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DOCKET SECTION

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THE ZEE COMPANY, INC.
F.A.A. APPROVED REPAIR STATION NO. EA2R787K

October 8, 1999

RE: Docket No. FAA-1999-5836 *-1458*
Part 145 Review: Repair Stations; Proposed Rule

Dear Administrator:

We would like to voice our concern over the new proposed FAR 145.

We are a small Repair Station of twenty-five employees- We feel that the new proposed FAR 145 will be too expensive, time consuming, and will place an extreme burden on the small Repair Station.

It appears that the new FAR 145 is trying to encompass all Repair Stations into one category, and we feel this simply will not work. It is unreasonable to expect to put a company like Delta Airlines in the same category as a company that may only employ half a dozen employees.

The proposed rule changes are too numerous to discuss in this letter. However one example would be the issue of training, which includes the recurrent training for all maintenance technicians. We have several employees with twenty plus years experience working on various systems; we feel there is no one qualified to m-train a repairman such as this. Furthermore, there is no formal training available other than "on the job training" gained from an experienced repairman.

We feel that the proposed FAR 145 needs to be re-evaluated with the consideration of the small repair stations which employ only a handful of employees.

As for solutions, we are currently and regularly audited by the FAA and CASE,. We feel that has sufficed the current regulations in the past, and will suffice in the future to produce quality work.

Best Regards,



Derek Zaiontz
Vice President