



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Flight Standards Service

800 Independence Ave., S.W.
Washington, DC 20591

Ms. Sarah MacLeod
Mr. Christian Klein
Mr. Brett Levanto
Aeronautical Repair Station Association (ARSA)
121 North Henry Street
Alexandria, VA 22314-2903

Dear Ms. MacLeod, Mr. Klein, and Mr. Levanto:

Thank you for your October 30, 2024, cosigned letter to Federal Aviation Administration (FAA) Administrator, Michael Whitaker. Administrator Whitaker has asked me to respond to you regarding your feedback and recommendations. We share your commitment to collaborate with the aviation maintenance industry to ensure safety.

You recommended encouraging FAA personnel to attend industry training events to stay updated on new compliance methods and technologies. I fully support your recommendation to increase FAA employee participation in industry training events. Flight Standards Service's Office of Safety Standards has implemented a Workforce Development Program to enhance the professional development of our employees and improve policy and guidance development. We will expand the Workforce Development Program to promote attendance at such events, enabling our personnel to remain informed about alternative compliance methods and advancements in technology.

You raised valid concerns about the difficulty stakeholders face in locating FAA employee contact information. I agree that the FAA must improve accessibility for stakeholders to contact FAA employees. Based on your feedback, the FAA's Office of Communications will make it easier for industry stakeholders to find the appropriate aviation safety personnel and other key personnel on www.faa.gov.

You emphasized the need for the FAA to provide timely and substantive feedback to Aviation Rulemaking Advisory Committee (ARAC) recommendations. The FAA highly values input from industry and advisory committees. I acknowledge your frustration regarding the lack of responsiveness to committee recommendations. Recognizing we can improve in this area, the FAA's Office of Rulemaking has taken steps to ensure the FAA provides timely feedback to committee recommendations at the quarterly ARAC meetings.

You recommended addressing the April 17, 2020, petition for rulemaking to amend Title 14 Code of Federal Regulations (14 CFR) part 43 §§ 43.3 and 43.7. The FAA agrees that increased flexibility to accept foreign maintenance organization certificates under bilateral aviation safety

agreements would benefit stakeholders. We are reevaluating our rulemaking priorities to determine if and when this project can be incorporated into our agenda.

You suggested we consider ARAC-assigned working group recommendations on Repairman Certificates (part 65, Subpart E) and Part 145 Guidance. We are currently reviewing the ARAC Repairman Certificate Portability Working Group Recommendation Report submitted to the FAA on July 19, 2024. Concurrently, we are collaborating with ARSA and the Aircraft Electronics Association to explore the publication of an advisory circular that would provide methods of compliance for part 145 repair station certification. We are also in the process of revising the requirements for part 145 Operations Specification paragraph A025, Electronic/Digital Recordkeeping System, Electronic/Digital Signature, and Electronic Media, which is not grounded in a regulatory mandate or safety limitation.

We value ARSA's partnership and contributions to safety and efficiency in the National Airspace System. I look forward to continuing our collaboration and addressing these important issues together. If you have further questions, please contact Jackie Black, Aircraft Maintenance Division Manager, jackie.l.black@faa.gov.

Sincerely,

Lawrence Fields
Executive Director, Flight Standards Service