



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

JUL 25 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 on airframe rated repair stations with line maintenance authorization performing major repairs and alterations, the Aircraft Maintenance Division has reviewed your request and provides the following response:

**ISSUE:** You indicated concern over FAA Order 8900.1 guidance being incomplete and in some cases contradictory regarding appropriate ratings in relation to line maintenance authorization. You request agency confirmation that appropriately rated repair stations with line maintenance authorizations may perform major repairs and alterations as directed by the air carrier and Title 14 Code of Federal Regulations (14 CFR) section 145.205.

**RESPONSE:** The regulatory definition, applicable to Part 145 contained in 14 CFR section 145.3(d), states:

*Line maintenance means –*

- (1) *Any unscheduled maintenance resulting from unforeseen events; or*
- (2) *Scheduled checks that contain servicing and/or inspections that do not require specialized training, equipment, or facilities.*

Furthermore, 14 CFR section 1.1 defines maintenance as: inspection, overhaul, repair, preservation, and replacement of parts, but excludes preventive maintenance. Alterations are not included in the regulatory definition of maintenance and are therefore not included in the privileges provided for in 14 CFR section 145.205(d).

As noted in your letter, the definition of line maintenance does not preclude an appropriately rated repair station with line maintenance authorization from performing major repairs. However, this is based on the contingency that there are no additional limitations imposed on the repair station by its “Line Maintenance Authorization” in Operations Specifications (OpSpec) paragraph D-107 that may preclude it from performing major repairs.

A prerequisite for issuance of the line maintenance authorization is that the repair station be appropriately certificated and rated – usually with a limited or class airframe rating. A Part 145 repair station, holding the appropriate ratings and limitations, may perform maintenance, preventive maintenance, and alterations, within the provisions of their ratings and limitations for an air carrier, as prescribed in 14 CFR section 145.205. This would include major repairs and alterations, as prescribed in the air carrier’s Continuous Airworthiness Maintenance Program (CAMP). A repair station that elects to perform work, including alterations, at another location must comply with the requirements of 14 CFR section 145.203 *Work performed at another location*, unless it is performing line maintenance under the provisions of 14 CFR section 145.205(d). Again, alteration privileges are not included in that paragraph.

Additionally, 14 CFR section 145.205(d) provides that the FAA may grant approval for a repair station to perform line maintenance for an air carrier, certificated under 14 CFR parts 121 or 135, or for a foreign air carrier (or foreign person operating a U.S.-registered aircraft under 14 CFR part 129) on any aircraft of that air carrier, or person, notwithstanding the housing requirements of 14 CFR section 145.103(b), provided:

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

The provisions of 14 CFR section 145.205(d) allow an appropriately certificated and rated repair station to perform *continuous line maintenance* at the air carrier locations listed on paragraph D-107 of its OpSpecs.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact the Repair Station Branch, AFS-340 at (202) 267-1675.

Sincerely,

  
Steven W. Douglas  
Manager, Aircraft Maintenance Division