



**(A) Interests Represented**

For the last 35 years, the Aeronautical Repair Station Association (ARSA) has represented the worldwide civil aviation maintenance industry—from its global corporations to the small, independent businesses before international governments and their agencies. The membership includes persons and individuals that have applied for and/or hold air agency certificates under part 145, as well as air carrier certificates issued under part 119.

**(B) Interests are Intrinsicly Linked**

The eligibility requirements for repairmen applicants are intrinsicly tied to part 145<sup>2</sup> air agencies and part 119 air carriers.<sup>3</sup> These certificate holders are required to ensure an individual holds the proper qualifications to be assigned certain jobs and/or duties. In addition to technical skills and knowledge, these specific jobs and duties require the individual to hold an appropriate certificate issued under part 65, subpart D or E. The air agency or air carrier and individual may choose to meet those requirements by the certificate holder recommending the qualified individual. Properly recommended individuals become immediately eligible to apply for and be issued a repairman certificate under part 65, subpart E.

Since the petitioners would not qualify to apply for the repairmen certificates without the recommendation of the part 145 employer,<sup>4</sup> the regulations provide ARSA with an abiding and legitimate interest in the matters before the Board.

**(C) ARSA’s Interests Not Adequately Represented by Petitioners**

The repairmen applicants that petitioned the Board to review the Federal Aviation Administration’s denial of the requested certificates are highly competent and fully qualified individuals in the required technical skills and regulatory compliance matters for the position they hold for the air agency employer.

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<sup>2</sup> See, 14 C.F.R. §§ [145.153](#), [145.157](#) and [145.159](#).

<sup>3</sup> See, 14 C.F.R. §§ [121.378](#) and [121.709](#); see, also, 14 C.F.R. §§ [135.435](#) and [135.443](#).

<sup>4</sup> See, 14 C.F.R. § [65.101\(a\)\(4\)](#).



UNITED STATES OF AMERICA  
NATIONAL TRANSPORTATION SAFETY BOARD  
OFFICE OF ADMINISTRATIVE LAW JUDGES  
CERTIFICATE OF SERVICE

I certify that on the 27th day of August 2020, I provided a copy of THE AERONAUTICAL REPAIR STATION ASSOCIATION'S MOTION FOR LEAVE TO INTERVENE IN RE: BENJAMIN JACOB TURNER AND DEREK PATRICK MESSNER-HENNING; DOCKETS CD-30003 AND 30004 by electronic mail, delivery and read receipt requested to:

Office of Administrative Law Judges  
National Transportation Safety Board  
490 L'Enfant Plaza East, S.W.  
Washington, D.C. 20594

Lisa M. Toscano  
Enforcement Division, Western Team  
1200 District Ave  
Burlington, MA 01803

aljappeals@ntsb.gov

lisa.m.toscano@faa.gov  
9-agc300-western-team@faa.gov

Benjamin J. Turner  
b.turner@bridgeraerospace.com

Derek Patrick Messner-Henning  
d.messner-henning@bridgeraerospace.com

Dated August 27, 2020

Printed name Marshall S. Filler

Signature 