



**THIS WILL AFFECT YOUR
REPAIR STATION!**

FAA Proposes a Significant and Potentially Damaging Rewrite of Part 145

**This proposal is critical, and understanding the FAA's proposal and its intent
is extremely important to the continued operation of your business**

SUMMARY FROM FAA NPRM: (as printed from the Federal Register)

This action would amend the regulations for repair stations by revising the system of ratings, the repair station certification requirements, and the regulations on repair stations providing maintenance for air carriers. This action is necessary because many portions of the existing repair station regulations do not reflect current repair station aircraft maintenance and business practices, or advances in aircraft technology. These changes would modernize the regulations to keep pace with current industry standards and practices.

AEA's SUMMARY:

This proposal makes wholesale changes to the avionics industry with damaging and costly repercussions. The FAA proposes to remove radio and instrument ratings and allow airframe-rated repair stations to work on radio and instrument components without qualifications or ratings. This proposal does not recognize avionics as a profession! Contrary to the FAA's claim (in their summary above), this proposal *does not* reflect current repair station aircraft maintenance and business practices, or advances in aircraft technology. These changes *would not* modernize the regulations to keep pace with current industry standards and practices.

AEA MEMBERS NEED TO COMMENT!!!!

Comments are due no later than November 19, 2012.

AEA'S MAJOR CONCERNS WITH THIS PROPOSED RULE:

- **Cost to Comply**

The cost to comply and transition to this new rule will impose a huge monetary investment on repair stations. This proposed rule requires revision and approval of all three repair station manuals, as well as developing and managing a list of capabilities! The FAA is not accounting for the man hours needed for a repair station to revise its manuals and create capability lists.

- **Lack of Time to Transition**

The rule proposes a 24-month implementation period to reissue new certificates for all repair stations. With the current lack of FAA workforce and sequestration initiatives, how will the agency provide the resources needed to approve and reissue certifications to 4,000 repair stations in a 24-month period? If a repair station certificate is not reissued within the 24-month time period, the previous certificate is no longer valid and businesses will not be able to operate as a Part 145 repair station.

- **Avionics Profession Loses Its Identity**

Under this proposal, the system of ratings would be reduced from eight ratings to five ratings. The ratings definitions would be revised to indicate the type of work that a repair station is authorized to perform. But, it also removes radio and instrument ratings and allows airframe-rated repair stations to repair and alter radios and instruments without any specific ratings or obvious qualifications.

- **Costly & Time-Consuming Capabilities List**

This proposal does not specifically require a capability list, but does require a listing of capabilities for all repair stations. This is a potentially marked change for repair stations with class ratings that do not currently have a capability list of the items they maintain. Also, capabilities list, or list of capabilities, will be subject to a line-item review every 24 months. This requirement will force repair stations to hire additional staff to maintain these lists.

- **No Mobility**

Each certificated repair station must provide and maintain suitable permanent housing for the facilities, equipment, materials and personnel consistent with its ratings. It appears this provision would prohibit mobile operations. Currently, the regulations allow for a permanent "fixed location" but not permanent housing. In addition, the proposal would not allow "space available" contracts with landlords.

Comments are due no later than November 19, 2012.

HOW TO COMMENT:

1. Go to: **www.regulations.gov**
2. On the home page, in the SEARCH box, type in: **faa-2006-26408-0211**
3. The FAA NPRM will appear. Click on COMMENT NOW.
4. Complete the easy comment form.
(Note: Step 3 of the form gives you the ability to attach a comment letter (document) on your repair station/company letterhead if you prefer not to type your comments in the box provided.)
5. Hit Submit.
6. That's it—it's simple—Please take the time to do it! **It's critical to your business!**

The screenshot shows a Windows Internet Explorer browser window displaying the 'Submit a Comment' page on regulations.gov. The page title is 'Submit a Comment' and the URL is 'http://www.regulations.gov/#submitCommentD+FAA-2006-26408-0211'. The page content includes the following sections:

- regulations.gov** logo and navigation links: Home, Help, Resources, Feedback and Questions.
- Search bar with a magnifying glass icon.
- Submit a Comment** heading with a speaker icon.
- Links: View Docket Folder | Alternate Ways to Comment.
- Text: You are commenting on a Proposed Rule: **Repair Stations; Comment Period Extension (Document ID FAA-2006-26408-0211)**
- Legend: * Required fields, Fields that will be viewable on Regulations.gov
- 1. ENTER INFORMATION** section with input fields for: First Name, Middle Name, Last Name, Mailing Address, Mailing Address 2, City, and Country.
- 2. TYPE COMMENT** section with a large text area for the comment and a '2000 characters remaining' indicator.
- 3. UPLOAD FILE(S) (Optional)** section with a 'Choose File...' button.
- 4. SUBMIT COMMENT** section.

The browser's taskbar at the bottom shows several open applications, including 'Submit a Comment', 'Inbox - Microsoft Outlook', 'Document1 - Microsoft W...', 'FAA Part 145 NPRM 201...', and 'Document4 - Microsoft W...'. The system clock shows 2:25 PM.