

August 3, 2012

Submitted electronically to: <http://www.regulations.gov>

Docket Management Operations, M-30
U.S. Department of Transportation
1200 New Jersey Ave. SE
Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

RE: Docket No. FAA-2006-26408
Repair Stations; Proposed Rule
Request for Extension of Comment Period

Dear Sir or Madam:

Pursuant to 14 CFR § 11.47, we respectfully request the Federal Aviation Administration (FAA) to extend the comment period for the Notice of Proposed Rulemaking (NPRM) titled "Repair Stations" docketed at FAA-2006-26408.¹ Specifically, we ask for an additional ninety (90) days from the present Aug. 20, 2012 deadline.

The undersigned associations represent a large cross-section of the aviation industry. Our members will be directly and significantly impacted by the changes contemplated in this rulemaking.

It is vital that additional time be provided for NPRM review and comment development. The good cause and need for an extended comment period arises from the scope and extent of the proposed changes, coupled with effects it will have between and among the individual companies represented by the undersigned associations.

Additionally, a final rule will have significant operational and financial ramifications for small businesses. A great many repair stations are small businesses in the true sense. As such, they do not have personnel or departments dedicated to reviewing regulatory changes; their focus, necessarily, is compliance with current regulations and day-to-day operations. More time is needed to reach these small businesses and gather their input on the NPRM.

We have alerted our organizations' members of the proposed changes and, in return, have heard some concerns over the planned modifications. Among those concerns is the impact the proposal would have on customer and repair station interfaces (particularly repair stations with airline clientele), making coordination among and between the undersigned associations invaluable to this rulemaking process.

To the extent possible, each undersigned organization intends to consolidate comments received from the individual member companies, and to further coordinate comments

¹ 77 Fed. Reg. 30054 (May 21, 2012)

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among the group. The value of such comprehensive industry comments will undoubtedly enhance the viability of the final rule.

It is therefore squarely in the public interest to lengthen the comment; doing so will enable the full participation of companies directly impacted.

We look forward to the agency's favorable response on this issue and the enhanced opportunity to provide comprehensive and meaningful comments to the proposed rule.

Sincerely,



Sarah MacLeod
Aeronautical Repair Station Association



David York
Helicopter Association International



Dan Elwell
Aerospace Industries Association



Eric Byer
National Air Transportation Association



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Aircraft Electronics Association



Oakley Brooks
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