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November 3, 2016

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Timothy W. Shaver
Manager
Aircraft Maintenance Division
Federal Aviation Administration
950 L'Enfant Plaza, S.W.
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Washington, DC 20024-2123

RE: 14 CFR § 145.213 Guidance

Dear Mr. Shaver:

This letter reiterates the Aeronautical Repair Station Association's (ARSA) requests, dated November 30, 2010, and May 14, 2014, regarding the inconsistency between 14 Code of Federal Regulations (CFR) § [145.213](#) and the agency's internal guidance material.

Specifically –

- (1) At paragraph 6-1843C.7(a)¹ of [Order 8900.1, Volume 6, Chapter 9, Section 11](#), where it states that the person performing final inspections must be certificated under part [65](#)– which is incorrect; and
- (2) The description of “maintenance function” in [Volume 2, Chapter 11, Section 1](#), paragraph 2-1182A is similarly problematic.

Upon reviewing the current guidance, we found that it has not yet been corrected. We kindly request that you immediately update the guidance material to mirror the regulations. If you have any questions, please do not hesitate to contact us.

Respectfully yours,

Kimberly R. Villiers, Esq.
Regulatory Affairs Coordinator

Enclosures:	November 30, 2010, Letter Re: section 145.213 Guidance	2 pages
	May 14, 2014, Letter Re: section 145.213 Guidance	4 pages

¹ Please note our May 14, 2014 letter incorrectly cites to paragraph 6-1844C.7(a) of Order 8900.1, Volume 6, Chapter 9, Section 11. It is, in fact, paragraph 6-1843C.7(a) of the same Order, Volume, Chapter and Section.