



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

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

JUL 26 2017

Ms. Sarah MacLeod
Executive Director
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314

Dear Ms. MacLeod:

Thank you for your May 23 letter cosigned by other aviation associates about Objective Standard for Title 14 Code of Federal Regulations (14 CFR) section 145.211 Reports, the Flight Standards Service, Aircraft Maintenance Division, has reviewed your concerns regarding the compliance and enforcement of section 145.221 in a consistent manner. We believe your reasoning is based off the reporting requirements as it pertains to the word "serious" in conjunction with the broad phrase "failure, malfunction or defect of an article."

The Federal Aviation Administration (FAA) agrees with Aeronautical Repair Stations Association's (ARSA) logic that the term "serious" failure, malfunction, or defect in an article is not well defined or interpreted consistently. It was not the intent of the regulation to report all items received by a repair station that have known and correctable serious failures. We have identified two sections of guidance found in FAA Order 8900.1, Flight Standards Information Management System that contains the basic reporting requirements for Service Difficulty Reports; however, these sections do not clearly explain the methods between serious reportable conditions and non-reportable conditions. To improve standardization within the FAA, these sections have been identified for future revisions and ARSA's comments will be considered.

The FAA does not agree with ARSA's logic that reporting should not be mandated if the design approval holder or the FAA has already mitigated the defect by incorporating corrective action in maintenance data, or by issuing an Airworthiness Directives (AD). The availability of maintenance data has no bearing in this situation. The FAA will use data on occurrences to identify trends that have a negative effect on the continued airworthiness of aeronautical products; and may take action to ensure prompt and appropriate correction of design defects. It is important to receive reports of defects even if a method of repairing them is known and available.

We have sent a copy of this letter to each of the cosigners. We appreciate the opportunity to assist you all. If you have any additional questions please contact the Aircraft Maintenance Division, AFS-300, at (202) 267-1675.

Sincerely,

John S. Duncan
Director, Flight Standards Service