

August 25, 2014

Delivered by email; read receipt requested: morgan.ctr.halvorsen@faa.gov

Morgan Halvorsen
Flight Standards Service
Federal Aviation Administration
1625 K Street NW
Suite 300
Washington, DC 20006

RE: Draft Advisory Circular 65-30B
Overview of the Aviation Maintenance Profession
Request for Extension of Comment Period

Dear Sir or Madam:

The Aeronautical Repair Station Association (ARSA) and the Aviation Technician Education Council (ATEC) respectfully request that the Federal Aviation Administration (FAA) extend the comment period for draft Advisory Circular (AC) 65-30B, "Overview of the Aviation Maintenance Profession." Specifically, ARSA and ATEC request a one-hundred and twenty (120) day extension of the current September 10, 2014 deadline.

ARSA and ATEC represent a large cross-section of the aviation industry, including aircraft owners and operators, aviation maintenance facilities, aviation maintenance technician schools, as well as individuals certificated by the FAA. Our members will be directly and significantly impacted by the changes contemplated by this AC.

Given that this AC has not been updated in thirteen years¹, it is critical that additional time be provided for thorough AC review and comment development. ARSA and ATEC intend to collect information from our members to provide quality feedback and effective recommendations to ensure the AC accounts for both current and future industry requirements. We also intend to encourage individual maintenance technicians to submit meaningful comment and insight. Simply stated, we need more time to achieve these objectives.

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

Sincerely,

Crystal Maguire
Vice President Operations, ARSA
Business Manager, ATEC

¹ Advisory Circular 65-30A was issued on Nov. 9, 2001.