



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

800 Independence Ave. S. W.
Washington, D.C. 20591

OCT 10 2007

Mr. Marshall S. Filler
Managing Director and General Counsel
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903

Dear Mr. Filler:

This is in reply to your September 28, letter regarding the European Aviation Safety Agency (EASA) or Federal Aviation Administration (FAA) only component maintenance release for a component whose design is only approved by one agency. In this case the component will only be certificated by EASA.

Your letter also outlined options for our consideration. Option 1 suggests issuing an FAA form 8130-3 with a statement that it is only valid for EU registered aircraft. Option 2 suggests a qualified dual release with the same statement. Option 3 suggests that the FAA validate the EASA Supplemental Type Certificate.

I understand your client's concerns; however as you stated, EASA will not allow their certificated 145 repair station to exercise privileges beyond the FAA certificate according to the Maintenance Implementation Procedures Guidance (MIP-G). The FAA cannot allow the repair station to add capabilities to their certificate if the component is not an FAA approved design.

If the component is not on the FAA repair station capability list, an FAA form 8130-3 cannot be issued.

Since the part 145 certificate cannot be utilized to maintain EASA design approved components, your client's concern is an EASA issue and should be addressed by them.

Sincerely,



David E. Cann
Manager, Aircraft Maintenance Division

cc: Julian Hall
Wilfred Schultz