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# ORIGINAL

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DEPT. OF TRANSPORTATION  
DOCKETS

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## DOCKET NO. FAA-19994836; NOTICE NO. 99-09

Dear Sir,

I have the following comments on this NPRM:

- a. The proposed rating system is much improved.
- b. The transition phase is fair and appropriate. The administrative burden for the agency is fair. A priority must be sent to the FSDO's stating that a revised manual will be reviewed and returned within 20 working days.
- c. I believe that the FAA should develop an AC that addresses how the operations manual will be written. AC 145-3 is too vague. This manual needs to address differences between small and large repair stations. The operations manual should be much more specific in how they do their work. This is especially true of their work order procedure. The process needs to clarify how the incoming, hidden damage, progressive, and final inspections are accomplished and recorded. It is important that the repair station operations manual addresses how discrepancies found during the inspection process are addressed and recorded. The operations manual should identify the recording of what data the inspections and repairs are accomplished by. In other words, when a repair is being accomplished, is it being done to the mfg.'s maintenance manual. If so what chapter and revision status. The operations manual should identify that all tags received, as well as those issued are copied and kept in the work order. This will assist in the determination at a later date of SUP's. I agree that the required amount of IPM's required are a burden for the repair station, however, I believe that the guidance in the 8300.10 should indicate that the PMI check repair station personnel for knowledge and location of the repair station operations manual. The AC for the completion of the repair station operation manual should address that this manual may be kept current in the company's computer system if it can show that the required personnel have access to this system. I would like this AC to be available on disk or on the Internet. This would assist the repair stations in developing a standardized operations manual, and reduce their work load.
- d. I disagree with your assertion that repair station need a quality assurance system. For the smaller repair stations, the Chief Inspector is the quality assurance system. This system works well. For larger organizations where numerous departments are handling the same part, a quality assurance department should be required. I would suggest that a simple quality assurance system be addressed in an AC for the smaller repair stations. A check list very similar to those addressed by the JAA could be used by the Chief Inspector. The PMI could review this check list as part of his routine visits of the repair station. When this system is being utilized there should be checks twice a year instead of only once a year. This would not be an undue burden on either the repair station or the PMI.
- e. I believe the capabilities list is a good idea. However there should be a currency check each year by the PMI to ensure that they still have the personnel, training, tools, and manuals to inspect and repair the items on the capabilities list. This capabilities list is being used as a marketing tool in the industry. This list needs to be kept current, to ensure that the repair station is not marketing services that they are not presently set up to accomplish. The idea

of self evaluation is good, but should be reviewed yearly by the FAA as well. This could be as simple as maintaining a list of compliance for each item on the capabilities list. I disagree that the repair station should just notify the FSDO of the changes to the capabilities list. This needs to be accepted by the PMI. I feel that the repair station operations manual should be a document that is "approved" by the administrator, not just accepted. This would be similar to an operators AAIP.

- f. Contract maintenance needs to be addressed more clearly. There needs to be more definition of what's required by the repair station. There should be a difference in the requirements of contracting out to certified repair stations vs non certificated agencies. The repair station should be required to perform case type audits of all companies that perform subcontract work for them. Should a company, especially another certified agency, have accreditation through an approved source, it should meet this requirement. The repair station should be able to sub contract with other repair stations without prior approval of the FAA. The operations manual should be updated as soon as practical. Non certificated agencies should be approved prior to their being used, The FAA has to be very responsive to this. It should not require an operation manual update prior to use, but an approval stamp by the PMI to a letter of request. The operations manual would be updates as soon as practical.
  - g. The operation manual needs to have more clarification on training. There needs to be documented training on the operations manual for all repair station personnel who are working on products. There should be additional training requirements for all inspectors. There should be documented training, or an approved reading file for all revisions to the operation manual. There needs to be more detail on training for 135 and 121 operators. For instance, what training is required when a transient 135 aircraft has a minor problem that needs to be addressed. Does the repair station need to have in depth knowledge of the operators manual prior to changing a light bulb at a remote location? RII training needs to be addressed specifically.
  - h. Record keeping and reporting needs to be more detailed. At this time, many repair stations have a work order page that lists the inspections accomplished. It does not detail discrepancies at all. The only detail for parts usage is a pick list. There is no requirement for a work order summary. The work order package should be required to be paged. This way anyone who reviews the work order can verify how many pages are in this package. This package should have all pertinent details such as incoming and out going tags, discrepancy and corrective action sections, inspection forms. Especially on overhauls, the repair station must have a copy of the procedure that the mechanic used to complete the work, and initials next to every step accomplished.
  - i. SFAR 36 needs to go away. If the FAA wants to allow this, they need to give this as a rating to an operator or repair station. An SFAR should be temporary, and become an FAR in a timely manner. Two years is acceptable, twenty years is not!
  - j. Altimeter and Transponder requirements need to be made much more clear. I have received differing statements from many PMI's on when these inspections are required. It should be made very clear an advisory letter. When and what is required when replacing a unit in these systems. If an antenna is changed, or removed and reinstalled for troubleshooting, what is required?
  - k. Not that this is part of the NPRM, but when is FAR 1 going to be updated to include all the definitions that are spread throughout the regulations?
  - l. I believe that the regulation should continue to require that the repair station keeps it's certificate accessible to public viewing. The public should be able to easily review the capabilities, and not have to ask for this information.
  - m. The update to FAR 145.9 is an improvement.
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- n. A problem throughout the industry is that operators and agencies change personnel without notifying the administrator. This obviously needs to be more detailed in the regulations, and needs to be addressed in the new FAR 145 update.
- o. In regards to duration and renewal there needs to be a statement in regards to activity. If a repair station has no activity for one year, they need to surrender their certificate until such time that they will again be active.
- p. The regulation must be much more specific about satellite facilities, and performing work away from home base. At this time facilities are being maintained that are not satellite bases, but they are considering themselves as working away from the main base. There are also companies that do not work out of a facility the better part of the time. Repair stations performing NDT or internal fuel tanks are examples. There should be language in the FAR that details how these will be monitored. For instance, they should notify their PMI any time they are working outside their geographic area. It is unreasonable to assume that all work must be accomplished in a hangar.
- q. The regulation stating that the repair station must notify the administrator prior to any work being accomplished at a relocated facility should be changed. It should be stated that the administrator must be notified prior to the move, or that the repair station would have to apply for a new certificate.
- r. Personnel requirements should note that there are differences in the personnel requirements for a repair station with one employee vs a repair station with 500. For a large repair station, they should not only require a Chief Inspector, but a Maintenance Manager. This should be detailed similar to the differing responsibilities of a 10 or more operator.
- s. The update to the recommendation for repairman is excellent. Anyone who meets the requirements of FAR 65.10 1 should be able to receive a repairman's certificate.

In general the updates to FAR 145 are an improvement. There should be little additional cost for either the repair station, or the FAA if detailed documentation is prepared IN ADVANCE to assist in these changes. This is especially true of how the operations manual will be presented. This should be made available on the FAA web page, preferably in a word format. Guidance on how the internal audits are to be accomplished should be made available and written clearly. It should differentiate between small and large repair stations. It should have examples of check lists that could be used.

Respectfully,



Earl A. Baumgard  
A&P 158466165  
54 15 Medlin Court  
Flower Mound, TX 75028