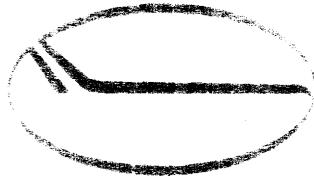


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Air Transport Association

DEPT. OF TRANSPORTATION
DOCKET SECTION

99 SEP -9 AM 11:19

September 3, 1999

United States Department of Transportation Dockets
Attention: Rules Docket No. FAA- 1999-5836 - 53
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590

Subject: Notice of Proposed Rulemaking, Part 145 Review: Repair Stations, 64 Federal Register, Number 118, June 21, 1999

Ladies/Gentlemen:

FAA has issued a Notice of Proposed Rulemaking, which, if adopted, would update and revise the regulations regarding Part 145 Repair Stations. The proposal would revise existing regulations to address technological advances, align with current industry best practices, strengthen maintenance records requirements, address international harmonization efforts, and clarify requirements with regard to enforcement issues.

The Air Transport Association, pursuant to 14 CFR 11.29c, respectfully requests an extension to the comment period of 180 days.

The airlines find themselves in a unique position with regard to this proposal. Many airlines operate under both Part 121 and Part 145 certificates. As such, additional time is required to determine the overall impact the proposal offers to both certificates as well as a complete evaluation of the economic impact to the airline community.

Thank you for your consideration of these views.

Sincerely,

Art Coulomb
Director, Maintenance & Materiel

Attachment

Cc: Engineering, Maintenance, & Materiel Council
Maintenance Operations Committee