuals obtain "part specific training from the OEM" is inappropriate as it is not supported by the regulation or publicly-available policy.

May 15, 2014
Ernst Biamby
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RE: Part Specific Training

It is also our understanding that you are particularly hostile to repair stations on this issue and are specifically derogatory to members of ARSA. Indeed, they fear retaliation merely because I am bringing this matter to your attention. If their fears are based upon verifiable facts, we would request your consideration of this matter in a calm and professional manner so further negative exchanges may be avoided. On the other hand, if your insistence is based upon a particular concern that can be addressed by a best practice or objective standard, ARSA would be happy to engage you on making any improvement to aviation safety.

Your Servant,

A handwritten signature in blue ink that reads "Sarah MacLeod". The signature is fluid and cursive, with the first name "Sarah" being more prominent than the last name "MacLeod".

Sarah MacLeod
Executive Director

Enclosures: July 29, 2013 Memorandum to ASO-230 from AFS-300
July 29, 2013 Letter to ARSA from AFS-300

cc:	Roy Shelton	Roy.shelton@faa.gov
	Sergio Lopez	Sergio.lopez@faa.gov
	Kim O. Davies	Kim.o.davies@faa.gov
	Steven Douglas	Steven.w.douglas@faa.gov
	Darcy Reed	Darcy.d.reed@faa.gov
	Carlos A. Quiles	Carlos.quiles@faa.gov
	John S. Duncan	John.s.duncan@faa.gov



Federal Aviation Administration

Memorandum

Date:

JUL 29 2013

To:

Kim O. Davies, Manager, Flight Standards Southern Region, ASO-230

From:

Steven W. Douglas, Manager, Aircraft Maintenance Division, AFS-300 *SWD*

Prepared by:

Carlos A. Quiles, Aviation Safety Inspector, AFS-340

Subject:

Clarification Around Training Requirements

This memo is in response to your memo, dated June 24, requesting clarification of training requirements. Your question is, "Does a repair station training program, as required by part 145.163 (b) (referencing language in part 65.101 (a) (2) & (5) (i)), requires the training be to a specific part number or just for the particular task?"

Based on the review of applicable rules and guidance, we have determined that if a person understands the manufacturers' current instructions and maintenance manuals, that person is not required to have specific part number/dash number articles.

If you have any questions, please contact Darcy Reed, Manager of the Repair Station Branch, AFS-340, at (202) 385-4277.



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

JUL 29 2013

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

Dear Ms. MacLeod:

This letter is in response to your email, dated May 15, where you requested clarification from a request by FSDO-19/Southern Region regarding part number specific training for repair station personnel authorized to approve articles for return to service.

We have reviewed related Title 14 Code of Federal Regulations (14 CFR) part 65.77, part 65.81, part 145.163, FAA 8900.1 Guidance and Advisory Circular (AC) 145-10 for required training to a specific part number. Based on the review, we have determined that if a person understands the current instructions of the manufacturer, and the maintenance manuals, that person is not required to have specific part number/dash number articles. Therefore, you are correct as there is no requirement for "Manufacturer Training" on specific part number/dash number articles.

If you have any questions, please contact the Darcy Reed, Manager of the Repair Station Branch, AFS-340, at (202) 385-4277.


Sincerely,
Steven W. Douglas
Manager, Aircraft Maintenance Division