



January 9, 2026

Alan Clay
Jeff Paugh
Clement Meersseman

alan.clay@aa.com
jeffrey.paugh@delta.com
cmeersseman@gonimbl.com

RE: Operations Specification Working Group (OSWG)

Gentlemen,

Thank you for taking the time to meet with us. As you suggested, combining the new efforts of the WG with the industry's plea to the agency in [2018](#) can yield sustainable results.

After reviewing the information contained in the minutes of the September 2025 meeting of the OSWG, we consolidated the regulatory and procedural elements associated with templates for operations specifications and similarly issued documents to provide the basis by which the agency and industry can request new or amended templates.

We have also provided suggestions for consideration by the Working Group to ensure positive results.

(I) Types of Templates

(A) Parts 121, 135, and other operations subject to part [119](#)

There are two types of operations specifications issued under part 119; those that are required to be issued and are part of the certificate and those that are issued in the interest of safety.

(1) Except for the required paragraphs identifying authorized operations, operations specifications paragraphs are specifically *excluded* from the certificate (see, section 119.[7](#)).

(2) Changes to the certificate are handled under section 119.[41](#) and operations specifications paragraphs are instituted and appealed under section 119.[51](#).

(B) Air Agency Certificates

(1) Air agency certificates are issued under parts [141](#), [142](#), [145](#), and [147](#).

(2) Under parts [141](#) and [142](#) pilot schools and training centers are issued certificates with ratings and training specifications.

(3) Under parts [145](#) and [147](#) the operations specifications paragraphs are all part of the certificate (see, sections 145.53([a](#)) and 147.[3](#)). Therefore, changes must be requested or agreed to by the certificate holder or handled as a certificate action by the agency. The FAA should never unilaterally change a template without rulemaking or agreement from each certificate holder.

(C) Other Operations and Operators

Part 91, subpart [K](#) fractional owners are issued management specifications, which are handled like operations specifications by the agency.

Part 119 does not govern operations under part [91](#),¹ nor does it govern operations conducted under part [129](#), [133](#), [137](#), or [139](#) (see, section 119.1(d)). However, these operators and businesses require letters of authorization (LOA) or deviation authority (LODA), or certificates of waiver (COW) to obtain and maintain compliance with national and international requirements. However, the FAA handles issuance of the LOAs, LODAs, and CoWs by creating templates in the same manner it creates and manages part [119](#) operations specifications paragraphs.

(II) Issues to Consider

(A) Automated operations specifications

- (1) The application of the automated system to all certificate holders fails to recognize the distinctions among operations, operators, and certificate holders.
- (2) The application of any template is rarely if ever challenged and the “blanket” application of these templates to part [119](#) certificate holders, air agencies, and other operations have, in fact, created regulation by operations specifications (or guidance).
- (3) New templates and changes to existing templates seem to be created without objective standards. Consequently, they can be complex and duplicative, not supported by a regulation or documented safety justification and in some cases have been specifically rejected during the rulemaking process.

(B) Due process

- (1) Changes to air carrier and other part [119](#) certificate holder operations specifications paragraphs are covered by due process procedures contained in that part.
- (2) All changes to air agency operations specifications are certificate actions; due process can only be accomplished by an application from the certificate holder or through legal action by the agency.
- (3) Due process for obtaining and protesting management specifications is set forth in section 91.[1014](#).
- (4) The due process for handling denials of LOAs, LODAs, and CoWs is unclear.

(C) Convenience of the agency

Some operations specifications paragraphs assigned under part [119](#) and to air agencies and LOAs, LODAs, and CoWs are already covered by regulation or a required manual or procedure. They are aimed at providing the agency with a convenient reference to aid oversight, adding burdens and obligation on certificate holders without regulatory basis.

If the agency wishes to continue this approach, it can ask for voluntary submission under the proper procedures for such activity.

¹ There is an exception for fractionally owned aircraft operated in common carriage, see, subpart [K](#), section 91.[1007](#).

(III) Applicable Regulations and Guidance

(A) Regulations

(1) Operations specifications for air carrier and other operating certificates

(a) Section 119.[7](#) sets forth the paragraphs of the operations specifications that are and are not part of an operator's certificate.

(b) Section 119.33(a)([3](#)) requires the operator to obtain "operations specifications that prescribe the authorizations, limitations, and procedures under which each kind of operation must be conducted."

(c) Section 119.[49](#) sets forth the paragraphs that are required to be obtained, including items that are issued because "the Administrator determines [it] is necessary" (*i.e.*, in the interest of safety with justifiable results).

(d) Amendments to operations specification paragraphs are handled under sections 119.[41](#) and 119.[51](#).

(2) Management specifications

(a) Management specifications are issued under section 91.[1014](#).

(b) Amendments to management specifications are issued under section 91.[1017](#), which contains due process procedures for both program manager and the agency-initiated changes.

(3) LOAs, CoWs, and LODAs

(a) LOAs, CoWs, and LODAs are issued under multiple sections of part [91](#). Additionally, Order 8900.1 indicates that LOAs are also used under parts [141](#) and [142](#). Applications are made on FAA Form [7711-2](#).

(b) Subpart [J](#)—Waivers lists the sections of part [91](#) subject to waivers.

(c) The sections of part [91](#) allowing LOAs, CoWs, and LODAs are handled similarly to operations specifications paragraphs—see Order 8900.1, Volume 3, Chapters [2](#) and [3](#).

(4) Air agency certificates, ratings, and specifications

(a) Under section 141.[11](#) pilot schools are issued certificates and ratings supplemented by LOAs.

(b) Under section 142.[5](#) pilot schools are required to have certificates and are issued certificates and training specifications.

(c) Under section 145.[5](#) repair stations must have a certificate and operations specifications; under section 145.[53](#) "a repair station certificate [is issued] with appropriate ratings prescribing such operations specifications and limitations as are necessary in the interest of safety." Changes to certificates and operations specifications paragraphs are made under section 145.[57](#). The certificate and operations specifications can include:

(i) Ratings issued are issued under sections 145.[59](#) or 145.[61](#) and are placed on the operations specifications.

(ii) Capability lists under section 145.215([a](#)) that at the certificate holder's choice are part of the repair station's operations specifications.

(iii) Section 147.[3](#) prohibits the operation of an aviation maintenance technician school without a certificate and operations specifications; applications for and issuance of certificates and operations specifications are under section 147.[5](#), which will include the rating(s) issued under section 147.[11](#). Section 147.[15](#) requires additional training locations to be on the certificate holder's operations specifications.

(B) FAA guidance and procedure

(1) Flight Standards Information Management System Order 8900.1 Volume 3, Chapter 18, "Operations Specifications" has basic guidance on issuance of operations specifications.

(2) Additional guidance is contained throughout Order 8900.1, for example—

(a) Volume 2, Chapter 2, Section [1](#), "General Information".

(b) Volume 2, Chapter 1, Section [4](#) "Preparation of FAA Operating Certificates".

(c) Volume 2, Chapter 11, Section [5](#) "Safety Assurance System: Phase 5—Administrative Functions".

(d) Volume 3, Chapter 2, Section [1](#) "Exemptions, Deviations, Waivers, and Authorizations".

(e) Volume 3, Chapter 18, Section [14](#) "Parts A, B, and D Letters of Authorization for 14 CFR part 141 Pilot Schools".

(C) Ambiguities or inconsistencies in regulations and guidance

A review of many templates will quickly reveal ambiguities and inconsistencies among and between the regulations, policy, and guidance. Whenever a template contains language that is contrary to the plain language of a cited regulation it creates an additional burden or obligation on the applicant or certificate holder without the benefit of the rulemaking process.

When industry has objective evidence supported by the statutes and regulations for the addition or amendment of a template it can provide the information to the agency in a comprehensive and consistent manner.

(IV) Suggestions

Augment the guidelines in the White Paper provided during the September 2025 meeting, the regulations and FAA guidance associated with issuance of and changes to templates for operations specifications, LOAs, LODAs, and CoWs by—

(A) Adding part 91 operators and air agency certificate holders to the Co-Chair positions as each have different regulations, issues, and conditions for the issuance of templates used for authorities or limitations.

(B) Assigning objective criteria for templates that will distinguish—

(1) The different types of certificates, for example—

(a) Those where the operations specifications are separate from the certificate.

(b) Those where the operations specifications are part of the certificate.

(c) The types of templates, for example—

(i) Required by regulation.

(ii) Required by a safety necessity, based on an objective safety requirement and historical evidence of necessity.

(iii) Requested by the operator or air carrier for convenience or unique circumstances or operations.

(iv) Requested by the operator or air carrier to capture essential safety information on types of operators or operations—only applicable to a specific class, type, or group of certificate holders or an individual certificate holder under objective and specific criteria.

(v) Required only for the convenience or administration of the agency and only applicable to the agency (e.g., noting a part 145 repair station uses electronic methods for creating and storing required documents or information, or works away from the fixed location).²

(2) The nature of the template—

(a) Temporary—only needed for a set time and reasons.

(b) Permanent—will be available for similar operators, operations, or certificate holders.

(C) Creating objective criteria for proposing new or changing operations specifications paragraphs to develop “the recommendation Report” that—

(1) Determines and assigns the type and nature of the template (see above).

(2) Provides the necessary elements. Whether the template is new or the industry is requesting a change, it must cite the regulation(s) associated with the request. To be considered in developing the Report—

(a) Plain language. The language of the request cannot be contrary to or different from a regulation except in an explanatory manner; it cannot go beyond the scope and purpose of the regulation, and it cannot add burdens to the industry.

² OMB approval is required information is voluntarily provided to the agency at its request.

(b) Redundancy. The language should not be redundant to an existing obligation. If the information is required to be kept by the operator or certificate holder, just in a different form and manner, the request may not be supportable.

(c) Safety or operational justification. The safety and operational justifications must be objectively stated and supported by the scope and purpose of the request. If the request has no operational or safety justification, it must be scrutinized for necessity.

(d) New regulatory requirement. If a new regulation requires the issuance of an operations specification, LOA, LODA, or CoW, the proposed template must adhere to the plain language of the regulation and not add requirements. This may necessitate a review of the preambles with the notice of proposed and final rulemakings to ensure consistency with the agency's original intent and safety purpose.

(e) Consistency with international obligations. Paragraphs must contain the language required for international operations.

(f) Uniform application. Paragraphs should not be applied across all operators and certificate holders without ensuring consistency with regulations and other templates.

(g) Measuring safety and efficiencies. There needs to be methods for measuring effectiveness for the agency, operators, and certificate holders to ensure the template achieves its objective.

(3) Reviewing paragraphs with directly impacted certificate holders on a regular and ongoing basis.

(D) Following the procedure in the White Paper, present the FAA with reports that provide the historical, regulatory, safety, and measurement information necessary for it to add, remove, or amend templates and to determine effectiveness.

Thank you for your consideration of this request.

Sincerely,

Ric Peri
Vice President, Government & Industry Affairs
Aircraft Electronics Association
601 Pennsylvania Ave, NW
Suite 900, South Building
Washington, DC 20004-3647
T: 202.589.1144
W: ricp@aea.net

Sarah MacLeod
Executive Director
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2905
M: 703.785.6605
W: sarah.macleod@arsa.org