



AERONAUTICAL REPAIR STATION ASSOCIATION

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United States Department of
Transportation Dockets
400 Seventh Street, S.W.
Room Plaza 401
Washington, D.C. 20590

RE: Docket No FAA-1999-5836 - 2
Notice No. 99-09

Please consider this a Request for Extension of Time for Comments to the above referenced Docket under 14 C.F.R. §11.29(c).

Petitioner, the Aeronautical Repair Station Association (ARSA), represents the interest of over 400 companies involved in the maintenance, alteration and preventive maintenance of civil aviation products, components and parts. As a representative of entities currently certificated under 14 C.F.R. Part 145, the Petitioner has a substantive interest in the proposed rule.

Many of Petitioner's member companies use non-certificated sources to perform maintenance, preventive maintenance or alteration. Under the proposed rule, these non-certificated sources will be required to allow the Federal Aviation Administration (FAA) access to their facilities for the purpose of determining compliance with the Federal Aviation Regulations (FARs). Among other reasons, Petitioner seeks the extension of time for comments in order to provide those non-certificated sources a copy of the proposed rulemaking and to allow those non-certificated entities the time to review the notice and to provide their comments.

In addition to the above, Petitioner believes that good, cause exists to extend the comment period to the maximum allowable on the basis on the FAA's own observation in the notice that this proposed rule has been under consideration since 1975. The

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proposal contains many changes to the requirements for the certification of repair stations which must be carefully considered by each of the over four thousand entities currently certificated under 14 C.F.R. Part 145. These entities are located in the United States and in foreign countries. The ability to access the proposed rule and to provide comment on the multiple changes is, in some cases, limited and may take as much as thirty (30) days for delivery.

Finally, the likelihood that the public will be given another opportunity to provide the agency substantive information and comment on the rules governing repair stations is remote considering the time it has taken to issue this proposal. This means that the proposed rule must be able to address future issues in a manner that allows the agency and the public to have confidence in the rule and the entities governed by the rule. It is imperative that all interested parties be given as much time as possible to review the proposal and provide substantive information and comment. We believe that the current comment period is insufficient for this purpose.

For the reasons stated, it is in the agency's, and indeed, in the public's, best interest to provide the maximum amount of time for comments on this proposal.

Therefore, the Petitioner respectfully request the FAA extend its Comment Period, at a minimum, to December 31, 1999.

Sincerely,

A handwritten signature in black ink that reads "Sarah MacLeod". The signature is written in a cursive, flowing style.

Sarah MacLeod
Executive Director