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

Aviation Safety

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

November 18, 2026

Mr. Christian A. Klein
Executive Vice President
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22043-2903

Dear Mr. Klein:

This is in response to your letter posted to Regulatory Docket No. FAA-2026-11617, September 10, 2026, petitioning the Federal Aviation Administration (FAA) to initiate rulemaking to change Title 14 Code of Federal Regulations (14 CFR) part 120 to extend for two years the deadline for impacted repair stations to comply from December 20, 2027, to December 20, 2029, in order to facilitate implementation of the drug and alcohol requirements for foreign repair stations.[1]

In accordance with 14 CFR § 11.73, the FAA considers the following criteria to determine whether it is appropriate to initiate rulemaking based on a petition:

1) The immediacy of the safety or security concerns you raise;

2) The priority of other issues the FAA must deal with; and

3) The resources the FAA has available to address these issues.

Each year, the FAA prioritizes its rulemaking projects based on issues that are important to the safety and security of the aviation community and the traveling public to ensure the FAA delivers the most value to the aviation system consistent with available resources.

The FAA is currently considering options for granting relief on the compliance deadline, and a rulemaking to extend the compliance date is among those options.

[1] 89 FR 103416, Drug and Alcohol Testing of Certificated Repair Station Employees Located Outside of the United States, December 19, 2024.

If the FAA does pursue rulemaking in this area in the future, you will be able to find out and track it through the DOT's semi-annual regulatory agenda, available through the Office of Management and Budget's (OMB) Office of Information and Regulatory Affairs' (OIRA) Unified Agenda website (https://www.reginfo.gov/public/do/eAgendaMain).

Sincerely,

/s/
Dan A. Ngo
Manager, Part 11 Petitions Branch,
Office of Rulemaking