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July 29, 2024

Original Delivered by: [regulations.gov](https://www.regulations.gov)

Courtesy copy by electronic mail: henry.trammel@faa.gov

RE: Docket No. [FAA-2024-1497](#)
Comments – Agency Information Collection Activities: Clearance of a Renewed
Approval of Information Collection: Certification of Repair Stations

Dear Mr. Trammel,

The Aeronautical Repair Station Association (ARSA) represents holders of air agency certificates issued under title [14](#) Code of Federal Regulations (CFR) part [145](#). The association's team has decades of experience working with certificated repair stations to manage the paperwork burden associated with obtaining and maintaining FAA certification. These comments reflect that experience along with analysis of the full burden of the recordkeeping requirements associated with applying for and holding a repair station certificate.

To produce these comments, the association reviewed the supporting statements provided by the FAA to OIRA via its [previous reviews](#) of the subject information collection. As of the due date of the *Federal Register* notice requesting public comments, the agency had not published its statement associated with the current review.

The [Paperwork Reduction Act](#) (PRA) defines "burden" to include "transmitting or otherwise disclosing the information" required by an information collection.¹ The burden associated with an application for an air agency certificate under [14](#) CFR part [145](#) includes the disclosure of information beyond the "axiomatic"² completion of the boxes on the FAA Form [8310-3](#) according to its instructions.

The FAA's assessment of the burden associated with application for a repair station certificate focuses entirely on the completion of Form [8310-3](#). The agency considers the public time burden *only* in terms of the drafting, confirmation, and submission of the information gathered on this form: basic applicant information, reasons for submission, rating application, maintenance functions to be contracted to outside agencies, and certification by individual name, date, and signature. In the agency assessment performed in [2019](#), the related burden ranged from 6.25 hours for a small repair station (1-10 employees) to 18.25 hours for a large one (more than 199 employees).

¹ P.L. 104-13 § 3502(2).

² "The FAA reviews the information collected on the FAA Form 8310-3 to assist the applicant in obtaining repair station certification. As the blocks indicate, they are *axiomatic*, basic and ease of burden in completing." (Emphasis Added.) See "[Supporting Statement A](#), Certification of Repair Stations, Part 145 of Title 14, CFR, OMB 2120-0682"; 2019.

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As noted in the FAA’s 2019 supporting statement, the Form 8310-3 – and the agency’s [Safety Assurance System](#) (SAS) Portal, created to electronically support the application submission process – provides the “format acceptable to the FAA” required by § 145.51(a). Unfortunately, the agency then ignores the remainder the paragraph’s paperwork-related requirements, including—

- (1) A repair station manual acceptable to the FAA as required by § 145.207;
- (2) A quality control manual acceptable to the FAA as required by § 145.211(c);
- (3) A list by type, make, or model, as appropriate, of each article for which the application is made;
- (4) An organizational chart of the repair station and the names and titles of managing and supervisory personnel;
- (5) A description of the housing and facilities, including the physical address, in accordance with § 145.103;
- (6) A list of the maintenance functions, for approval by the FAA, to be performed for the repair station under contract by another person in accordance with § 145.217; and
- (7) A training program for approval by the FAA in accordance with § 145.163.

Creation, review, and submission of each of these *required*³ elements constitutes considerable burden on the applicant currently unaccounted for in the FAA’s PRA analysis. ARSA’s experience working with members developing the required documents indicates at least 40 hours of total time – mostly from quality personnel, with administrative and management support – is necessary to prepare for review by agency personnel. Coordination regarding requested updates after initial review adds additional time before the paperwork elements of the application are found acceptable and the applicant moves on to demonstration. Overall, a smooth process could still require as many as 60 hours from applicant personnel, which is between 300 and 900 percent greater than the estimate made by the government.

Additionally, the FAA imposes a *de facto* requirement on applicants to complete the agency’s [Data Collection Tools](#) (DCTs) as part of their application process. Despite [guidance](#) issued in 2019 at ARSA’s request stating DCTs were “for inspector use only and *should not* be given to the certificate holder to complete” (emphasis in original), those inspectors continue to demand applicants complete them in order to move the review process along. This additional burden, for which the FAA has not received OMB approval, can add countless hours to the time demanded of repair station certificate applicants.

³ “An application for a repair station certificate and rating must be made in a format acceptable to the FAA and must include the following.” (Emphasis added.) See 14 CFR § 145.51(a).

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Overall, the FAA has dramatically understated the burden associated with transmitting information required by § 145.51(a) as part of an application for a repair station certificate. As a result, the agency has a well-noted backlog of persons seeking certification but awaiting review. Before continuing this request to OMB, the FAA should audit its application requirements and procedures to assess the full burden associated with the rule and current agency practices.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brett Levanto", is positioned above the typed name.

Brett Levanto

Vice President of Operations

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