



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

AUG 26 2015

Ms. Sarah MacLeod
Executive Director
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314

Tracking Number: L340-8000.1-P-1508-0292

Dear Ms. MacLeod:

In reference to your July 21, 2015 email on Amended vs. New Certificates, the Aircraft Maintenance Division, Repair Station Branch, has reviewed your request for further clarification and provides the following responses:

ISSUE 1: To summarize your email, you stated that the July 20, 2015 response to your clarification request (of when an amended vs. new repair station certificate was required) was confusing and that FAA Order 8900.1 guidance is conflicting.

RESPONSE: Your earlier recommended guidance revisions were reviewed and taken into consideration. Upon FAA review of those proposals, the FAA found that one particular section of guidance was in need of additional clarification. That change will be incorporated into a future revision of FAA Order 8900.1 Volume 2, Chapter 11, Section 2, paragraph 2-1215B. This paragraph will be revised to state, "If the holder of the repair station sells or transfers assets, the new owner must apply for an amended *or new* certificate in accordance with Title 14 Code of Federal Regulations (14 CFR) section 145.57(b).

In our review of your remaining suggestions, we find that the guidance as currently published is accurate. The guidance within FAA Order 8900.1 is designed for the FAA inspector workforce and inspectors receive initial and recurrent training on the content and processes of repair station certification and surveillance activities, as outlined in the Order. These sections are coordinated with Flight Standards inspectors prior to publication and changes are incorporated into the guidance based on those review comments.

QUESTION 2: In your email you also asked the FAA to "help us understand when the FAA will require a new certification from the new owner that "chooses" to use the assets in the repair station capacity."

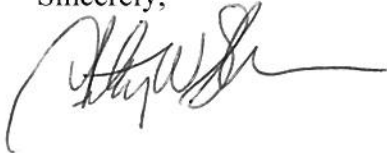
RESPONSE: You indicated in your email the Aeronautical Repair Station Association understands that if a repair station's assets are purchased by a new owner, that new owner has the choice to either apply to "amend" the existing repair station certificate, in order to retain

the existing repair station certificate number, or apply to obtain a “new” certificate number. The guidance in FAA Order 8900.1 is clear that the choice for amending or obtaining a new certificate is determined by the applicant, which is in line with 14 CFR section 145.57(b). Therefore, the Repair Station Branch is not in agreement that the guidance pertaining to the sale or transfer of assets, within FAA Order 8900.1, is conflicting or confusing to FAA inspectors with respect to repair station certification requirements.

Amending the actual Air Agency Certificate and Operations Specifications is required when the current owner of a repair station sells or transfers the assets to another person/entity. Regardless of whether the new owner chooses to obtain a new certificate number or retain the current certificate number, a sale or transfer of assets requires an application for certificate action.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact Patricia K. Williams, Manager, Repair Station Branch, AFS-340, at (202) 267-1684.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy W. Shaver', with a long horizontal flourish extending to the right.

Timothy W. Shaver
Acting Manager, Aircraft Maintenance Division