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| U.S. Department of Transportation  Docket Operations  West Building Ground Floor  Room W12-140  1200 New Jersey Avenue, SE  Washington, DC 20590-0001 | | Submitted Electronically to: [www.regulations.gov](http://www.regulations.gov) |
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| RE: | Comments to Petition for Rulemaking on 14 CFR §145.221  Docket No. FAA-2014-0767-0001 | |

To Whom It May Concern:

The current revision to 14 CFR §145.221(a), which removes the word "serious" from SDR reporting requirements, will have a substantial impact on this and all [small] repair stations.

Unless the petition is granted, our organization will be required to submit reports for all components that arrive at our shop. Every article has a “failure, malfunction, or defect” – that is why maintenance, preventive maintenance or alteration must be performed!

This repair station processes \_\_ units per week, which equates to over \_\_\_ a year—to file a report on each unit would take at least 15 minutes (if not more since lots of the information requested is not readily available and must be obtained from the customer, who in turn may need to obtain information from the actual operator).

Our organization is currently evaluating the hiring of up to \_\_ additional persons to comply with the expanded reporting. This is an unplanned \_\_ % increase in headcount, simply to process “all failures, malfunctions and defects” on articles received by this repair station. As there are over 4,000 domestic repair stations; if half of those facilities have to add one additional head to their rosters to comply with the rule; at a low wage of $10.00 per hour; that is $41,600,000 in annual economic impact to the repair station community (not calculating required overhead costs such as federal taxes, health benefits and the like). I suspect the number is substantially higher. Using the basic methodology above, if half of all domestic repair stations submit 300 reports per week that boils out to over 31 million reports annually. Again I suspect the number is substantially higher.

I am surprised that the agency removed the word after the issue was vetted in a previous rulemaking AND the word was ADDED due to public comment during that process. Equally concerning is the fact that no mention of the potential change was made in the latest Notice of Proposed Rulemaking (NPRM), thus no chance to comment was afforded and no economic analysis was made regarding this serious change.

The agency’s desire to receive precursors to safety issues through SDR compliance has been eliminated by removing the word “serious” and requiring “all” failures, malfunctions and defects to be reported. Almost all failures, malfunctions and defects in articles are contemplated, covered and fixed by following acceptable methods, techniques and practices as required by 14 CFR § 43.13—if the problem is known and can be fixed, the agency certainly does not need information on it—the agency needs information on new or unusual and serious problems that have not been previously addressed and that will have an effect on the continued safe flight and landing of an aircraft.

The agency agreed that only serious issues needed to be reported when it attempted to remove the word in an earlier rulemaking procedure. What has made it change its mind? That reasoning has to be vetted through another rulemaking process so the parties directly responsible for compliance can understand and comment on the change.

Furthermore, it does not seem the agency’s current system could handle the volume of reports required under the new rule. It cannot possibly have the staffing and other resources necessary to mine the flood of data received for helpful and useful information on precursors to safety issues. Indeed, the agency has internal documents that complain about the current SDR system and how it needs improvement; adding millions of required reports on issues that have already been addressed will not enhance that system.

For the reasons stated in the associations’ petition and above, we request the agency grant the petition and reinsert the word “serious” in 14 CFR § 145.221(a) on a direct final rule basis.

Sincerely,

**[NAME]**

**[TITLE]**

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