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FILED ELECTRONICALLY

August 25, 2016

U.S. Department of Transportation
Docket Operations
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

RE: Comments to Docket No. FAA-2016-8744

To Whom It May Concern:

The Aeronautical Repair Station Association (ARSA) respectfully submits the following comments to the above-referenced rulemaking. ARSA is devoted to the advancing policy efforts that address the needs of the global civil aviation maintenance industry. Regular members of the association hold repair station certificates issued by the Federal Aviation Administration under 14 CFR part 145. As such, they will be directly impacted by the agency's revision of the housing requirements in 14 CFR § [145.103](#) and potential limited ratings under 14 CFR § [145.61](#).

The association is fully supportive of the agency's actions; the regulations were unclear and needed to be updated. Although the changed rule still does not distinguish between repair stations working on completed aircraft and those working on airframe components, the removal of specified housing for airframe ratings will certainly allow for performance-based compliance.

We would request that the agency consider removing section 145.61(b) in its entirety. The menu of potential limited ratings in that section has hampered the agency's ability to issue an appropriate rating when the work does not fit neatly into the list. It seems that the language in section 145.61(a) alone would be sufficient to ensure appropriate ratings and limitations could be determined without the list in section 145.61(b). Indeed, the agency's reasoning for removing section 145.103(b) is valid for removing section 145.61(b). Paragraph (a) of section 145.61 provides the same performance-basis as does section 145.103(a). The reinstatement of paragraph (13) "Any other purpose for which the FAA finds the applicant's request is appropriate" is merely a specific acknowledgement of the general language in section 145.61(a). Specifically, the phrase "FAA may issue..." indicates that whenever the contemplated work does not fit into any class ratings offered under section [145.59](#), the agency "may" issue any rating it deems appropriate.

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We specifically request that the agency not deem our observation as opposition to the interim final rule, rather, it is merely a suggestion for consideration.

ARSA looks forward to continuing its efforts to support the FAA in its rulemaking activities. Please do not hesitate to contact our office if we can provide further assistance.

Best Regards,

A handwritten signature in blue ink, appearing to read "Sarah MacLeod". The signature is fluid and cursive, with a large loop at the end.

Sarah MacLeod
Executive Director