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July 15, 2016

**DELIVERED VIA EMAIL**

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Re: Request for Extended Comment Period  
Draft Advisory Circular 145-9A, Guide for Developing and Evaluating Repair Station  
and Quality Control Manuals

Dear Ms. Renaut:

The Aeronautical Repair Station Association (ARSA) respectfully requests a 90-day extension of the July 20, 2016 deadline for submitting comments on Draft Advisory Circular 145-9A.

The draft AC proposes significant revisions to agency guidance applicable to all repair stations certificated by the FAA under Title 14 of the Code of Federal Regulations. Because every repair station is required to have a repair station manual (RSM) and a quality control (QC) manual, ARSA's members will be directly and appreciably affected by any change in the guidance.

The association is deeply concerned that the proposed guidance is not supported by the plain language of the regulation. Additionally, the proposed changes will have a significant impact on small-to-medium sized enterprises with limited resources to accomplish "best practices," which seems to be the aim of the changes to the guidance material. Therefore, additional time is required to analyze the draft guidance and to develop substantive and meaningful comments.

We look forward to continuing our partnership with the agency.

Best regards,

A handwritten signature in blue ink, appearing to read "Ryan Poteet". The signature is fluid and cursive, written over a white background.

Ryan M. Poteet, Esq.  
Regulatory Affairs Manager