



121 North Henry Street  
Alexandria, VA 22314-2903  
T: 703 739 9543 F: 703 739 9488  
arsa@arsa.org www.arsa.org

March 29, 2019

Delivered by email; read receipt requested: [laura.ctr.booth@faa.gov](mailto:laura.ctr.booth@faa.gov)

Laura L. Booth  
Federal Aviation Administration  
600 Maryland Ave SW  
Suite 610E  
Washington, DC 20024

Re: Draft Advisory Circular 65-30B  
Overview of the Aviation Maintenance Profession  
Request for Extension of Comment Period

Ms. Booth:

The Aeronautical Repair Station Association (ARSA) respectfully requests the Federal Aviation Administration (FAA) extend the comment period for draft Advisory Circular (AC) 65-30B, "Overview of the Aviation Maintenance Profession." Specifically, ARSA requests a ninety (90) day extension of the current April 4, 2019 deadline.

ARSA represents a large cross-section of the aviation industry including holders of both air agency and airman certificates, as well as non-certificated persons, working in aircraft manufacturing and parts production, maintenance and operations. Our members will be directly and significantly impacted by the AC when its final updated version is released – it will be the agency's blueprint for the technical professional careers on which they depend.

When the agency last opened a draft version of this AC for comment in 2014, ARSA and its colleagues at the Aviation Technician Education Council (ATEC) jointly submitted comments providing a rewritten version of the document. Given that the AC had not been rewritten in more than a decade – a lapse that has now grown to 17 years since the November 2001 release of AC 65-30A – the thorough treatment given by the associations to the document was necessary.

Now that an updated draft has been re-released for comment, it is critical that time be provided to carefully consider this version against not only the agency's previous effort but also the industry's. ARSA intends to review the current draft and include association members and industry partners in its feedback. Considering how central workforce development planning has become to maintaining the current and future health of the aviation community, more time would allow us to help the FAA produce a cogent and instructive guidance document illustrating the "profession."

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We look forward to the agency's favorable response on this issue and the enhanced opportunity to provide comprehensive and meaningful comments to the draft AC.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brett Levanto".

Brett Levanto  
Vice President of Operations  
Aeronautical Repair Station Association