



121 North Henry Street
Alexandria, VA 22314-2903
T: 703 739 9543 F: 703 739 9488
arsa@arsa.org www.arsa.org

July 23, 2014

Delivered by email; read receipt requested: steven.w.douglas@faa.gov

Original delivered by Certified Mail

Return Receipt Requested

Receipt No: 7012 2920 0001 1065 8613

Steven W. Douglas
Manager – AFS-300
Aircraft Maintenance Division
Federal Aviation Administration
National Headquarters
800 Independence Avenue, SW
Washington, D.C. 20553-0002

RE: Airframe Rated Repair Station with Line Maintenance Authorization
Performing Major Repairs and Alterations

Dear Mr. Douglas:

It has come to the association's attention that there is controversy regarding a limited airframe repair station with line maintenance authorization performing major repairs and alterations; the performance of major repairs and/or alterations "under a line maintenance authorization" is alleged to be contrary to [14 Code of Federal Regulations \(CFR\)](#).

It is imperative that this issue be resolved expeditiously. Although the agency has not articulated its position to either the repair station or the association in the matter at hand, we believe the misunderstanding involves the application of [part 145](#) in its entirety.

To begin and end the discussion of what constitutes "line maintenance" with the contradictory and illogical definition contained in [section 145.3\(d\)](#), is not enough. The definition of line maintenance is not a prohibition against any activity; it merely delineates, for the sole purpose of [part 145 certification activities](#), the nature of a forthcoming rating and authorization. Whether an appropriately *rated* repair station with line maintenance *authorization* can perform major repairs and alterations goes beyond that specific paragraph.

Ratings are issued under [section 145.53](#). Although not specified, logically, an airframe or limited airframe *rating* is a prerequisite to issuance of a line maintenance *authorization*. Once issued, the certificate, ratings and operations specifications dictate the repair station's general privileges and limitations under [section 145.201](#).

July 23, 2014
Steven W. Douglas
Page 2

RE: Airframe Rated Repair Station with Line Maintenance Authorization
Performing Major Repairs and Alterations

Additionally, under the FAA's current guidance, line maintenance is only authorized for specified air carriers; therefore the work must be performed under the dictates of [section 145.205](#). Once the *rating* is issued, [section 145.3\(d\)](#) no longer applies; rather, the line maintenance authorized by the repair station's operations specifications must be performed in accordance with the air carrier's program and manual.

It appears that the guidance in [Order 8900.1](#) is incomplete and, in some cases, contradictory on the subject of appropriate *ratings* vis-à-vis line maintenance *authorization*. Therefore, we request the agency confirm that appropriately rated repair stations with line maintenance authorizations may perform major repairs and alterations as directed by the air carrier and [section 145.205](#).

Your Servant,

A handwritten signature in blue ink, appearing to read "Sarah MacLeod". The signature is fluid and cursive, with a large loop at the end.

Sarah MacLeod
Executive Director