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ORIGINAL



## JET SYSTEMS, INC.

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DEPT. OF TRANSPORTATION

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July 22, 1999

U.S. Dept. of Transportation Dockets  
Docket No. [FAA-I 999-5836] - 27  
400 Seventh Street SW  
Room Plaza 401  
Washington, DC 20590

### RE: Notice 99-09, NPRM concerning Part 145 Repair Stations

We would like to submit some comments on the proposed revisions to Part 145.

As the Director of Quality of Jet Systems, Inc., an FAA certificated Repair Station, I am writing from the point of view of one having responsibility for the implementation and direction of all quality control procedures within the repair station. This includes responsibility for our Inspection Procedures Manual and would include responsibility for writing and revising the Repair Station Manual that would be required under the proposed § 145.205.

Although there are extensive changes in the proposed revisions to part 145, including many new requirements for repair stations, we find that in our own situation, most of these do not impose any additional burdens on us as we are already in compliance with most of these new requirements. (For example: proposed §145.201 on Quality assurance and quality control systems, and proposed §145.213 on Contract maintenance.)

*However, there are some provisions in § 145.207 (Repair station manual contents) that we feel would be unnecessarily burdensome both to repair stations and to FAA personnel. The concern here is that some of the material that would be required to be included in the repair stations' manuals is so overtly specific that it would necessitate frequent revisions to the manuals and, consequently, frequent submission of requests for approval to the Administrator. (Given the provisions of the proposed § 145.205(f).)*

Specifically, the material we are concerned about is that which would be required by §§ 145.207(a), 145.207(b), 145.207(h)(l) &(2), 145207(k), and 145.207(l).

Section 145.207(a) would require an organizational chart containing the name of each management employee who is authorized to act for the repair station, the employee's assigned area of responsibility, and the employee's duties, responsibilities, and authority. We feel it would be a serious mistake to require the employee's name and

that it would be preferable to require only the *title* of each management position along with that position's assigned area of responsibility, and the employee's duties, responsibilities, and authority.

It has been our experience that there is a great deal of mobility in this industry and thus a fairly high rate of employee turnover. This involves both advancement within a company and movement between companies. The proposed § 145.207(a) would require that anytime a management employee was promoted, reassigned, or left the company, then the repair station manual would have to be revised and submitted to the Administrator for approval. We feel certain this would be found to be administratively burdensome to both the company and FAA.

This requirement would also seem to have the odd result that if a management employee left the company, the company would have to seek FAA approval for the corresponding change to its organizational chart. Would internal promotions or reassignments have to wait upon FAA approval of the corresponding manual revision? It does not seem that that would be advisable.

The exact same situation exists with the proposed § 145.207(b) which requires a roster of inspection personnel and § 145.207(l) which requires the names of persons authorized to approve manual revisions. Similarly, §§ 145.207(h) (1) & (2) require specific information about subcontract agencies that is quite subject to change. For example, we recently had one subcontractor discontinue their operations, causing us to change to a different one. Such situations, as well as ones where a subcontractor obtains a change in their type of certificate or in their ratings would, again, require a revision of the repair station manual.

When one considers that a change in *any one of the* four above mentioned sections would require a manual revision, there is the very real possibility that manual revisions would need to be made on a far too frequent basis.

In our own situation, we did have a roster of inspection personnel included in our Inspection Procedures Manual. Due to the type of problem mentioned above, we removed the roster from the IPM and put it in a separate personnel manual, which also contains a roster of all supervisory personnel. We have found this to be a much better arrangement.

We do not feel that it would be unreasonable to require a repair station to maintain, in current condition, a roster of management employees and inspection personnel and to make it available for inspection by the Administrator. Additionally, requiring the repair station to furnish such a roster to its certificate holding district office and to update it when changes are made would also be acceptable (similar to the requirements of § 145.203, Capability list). But we feel it would be a mistake to require individual names in the repair station manual itself.

Similarly, a list of subcontract agencies and the requisite information about them could be required to be maintained by the station, and a list of the maintenance functions contracted to outside agencies could be included in the repair station manual. But putting the names of the facilities and the type of certificate and ratings that they hold in the repair station manual itself, does not seem advisable.

Section 145207(k) would also require including material (a capability list) in the repair station manual that is subject to frequent change. In fact, changes to the capability list would, in our experience, be even more frequent than any of the changes previously discussed. As is acknowledged in the "General Discussion of the Proposals" section of this NPRM, capability lists are often used by repair stations as marketing tools. This is the case in our own situation and, as such, our capability lists are updated on an almost daily basis. Even though a change in the capability list would not require submission of the manual revision to the Administrator for approval [§ 145205(f)], it would still require a revision of the manual, which requires, besides the changes in the list itself, changes in the list of effective pages, changing the date of the latest revision on each page, changing the list of revision to the manual, and possibly changes in the table of contents. [§ 145207(m),(n), & (o)]

*We would very much like to see § 145.207(k) deleted entirely.* Section 145.203 already requires each certificated repair station to prepare and maintain a current capability list acceptable to the Administrator. We would like to suggest that this list be kept as a separate document, not part of the repair station manual. Deleting § 145.207(k) would not diminish the effect of § 145.203, nor would it require any changes in it. If there is some reason to have repair stations include their capability list in their repair station manuals, then we would like to suggest that it be included as an appendix, with the provision that changes to that appendix would not be considered as revisions to the manual.

With regard to § 145.203 itself, we would only like to question the provision that when an additional article is added to the list, a copy of the list is to be sent to the CHDO. [§ 145.203(k)] Considering that the capability list may contain several hundred articles, it might reduce administrative burdens if a list of *on/y the added articles* was sent to the CHDO.

Thank you for your consideration of these points.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald Stoothoff", with a long horizontal flourish extending to the right.

Ronald Stoothoff  
Director of Quality