

62387

ORIGINAL

**CORPAIR**  
FM Certified Repair Station No. **SE2R158L**

FEDERAL DEPARTMENT OF TRANSPORTATION  
DOCKET SECTION

00 AUG 30 AM 11:32

U.S. Department of Transportation Dockets  
400 Seventh St. SW., Room Plaza 401  
Washington, D.C. 20590

August 24, 1999

Ref.: Docket No. [FAA- 1999-5836; <sup>46</sup> Notice No. 99-09 ]

To Whom It May Concern:

The following comments are in response to a careful review of the Federal Register Part II on part 145 Review: Repair Stations; Proposed Rule, dated Monday June 21, 1999.

There has been a long needed overhaul of part 145 to bring it up to date with the advancements in the industry and many changes that have occurred since it's last review and minor amendments. The initial NPRM looks as though much thought was put into it's construction and there are many good changes, however there still seems to be some items that require careful consideration and more thought before it is put into effect.

The changes to *Ratings and Classes* look good and will clear up much open ended and loose interpretations of the old outline. The changes will bring the ratings up to date with the industry advancements and enable repair stations to better define their capabilities when applying for and changing ratings. The proposal to eliminate the requirement to maintain an IPM is a bad idea. The IPM provides a good guideline for the operation of the repair station with definite parameters to follow. It also allows the repair station the flexibility of tailoring its IPM to fit its capabilities and develop a good working relationship with the PMI assigned by the FSDO. The IPM sets guidelines agreeable to both the repair station and PMI and puts the repair station in compliance with the FAR's. In simple terms, don't fix what already works--- leave it alone! The proposed change to the requirement of a quality assurance system is good. Most repair stations already have in place a system that is approved by their PMI so this change would have no significant impact.

The proposal concerning the requirement of a *capability list* in theory may be a good idea but will never work in the real world. This will place an undue burden on the repair stations by a nightmare of administrative duties on the part of quality assurance and managerial personnel to keep the list current. True, some repair stations remain relatively static throughout their existence and capability lists would seldom change. However there are many repair stations due to their involvement with aging aircraft fleets, problems with parts procurement, availability of technical data, and other associated problems plaguing the industry these days that would make it impossible to maintain a capability list with any consistency. The constant changes would not only put an undue burden on the repair station but also on the PMI assigned to it and the FSDO he or she works out of. There are already regulations in place that require a repair station to self

# CORPAIR

FAA Certified Repair Station No. SE2R158L

regulate their capabilities and refrain from performing maintenance on any aircraft, engine, propeller, or appliance that it doesn't have the personnel, technical data, tooling, and knowledge to do so. Let's not add any additional regulations for something that already exists.

The proposal concerning the control of contracting to noncertificated sources is a good and sorely needed change. By putting the repair station in charge of the work involved and supervising it closely a system of quality control will be maintained over the noncertificated source. The procedures in the repair stations' manual will set forth definite guidelines as to how the repair station will mandate the work performed by the noncertificated source. Along with the good aspects of this change there must also be mention of some bad points. The proposal suggests that the Administrator may inspect this non-certificated contractor to "determine compliance with this chapter". There are no limitations on what the administrator will be looking for. This vague description will cause an unwilling participation on the part of the **non-**certificated contractor if he doesn't know what his responsibility is going to be. Non-certificated contractors are sometimes leery of aviation related work to begin with due to the liability involved. They are not accustomed to the regulations that must be adhered to as are the certificated repair stations. If they think that taking on work contracted from a repair station will bring an onslaught of FAA inspectors nosing around their facilities they will immediately withdraw their interest in the additional business. Their limited understanding of 14 CFR, parts I-199 will create an uncomfortable atmosphere that will promote a **false** sense of liability on their part. Any changes in rulemaking of this subject must be direct and defined so that there is no question that the repair station is the person responsible for compliance with the FAR's, not the non-certificated contractor.

The proposal in 145.201 is much too narrow and limited. There is too much **left** to question the way it is written. The requirement **to possess article-specific maintenance manuals only when required** leaves a lot in question. **Article specific maintenance manuals** does not begin to describe the myriad of technical data available that makeup instructions for continued airworthiness. They are identified by many names and titles that must be included in this proposed change. The text that mentions "when required" leaves a question as to whose authority makes that decision. The person should be identified and there should be a clarification as to how that decision is made.

*In summary, the changes proposed are for the most part well constructed however there are many subjects that still need **careful** consideration and more thought and **input from** the industry. The ratio of time since previous changes to part 145 and the time that has been given to review and comment on the proposed change is far too unbalanced*



*It is with this consideration that I propose and request an extension of 90 days to the deadline for comments. This extension is necessary for the industry to digest the changes proposed and consider all the positive and negative impacts that it will have once put into effect.*

Sincerely,

A handwritten signature in black ink, which appears to read "Andrew S. Thurmond". The signature is written in a cursive style.

Andrew S. Thurmond  
Corpair Supply Co., Inc.  
FAA Certified Repair Station No. SE2R158L