



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

800 Independence Ave., S.W.
Washington, D.C. 20591

JUN 13 2014

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

Dear Ms. MacLeod:

In reference to your letter regarding Title 14 Code of Federal Regulations (14 CFR) Section 145.213 guidance, the Aircraft Maintenance Division, Repair Station Branch, has reviewed your recommendations and provides the following response:

ISSUE: You indicated concern over the Federal Aviation Administration's (FAA) internal guidance material not correctly reflecting changes to the relevant regulations. In doing so, you made recommendations for expedited changes to paragraph 6-1844C.7(a) in FAA Order 8900.1, Volume 6, Chapter 9, Section 11 and paragraph 2-1182A.16 in Volume 2, Chapter 11, Section 1.

RESPONSE: Your concerns regarding the discrepancies have been taken into consideration and are being addressed in current revisions to FAA Order 8900.1, as noted below:

- Volume 6, Chapter 9, Section 11, Paragraph 6-1844 C .7 (a) as follows:
 - 7) For performing a final inspection:
 - a) The inspector performing the final inspection for the repair station is:
 - On the roster of inspection personnel, and
 - Meets the requirements of §145.155.
 - 8) Issuing the approval for return to service of an article:
 - a) The person signing off on the accomplishment of the final inspection and issuing the approval for the article to return to service for the repair station is:
 - On the roster of inspection personnel, and
 - Meets the requirements of §145.157.
 - b) The repair station inspects for and certifies airworthiness for the work performed following maintenance, preventive maintenance, or alterations of articles.

- c) The repair station takes corrective action using appropriate data when a final inspection is not satisfactory.

NOTE: When certificated repair stations are outside the United States, inspection personnel do not need certification per part 65. However, the requirements of §145.157 do apply.

The following changes to FAA Order 8900.1 are currently in the revision process. Once the implementation of the Safety Assurance System (SAS) is completed, these revisions will be reflected:

- Volume 6, Chapter 9, Section 13, Paragraph 6-1887B.1 and 2 by removing reference to final inspection when the guidance is specifically speaking to approval for return to service and maintenance release.
- Volume 2, Chapter 11, Section 1, Paragraph 2-1182A.16 as follows:

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) may approve the work performed on an article for return to service, by signing a maintenance release.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact the Repair Station Branch at (202) 385-6435.

Sincerely,



Steven W. Douglas
Manager, Aircraft Maintenance Division