



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

Office of the Chief Counsel

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

FEB 1 - 2016

RECEIVED
FEB -5 2016

Aeronautical Repair Station Association
Attn: Sarah MacLeod, Executive Director
121 North Henry Street
Alexandria, VA 22314

Re: Aeronautical Repair Station Association Letter Dated December 8, 2015,
Concerning the FAA's Interpretation of the Agency's Regulation Requiring a
Repair Station with a Limited Airframe Rating to Provide Housing to Enclose
the Largest Aircraft Listed on its Operations Specifications Even if the Repair
Station Works Only on Component Parts of the Aircraft

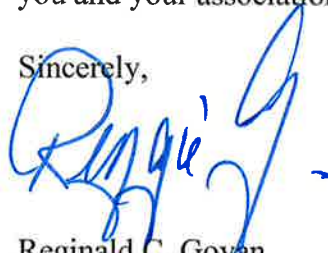
Dear Ms. MacLeod:

Thank you for your letter of December 8, 2015, in which you raised questions concerning how the FAA interprets 14 C.F.R. § 145.103(b), the regulation that requires a repair station with a limited airframe rating to provide suitable permanent housing to enclose the largest type and model of aircraft listed on its operations specifications. You referenced an October 29, 2015 Memorandum issued by the Aircraft Maintenance Division (AFS-300) of the FAA's Office of Flight Standards that confirmed the FAA's March 4, 2015 interpretation of the regulation. It concluded that if a repair station seeks and receives a limited airframe rating, even if it works only on airframe components or parts, it must meet all the housing requirements in § 145.103, including providing suitable permanent housing (a hangar) to enclose the largest aircraft listed on its operations specifications. You stated that "no safety purpose is achieved by requiring component level work be performed in housing suitable for *aircraft* maintenance, simply because the certificate must be issued for an *airframe* rating."

We are aware of this issue based on our review of exemption requests and Consistency and Standardization Initiative (CSI) requests filed on this issue, including the related issue of repair stations that hold limited airframe ratings performing air carrier line maintenance when they do not have a hangar. Because of these concerns, the agency is contemplating rulemaking to make the repair station housing rules better accommodate current industry needs. In addition, we are working with the Flight Standards Service to explore whether there are near-term actions the agency may consider as well.

Again, thank you for your inquiry into this important matter. If you have any questions on this, or would like to discuss these issues further, please contact Tony Janco (AFS-300) on (603) 881-1158, or Edmund Averman of my staff on (202) 267-3147. We look forward to working with you and your association on this effort.

Sincerely,



Reginald C. Govan
Chief Counsel