



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

800 Independence Ave., SW  
Washington, DC 20591

SEP 12 2006

Ms. Sarah MacLeod  
Executive Director  
Aeronautical Repair Station Association  
121 North Henry Street  
Alexandria, VA 22314-2903

REC'D SEP 15 2006

Dear Ms. MacLeod:

Thank you for your letter bringing to our attention the apparent conflict between the rule and Federal Aviation Administration (FAA) guidance concerning the human factors training requirements.

We agree that Advisory Circular (AC) 145.10 should not be in conflict with FAA Order 8300.10 volume 2, chapter 160. The AC will be revised to remove the requirement that training programs must include human factors training elements. The change will be more in line with the requirements contained in the order. In the interim, a handbook bulletin (HBAW) will be published for our field inspectors to clarify the human factors requirements. The HBAW should be published by September 30, 2006.

Flight Standards believes human factors training is an important next step in promoting aviation safety. The European aviation community has incorporated the human factors training requirements into its regulations. We will be addressing the appropriate changes to Title 14 of the Code of Federal Regulations (14 CFR) section 145.163 to ensure human factors training is included.

Not all repair stations will require the same level of training in human factors. I'm sure you would agree that one size does not fit all. I believe you would also agree all repair stations should include some human factors training to help aviation maintenance move to a higher level of safety.

At this time, human factors is not required to be in the training program. However, I am confident you and your organization feel as strongly as we do that we must promote aviation safety at all levels of maintenance. I would encourage your organization to include human factors as part of a repair station training program even though it is not a mandatory requirement at this time.

Sincerely,

James J. Ballough  
Director, Flight Standards Service