



121 North Henry Street
Alexandria, VA 22314-2903
T: 703.739.9543
E: arsa@arsa.org
www.arsa.org

September 26, 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](#)
Secondary 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](#). Based on the ARSA team's long experience supporting certificate applications, manual development, and repair station recordkeeping, the association submitted comments on July 29 to the FAA's initial notice concerning the subject information collection. These comments supplement that initial submission by applauding the agency's release of its updated supporting statement.

ARSA's response¹ to the initial notice, based upon its review of the FAA's past analysis of the burden related to application for and holding part [145](#) certification, noted the government had drastically underestimated the imposition on aviation stakeholders and had to audit its *complete* application requirements. The updated [supporting statement](#) provided to the Office of Information and Regulatory Affairs undertook this task: It's new analysis includes a thorough review of all paperwork and recordkeeping requirements established by the plain language of part [145](#). The FAA's explanation of circumstances making collection necessary (supporting statement question 1.) and "Reporting Burden Calculations" cover various submissions required of applicants and information management mandated for certificate holders including manuals, capability lists, and various compliance records.

As a result of this expanded analysis, the agency's total industry cost assessment has increased dramatically. The 2019 supporting statement, which ARSA reviewed in submission of its initial comments, estimated the total collection burden to require just more than 1,000 hours of total time and cost less than \$500,000. Without any substantive changes to the paperwork required by the regulations, the total annual burden is now estimated to be 240,868.75 hours costing \$11,507,548.60: Considering all recordkeeping requirements and not just completion of an application on FAA Form 8130-3 resulted in a 23,000 percent increase in hours and a 2,600 percent increase in estimated cost; these increases greatly exceed the estimates offered by ARSA in its initial comments.

¹ ARSA [Comments](#) to Docket No. FAA-2024-1497, "Agency Information Collection Activities: Clearance of a Renewed Approval of Information Collection: Certification of Repair Stations." July 29, 2024.

September 26, 2024

Mr. Trammel

Page 2

RE: Docket No. [FAA-2024-1497](#)

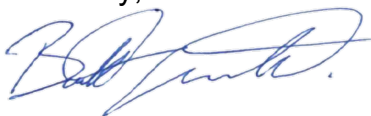
Secondary Comments – Agency Information Collection Activities: Clearance of a Renewed Approval of Information Collection: Certification of Repair Stations

The updated definition of repair station recordkeeping burden provides additional opportunity for improvement. The 2024 supporting statements explain the FAA issues an air agency certificate with appropriate ratings “when all part 145 requirements have been met.”² An applicant actually receives its certificate through the application requirements defined in § 145.51. Only air agency certificate holders must meet “all part 145 requirements,” which are surveilled by the FAA after part [145](#) certification is issued. Clarifying this understanding as described in the agency’s supporting statement would provide useful guidance to inspectors reviewing applications but expecting applicants to show total compliance with the rule.

The new supporting statement also describes the FAA’s Safety Assurance System (SAS) External Portal as *an option* for submitting documents.³ In fact, the SAS External Portal [Data Collection Tools](#) (DCTs) are commonly completed by applicants to ensure the agency has all the requirements demanded by the application process. Despite [guidance](#) described in ARSA’s initial comments stating DCTs are “for inspector use only and *should not* be given to the certificate holder to complete” (emphasis in original), government personnel continue to rely on applicants’ to ensure a timely review process is followed. This additional burden, for which the FAA has received “blanket” OMB approval because of its “voluntary” nature, adds an unaccounted burden to repair station applicants.

The FAA’s revision of its 2024 supporting statement demonstrates a drastically improved description of the paperwork burden imposed by the repair station applicant and certificate holder rules. ARSA commends the agency for that improvement and continues to push the government to scrutinize procedures for collecting information from the public and using that information for oversight.

Sincerely,



Brett Levanto

Vice President of Operations

M: 703.507.9798

E: brett.levanto@arsa.org

² “The FAA uses the information to determine compliance with the part 145 requirements for obtaining and/or retaining an FAA air agency certificate issued under part 145. For part 145 applicants, when all part 145 requirements have been met, an FAA air agency certificate with the appropriate ratings is issued.” *FAA Supporting Statement A. “Certification of Repair Stations, Part 145 of Title 14 CFR.” OMB 2120-0682, Page 6.*

³ *Ibid* at page 7.