

June 22, 2022

Brandon Roberts
Executive Director, Office of Rulemaking, ARM-1
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Re: Part 145 Working Group Special Report

Dear Mr. Roberts,

On behalf of the Aviation Rulemaking Advisory Committee (ARAC), I am pleased to submit the enclosed Special Report from the Part 145 Working Group. At the June 16, 2022, ARAC meeting in Washington, DC, Sarah MacLeod presented an overview of the Special Report. The Special Report responds to a request from the FAA's Flight Standards office to provide recommendations for consideration by ARAC regarding the ability of a repair station applicant or certificate holder to work from multiple locations under a single quality system.

ARAC members who attended the June 16 meeting, in-person and virtually, accepted the report, as presented.

I want to thank the members of the Part 145 Working Group for their timely response to the agency's request – input that can be utilized to adjust its current guidance to accommodate applicants and certificate holders that choose to operate all locations under one certificate or to request satellite repair station certificates for each location.

Lastly, I would highlight and support the working group's call to maintain communication to ensure any changes are aligned with the Working Group's final report.

Sincerely,



David Oord
ARAC Chair

Enclosure: ARAC Part 145 Working Group Special Report

Federal Aviation Administration
Aviation Rulemaking
Advisory Committee

Part 145 Working Group
Special Report

Table of Contents

Executive Summary	3
Task.....	3
Summary of Work Performed.....	4
Businesses with Multiple Locations and Capabilities	4
Application Process	4
Operations Specifications Paragraphs.....	5
Resource Challenges	5
Conclusions.....	Error! Bookmark not defined.
Recommendation.....	6
(I) 145-51-A -- Application for certificate	9
(A) Scope.....	9
(B) Acceptable Means of Compliance	9
(C) Related Regulations	15
(D) Guidance Material.....	15
(II) 145.53-A – Issue of certificate	20
(A) Scope.....	20
(B) Acceptable Means of Compliance	20
(C) Guidance Material.....	20

Federal Aviation Administration
Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report

Executive Summary

The Federal Aviation Administration (FAA) tasked the Aviation Rulemaking Advisory Committee (ARAC) to provide recommendations regarding the agency's guidance on the certification and oversight of all part 145¹ repair stations. The ARAC accepted the task, and the Part 145 Working Group was established to serve as staff to the ARAC and to provide preliminary and final reports with advice and recommendations on the assigned task for the ARAC's review.²

The Preliminary Report was provided to ARAC during its December 10, 2020, meeting at which the report was accepted and forwarded to the FAA for its consideration.

This report provides the results of a special request from the FAA's Flight Standards office to provide recommendations for consideration by ARAC regarding the ability of a repair station applicant or certificate holder to work from multiple locations under a single quality system.

The Working Group reviewed the regulatory language associated with satellite repair station certification as well as the agency's current policy accepting additional fixed locations under a single certificate. After its review of the history, regulation, and guidance material the Working Group believes that an applicant or certificate holder can choose to either establish satellite repair stations, which are each issued a separate certificate, or include multiple locations under a single certificate.

The Working Group is appending the portions of the Acceptable Means of Compliance (AMC) document associated with applying for and being issued certificates that would implement the ability to choose using satellite certificates or adding locations from which work is performed to a single certificate. The Working Group recommends that ARAC forward this Special Report with the recommendations that the agency—

- Remove the word “fixed” from the guidance and operations specifications associated with the locations where work will be performed.
- Use the information in Appendix A to adjust its guidance on the application for and issuance of repair station certificates with multiple locations and satellite certificates.

Task

The Part 145 Working Group applied the same methodology to the special request as is being applied to the regular task. First, to investigate the relationship among and between part 145 regulations, internal and external guidance, and policies to determine where each supports the other.

Second, where misalignments are found, make recommendations for improvements to ensure the internal and external guidance material is—

1. Aligned and compliant with the aviation safety regulations, other laws and executive orders reviewed in (1)(b).
2. Annotated to the applicable rule, other law, or executive order; and,
3. Consistently numbered to ensure a comprehensive relationship between the guidance document and the annotated rule, law, or executive order.
4. Developed to communicate the agency's expectations for compliance to the public and the FAA workforce in a comprehensive and consistent manner and includes the tools necessary to ensure the

¹ All references are to 14 Code of Federal Regulations (CFR) unless otherwise noted.

² See, 83 FR [2715](#) (January 18, 2019) (announcing the formation of the working group and asking for members).

Federal Aviation Administration
Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report

application and evaluation of compliance supports performance-based oversight that takes into account the amount, type, scope and complexity of work performed and the certificate holder's size.

The special report provides a detailed description of the Working Group's review and analysis of this task.

Summary of Work Performed

The Working Group completed a comprehensive compilation of the regulatory material directly related to applications for, issuances, and oversight of air agency certificate holders under 14 CFR part 145.

After collecting the historical documents associated with issuance of certificates authorizing organizations to perform maintenance, preventive maintenance, rebuilding, and alterations on civil aircraft, the Working Group began developing information related to each paragraph of 14 CFR part 145. The methodology for imparting information regarding the obligations of applicants and certificate holders complies with the task by following the numbering system associated with the applicable 14 CFR section and paragraph.

This Special Report contains the information related to applicants and certificate holders that wish to work from more than one location under a single quality system.

Businesses with Multiple Locations and Capabilities

The agency has handled businesses with multiple locations and capabilities in different manners over the years. An application for and issuance of repair station certificates can take several forms if the organization has more than one location from which it conducts business.

When applicants/certificate holders conducting singular operations from multiple sites wish to maintain a sole air agency certificate, the agency uses operations specifications paragraph A101 to authorize continuous work at the addresses listed in Table 1.

Alternatively, if an applicant wishes to conduct operations under multiple certificates, it may apply for satellite locations after the repair station with managerial control is established. In that case, no operations specifications paragraph makes the connection between the repair station with managerial control and its satellites.

The singular problem with the current application of the language "the satellite may not hold a rating not held by the certificated repair station with managerial control." There is nothing in the rule that prohibits the repair station with managerial control from holding all the ratings associated with the capabilities of its satellites. Therefore, the repair station with managerial control would hold all cumulative ratings from its multiple locations. In other words, applicants that choose to obtain satellite repair stations should not be penalized.

Application Process

The application process begins with the agency's review of FAA Form 8310-3 completed by an applicant or certificate holder. The Working Group outlined the process of the application and issuance of a repair station certificate with multiple locations under a single certificate or a repair station with managerial control over separate satellite repair station certificates.

The Appendix to this Special Report provides a snapshot of the Acceptable Means of Compliance document for 14 CFR §§ 145.51(a) and 145.53(a) for the purpose of fulfilling the request of the agency to provide information relative to repair stations with multiple locations.

Federal Aviation Administration
Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report

The Working Group noted that the FAA Form 8310-3 does not contemplate an application for a satellite repair station by providing an option in Block 2. Since a satellite certificate holder must stand on its own with respect to all elements required to obtain a repair station, the Appendix explains the use of the current form for both options. The Final Report will provide recommendations on changes to the FAA Form 8310-3 to track the current regulations more carefully.

Operations Specifications Paragraphs

The operations specifications paragraphs associated with delineating multiple locations of the certificate holder and any limitations in the interest of safety are A-001, A-101 and A-003.

The forms for each of those paragraphs and instructions for their use would need to be adjusted to reflect slightly different usage; examples of the paragraphs are contained in the Guidance Material for 14 CFR § 145.53(a).

A-001 – this paragraph duplicates the information in Block 1 of FAA Form 8310-3. It would be used to associate a satellite to the repair station with managerial control and visa-versa. This information is not being captured today but would enhance the ability of the agency to manage its oversight resources in a more efficient manner.

A101 – this paragraph would be used to document all locations from which the repair station conducts continuous operations under a single certificate with managerial control.

A003 – this paragraph would be used to document safety related limitations to any rating or location for a repair station that performs work at locations in Table 1 of operations specifications paragraph A101. The Working Group believes that a minor format change to this paragraph would accommodate the ratings at each location along with any limitations associated with that rating or location that are required in the interest of safety.

For the repair station with managerial control over satellite certificates, all ratings associated with all certificates would be entered on the primary certificate, and the agency would denote which satellite performed which rating in a similar manner to that recommended for additional locations under a single certificate.

Resource Challenges

The Working Group acknowledges that the management of repair station certificates with multiple locations will need to be addressed by the agency. However, the Working Group notes that the concept of satellite repair stations was to allow an applicant or certificate holder to manage regulatory compliance under a single quality system. Since satellite repair stations are issued separate, standalone certificates, the oversight of those repair stations does not reside with a single Flight Standards District Office. The reality of a single quality system has never been realized because of the disparity in regulatory application among and between the agency's offices with oversight of the individual certificates associated with a repair station with managerial control.

The agency oversees other certificates with multiple locations under a single certificate management office which allows more efficient administration and standardization. A repair station that wishes to manage all locations under a single certificate must explain every difference in procedures among and between its locations in a single manual system. While different locations may have different maintenance and inspection forms to record different maintenance or alteration activities, the *management* of housing,

Federal Aviation Administration
Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report

facilities, tools, tooling, equipment, test apparatus, data, personnel, repair station and quality manual procedures, and records would be under the control of a single location and system.

Recommendation

The Working Group recommends the agency use the information provided in this Special Report to adjust its current guidance to accommodate applicants and certificate holders that choose to operate all locations under one certificate or to request satellite repair station certificates for each location. The Appendix does not contain the word “fixed” before locations where work will be performed.

As the Working Group continues its task, the agency is urged to maintain communications on this Special Report particularly with any questions regarding how changes may impact the ARAC Working Group’s Final Report.

Federal Aviation Administration
Aviation Rulemaking Advisory Committee
Part 145 Working Group Special Report
Appendix A – Acceptable Means of Compliance Excerpt of 14 CFR §§ 145.51(a) and 145.57(a)

This is an excerpt from the Acceptable Means of Compliance document being drafted by the ARAC’s Part 145 Working Group. It addresses 14 CFR §§ 145.51(a) and 145.57(a) with respect to applications for multiple locations under one certificate holder with managerial control and/or for satellite repair station applications. There is no doubt that it is missing information as the Working Group has not completed the task of reviewing all related regulations and requirements

The AMC is organized into five segments as depicted below. This excerpt does not have all the segments completed for each regulation covered by the Special Report. For example, neither section of the regulation has "Additional Information" and 14 CFR § 145.57(a) is missing "Related Regulations." These elements are not necessary to provide the information the agency requested in this Special Report.

Scope explains the requirements associated with the plain language of the section or paragraph.

Acceptable Means of Compliance provides guidance to applicants and the FAA on what is expected to establish compliance.

Guidance Material contains information necessary for the agency to process the application or request

Related Regulations

The sections of the 14 CFR parts 43, 65, and 145 that related directly to the section being reviewed.

Additional Information

Going beyond the plain language of the regulation cannot be demanded by the federal agency; however, explaining, the expectation of international aviation authorities, quality assurance and air carrier customer requirements, and the advantages of best practices is provided in this area of the document.

The AMC will also contain an Acronyms and Definition section that will include:

Acceptable to – the submission by the applicant/certificate holder that can or has shown compliance with the plain language/minimum standard in a cited regulation. The submission may be used by the applicant/certificate holder without action by the agency.

Accepted by – The agency has found the applicant/certificate holder can or has shown compliance with the plain language/minimum standard in a cited regulation.

Approved by – The definition of approved is in 14 CFR section [1.1](#). When a document must be approved, the applicant/certificate holder cannot use or rely upon the contents without written approval from the agency.

With respect to the excerpt, the following are relevant:

Official business name – The legal name of the individual or business ([person](#)) that owns or controls the elements necessary to fulfil the obligations of 14 CFR.

Principal place of business – When used in the application for an air agency certificate under 14 CFR part 145 means the location that holds managerial control from which administrative functions will be mandated.

NOTE: Internal hyperlinks (words and phrases in bold) do not work in this Special Report although they will be active in the final AMC.

(I) 145-51-A -- Application for certificate

(a) *An application for a repair station certificate and rating must be made in a format acceptable to the FAA and must include the following:*

(A) Scope

The form acceptable for an application for repair station certificate under [14 CFR part 145](#) is FAA Form [8310-3](#).

The items listed in subsequent paragraphs are to be provided in a media accessible to the FAA.

(B) Acceptable Means of Compliance

FAA Form [8310-3](#) collects information that is used to determine the initial certification parameters, i.e., ratings and limitations. The application form enables an applicant/certificate holder to provide the information necessary to show compliance with the applicable regulations in [14 CFR, Chapter 1](#).

All blocks must be completed. Information essential to the application and the applicant's business model that does not or cannot fit on the form needs to be provided as attachments.

A cover letter is encouraged to provide the agency with information that may not be required or requested but that is essential to showing compliance and establishing the correct privileges and limitations, procedures, and oversight.

Block 1.a. Official Name of Station. *Insert the repair station official business name. If the applicant is not an individual, then documentation must be provided attesting to the designation of a business name.*

Enter the legal name ([person](#)) of the individual or business that owns or has managerial control over the housing, facilities, equipment, test apparatus, personnel qualifications, data, materials, procedures, and records necessary to fulfill the obligations of [14 CFR parts 43 and 145](#). The legal name will be the primary entity authorized and registered in the state or country associated with the principal place of business' physical location(s) in Block 1.b.

If the applicant conducts business under any other name(s), commonly referred to as "doing business as", enter it/them in Block 1.d.

Individual applicants are to determine if the state in which s/he plans to do business require registration. If the state does not require registration of the sole proprietor, the agency will expect a positive form of picture identification such as a U.S. driver's license, passport, or U.S. Military identification, to be presented in person at the time of application. ASIs will record the information in the "Remarks" block on the back of FAA Form [8310-3](#).

ü An applicant with a single location will enter the legal name authorized and registered with the state or country associated with the principal place of business' physical location in Block 1.b.

ü For applicant/certificate holders with multiple locations:

ü If the application is for additional location(s), enter the business' legal name that has managerial control for all locations.

ü For satellite repair station certificate(s), enter the business' legal name that has or will have managerial control.

If the certificate holder or any of its locations' name changes or the assets of a location are sold, the location with managerial control will be required to apply for an amendment to its certificate, *see*, **145.57-A – Amendment to or transfer of certificate**

Verification of the business' legal name and status must be submitted as an attachment to the application.

Number. *If a precertification number is assigned, insert the number in this block. If the repair station holds a permanently assigned certification number, insert the number in this block.*

Applicants for an original certification, including a satellite, will leave the Number blank.

Applicants for changes to issued certificates, i.e., changes to the name, location(s) (*see*, **145.57-A-1 – Amendment to or transfer of certificate**) or rating, (*see*, **145.57-A-2 – Amendment to or transfer of certificate**) amendments to operational specification paragraphs, (*see*, **145-5-A – Certificate and operations specification requirements**), or changes in housing, (*see*, **145.105-A – Change of location, housing, or facilities**) facilities, (*see*, **145.105-B – Change of location, housing, or facilities**) and asset ownership (*see*, **145.57-B – Amendment to or transfer of certificate**), or other amendments will enter the Number set forth on the Air Agency Certificate.

Block 1.b. Location Where Business Is Conducted. *Insert the address of the physical location of the primary repair station facility. This location will be inspected by the FAA for compliance with 14 CFR 145.*

Enter the physical location of the applicant/certificate holder's principal place of business, which matches the State of Incorporation registration information required by Block 5. For domestic applicants, the address should be one assigned by the U.S. Postal Service unless it has not done so. Applicants must furnish a physical location where the business can be located, i.e., a strip map, or written directions to the applicant's physical location if no official address exists. This information must be included as an attached the application.

The applicant must determine how it wishes to conduct business with and under the privileges and authorities of an issued certificate. There are several choices that impact business opportunities without impinging on the safety objectives of the [14](#) CFR part [145](#) requirements.

If an applicant has only one place from which business will be conducted, it will enter the physical address where business is controlled, managed, and administered.

If an applicant or certificate holder has more than one location from which it wishes to perform activities under a single air agency certificate, it may apply—

- Ü For a single certificate with multiple locations, *and/or*
- Ü A managerial certificate with satellite locations, or
- Ü For a single certificate with multiple locations and satellites.

When applying for a single air agency certificate with multiple locations from which maintenance and alterations will be performed on a continuous basis—enter the principal place from which business is controlled, managed, and administered. In Block 2 mark both “Original Application for Certificate and Rating” and “Other” and enter “Additional locations” in the blank space. Provide the locations where work will be performed on an attachment to the application.

When applying for a satellite certificate, *enter the satellite location*, and in Block 2 mark both “Original Application for Certificate and Rating”, and “Other”, and enter “Satellite” in the blank space.

Federal Aviation Administration—Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report – June 2022

Appendix A – Acceptable Means of Compliance Excerpt of 14 CFR §§ 145.51(a) and 145.57(a)

If applying for both a repair station with managerial control and a satellite, complete an application for each location.

When applying to *add* another location to an existing certificate with managerial control—enter the principal place of business. In Block 2 mark “Change in Location” and enter the additional locations on an attachment to the application.

When the application is for a foreign repair station, the option for satellite locations is curtailed by the country in which the applicant’s principal place of business (*see*, **145.107-C – Satellite repair stations**). Additional locations can be curtailed by the bilateral aviation safety agreement that applies between the United States and the foreign authority. However, applicants that request the application be processed outside the bilateral agreement may be issued for multiple locations with geographic authorizations.

The capabilities, location(s), and the facilities will be described in the repair station manual, *see* **145.103-A-1 – Housing and facilities requirements**.

Block 1.c. Official Mailing Address of Repair Station. *If the repair station mailing address is other than the location in block 1.b., insert the mailing address here. If blocks 1.b. and 1.c. are the same, you may insert the word SAME in block 1.c.*

If the certificate holder’s mailing address changes, it will be required to apply for a change to its certificate, *see*, **145.57-A – Amendment to or transfer of certificate**.

Block 1.d. Doing Business As. *Insert any additional business names the repair station will do business as (DBA). If the applicant chooses to use DBAs, documentation should be available to substantiate authority to use the additional names.*

For states that require the registration of trade names or “doing business as” monikers (DBAs), submit evidence that the company can use the “DBA” in each such state.

If the certificate holder’s name, including any DBAs, changes, it will be required to apply for an amendment to its certificate, *see*, **145.57-A – Amendment to or transfer of certificate**.

Block 1.e. 145.51(e) Statement. *The applicant must indicate whether any person described in part 145.51(e) is or will be involved in the management, control, or have substantial ownership in the repair station. An affirmative answer will require a detailed explanation on a separate attachment page and may or may not result in denial. A fraudulent or intentionally false answer is a basis for suspending or revoking the repair station certificate and any certificate, approval, or authorization issued by the FAA.*

The FAA may deny an application for a repair station certificate if the “person” as defined in [14 CFR § 1.1](#) is:

Ü A person (individual or entity required by Blocks 1.a. and 5) that holds (owns) a repair station certificate in the process of being revoked under [14 CFR part 13](#), i.e., a notice of proposed certificate action has been issued indicating that the agency is seeking revocation (as opposed to suspension). (*See*, **145-51-E-1 – Application for certificate**.)

Ü A person (individual or entity required by Blocks 1.a. and 5) that held (owned) a repair station certificate that *was* revoked, i.e., a final order has been issued against the certificate holder or individual. (*See*, **145-51-E-1 – Application for certificate**.)

Ü An individual that had or will have a controlling or substantial ownership (required by Blocks 1.a. and 5) position of a repair station that has been issued a final order under [14 CFR section 13.20](#) finding s/he materially contributed to the circumstances causing the revocation or causing the revocation process. (See, **145-51-E-3 – Application for certificate.**)

Ü An individual that filled or will fill a managerial position that exercises control over or held the same or similar position with a certificate holder whose repair station certificate is in the process of or was revoked that has been issued a final order under [14 CFR section 13.20](#) finding s/he materially contributed to the circumstances causing the revocation or causing the revocation process of a repair station certificate. Such individuals may not hold a management position required by **145.209-A-1 – Repair station manual contents** (See, **145-51-E-2 – Application for certificate.**)

Block 2. Reason for Submission. *Check the appropriate reason. If the reason is other than one of those listed, check ‘Other’ and explain the reason for submission. If more space is needed an additional page or pages may be attached.*

- *Original Application for Certificate and Rating*

Used when making an application for a *new* certificate, including an application for a satellite repair station certificate.

- *Change in Rating*

Use when wishing to change a rating or to change the language in operations specifications A-003 (that sets forth the rating and any limitations imposed in the interest of safety). (See, **145-5-A – Certificate and operations specification requirements** and **145.57-A-2 – Amendment to or transfer of certificate**)

The application need only contain the information necessary to support the change (see, **145-51-D – Application for certificate**).

- *Change in Location or Housing and Facilities*

Changes in, or the addition to, a physical address of any location, including line maintenance authorizations, will require *prior* approval from the agency (see, **145.57-A-1 – Amendment to or transfer of certificate**, **145.105-A – Change of location, housing, or facilities**, and **145.205-D – Maintenance, preventive maintenance, and alterations performed for certificate holders under parts 121, 125, and 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under part 129**).

Changes in housing and facilities that have a direct impact on the certificate holder’s ability to perform its work in an airworthy manner will require *prior* approval by the FAA. (See, **145.105-B – Change of location, housing, or facilities.**)

- *Change in Name or Ownership*

When the name of the repair station changes, the agency must be notified so it may update the certificate to reflect the information required by Block 1.a. (See, **145.57-A-1 – Amendment to or transfer of certificate**). For changes in name *only*, submit the information provided by the state when it changed the business name.

If the name of an individual owner or partner(s) change, the agency must be notified so it may update its information regarding the individual or partners that is responsible for compliance with [14 CFR part 145](#) as indicated in Block 5. *See, 145.57-A-1 – Amendment to or transfer of certificate*)

A transfer of stock is not considered a change in ownership under this section.

If there is a transfer of *assets*, the new owner must apply for a new or amended certificate (see, **145.57-B – Amendment to or transfer of certificate**).

Ü If the new owner is applying for a new certificate, use “Original Application for Certificate and Rating”.

Ü If the new owner is applying for an amended certificate, use this block (“Change in Name or Ownership”) and “Other” and enter “Amended” in the blank space.

· *Other (Specify)*

This block will be used for:

· Changes in operations specifications paragraphs other than A003 (use “Change in Rating” check box), which are part of the [14 CFR part 145](#) certificate (see, **145-5-A – Certificate and operations specification requirements** and **145.53-A – Issue of certificate**).

Ü Changes in contract maintenance functions (see, **145.217-A-1 – Contract maintenance**).

Ü Satellite locations.

Ü Additional locations.

Ü Amended certificates when assets are transferred (**145.57-B – Amendment to or transfer of certificate**).

Block 3. Ratings Applied For. *The applicant will check the appropriate block for the work intended to be performed. A rating for specialized services is intended to be process based, not article based. If there are any questions regarding what the appropriate rating may be, review section 145.59. If you still are not clear consult with your local FAA Flight Standards District Office.*

The applicant/certificate holder should consider the work it will approve for return to service. The application process evaluates the applicant’s ability to perform the maintenance steps or functions with the housing, facilities, tools, tooling, equipment, test apparatus, data, and knowledgeable personnel it controls directly or through contract.

While the applicant/certificate holder must provide the type, make, or model of articles upon which work will be performed (see, **145-51-A-3 – Application for certificate**), it is the capability to perform the tasks that will be evaluated by the agency.

When a certificate holder performs a specialized service such as non-destructive testing/inspections, welding, heat treat, or plating, in the course of work under its ratings, the applicant/certificate holder need not obtain a separate rating. However, if the applicant/certificate holder is contemplating providing the approval for return to service on that process, it will apply for a limited specialized service rating. The specialized service may be accomplished on various types of articles provided the process, equipment, and personnel accommodate those items.

The applicant/certificate holder may contemplate its ability to contract maintenance steps and functions when it applies for a rating (see, **145.201-A-2 – Privileges and limitations of certificate**). The application requires the applicant to list the processes that it cannot perform within the housing and facilities of the location(s).

The rating issued is always limited by the requirements of [14](#) CFR section **145.201-B – Privileges and limitations of certificate** that mandates the applicant/certificate holder to perform work in accordance with the performance standards in [14](#) CFR part [43](#).

Review **145.59 – Issuance of Ratings** and **145.61-A – Limited ratings** for further information on determining the ratings that would or could be appropriate.

The rating issued may or may not be the one requested.

Block 4. List of Maintenance Functions to be Contracted to Outside Agencies. *The applicant will indicate the functions included in the ratings applied for that will be performed by outside agencies but for which the applicant will be responsible.*

List the maintenance functions, i.e., steps or tasks in the maintenance process, that must be performed by contractors because the applicant or certificate holder does not have in-house capabilities. The list may also include maintenance functions that the applicant or certificate holder chooses to contract for business reasons.

The list need only include contractors for which the certificate holder will use **145.201-A-2 – Privileges and limitations of certificate** to be directly in charge of the maintenance function performed *and* to issue an approval for return to service for the contracted work under **145.201-A-3 – Privileges and limitations of certificate**

The list must be kept current under **145.217-A-1 – Contract maintenance** by completing Block 2 “Other” and this block for any changes in the maintenance functions list.

Block 5. Applicant’s Certification. Name of Owner (include name(s) of individual owner, all partners, or corporation name giving state and date of incorporation). *If more space is needed an additional page or pages may be attached as necessary. Below the printed Certification Statement, the applicant must insert the date of signature, signature, printed name of authorized signer, and title of authorized signer (if not an individual applicant the person signing should provide documentation of signatory authority).*

This Block relates to Block 1.a and must include information on the individual or legal entity, i.e., limited liability company, partnership, or sole proprietor, requesting the certificate.

The signature must be an individual with the authority to bind the legal entity; an owner or one with written authority from the official business who is responsible for and has the authority over the operations that will be conducted under [14](#) CFR parts [43](#) and [145](#). The person provided the authority and responsibility to apply for a certificate usually has control over the operations of the repair station and would normally be designated as the accountable manager (see, **145.151-A – Personnel requirements**).

Individual – a sole proprietor may sign for themselves or must provide a letter authorizing another person to bind the individual or sole proprietorship to the requirements of [14](#) CFR.

Partnership – the names of all individuals and/or legal entities that make up the partnership must be included. If the partnership documents provide the authority for one or more of the partners to bind the

Federal Aviation Administration—Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report – June 2022

Appendix A – Acceptable Means of Compliance Excerpt of 14 CFR §§ 145.51(a) and 145.57(a)

legal entity, those individuals would sign the application. Otherwise, the partnership must provide a duly authorized letter naming the individual signing the application with authority to bind the partnership to the requirements of [14 CFR](#).

The information provided on corporate entities, e.g., limited liability companies, partnerships, and incorporated organizations would match the name registered with the state or country for the location contained in Block 1.b.

Individuals named in the corporate papers registered with the state or county of domicile, e.g., a partner, manager, or director, should provide authority for any other individual to sign the application. Attach the authorization documentation, letter of authority signed by a partner, manager, or director, or a resolution issued by the legal authority, to the application.

(C) *Related Regulations*

145.53-A – Issue of certificate

145.55-C-1 – Duration and renewal of certificate

145.57-A – Amendment to or transfer of certificate

145.57-B – Amendment to or transfer of certificate

145.103-A-1 – Housing and facilities requirements

145.105-A – Change of location, housing, or facilities

145.105-B – Change of location, housing, or facilities

145.107-A – Satellite repair stations

145.163-A – Training requirements

145.205-D – Maintenance, preventive maintenance, and alterations performed for certificate holders under parts 121, 125, and 135, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under part 129

145.207-A – Repair station manual

145.211-C – Quality control system

145.217-A – Contract maintenance

14 CFR § [13.20](#) Orders of compliance, cease and desist orders, orders of denial, and other orders

(D) *Guidance Material*

The purpose of reviewing the information provided by FAA Form [8310-3](#) is to determine the applicant's ability to show compliance with the elements associated with the application.

- For original applications, the review begins the process of certification and should focus on the readiness of the applicant to comply with the requirements needed for the issuance of a certificate with appropriate ratings and limitations as necessary in the interest of safety at the time of demonstration.
- For existing certificate holders, the review need only focus on the changes requested; it is unnecessary to audit all the functions associated with continued compliance in areas unaffected by the requested change.

Federal Aviation Administration—Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report – June 2022

Appendix A – Acceptable Means of Compliance Excerpt of 14 CFR §§ 145.51(a) and 145.57(a)

Block 1.a. Official Name of Station. *Insert the repair station official business name. If the applicant is not an individual, then documentation must be provided attesting to the designation of a business name.*

Confirm that the business name is consistent with the corporate papers attached to the application.

If there is a DBA involved ensure that the information is consistent with the corporate papers attached to the application when reviewing compliance with block 1.d.); the DBA will be entered on operations specifications paragraph A001 – “d. *The certificate holder is authorized to conduct the operations described in subparagraph a under the following other business names:*” and/or in Table 1 of operations specifications paragraph A101 if the DBA is associated with an additional location.

If the application was submitted by an individual, a positive form of picture identification such as a U.S. driver’s license, passport, or U.S. Military identification, will need to be presented in person during application process.

All documents that contain Personally Identifiable Information (PII) will be protected in accordance with FAA Order 1370.121, FAA Information Security and Privacy Program & Policy. All documentation that any part 145 certificate holder or applicant provides that contains PII is on a need-to-know basis. All additional non-FAA documents supplied during the certification process will only be annotated on FAA Form [8310-3](#), the PTRS, and/or any future use of the Integrated Airman Certification and Rating Application (IACRA) and Safety Assurance System (SAS).

Number. *If a precertification number is assigned, insert the number in this block. If the repair station holds a permanently assigned certification number, insert the number in this block.*

Request a precertification number assignment for new applicants.

When the application is for a satellite, the precertification number will be based upon the certificate number of the repair station with managerial control.

For certificate holders, confirm the number entered is correct.

Block 1.b. Location Where Business Is Conducted. *Insert the address of the physical location of the primary repair station facility. This location will be inspected by the FAA for compliance with 14 CFR 145.*

If the U.S. Post Office did not assign a location, the applicant must furnish a physical location where it can be located, it can be by description, i.e., a strip map, or written directions. ASIs should record the identification method in the “Remarks” block on the back of FAA Form [8310-3](#).

The physical location(s) entered on or attached to the application are verified by checking with the applicant, U.S. Post Office, a satellite map application, the airport authority, the owner of the property upon which the operation is located, or in a manner that verifies the agency can find it, perform audits, and determine if it matches the information provided in **145.209-C – Repair station manual contents**. If work will not be performed at the principal place of business, merely verify its existence since surveillance activities will be limited to the administrative functions.

For foreign repair station applicants, satellite repair stations are limited to the country of the repair station with managerial control. For additional locations beyond the country boundaries, the applicant will be issued appropriate geographic authorization in its operations specifications.

If the application will be processed under a bilateral aviation safety agreement that applies between the United States and the foreign authority, the agreement and its maintenance annex or agreement will be followed.

Block 1.c. Official Mailing Address of Repair Station. *If the repair station mailing address is other than the location in block 1.b., insert the mailing address here. If blocks 1.b. and 1.c. are the same, you may insert the word SAME in block 1.c.*

The address should match the corporate information and it is generally where the individual or legal entity will receive official notifications from the agency.

Block 1.d. Doing Business As. *Insert any additional business names the repair station will do business as (DBA). If the applicant chooses to use DBAs, documentation should be available to substantiate authority to use the additional names.*

For states that require the registration of trade names or “doing business as” monikers (DBAs), review the submitted evidence that the company can use the “DBA” in each such state.

A001 authorizes the conduct of operations under business names other than the legal name of the applicant/certificate holder, known as “doing business as” (DBA). Before listing a DBA in A001, inspectors must verify that the DBA is on file with an appropriate state agency. This verification is accomplished by reviewing the information provided with the application.

Block 1.e. 145.51(e) Statement. *The applicant must indicate whether any person described in part 145.51(e) is or will be involved in the management, control, or have substantial ownership in the repair station. An affirmative answer will require a detailed explanation on a separate attachment page and may or may not result in denial. A fraudulent or intentionally false answer is a basis for suspending or revoking the repair station certificate and any certificate, approval, or authorization issued by the FAA.*

Review final orders issued against individuals under [14 CFR part 13.20](#). If any person listed in or on the corporate documents, or in the organizational chart required by 145-51-A-4 – Application for certificate have had a final order issued, the certificate will be denied.

Block 2. Reason for Submission. *Check the appropriate reason. If the reason is other than one of those listed, check ‘Other’ and explain the reason for submission. If more space is needed an additional page or pages may be attached.*

- *Original Application for Certificate and Rating*

The information submitted will be reviewed for compliance with the instructions on the form.

- *Change in Rating*

Review the information only to the extent necessary to determine that the change can be implemented.

- *Change in Location or Housing and Facilities*

When an applicant requests a change to or the addition of a location (housing) to a current certificate, it is to be accompanied by the information necessary to integrate that change or site into its existing policies, procedures, forms, and systems required by **145.206-B – Notification of hazardous materials authorizations**, **145.207-A – Repair station manual**, **145.209 – Repair station manual contents**, and **145.211-A – Quality control system**. Approval is also needed to make changes to existing housing and

facilities that have a direct impact on the certificate holder's ability to perform its work in an airworthy manner. (See, **145.105-B – Change of location, housing, or facilities**).

The certificate holder must provide the information necessary to ensure any work performed during the transition is controlled in a manner consistent with its policies and procedures and can be accomplished in accordance with 14 CFR part 43.

Before approving a transition plan for a change in housing or facilities, the ASI should understand—

ü The general timeline that the change will take place; adjustments to the general need to be communicated to the applicant, and it will need to communicate changes in its schedule as soon as practicable. At a minimum, an understanding of when the location, housing, or facility change will be operational provides the ability to accommodate each other's schedules.

ü The description of the new housing, facilities, and equipment (145.209-C – Repair station manual contents).

ü How any transition of work will be handled—

- When and how the inventory (materials) and equipment will be moved, including protective measures to be taken.

- When and how the work will cease or begin. If adding a location, changing housing or facilities, how any articles in process will be protected during the relocation.

ü Any training that may be required for the addition or change.

When adding an additional location to an existing certificate, use operations specifications paragraph A101 to delineate the new location or any change in a location currently listed in Table 1.

- *Change in Name or Ownership*

Not all changes in name or ownership require action by the agency.

For changes in name(s), review the information provided to determine compliance with Block 1. If the change in partnership or in the names of limited liability partners impact operations specifications paragraph A007, request the new owners or partners provide a letter authorizing the change in the air agency certificate (which includes the operations specifications).

A transfer of stock is not considered a change in ownership under this section.

If there is a transfer of *assets*, the new owner must apply for a new or amended certificate, not a change in name or ownership.

- *Other (Specify)*

This block can be used for:

ü Changes to operations specifications are changes to the air agency certificate. If an applicant is requesting a change, such as adding an exemption, the request will be handled in accordance with the regulation or interest of safety requiring the paragraph.

ü Changes in contract maintenance functions – the original contract maintenance functions are approved during the certification process, *see*, Block 4. Changes to the functions that repair station must or has decided to contract are handled under

Federal Aviation Administration—Aviation Rulemaking Advisory Committee

Part 145 Working Group Special Report – June 2022

Appendix A – Acceptable Means of Compliance Excerpt of 14 CFR §§ 145.51(a) and 145.57(a)

- Ü Addition of another location under an existing certificate.
- Ü Addition of a satellite to a certificate holder with managerial control.

Block 3. Ratings Applied For. *The applicant will check the appropriate block for the work intended to be performed. A rating for specialized services is intended to be process based, not article based. If there are any questions regarding what the appropriate rating may be, review section 145.59. If you still are not clear consult with your local FAA Flight Standards District Office.*

The applicant may apply for a rating or ratings that it may or may not be issued. Appropriate ratings will be issued after an evaluation of compliance with Subparts C, D, and E is complete. The review will ensure the applicant/certificate holder is properly and adequately equipped, competent and able to maintain or alter articles in accordance with the applicable requirements.

More information on ratings will be added later.

Block 4. List of Maintenance Functions to be Contracted to Outside Agencies. *The applicant will indicate the functions included in the ratings applied for that will be performed by outside agencies but for which the applicant will be responsible.*

The list provided by the applicant will be reviewed for the extent and nature of the work to be contracted. The regulation allows the contracting of any work for which the applicant will be rated or has a rating (see, **145.201-A-2 – Privileges and limitations of certificate**).

The need to have the equipment, equipment, tools, and material on the premises and under the applicant/certificate holder's control at the time of certification is alleviated by (1) what it is approved to contract as a maintenance function, and (2) having a contract for the equipment, tools, or material acceptable to the agency.

The agency cannot curtail the contracting of any maintenance function; however, it has prohibited the issuance of an approval for return to service only of a product (see, **145.217-C – Contract maintenance**).

Block 5. Applicant's Certification. Name of Owner (include name(s) of individual owners, all partners, or corporation name giving state and date of incorporation). *If more space is needed an additional page or pages may be attached as necessary. Below the printed Certification Statement, the applicant must insert the date of signature, signature, printed name of authorized signer, and title of authorized signer (if not an individual applicant the person signing should provide documentation of signatory authority).*

Review the business information submitted and ensure the person signing has the apparent authority to act on behalf of the applicant. If there is doubt regarding the authority of the individual, the agency may ask the legal entity for further confirmation.

(II) 145.53-A – Issue of certificate

(a) *Except as provided in § 145.51(e) or paragraph (b), (c), or (d) of this section, a person who meets the requirements of subparts A through E of this part is entitled to a repair station certificate with appropriate ratings prescribing such operations specifications and limitations as are necessary in the interest of safety.*

(A) Scope

Except for applicants that are denied a certificate under **145-51-E – Application for certificate**, applicants that have shown compliance with the requirements of subparts **A** (General), **B** (Certification), **C** (housing, Facilities, Equipment, Materials, and Data), **D** (Personnel), and **E** (Operating Rules) are entitled to a repair station certificate with ratings appropriate to its capabilities. The operations specifications with limitations necessary for safety are issued with and are part of the air agency certificate.

As accommodated by **145-51-B – Application for certificate**, an applicant need not have the equipment required by **145.101 – General** in place at the time of initial certification or rating approval if the applicant has a contract acceptable to the FAA with another person to make the equipment available at any time it is necessary to accomplish the relevant work in accordance with [14 CFR part 43](#).

In addition to the subparts, under **145-51-C – Application for certificate**, an applicant for a foreign repair station must provide a showing of need as required by **145-51-C-1– Application for certificate**, and that the appropriate fee has been paid (*see, 145-51-C-2 – Application for certificate*).

(B) Acceptable Means of Compliance

Submission of the elements contained in the 145-51-A -- Application for certificate and a showing of capability during a demonstration phase if required.

(C) Guidance Material

The applicant is entitled to a certificate when compliance to the minimum standards of [14 CFR](#) is shown.

Ratings information to be added.

When issuing certificates for repair stations with satellites or multiple locations, the certificate holder with managerial control will be issued all the ratings held by its individual satellites or locations.

Therefore, when adding locations or satellites—the repair station with managerial control will need to have its air agency certificate and operations specifications updated to add the rating(s) and location(s).

Sample operations specifications paragraphs follow that delineate how the agency will record the relationships between repair stations wishing to have multiple ratings and locations under a single certificate with managerial control or a repair station with managerial control with satellite locations. Either way, the agency can ensure compliance with all safety attributes associated with 14 CFR parts 43 and 145.

A-001 – this paragraph duplicates the information in Block 1 of FAA Form 8310-3. It is used to associate a satellite to the repair station with managerial control and visa-versa.

U.S. Department of Transportation
Federal Aviation Administration

Operations Specifications

A001 Issuance and Applicability

HQ Control

HQ Revision

a. These operations specifications are issued to NAME, a repair station located in the United States, pursuant to 14 CFR part 145, § 145.53. The repair station certificate holder shall conduct operations in accordance with 14 CFR part 145 and these operations specifications

The certificate holder's locations:

Primary Name
 Address

Satellite Location Name
 Address

Satellite Location Name
 Address

b. The holder of these operations specifications is the holder of certificate number ENTER and shall hereafter be referred to as the "certificate holder".

c. These operations specifications are issued as part of this repair station certificate and are in effect as of the date approval is effective. This certificate and these operations specifications shall remain in effect until the certificate for a repair station that is located in the United States is surrendered and accepted for cancelation, suspended, or revoked.

d. The certificate holder is authorized to conduct the operations described in subparagraph a under the following other business names:

Primary Names

Satellite Location Name
 Address

Satellite Location Name
 Address

Delegated authorities:

A101 – this paragraph is used to document all locations from which the repair station conducts continuous operations under a single certificate with managerial control.

U.S. Department of Transportation
Federal Aviation Administration

Operations Specifications

A101 Additional Locations

HQ Control
HQ Revision

a. The holder may perform work at the locations listed in Table 1 below, provided it has the facilities, material, equipment, and technical personnel to perform the work authorized:

Table 1

Additional Locations				
Address	City	State	Country	Postal Code
Name Address				
Name Address				

- b. This authorizes the certificate holder to use multiple locations to perform its operations under a single certificate.
- c. This authorization does not constitute work performed at additional location(s) outside the domiciled country.
- d. The certificate holder may perform continuous operations at the facilities listed in Table 1 above.
- e. All the authorizations and exemptions authorized for the certificate holder apply at these locations, as applicable.

A003 – this paragraph is used to document safety related limitations to any rating or location listed in operations paragraph A001 or in Table 1 of operations specifications paragraph A101.

For the repair station with managerial control over satellite certificates, all ratings associated with all certificates is entered on the primary air agency certificate, denoting which satellite performed which rating in the same manner for additional locations under a single certificate.

U.S. Department of Transportation
Federal Aviation Administration

Operations Specifications

A003 Ratings and Limitations

HQ Control
HQ Revision

The certificate holder is authorized the following Ratings and/or Limitations:

Class Ratings **Location(s)**

Airframe Class 1: Composite Construction of Small Aircraft Name
Address

Limited Ratings

<u>Rating</u>	<u>Location(s)</u>	<u>Manufacturer</u>	<u>Make/Model</u>	<u>Limitations</u>
Accessory	All	See capability list	See capability list	Wheels and Brakes
Airframe	Name Address or <i>satellite certificate number</i>	See capability list	See capability list	Seats
Powerplant	Name Address or <i>satellite certificate number</i>	GE	GE 90	None

Limited Rating – Specialized Services

<u>Rating</u>	<u>Location</u>	<u>Specifications</u>	<u>Limitations</u>
Welding	Name Address or <i>satellite certificate number</i>		