

May 15, 2013

Darcy,

I wanted to follow-up on my question earlier today about the clarification request from FSDO-19/Southern Region regarding part number specific training for repair station personnel authorized to approve articles for return to service. In a nutshell, since I am familiar with the matter that gave rise to the request I want to provide additional background information for context.

The question stems from the requirement in § 145.157(a) that “each person authorized to approve an article for return to service under the repair station certificate and operations specifications is certificated under part 65.” Although the language in the rule plainly states that work is being approved under the repair station certificate (i.e., not the individual’s part 65 certificate), confusion led a few folks to the general privileges and limitations section for mechanics in § 65.81. (Since the matter at issue involved the holder of a mechanic certificate with airframe and powerplant ratings (A&P), I will focus only on part 65, subpart D.)

In other words, the part 65 requirement in § 145.157(a) is a pre-requisite for being granted authorization to approve articles for return to service. It does not mean that the authorized individual is exercising the privileges of his A&P – again, the work is being approved for return to service under the repair station certificate.

Nevertheless, misperception of the requirements in § 145.157(a) led to the mistaken conclusion that the general privileges and limitations of § 65.81(a) applied to the individual authorized by the repair station to approve articles for return to service. As such, it was falsely reasoned that part number specific training was required based on the limitation that a certificated mechanic “may not supervise the maintenance, preventive maintenance, or alteration of, or approve and return to service, any aircraft or appliance, or part thereof, for which he is rated unless he has satisfactorily performed the work concerned at an earlier date. If he has not so performed that work at an earlier date, he may show his ability to do it by performing it to the satisfaction of the Administrator or under the direct supervision of a certificated and appropriately rated mechanic, or a certificated repairman, who has had previous experience in the specific operation concerned.” (*Emphasis added*)

The issue should not have gotten this far; the return to service is issued “under the repair station certificate” and repair station training requirements are contained in § 145.163 which, as stated in paragraph (b) of that section, “must ensure each employee assigned to perform maintenance, preventive maintenance, or alterations, and inspection functions is capable of performing the assigned task.” There is no requirement for “manufacturer training” on specific part number/dash number articles.

I really hope this can be resolved quickly.

Best regards,

Craig Fabian  
Vice President of Regulatory Affairs & Assistant General Counsel  
Aeronautical Repair Station Association  
121 North Henry Street  
Alexandria, VA 22314-2903  
T: 703 739 9543  
F: 703 739 9488  
E: [craig.fabian@arsa.org](mailto:craig.fabian@arsa.org)  
W: [www.arsa.org](http://www.arsa.org)

