

November 5, 2002

U.S. Department of Transportation  
Docket Management System  
400 7<sup>th</sup> Street, SW  
Room PL 401  
Washington, DC 20591-0001

Sent Via Electronic Submission  
and USPS

RE: AEA/AIA/ASA/NATA Petition Dated 21 October 2002 to Postpone Implementation  
of the Changes to 14 CFR §145

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), representing the interests of its more than 387,000 members who own, operate and maintain aircraft, supports the postponement of the planned changes to the regulations pertaining to certificated repair stations- Federal Aviation Regulation (FAR) Part 145. Postponement is needed to give the Federal Aviation Administration (FAA) time to complete and publish advisory circular guidance as well as time to train its employees. With less than six months before the implementation date, AOPA believes that the FAA will not be able publish the advisory circular guidance document and complete the required FAA employee training before that date. Therefore, AOPA requests that the FAA grant the above referenced petitioners' request for postponement of the implementation of FAR Part 145.

If the advisory circular guidance and FAA employee training is not completed before the current implementation date takes effect, AOPA feels that the associated costs to General Aviation will be even higher than those costs that were formally identified by the FAA. For example, the new rule requires that certificated repair stations develop new manuals for FAA approval by the rule's implementation date. In the absence of published guidance and completed FAA employee training, these new manuals will most likely have to undergo revisions. In other words, it would be counter-productive and an inefficient use of resources to implement the rule before publishing the guidance materials and before FAA employee training is completed. It will only serve to add to the affected repair station's costs of doing business without any safety benefit. Those added costs would also be passed on to consumers, in the cost of doing business. Suitably postponing implementation will help serve to minimize the overall costs associated with the development of the required manuals.

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AOPA believes that granting the petitioners' request to postpone implementation of FAR Part 145 is practical and in the public's interest. Doing so will have a positive effect on regulatory compliance, will not have a negative impact on safety and will not impose any new burdens.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Melissa Bailey', with a horizontal line extending to the right.

Melissa Bailey  
Vice President – Air Traffic, Regulatory and Certification Policy

CC: Nicholas Sabatini – FAA Associate Administrator for Regulation & Certification  
David Cann – FAA Flight Standards Division Manager –  
Continuous Airworthiness Maintenance  
Jason Dickstein – Representative for the Petitioners