



May 21, 2014

Delivered by email; read receipt requested: john.s.duncan@faa.gov  
Original delivered by Certified Mail  
Tracking No: 7012 2920 0001 1065 7869

John S. Duncan  
Director  
Flight Standards Service  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, D.C. 20553-0002

Re: Consistency and Standardization Initiative (CSI)  
Airframe ratings and line maintenance authorizations

Dear Mr. Duncan:

The Aeronautical Repair Station Association (ARSA) and AJETON Inc., apologize for the misunderstanding that resulted from the CSI submitted on April 30, 2014. We have either misconstrued the CSI principles and/or the process or did not explain the situation in a summary that allows review by your office.

As we understand the CSI process, if a certificate holder wishes to question a decision by a local inspector, it may summarize the facts, regulations and guidance for reconsideration by the management of the local office. If that answer is unsatisfactory, the next step is to update the facts, regulations and guidance for submission to the regional expert. If that answer is unsatisfactory, the next step is to update the submission for consideration by the Director of Flight Standards and/or Aircraft Certification and finally the Associate Administrator for Aviation Safety.

The April 30 submission of the above referenced CSI resulted in the attached response from the Los Angeles Flight Standards District Office (LAX FSDO). Included in the submission was evidence that a review of the situation by that office had taken place on September 26, 2011, which resulted in an appeal to the Western Pacific Region on February 18, 2013. A response was received from the Region on April 1, 2013. Therefore, we submitted an appeal to you following the CSI principles available to the public and previously successful submissions.

If we have misconstrued the principles and/or the process for submitting a particular situation to the agency under the CSI, please direct us to the appropriate procedure so we may assure compliance in the future.

Mr. John Duncan

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RE: Consistency and Standardization Initiative  
Airframe ratings and line maintenance authorizations

Since we were previously unclear as to where this particular issue is in the CSI process, we would appreciate an appropriate review by your office on the merits. That should include, at a minimum:

- Fair and careful consideration of the issues.
- A timely and complete response to the request, with:
  - A clear explanation of the FAA's decisions based upon the regulations and associated guidance.
  - A clear explanation of the requirements, alternatives and possible outcomes associated with the request.

Thank you for your time and consideration.

Sincerely,



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

cc:	Jeff Gordon, FSDO Acting Manager	jeffrey.gordon@faa.gov
	Steve Douglas	steven.w.douglas@faa.gov
	Nicholas Reyes	nicholas.reyes@faa.gov
	Jerry M. Mellody	jerry.mellody@faa.gov
	Greg Albert	greg@ajeton.com
	Carol Giles	carol@carolgiles.com

Attachment: May 19, 2014 Response from LAX FSDO



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

Western-Pacific Region  
Los Angeles Flight Standards District Office

15000 Aviation Boulevard, Suite 2000  
Lawndale, CA 90261-1000  
Phone: (310) 725-6600, Facsimile (310) 725-6670

May 13, 2014

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Marshall S. Filler  
Counsel for the Aeronautical Repair Station Association  
121 N Henry St  
Alexandria, VA 22314

RECEIVED  
MAY 19 2014

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Dear Mr. Filler:

Our office has reviewed the Consistency and Standardization Initiative (CSI) submission regarding AJETON Inc.'s Airframe Ratings and Line Maintenance Authorizations. The submission is suggesting changes to national policy and inspector guidance in addition to the re-instatement of AJETON, Inc.'s authorization to work away from their principal base (Operations Specification D-100).

Our office has determined it would be contrary to our guidance to issue AJETON, Inc., D-100.

In accordance with the CSI process, you may address your concurrence or non-concurrence with this decision. Your response must be made in writing within 30 days of the date of receipt of this letter and must include all information and arguments relied upon.

Sincerely,

Jeff Gordon  
Acting Manager  
Los Angeles Flight Standards District Office