

February 8, 2016

Delivered by email; read receipt requested: briona.ctr.brown-calhoun@faa.gov

Briona Brown-Calhoun
Federal Aviation Administration
600 Maryland Ave, SW
Suite 610E
Washington, DC 20024-2571

Re: Draft Advisory Circular 43-210A

Dear Ms. Brown-Calhoun:

The undersigned are writing to request the Federal Aviation Administration Flight Standards Service withdraw its update to the referenced draft advisory circular until such time as—

- (1) The agency and industry representatives can meet to discuss the differing aspects of approving data that support major repairs and alterations. Specifically, the industry is requesting that the agency distinguish among and between the types of maintenance providers and operations to accommodate:
 - (a) [Aircraft](#) specific maintenance and alteration actions—
 - (i) Under air carrier rules (i.e., parts [121](#) and [135](#))
 - (ii) Part [91](#) operators and operations
 - (b) Other [product](#) specific maintenance and alteration actions —
 - (i) [Aircraft engines](#)
 - (ii) [Propellers](#)
 - (c) Maintenance and alteration actions taken by and for air carriers on components.
 - (d) Maintenance and alteration actions by and for repair stations on components.
 - (e) Clarity on the definition of [appliance](#) for purposes of § [121.707](#).
- (2) The draft advisory circular can be reconciled with other information and guidance on approving engineering data in support of major repairs and alterations, specifically:
 - (a) Advisory circular [120-77](#) “Maintenance and Alteration Data.”
 - (b) Advisory circular [43-18](#) “Fabrication of Aircraft parts by Maintenance Personnel” (to accommodate the change to section [21.8\(d\)](#)).
 - (c) The technical implementation procedures (TIP) and maintenance annex guide (MAG) associated with the bilateral agreement between the United States and the European Union.

To ensure the agency receives a consolidated position among and between the different stakeholders, the Aeronautical Repair Station Association will hold no fewer than four online listening sessions to discuss the issues and potential resolutions with

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the differing advisory material and guidance associated with approving engineering data in support of major repairs and alterations. To initiate the discussion and resolution, the schedule for the listening sessions will be coordinated among and between the undersigned and the agency.

We look forward to working together to accommodate the different methods used to obtain approval of engineering data associated with major repairs and alterations.

Sincerely,

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