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April 23, 2014

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-2012-1058
Drug and Alcohol Testing of Certain Maintenance Provider Employees Located
Outside of the United States Advanced Notice of Proposed Rulemaking
Request for Extension of Comment Period

Dear Sir or Madam:

Pursuant to 14 CFR § 11.47, we respectfully request that the Federal Aviation Administration (FAA) extend the comment period for the Advanced Notice of Proposed Rulemaking (ANPRM) referenced above.¹ Specifically, we ask for an additional one hundred twenty (120) days from the present May 16, 2014 deadline.

The Aeronautical Repair Station Association (ARSA) is the principal association for the international civil aviation maintenance industry. Its members include aircraft owners and operators, aviation maintenance facilities, and individuals certificated by various international aviation authorities and agencies. As such, a final rule concerning drug and alcohol testing of maintenance providers located outside the United States would directly and appreciably affect ARSA members.

Pursuant to the regulation's "good cause" and "public interest" requirements, additional time would ensure proper fact gathering and comment development such that the association could properly and thoroughly respond to the agency's information request. For example, the association is surveying its members to obtain some of the specific data sought, an extension for time to comment will ensure responses are maximized and properly incorporated into the association's comments. It is therefore squarely in the public interest to lengthen the comment period; doing so will enable the full participation of companies and countries directly impacted.

¹ 79 FR 14621 (March 17, 2014)

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RE: Docket No. Docket No. FAA-2012-1058; Drug & Alcohol ANPRM
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We look forward to the agency's favorable response on this issue and the enhanced opportunity to provide comprehensive and meaningful comments to the ANPRM.

Sincerely,

A handwritten signature in blue ink that reads "Crystal Maguire". The signature is written in a cursive, flowing style.

Crystal Maguire
Vice President Operations