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May 30, 2007

Mr. David E. Cann
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Aircraft Maintenance Division
Federal Aviation Administration
800 Independence Avenue, S.W.
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VIA E-Mail

RE: U.S. – Canadian MIP, Additional Recommendations

Dear Mr. Cann:

The Aeronautical Repair Station Association (ARSA) has identified additional recommendations for the U.S. – Canadian Maintenance Implementation Procedures (MIP) that require your consideration.

It has come to our attention that some Aviation Safety Inspectors in the field are under the impression that they must approve all procedures referenced in the Canadian Supplement. This includes procedures incorporated by reference used to comply with both Federal Aviation Administration (FAA) and Transport Canada Civil Aviation (TCCA) requirements. The draft guidance, (Notice N8000.RSA Appendix A, Section 2, paragraph 5B.4) is clear that the intent of the MIP is to only approve the Canadian requirements of the Supplement. We feel it would be beneficial if the MIP were consistent with this guidance; therefore, ARSA recommends that paragraph 3.2.2 of the MIP be revised as follows:

“3.2.2 In addition to the other requirements specified in this MIP, a repair station performing maintenance, preventive maintenance, or modifications on aircraft operating in commercial air service under CAR Part IV or CAR Part VII must include in its manual a supplement describing the procedures specified in paragraph 3.2.1, or explain where in the repair station manual those procedures are described, and which procedures, unique to the Canadian requirements, are approved by the FAA.”

A far more overreaching approach ARSA would like the FAA to consider is having the Canadian Supplement accepted rather than approved. This would make the Canadian Supplement consistent with the FAA's handling of the European Aviation Safety Agency (EASA) Supplement and reduce the complexities associated with approval.

Prior to the development of the MIP, the FAA and TCCA have long accepted each others maintenance. With the MIP requiring an approval process, repair stations must

Mr. David Cann
May 30, 2007
Page 2

maintain two different methods of control, acceptance and approval. The FAA must recognize and approve only the sections of the manual applicable to the Canadian requirements. An accepted Canadian Supplement would eliminate these concerns, the inconsistencies with the management of the EASA Supplement and not affect safety.

Again, we believe this information will assist in the annual meeting with the TCCA on the MIP. Should you require any additional information or have any questions, please contact Paul Hawthorne, ARSA's Vice President of Quality.

Sincerely,



for

Marshall S. Filler
Managing Director and General Counsel
Aeronautical Repair Station Association

cc: Rick Domingo