April 13, 2026

BY E-MAIL TO: 9-awa-afs-300-maintenance@faa.gov
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Mr. Jackie Black
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RE: Response to FAA: Petition to Amend 14 CFR part 43 – Bilateral Reciprocity

Dear Mr. Black:

This responds to the March 18, 2026 request for comments and information regarding proposed amendments to 14 CFR part 43 to permit the mutual acceptance of both maintenance organization and individual maintenance certificates under Bilateral Aviation Safety Agreements (BASA).

To ensure all issues raised in your letter are addressed, each item is reiterated in *italics*, below, with our responses in **bold**.

The Federal Aviation Administration, Aircraft Maintenance Division, is considering the petition for rulemaking to amend 14 CFR §§ 43.3 and 43.7, which was originally submitted by the Aeronautical Repair Station Association (ARSA) on April 17, 2020.

We are pleased the agency is considering moving forward with the petition, which, in addition to ARSA, was signed by 14 other organizations, demonstrating broad industry support. The proposed amendments will allow the FAA, at its option, to pursue BASAs with trusted Civil Aviation Authorities that increase efficiency for industry and the agency alike.

In addition to the proposed amendments that are described in the petition, the Aircraft Maintenance Division believes that additional amendments to §§ 43.1, 43.3, 43.7, 145.209, and 43.17 would be needed. The following amendments are under consideration:

Thank you for the opportunity to comment on the proposed amendments; a summary and analysis of all proposed changes is contained in the Appendix to this letter.

Add § 43.1(a)(3) to state the following, and rename current § 43.1(a)(3) to § 43.1(a)(4):

Foreign-registered civil aircraft, registered in a country which the U.S. has a reciprocal Bilateral Aviation Safety Agreement that includes maintenance provisions accepting applicability of this part: and

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We agree that an amendment to the applicability section of part 43 is appropriate; however, to fully embrace the power of bilateral agreements, we propose the following alternative language:

> **(3) Civil aircraft under the regulatory jurisdiction of a foreign Civil Aviation Authority with which the U.S. has a Bilateral Aviation Safety Agreement that provides for the acceptance of maintenance approvals and applicable provisions of this chapter; and**

The alternative language recognizes that a BASA may be with either a national authority (*e.g.*, United Kingdom Civil Aviation Authority) or a multinational authority (*e.g.*, European Union Aviation Safety Agency). It also recognizes that the responsibility for regulating certain aviation activities may be transferred from one State to another (*e.g.*, as permitted by Article 83 *bis* of the Convention on International Civil Aviation).

Additionally, rather than only referencing part 43 ("this part"), the revision ensures the BASA defines the scope of authority and that it may impose any provision in 14 CFR chapter I on the foreign maintenance certificate holder.

Add § 43.3(l) to state:

A foreign Civil Aviation Authority Approved Maintenance Organization may perform maintenance, preventive maintenance and alterations within that authority's territory, provided the FAA has a Bilateral Aviation Safety Agreement with that authority for reciprocal acceptance of maintenance organizations and the organization complies with the maintenance provisions of that agreement.

We propose the following alternative language:

> **The holder of a maintenance certificate issued by a foreign Civil Aviation Authority may perform maintenance, preventive maintenance, and alterations as provided in a Bilateral Aviation Safety Agreement.**

The governing authority for any mutual acceptance relationship between authorities, regardless of the scope, must be the BASA. While bilateral agreements generally restrict maintenance activities to those performed in the maintenance provider's home territory, that may not always be the case. The above proposal would provide the FAA with the most flexibility. Additionally, by removing the word "organization", the industry's proposal would permit the FAA, at its option, to extend authority to both certificated individuals and organizations similar to its current arrangement with Canada under § 43.17.

Add § 43.7(i) to state:

A foreign Civil Aviation Authority Approved Maintenance Organization may approve an aircraft, airframe, aircraft engine, appliance, or component part for return to service within that authority's territory provided the FAA has a Bilateral Aviation Safety Agreement with

that authority for reciprocal acceptance of maintenance organizations and the organization complies with the maintenance provisions of that agreement.

For the same reasons cited for § 43.3(l) above, we propose the following alternative language:

> **The holder of a maintenance certificate issued by a foreign Civil Aviation Authority may approve the work performed as provided in a Bilateral Aviation Safety Agreement.**

Add § 145.209(j) to state the following, and rename current § 145.209(j) to §145.209(k) and § 145.209(k) to § 145.209(l):

Procedures for evaluating current reciprocal Bilateral Aviation Safety Agreement maintenance provisions for aircraft applicable to 43.1(a)(3) and articles intended for installation on those aircraft, to ensure compliance with the maintenance provisions of that agreement;

Since not all repair stations will work under a BASA, we propose the following alternative language:

> **When performing work under a Bilateral Aviation Safety Agreement to which § 43.1(a)(3) applies, procedures to ensure compliance with those agreements;**

Amend § 43.17(d) to state the following:

Performance requirements. A person authorized in paragraph (c) of this section may perform maintenance (including any inspection required by Sec. 91.409 of this chapter), preventive maintenance, and alterations, (except a Maintenance Engineer cannot perform an annual inspection), provided---

If the industry's proposed amendments to part 43 are adopted, we believe § 43.17 may be eliminated in its entirety because all authority and limitations will be stated in the BASA.

The Aircraft Maintenance Division is soliciting feedback regarding these additional regulatory considerations from the aviation industry groups that supported the original petition submitted by ARSA. Specifically, we are requesting responses from you in relation to the following:

1) *How do you believe these amendments would support the objectives of President Trump's executive orders on deregulation, specifically in terms of reducing regulatory burdens and fostering economic growth within your industry?*

The proposals align closely with President Trump's deregulatory and America First trade efforts.

In announcing the "10-to-1 Deregulation Initiative" on Jan. 31, 2025, the White House stated:

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> **Overregulation stops American entrepreneurship, crushes small business, reduces consumer choice, discourages innovation, and infringes on the liberties of American citizens.**

Current rules forcing U.S. repair stations to maintain multiple foreign certificates are examples of "overregulation". The proposed changes to part 43 will allow the FAA to enter into BASA's that recognize equivalent safety outcomes and impose fewer unnecessary burdens.

Similarly, President Trump's April 9, 2025 Executive Order (EO) "Reducing Anti-Competitive Regulatory Barriers" directs federal agencies to identify regulations that, *inter alia*, "create unnecessary barriers to entry for new market participants" and "create or facilitate licensure or accreditation requirements that unduly limit competition". The cost associated with obtaining a foreign maintenance certificate is a barrier to entry that disproportionately affects small businesses, which have less revenue over which to amortize duplicative compliance costs. Amending part 43 as proposed will provide the FAA with the discretion to enter into BASAs with trusted international partners that will benefit all maintenance facilities subject to the BASA.

The proposal is also consistent with the Trump administration's trade policy. For example, the April 2, 2025 EO entitled "Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits" identified "a lack of reciprocity in our bilateral trade relationships" and "non-tariff barriers" as threats to the economy and national security. Amending part 43 as proposed would allow the FAA to more aggressively pursue BASAs providing for full acceptance of maintenance certificates and significantly reduce non-tariff barriers U.S. repair stations face when serving foreign customers.

The proposal will benefit most of the 1,400 U.S. repair stations that currently maintain at least an EASA approval because (depending on the terms of the BASA) those organizations will not be required to obtain a certificate from the foreign authority.

The change will put U.S. repair stations on a level playing field with their foreign competitors in other countries that already enjoy reciprocal acceptance. EASA and Transport Canada Civil Aviation, for example, amended their BASA documents in 2024 so AMOs that "maintain aeronautical products other than aircraft no longer require an approval under the EU-Canada Bilateral Aviation Safety Agreement because their Authorized Release Certificates (EASA Form 1 and the TCCA Form One) are mutually accepted by EASA and TCCA."

Please provide a detailed description of the positive impacts that are expected to result within your industry following the implementation of these proposed amendments.

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Consider addressing potential improvements in efficiency, compliance, safety, or any other relevant areas that may be affected.

The expected positive impacts are as follows:

- **Reduced barriers to entry and compliance costs. If the amendments are adopted and the FAA pursues BASAs that provide for full mutual acceptance of AMO approvals, U.S. repair stations will no longer be required to apply for and maintain foreign certificates issued by those countries.**

- **Reduced regulatory complexity. Repair stations approved by foreign authorities under a BASA are required to maintain separate manual supplements for each foreign authority establishing requirements beyond those of 14 CFR. The amendments will allow the FAA to pursue BASAs that eliminate the need for redundant paperwork.**

- **Reduced FAA oversight burden. Under the current BASA system, the FAA plays the middleman, accepting applications for foreign approvals and forwarding them to the foreign authority. The FAA must also devote resources to certifying foreign AMOs that already hold maintenance approvals in their home jurisdictions. Adopting the proposal would allow agency resources to be directed at continued operational safety rather than to duplicative certification and oversight activities.**

- **Regulatory alignment. As described in the original petition, the proposed amendments would more closely align maintenance activities with §§ 21.29 (Issuance of Type Certificate for Import Products), 21.183(c) (Import Aircraft – Standard Airworthiness Certificate) and part 21, subpart N (Acceptance of Aircraft Engines, Propellers and Articles for Import). These regulations allow the FAA to accept aircraft, aircraft engines, propellers, and articles designed and/or manufactured in a foreign country with which the FAA has a bilateral agreement. Under part 21, subpart N, the FAA does not issue production approvals to entities located outside the United States; instead, it relies on approvals issued by BASA countries to accept such articles for import.**

- **Safety impact. The FAA enters maintenance BASAs only with authorities whose systems yield equivalent safety results; certification and oversight of FAA part 145 repair stations in countries with which the United States does not have a bilateral agreement would not change under the proposal. As such, there will be no negative impact on safety. This is underscored by the safety record associated with the longstanding BASA between the United States and Canada that reciprocally recognizes maintenance certificates. Allowing the FAA to pursue similar BASAs that eliminate duplication will permit repair stations to focus less on redundant regulatory obligations and more on quality.**

Please share an assessment of the projected cost savings your industry anticipates by the adoption of these amendments. Please include any relevant data that illustrates

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potential reductions in expenditures, enhanced operational efficiencies, or any other financial advantages that may arise from these amendments.

A 2011 economic study conducted for the Aeronautical Repair Station Association (ARSA) by AeroStrategy estimated it costs an organization $15,000 to become an FAA certificated repair station and approximately $11,500 to obtain EASA approval under the current bilateral agreement.

According to the Bureau of Labor Statistics CPI Inflation Calculator, today the adjusted cost of EASA certification is $16,985. There are currently 1,400 U.S. repair stations that hold EASA approval. Had a bilateral with reciprocity for maintenance certificates between the FAA and EASA existed since EASA's inception, industry would have saved as much as $23.8 million in initial certification costs.

Going forward, the duplicative certification costs for approval from trusted bilateral partners would be eliminated, as will ongoing compliance and foreign oversight costs.

We look forward to your responses and greatly value these preliminary discussions with our stakeholders. Your insights and feedback are crucial to ensuring that the amendments effectively address industry needs while maintaining equivalent levels of safety and contributing to our shared objectives.

Please provide your responses to the following email address by April 13, 2026:

9-AWA-AFS-300-Maintenance@faa.gov.

Thank you for the opportunity to review and comment on the FAA's proposed amendments to part 43 and to provide insights into the proposal's benefits. We look forward to the agency's swift action.

Sincerely,

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Attachments: Appendix 1: Comparative Analysis
Appendix 2: Policy Analysis

cc: Chris Parfitt chris.parfitt@faa.gov

Citation	Current Regulatory Language	FAA Proposed Language	Industry Proposed Language (Original)	Industry Proposed Language (Revised)	Notes/Comments
43.1(a) ("Applicability")	(a) Except as provided in paragraphs (b) and (d) of this section, this part prescribes rules governing the maintenance, preventive maintenance, rebuilding, and alteration of any— (1) Aircraft having a U.S. airworthiness certificate; (2) Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135 of this chapter; and (3) Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.	(a) Except as provided in paragraphs (b) and (d) of this section, this part prescribes rules governing the maintenance, preventive maintenance, rebuilding, and alteration of any— (1) Aircraft having a U.S. airworthiness certificate; (2) Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135 of this chapter; ~~and~~ (3) Foreign-registered civil aircraft, registered in a country which the U.S. has a reciprocal Bilateral Aviation Safety Agreement that includes maintenance provisions accepting applicability of this part: and (~~3~~ 4) Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.	N/A	(a) Except as provided in paragraphs (b) and (d) of this section, this part prescribes rules governing the maintenance, preventive maintenance, rebuilding, and alteration of any— (1) Aircraft having a U.S. airworthiness certificate; (2) Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of Part 121 or 135 of this chapter; ~~and~~ (3) Civil aircraft under the regulatory jurisdiction of a foreign Civil Aviation Authority with which the U.S. has a Bilateral Aviation Safety Agreement that provides for the mutual acceptance of maintenance organization and individual approvals and applicable provisions of this chapter; and (~~3~~ 4) Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.	It is appropriate to amend 43.1 to align with the other changes to part 43. The industry's revision: Recognizes that an agreement may be with a national authority (UK CAA) or a multinational authority (e.g., EASA). Provides the agency with flexibility to apply any provision in chapter 1 to the foreign AMO in the bilateral and ensures the BASA defines the scope of authority provided.

Citation	Current Regulatory Language	FAA Proposed Language	Industry Proposed Language (Original)	Industry Proposed Language (Revised)	Notes/Comments
43.3(l) ("Persons authorized to perform maintenance, preventive maintenance, rebuilding, and alterations")	N/A	A foreign Civil Aviation Authority Approved Maintenance Organization may perform maintenance, preventive maintenance and alterations within that authority's territory, provided the FAA has a Bilateral Aviation Safety Agreement with that authority for reciprocal acceptance of maintenance organizations and the organization complies with the maintenance provisions of that agreement.	The holder of a maintenance organization certificate issued by a foreign civil aviation authority may perform maintenance, preventive maintenance, and alterations provided the FAA has entered into a bilateral agreement with that authority for the reciprocal acceptance of such maintenance organization certificates.	The holder of a maintenance certificate issued by a foreign Civil Aviation Authority may perform maintenance, preventive maintenance, and alterations as provided in a Bilateral Aviation Safety Agreement.	Currently, bilaterals restrict maintenance activities to the maintenance provider's home territory but may not in the future; the governing authority for any mutual acceptance (regardless of the scope) must be the bilateral. Regulations need to adjust to the times. Industry's proposed language would provide the FAA with the most flexibility to tailor the bilateral agreement to the specific relationship with a foreign authority. Additionally, by removing the word "organization", the industry's proposal would permit the FAA, at its option, to extend authority to both certificated individuals and organizations.
43.7(i) ("Persons authorized to approve aircraft, airframes, aircraft engines, propellers, appliances, or component parts for return to service after maintenance, preventive maintenance, rebuilding, or alteration.")	N/A	A foreign Civil Aviation Authority Approved Maintenance Organization may approve an aircraft, airframe, aircraft engine, appliance, or component part for return to service within that authority's territory provided the FAA has a Bilateral Aviation Safety Agreement with that authority for reciprocal acceptance of maintenance organizations and the organization complies with the maintenance provisions of that agreement.	The holder of a maintenance organization certificate issued by a foreign civil aviation authority may approve the work performed on an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service provided the FAA has entered into a bilateral agreement with that authority for the reciprocal acceptance of such approvals.	The holder of a maintenance certificate issued by a foreign Civil Aviation Authority may approve the work performed as provided in a Bilateral Aviation Safety Agreement.	See discussion of 43.3(l) above.

Citation	Current Regulatory Language	FAA Proposed Language	Industry Proposed Language (Original)	Industry Proposed Language (Revised)	Notes/Comments
43.17(d) ("Maintenance, preventive maintenance, and alterations performed on U.S. aeronautical products by certain Canadian persons.")	*Performance requirements.* A person authorized in paragraph (c) of this section may perform maintenance (including any inspection required by Sec. 91.409 of this chapter, except an annual inspection), preventive maintenance, and alterations, provided—	*Performance requirements.* A person authorized in paragraph (c) of this section may perform maintenance (including any inspection required by Sec. 91.409 of this chapter), preventive maintenance, and alterations, (except a Maintenance Engineer cannot perform an annual inspection), provided---	N/A		With the changes proposed by industry, we believe sec. 43.17 may be eliminated in its entirety. Appropriate changes to part 43 will ensure the bilateral agreement defines the scope, nature, and requirements for work performed on U.S. aeronautical products by Canadian persons.
145.209(j) "Repair station manual contents.")	N/A	Procedures for evaluating current reciprocal Bilateral Aviation Safety Agreement maintenance provisions for aircraft applicable to 43.1(a)(3) and articles intended for installation on those aircraft, to ensure compliance with the maintenance provisions of that agreement;	N/A	When performing work under a Bilateral Aviation Safety Agreement to which sec. 43.1(a)(3) applies, procedures to ensure compliance with those agreements;	Limits the applicability to those repair stations that do work under bilateral agreements that mutually accept each authority's maintenance organization certificates under proposed sec. 43.1(a)(3). The agency's proposal would apply to all repair stations, not just those that perform work under a bilateral agreement described in proposed sec. 43.1(a)(3).

FAA Question	Resources and Responses
How do you believe these amendments would support the objectives of President Trump's executive orders on deregulation, specifically in terms of reducing regulatory burdens and fostering economic growth within your industry?	**Regulatory Freeze Pending Review** **Eliminating 10 Regulations for Each New Regulation Issued** **Ensuring Accountability for All Agencies** **Reducing Anti-Competitive Regulatory Barriers** **Directing the Repeal of Unlawful Regulations** **Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits** The proposals align closely with President Trump's deregulatory and America First initiatives. The proposal will benefit more than 1400 U.S. repair stations that maintain at least one foreign maintenance approval. The change will allow organizations to serve international customers more efficiently. Importantly, the change will put U.S. repair stations on a level playing field with foreign competitors that enjoy the benefits of reciprocal acceptance of certificates issued by partner nations.
Please provide a detailed description of the positive impacts that are expected to result within your industry following the implementation of these proposed amendments. Consider addressing potential improvements in efficiency, compliance, safety, or any other relevant areas that may be affected.	The change will eliminate duplicative compliance requirements without compromising safety. The change will lessen the FAA's oversight burden by eliminating the need to facilitate foreign approvals of U.S. repair stations and to certificate maintenance organizations under the jurisdiction of trusted bilateral partners. By eliminating the time-consuming process of obtaining foreign approvals, U.S. repair stations can move swiftly to accommodate international customers and potential customers. FAA only enters into bilateral agreements with authorities whose systems yield equivalent safety results. As such, there will be no impact on safety.
Please share an assessment of the projected cost savings your industry anticipates by the adoption of these amendments. Please include any relevant data that illustrates potential reductions in expenditures, enhanced operational efficiencies, or any other financial advantages that may arise from these amendments.	https://arsa.org/new-report-details-benefits-of-aviation-safety-agreements/ A 2011 economic study conducted for ARSA by AeroStrategy estimated it costs an organization $15,000 to become an FAA certificated repair station and approximately $11,500 to obtain EASA approval under the current bilateral. According to the Bureau of Labor Statistics CPI Inflation Calculator, the adjusted cost of EASA certification is $16,985 today. With 1,400 U.S. repair stations holding EASA approval, full reciprocity between the FAA and EASA since EASA's inception would have saved the industry as much as $23.8 million in initial certification costs. Going forward, the initial certification costs for approval from trusted bilateral partners will be eliminated. **Without a BASA, it costs repair stations almost three times as much to become certificated**. AeroStrategy determined that initial FAA certification for a repair station located in the U.S. costs a little over $15,000. Approval by the EASA for U.S. facilities costs slightly less

FAA Question	Resources and Responses
	(around $11,500) because the FAA certificate serves as the basis for EASA approval. By contrast, the cost for a U.S. repair station to become certificated by the Civil Aviation Administration of China is more than $30,000. **BASAs make repair stations more profitable**. FAA certification renewal costs consume two cents of every dollar of revenue generated by the certificate, while EASA renewal consumes almost four cents. By comparison, renewing a CAAC certificate consumes 16 cents of the average revenue dollar it generates. Non-BASA certificates typically generate lower revenues (relative to FAA/EASA business), making the work less profitable. **Disproportionate costs for small companies**. Larger companies are better able to spread out (i.e., internally amortize) regulatory compliance costs. EASA certificate renewal consumes a greater portion of revenues for smaller companies (one to five employees) than large companies (200+). If the U.S.-EU BASA did not exist, compliance costs would increase for all U.S. repair stations, but small companies would be hit harder because the costs would consume a greater percentage of their revenues.