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DEPT. OF TRANSPORTATION

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August 25, 1999

U. S. Department of Transportation Dockets
Docket No. [FAA-1999-5836]-48
400 Seventh Street SW.
Room Plaza 401
Washington, DC 20590

To Whom It May Concern:

The enclosed response is in reference to an NPRM in your proposed revision of part 145 that has to do with FAA approved repair stations.

The undersigned has reviewed your proposed revisions to the repair station.

Under Quality Assurance you state and I quote "The size of an acceptable quality assurance system would be based on the repair station's size and type of operations." You further state, "The FAA recognizes that many certificated repair stations have few employees. Consequently the FAA would consider a repair station's size and complexity and the repair station's designation of persons who perform quality assurance functions in reviewing a quality assurance system. For example, the FAA would permit smaller repair stations to assign individuals to quality assurance on a part-time basis." The above statement makes no definition or description of what the FAA would require under the heading of quality assurance. This is one of the problems we have had under the past 50 years that I know of that leaves too much to the individual examiner to define what quality assurance means. There should be some definite guidelines in your rewrite so that everybody would be reading from the same book.

Under the heading of Contract Maintenance, you are proposing that a repair station may contract maintenance and alterations of components of a type certificated product to a non certificated source. However, I interpret that regulation change to mean that our repair station would be responsible for monitoring the people we would be buying from and be responsible for any screw ups they would make during repairs.

You also state under Contract Maintenance that you would require us to list everybody that we buy accessories, tires, engines, propellers or any other parts from and that we would be required to go and inspect that facility to determine if they meet the qualifications of the repair station and monitor it to insure they are qualified to perform in accordance to FAA regulations.

This will make it very difficult for us to maintain an approved repair station. We do not always know whom we are buying a particular accessory from that we need until we locate it. Because we maintain several types of different aircraft some of those aircraft are no longer in production and we are unable to call a distributor or manufacturer and order the parts. We are unable to buy parts for an aircraft that is no longer in production from the manufacturer. For example, a customer comes into our shop and wants a single or double engine change made on his aircraft and he wants to provide the engine, which are often times, the case. This is not only for a field-overhauled engine but also for a remanufactured engine. Under new guidelines if we do not list the company that overhauled that engine or accessory we will have to refuse our customers request. Under the above conditions, we could not continue to be an approved repair station.

Under the Training Program, you state that you “would require each repair station to establish and maintain a document training program for all employees who perform work under repair station’s ratings and classes. You go on to propose that training would be required to consist of initial and recurrent training for aviation personnel based on each individual’s assignment and ensure that each individual is capable of performing the assigned task. A person who is certificated or rated to perform particular duties, but is not currently assigned to perform those duties at the repair station, would not be required to participate in recurrent training for all of the tasks for which the person is certificated or rated until such time as that person is assigned to those duties. Because repair stations’ activities vary greatly, information about the specific training needed to satisfy the requirements of the proposed rule would be published and advisory material that would be issued with this rulemaking.” Why wouldn’t you in your new revision list the type of training that would be required of each repair station? Each repair station would be certificated for particular categories of aircraft. Again, you leave too much to interpretation of a particular rule. Where as one GADO might require one type of training and another GADO would require another type of training.

The conclusion of your proposed rule change states and I quote, “The initial determination is that the annual costs associated with compliance with the proposed revision of part 145 would be less than \$5,000 per repair station and each affected manufacturer. For the type of business entities covered by this proposed rule, these annual costs are negligible. Therefore, the FAA certifies that the proposed revision of part 145, would not have significant economic impact, negative or positive, on the repair stations or MMFs considered to be small entities under the rule.”

My question to you is who rewrites these regulations and how can you truthfully make such a statement when you don’t know how many employees a repair station has or the cost for sending maintenance personnel to school?

I would like to conclude my remarks on the proposed rule change by making my own observations about the proposed changes:

1. After having been in aviation as a FBO for the past 50 years, I will admit some changes need to be made in part 145.
2. A general aviation FBO approved repair station is usually different from a 121-airline operation. It would appear to this individual that you are attempting to write a regulation that puts us smaller fries in the same category as say Delta, United, American and other large air carrier operations. When these carriers contract out maintenance they investigate the companies they do business with because it is their company policy to do so. However, in our operation we do not know whom we are going to be buying from until we locate the item we need. We do not install an accessory or any equipment on an airplane that does not have a yellow tag, which certifies that, the person or company who overhauled or manufactured that equipment has the proper approval from the FAA.
3. It would seem to this individual that you could write a regulation that would separate a general aviation operation from a part 121 air carrier operation, which would make it simple to read and interpret.
4. Your foreign repair station regulations is mixed in with your domestic regulations. Why not separate in your rewrite the foreign from the domestic so that anyone seeking information can find what they are looking for.

In conclusion, I would like to say that in my opinion in trying to paint everybody in the aviation industry with one brush, it makes it difficult for us who make an attempt to obey your laws and regulations.

My advise would be to assemble a group of educated individuals who have had on the job experience to answer some of the problems that this rewrite could cause.

Please do not force us to give up our approved repair stations.

What regulations are you going to propose for unapproved repair stations?

Sincerely,


Guy F. Hill Sr.