



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

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

April 7, 2017

Ms. Kimberly R. Villiers, Esq.
Regulatory Affairs Coordinator
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903

Dear Ms. Villiers:

In reference to your letters referencing Title 14 Code of Federal Regulations (14 CFR) section 145.213 guidance, the Aircraft Maintenance Division, Repair Station Branch, AFS-340, has reviewed your request for information and provides the following responses:

ISSUE: It has come to the association's attention that the Federal Aviation Administration's (FAA) guidance regarding 14 CFR Section 145.213 is incorrect. Specifically, the language in FAA Order 8900.1, Volume 6, Chapter 9, Section 11, paragraph 6-1843 C(7)(a), that indicates the person performing final inspections must be certificated under part 65 and Volume 2, Chapter 11, Section 1, paragraph 2-1182 A(16).

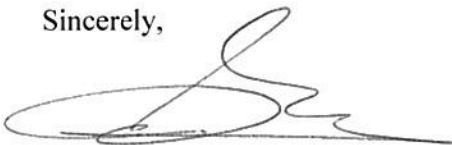
RESPONSE: Your concerns regarding errors found in FAA Order 8900.1, Volume 6, Chapter 9, Section 11 guidance are noted and have been addressed. Since receipt of your letters, FAA guidance has been revised to include the elements of Safety Assurance System (SAS) and has corrected the errors that you discovered regarding final inspection regulation reference and return to service regulation reference. For your reference, the areas of errors discovered are now addressed and corrected in paragraph 6-1843 C(9)(10), which will be published in the coming weeks.

ISSUE: FAA Order 8900.1, Volume 2, Chapter 11, Section 1, paragraph 2-1182 A(16) defines maintenance function which also contains errors relating to the regulatory reference for inspection personnel performing final inspections.

RESPONSE: FAA Order 8900.1, Volume 2, Chapter 11, Section 1 has also been revised to incorporate the elements of SAS. In the latest revision, which will be published in the coming weeks, the definitions currently listed in this section have been removed in entirety. The guidance for contract maintenance functions has been revised and moved to Volume 6, Chapter 9, Section 23. Specifically, paragraph 6-2106 C(2) defines maintenance functions as a Note. The Note states, for the purposes of part 145 repair stations; a maintenance function is a step or series of steps in the process of performing maintenance, preventive maintenance, or alterations.

We appreciate the opportunity to assist you. If you have any additional questions please contact the Aircraft Maintenance Division, AFS-300, at (202) 267-1675.

Sincerely,

A handwritten signature in black ink, appearing to be 'Timothy W. Shaver', written over a horizontal line.

Rolandos Lazaris for
Timothy W. Shaver,
Manager, Aircraft Maintenance Division