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November 94,2002

U.S. Dept. of Transportation
Docket Management System
400 7th Street, SW
Room PL 401
Washington, DC 20491-0001

Dear Sir or Madam,

I am writing to you today to ask that you strongly consider revising both the implementation date and scope of the proposed changes to the Part 145 regulations published in 66 Federal Register 41088-41124 on August 6, 2001. Although the intent of these changes is well meaning, the impact on Repair Stations (80% of which are small businesses) has not been fully considered.

Many small shops such as ours went through considerable time and expense to produce our current FAA certified manual. The proposed changes would place an overwhelming financial and administrative burden on these shops. Often is the case where the Chief Inspector is also the technician, bookkeeper and shop librarian. To ask such a person to take on the enormous responsibility of completely overhauling the current manual, will place some shops in fiscal jeopardy or worse, lead to a marked decrease in the number of Repair Stations, which certainly cannot be in the best interests of pilot safety. A small shop cannot devote the time necessary to both operate his business and produce a whole new set of manuals. The expense alone would be prohibitive for many shops.

We understand that change is inevitable, and acknowledge that there have been many technological changes in our industry that may need to be addressed. Repair Station Manual requirements already have foreseen that possibility and are set up currently to accept revisions to the manual. The FAA has the responsibility and the means to address such shortcomings during their inspections of Repair Stations. Changes that need to be made could more easily be pointed out by the local FSDO Inspectors and be complied with in a more synergistic approach. This may take more time initially, but will allow for greater compliance, which serves everyone's greatest interest, aviation safety.

Respectfully,

James T. Griffin
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