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Comment submitted to docket: <http://www.regulations.gov>

Federal Aviation Administration  
Office of Rulemaking  
800 Independence Avenue, SW  
Washington, DC 20591-0001

RE: Docket No. FAA–2023–1240  
Comments on Petition for Exemption: Gregory D. Kruse

The Aeronautical Repair Station Association (ARSA) is devoted to the worldwide civil aviation maintenance industry—from its global corporations to small, independent businesses. ARSA members are located on five continents and in nearly 20 countries. It is deeply committed to ensuring qualified technical personnel are given every chance to join the aviation industry and earn a certificate from a civil aviation authority.

The petitioner’s desire to become a certificated mechanic is commendable; pursuing a career in aviation needs to be encouraged. There are thousands of aviation jobs that need individuals who face and overcome obstacles and who are willing to petition the federal government when rules seem unfair.

Unfortunately, the petition is misdirected. The plain language of 14 CFR § 65.71(a)(2) does not limit the aids an applicant may use to read the English language; many certificated mechanics wear glasses, for example. Therefore, the petition should be denied as it is not required to comply with the cited section of 14 CFR.

Rather, the petitioner must apply for an exemption from 14 CFR § 65.79, which requires “demonstrating...the skill elements...contained in the [Aviation Mechanic General, Airframe, and Powerplant Airmen Certification Standards](#)” (the Standard). The ability to read rules and regulations through the technology and software referenced in the petition may work. However, the ability to find, read, compare, and apply the myriad maintenance manuals, standards, specifications, drawings, and other data required to be issued a mechanic certificate is extremely problematic.<sup>1</sup>

Unlike the petitioner’s assumption that an aviation mechanic’s work involves “repetitive mechanical procedures [that] will become just like riding a bike”, applicants must demonstrate, and certificate holders must maintain capability on a multitude of skills. The strictness and variety of the Standard’s demonstrations ensure the individual holds the basic knowledge as well as the physical skills and mental capability to find and appropriately rectify multiple and assorted technical issues during aviation maintenance.

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<sup>1</sup> The Aviation Mechanic General, Airframe, and Powerplant Airmen Certification Standards is replete with examples of the need to find, read and compare documents. One example: Subject A. Fundamentals of Electricity and Electronics, page 2, Skills AM.1A.S7 and S9.

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A critical and fundamental task to continued airworthiness is the performance of inspections. Not only does the Standard require a demonstration of visual inspection capability,<sup>2</sup> but also the ability to inspect an aircraft for compliance with an Airworthiness Directive (AD).<sup>3</sup> Almost every AD begins with the requirement to perform a visual inspection; many require a detailed visual inspection to determine whether the unsafe condition exists and if so, whether it can be repaired. While technology is advancing rapidly, the agency does not accept replacements for a mechanic's vision and knowledge to determine corrective actions in accordance with an aviation safety mandate.

The petition claims that “mechanics in this field should have checks and balances to ensure that everyone is doing their job correctly.” A mechanic's certificate provides qualified and capable individuals the privilege and authority to perform *or supervise* maintenance, preventive maintenance, and alteration tasks on civil aircraft.<sup>4</sup> The certificated mechanic is required to inspect *all* work performed or supervised before completing a maintenance record with a signature and type of certificate. The mechanic's signature certifies the work was performed satisfactorily.<sup>5</sup> In other words, the mechanic is the check and balance that assures “everyone is doing their job correctly.”

There are literally hundreds of other jobs and positions that would allow the petitioner to pursue an exciting and fulfilling career in aviation. However, until technology can literally and figuratively replace human vision and judgment, individuals that lack or have lost the ability to perform visually under the required skill standards cannot be issued a mechanic certificate.

Your Servant,



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<sup>2</sup> See, the Aviation Mechanic General, Airframe, and Powerplant Airmen Certification Standards, page 17, Skills, AM.I.K.S3.

<sup>3</sup> Ibid at AM.I.K.S5.

<sup>4</sup> See, section 65.81(a).

<sup>5</sup> See, section 43.9(a)(4), which requires a mechanic to determine that the work has been performed satisfactorily before issuing an approval for return to service, as is allowed by section 43.7(b).