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Subject: Comments on Docket No. FAA-1999-5836; Notice No. 99-09 *FAA 99-583640*

Other than the two comments attached I believe that this proposed rule change is consistant with the support of aviation safety. It provides an understandable regulation which is also practicle and well within the abiiities and economic budgets of **ail** repair stations. Please see attatched comments.



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Comment on Proposed Rule Change [Docket No. FAA-1999-5836; Notice No. 99-09]
By Tamra L. Thompson, Aviation Safety Inspector, FAA, PDX-FSDO, NM-09

1. Proposed verbiage change to 14 CFR Part 9 1.4 11 (b)(2)(iii) and 9 1.4 13(c)(1)(iii), "A specialized service rating", is not conducive to consistency with the practices and procedures of the FAA and Industry, due to the fact that there is not an Industry Standard and or Specification which could be listed on the repair stations operation specification. To make this statement consistent and keep the proposed verbiage, the FAA would need to provide guidance to it's Flight Standards Inspectors for the evaluation and approval of a Specification or allow industry some other method to perform this type of work. Another method would mean adding verbiage to the new 14 CFR Part 145.59(5) "Or other rating as approved by the Administrator."
2. The verbiage of 14 CFR Part 145.2 15(a)(2) "Arrange for the maintenance. . .", appears inconsistent with the previous verbiage of 14 CFR Part 145.2 13 "Contract Maintenance". If it is the intent of the new 145.215(a)(2) to ensure that contracted maintenance is under the quality control of the repair station, then this section should state that specifically. However, if it is the intent that the quality control system should also include some assurances for a repair station making the arrangements for maintenance for which it may or may not be rated. Then this part should have verbiage for a specific procedure to ensure that the person with whom it is making arrangements is qualified, certificated and has a quality control system for the job function it is arranging. Further it should be noted that just because a repair station is making arrangements for an article to have maintenance performed on it, does not mean that they are obtaining contracted maintenance.