

ARSA Urges FAA to Clarify Technical Data Requirements

June 10, 2013

On June 9, ARSA submitted [comments](#) to Federal Aviation Administration (FAA) draft order 8300.X providing guidance on requirements for the approval of technical data associated with major repairs or alterations.

Citing Advisory Circular (AC) 120-77, an FAA letter to Erickson Air-Crane, Inc. under the Consistency and Standardization Initiative (CSI), and Title 14 of the Code of Federal Regulations (CFR), ARSA suggested a number of changes to the draft order that would eliminate confusion over the interpretation of the new guidance.

ARSA's comments focused on changing language inconsistent with AC 120-77, the CSI letter, and 14 CFR, requesting clarification of potentially confusing terms, and suggesting the definitions of specific terms be consistent throughout.

To view ARSA's past regulatory advocacy efforts for the aviation maintenance industry, visit arsa.org/arsa-action.