



September 10, 2026

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RE: Part 145 Operations Specification Paragraphs

Dear Hugh,

The Aircraft Electronics Association and the Aeronautical Repair Station Association have been consistently requesting the agency review the Operations Specifications paragraphs “automatically” assigned to repair stations. The work started with a letter to John Duncan in [2018](#), followed by the recommendations of the Aviation Rulemaking Advisory Committee’s [final report](#) on part [145](#), and continuing with discussions on the removal of A025 for electronic recordkeeping (full reviews of those related efforts can be found at [arsa.org/opspecs](#), [arsa.org/145-task](#), and [arsa.org/electronic-recordkeeping](#)).

We are requesting your assistance to institute a legally supportable process for issuing part [145](#) air agency certificates and *appropriate* limitations.

The regulations are clear; the automated Operations Specification system and the guidance are not aligned with the requirements in the rules or due process. The agency’s paperwork is governed by the euphemistic Paperwork Reduction Act. The Office of Management and Budget (OMB) has only issued control numbers for the air agency certificate and its one-page operations specifications containing *limitations* – none of the automated operations specifications paragraphs are approved by OMB for part [145](#) certificate holders; only FAA Form 8000-4 and its one-page of limitations from 1967.

The agency is failing to distinguish in its automated Operations Specification system between paragraphs that are part of a certificate from those that are not. As a result, the agency has issued a notice of proposed civil penalty against a repair station because its operations specifications did not give it permission to use electronic records resulting from paragraph (b) below, which is automatically applied to part [145](#) Operations Specifications:

b. The certificate holder is <i>not</i> authorized and shall not:	
	Reference Paragraphs
Use Exemptions.	A005
Use an acceptable electronic recordkeeping system, electronic/digital signature, and/or electronic media.	A025
Perform maintenance with ratings for repair stations located outside the United States under a Bilateral Aviation Safety Agreement with Maintenance Provisions.	A060
Perform work, including continuous operations, at additional locations other than at its primary fixed location.	A101
Perform safety-sensitive functions requiring a drug and alcohol testing program under 14 CFR part 120	A449
Perform maintenance in accordance with foreign repair station geographic authorizations.	B050
Perform work, excluding continuous operations, at additional locations other than at its primary Fixed Location.	D100
Perform line maintenance for cert. holders conducting operations under Parts 121 and 135 and for foreign carriers/persons operating non-U.S.-registered aircraft in common carriage under Part 129, apart from D100 which authorizes that work away from station.	D107

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This paragraph needs to change dramatically; few of the listed items are *legitimate limitations*. An Operation Specification cannot stop someone from using an exemption; listing exemptions is for the convenience of the agency. The ability for a repair station to use any media to maintain data and records was clearly allowed under the 2001 [final rule](#). The agency acknowledged that the use of A025 was not supported by the regulation or safety in its [letter](#) of December [2024](#). Paragraph A060 is nonsensical as the bilateral governs the work; this is another paragraph that is for the agency's convenience. The regulations give the repair station the *authority under § 145.203* to work away from its fixed location merely by having a procedure in its manual, making D100 only for the convenience of the agency, not a legitimate limitation.

Organizationally, it appears the automated Operations Specifications paragraph system is under the jurisdiction of AFS-200, while the issuance of *air agency* certificates is under the auspices of AFS-300. Further complicating the management of the paragraphs was an industry working group of mainly air carrier participants. The issuance of Operations Specifications paragraphs under part 119 is definitively different than under the air agency rules in parts [141](#), [145](#), and [147](#). Under part [145](#), the air agency certificate and a single page of limitations are what the laws allow and demand.

We request a meeting about part [145](#) Operations Specifications paragraphs to determine how the agency can align air agency certificates and operations specifications with [14](#) CFR expeditiously. The result will save the agency and industry untold hours of unnecessary work.

Sincerely,

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