



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

JUL 20 2015

Ms. Laura Vlieg
Regulatory Affairs Manager
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903

Dear Ms. Vlieg:

In reference to your letter, dated January 29, 2015, on Repair Station Certificates, the Aircraft Maintenance Division, Repair Station Branch has reviewed your concerns regarding amended vs. new certificates and provides the following responses:

ISSUE 1: You indicated concern over the recent change to Title Code of Federal Regulations (14 CFR) section 145.57(b). You state that the new language within this section brings about confusion, rather than clarity, regarding when amended versus new certification actions are required.

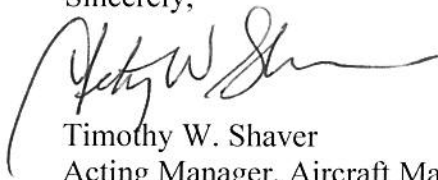
RESPONSE: The change to 14 CFR section 145.57(b) added clarification in regards to selling or transferring assets. Only if the new owner of the repair station *chooses* to operate as a repair station, will the new owner be required to apply for either an amended or new certificate. The option to apply to amend or obtain a new certificate is currently an option in the guidance.

ISSUE 2: You also identified concerns within the Flight Standards Information Management System (FSIMS) regarding changes and amendments to repair station certificates. You indicated disagreement with the term “transfer” being used in FAA guidance “since that action is prohibited in part 145.”

RESPONSE: The term “transfer” will be retained in FAA guidance. We have reviewed the volumes and sections you identified with your letter. We appreciate your suggestions and have initiated revisions to FAA guidance to support the amendments made to the Part 145 regulation.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact Patricia K. Williams, Manager, Repair Station Branch at (202) 267-1684.

Sincerely,



Timothy W. Shaver
Acting Manager, Aircraft Maintenance Division