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**ORIGINAL**

DEPT. OF TRANSPORTATION  
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U.S. Department of Transportation Dockets,  
Docket No. [FAA-1999-5836], -198  
400 Seventh Street SW., Room Plaza 401,  
Washington, DC 20590

Subject: Comments on the NPRM for New FAR-145  
Reference: Federal Register Docket No. FAA-19995836; Notice No. 99-09

Dear Sir,

Japan Airlines Co., Ltd. appreciates the issue of the proposed New FAR-145 because the repair station rules have not been updated for many years. However, as a foreign repair station (Certificate No. JACY 109F and JACZ109F), we would like to submit the following general comments with regard to the above reference documents-

The following also incorporates the comments of other companies in the JAL Group who hold an FAA repair station such as Airport Engineering Service Co., Ltd. (Certificate No. UJ33895L/UJ32895L/ UJ3Y895L), JAL Engine Technology Co., Ltd. (J3LY116N/J5LY117N), and Japan Turbine Technologies Co., Ltd. (JVKY492L).

145.3 Definition of terms

Generally, the inspector who is authorized to perform a return to service after completion of maintenance work is called a Repair Station Authorized Inspector. Therefore, the definition of "Authorized Inspector" should be prescribed in this part. JAR-145 defines the term of "Certifying Staff". Also the definition for the following words should be specified in this part. (JAR-145 defines the definition of the similar words in the regulation.):

"Line Maintenance"

"Acceptable to the Administrator"

"Approved by the Administrator" or "Accepted by the Administrator"

The new FAR-145 requires that the training program and repair station manual must be approved by the FAA. However, the current Inspection Procedures Manual (IPM) has been accepted by the FAA. The process that is used to "accept" a document is exactly the same as an approval process-

Therefore, please define the differences among “Approved by the Administrator”, “Accepted by the Administrator” and “Acceptable to the Administrator”.

145.7 (e) Geographic authorization

The procedures for the Geographic Authorization to a line station is newly prescribed. Currently, there are some differences in the approval procedures of the Geographic Authorization between our regional FAA IFO office and other FAA IFO offices. In our case, we have to obtain the Geographic Authorization for line maintenance at Narita airport where our main base maintenance facility is also located. However, in case of repair stations approved by other IFO offices, the line station which is located at the home airport of their repair station does not need to obtain the Geographic Authorization. Therefore, the more detail procedures should be defined in this part.

145.5 1 Application for certificate

This part, (e) prescribes that “An application for an additional rating or renewal of . . . .must be made on a form and in a manner prescribed by the Administrator.” The standard procedures for the required documents for the renewal and addition of rating should be prescribed because there are differences in this area among PMIs and there is some confusion.

In our case, if there is no activity on rated article for the last two years under the certified repair station at the renewal inspection, the rating was removed from the operation specifications or the component was removed from the capability list according to the PMI’s policy. We believe that as long as the repair station keeps the capability on performing maintenance, preventive maintenance or alteration on rated article, there is no reason for removal of the rating. Also JAR-145 does not require such a procedure. Please add the following statement to this part. “As long as the repair station keeps the capability on performing maintenance, preventive maintenance or alteration on rated article, rated certificate can be renewed.”

145. 111 Equipment and material requirement

All inspection and test equipment would need to be calibrated to a standard that is acceptable to the Administrator. We need detailed descriptions addressing what factors would make the standards acceptable to the Administrator such as NIST support, standard of the country of the manufacturer. And also the procedure should enable foreign repair stations to meet the standard without enormous effort and cost.

145. 153 Supervisory and inspection personnel requirements

This NPRM did not fully consider the problems of repair station located in

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foreign countries where English is not the primary language.

It should be clearly prescribed in this part that only the inspector who can perform an approval for return to service (the authorized inspector) under a foreign repair station should need to be proficient in English. Also, please clarify the difference between "inspector" and "inspection personnel" used in this part.

145.159 Training requirements

This NPRM did not fully consider the problems of repair station located in foreign countries where English is not the primary language.

Each repair station will be required to have an FAA approved training program for initial and recurrent training for employees. In JAL's case, we have around four thousand employees in our repair stations, and training syllabuses and materials for those people are written in Japanese, only training syllabuses and materials for authorized inspectors and supervisors are written in English. Therefore, it is very difficult for us to obtain FAA approval for the training program applicable to all employees. The required personnel and training under this part should be only applicable to authorized inspectors and supervisors.

Also, this part, (a) prescribes that "Each certificated repair station must have an employee training program that consists of initial and recurrent training and is approved by the Administrator." The training program for the authorized inspectors and supervisors is required to be incorporated in the repair station manual and this manual has to be approved by the FAA. Therefore, automatically the program will be approved by the FAA in the manual. Please prescribe such a detailed and practical procedure for obtaining the approval from the Administrator.

145.203 Cap ability List

We have been requested to make the capability list including name of manufacturer, model, part name and complete (including dash number) part number by the FAA. This has resulted in a lot of paper work. Also JAR-145 does not require to define the part number with dash number in the capability list. Please clarify in this part that no dash number is required to specify the part number of the article in the capability list.

145.207 Repair Station Manual contents

This part, (b) prescribes that the Repair Station Manual would include the roster of authorized inspectors. To be consistent with JAA requirements and to reduce the burden of approvals for revisions, the roster of authorized inspectors should be kept separate from the Repair Station Manual.

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Also the Manual is required to include a list of the maintenance functions contracted to an outside facility including a certificated repair station. It should not be required to include a certificated repair station in the Repair Station Manual because the list of U.S. certificated contractors can be very long and revisions may be frequent, placing an unjustified burden on us and the FAA inspector who must approve the revisions.

145.213 Contract Maintenance

This part, (a) requires that the repair station must confirm if the quality control and inspection system of a certificated contractor meets the FAA requirements. We understand that the FAA already confirm this matter before issuing the repair station certificate. Therefore this requirement should be deleted.

This part, (c) prescribes that "A certificated repair station may not contract.....of a complete type-certificated product." Please clarify the definition of "complete".

145.217 Record keeping

The regulations require signatures in several instances. Some FAA inspectors have required us that the signature of maintenance release must be made by English, full name and no block letter. The signature by Japanese character is common in other area. If this can not be accepted, the requirement should be prescribed in this part.

The official signature of a Japanese citizen is two or more characters that are not English letters or words. Some FAA inspectors have required that JAL signatures be English equivalents of the Japanese names. Consequently we have printed or written in script the English words; however, these are not legal signatures. What does the FAA intend?

Your attention to this matter would be greatly appreciated.

Sincerely,



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