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August 14, 2015

Delivered by email; read receipt requested: 9-AVS-ICA@faa.gov

Federal Aviation Administration
Mike Monroney Aeronautical Center
ARB, Rm 308
P.O. Box 25082
Oklahoma City, OK 73125-0082

Re: Order 8110.54B and Advisory Circular (AC) 20-ICA, Instructions for Continued
Airworthiness
Request for Extension of Comment Period

To Whom it May Concern:

Pursuant to Title 14 Code of Federal Regulations (CFR) § 11.47, the Aeronautical Repair Station Association (ARSA) respectfully requests the Federal Aviation Administration (FAA) extend the comment period for the two draft documents referenced above. Specifically, the association asks for an additional ninety (90) days from the present Oct. 6, 2015 deadline.

ARSA is the principal association for the international aviation maintenance industry. Its members include aircraft operators and aviation maintenance and manufacturing facilities. As such, ARSA members are directly and significantly impacted by the matters addressed in the draft guidance material.

It is vital that additional time be provided for review of the draft documents and comment development. The need for an extended comment period arises from the importance of the issue to our membership, coupled with effects it may have between and among the individual companies represented by the association.

ARSA has alerted its membership of the proposals and, in return, has received some valuable feedback. Extending the comment period would ensure full participation by the companies most directly impacted.

We look forward to the agency's favorable response and the enhanced opportunity to provide comprehensive and meaningful comments.

Regards,

A handwritten signature in blue ink, appearing to read "Ryan Poteet", is written over a white background.

Ryan M. Poteet, Esq
Regulatory Associate