

66184

Avionics Shop, Inc.

TACOMA NARROWS AIRPORT

ORIGINAL



U.S. Department of Transportation Dockets
Docket No. FAA-1999-5836 - **116**
400 Seventh St SW
Room Plaza 40 1
Washington DC 20590

DEPT. OF TRANSPORTATION
DOCKET SECTION
99 OCT 21 PM 3:39

Re: Repair Station 145 Rewrite.

Dear Sirs;

15OCT99

We are a small repair station, that only works on General Aviation and Corporate Aviation Aircraft, with currently a total of six employees. We have some very serious concerns with the proposal as written. It basically threatens the very existence of my company. It is of my opinion that the majority of the repair stations in the United States, are of the "small" size. This proposal appears to aim at the large facilities that are capable of working on very large aircraft. Many of the proposed changes will cause an extreme financial hardship on the part of these small repair stations. I will attempt to address many of the concerns I have, but will by no means, be all inclusive.

145.159 This regulation puts forth the requirement of approved formal training. We are constantly going through training on a daily basis. This would no longer count. We would be required to have a formal training program with on-staff instructors. No longer would we be able to go to conventions, or seminars, and get training there at no cost from the manufacturers (who would know their products best). Further, this does not specify an amount of hours training that would be acceptable. It refers to an upcoming Advisory Circular for recommendations, which would be subject to local FAA interpretation. It is not specific.

145.201 This regulation requires that all repair stations conduct annual on-site surveillance, of all sub-contracted work. This would result in tens of thousands, of dollars of expense per year. Further, this assumes that the repair station doing the surveillance would know what to look for. For Example, we constantly have altimeters overhauled by an instrument shop, as a result of our performing the FAR 91.411 inspection. It is beyond our expertise to be able to make sure that proper procedures, parts, or test equipment are being used. Currently this is being done by the local FSDO ASI's in their respective areas.

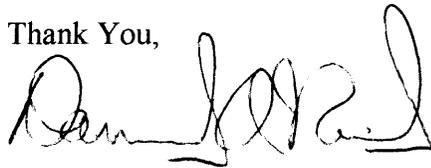
145.209 This regulation requires that a separate Quality Control System be enacted. This goes beyond the current procedure of Inspectors and Chief Inspectors, who already have to ensure that proper procedures, parts, or test equipment are being used. This is a redundant system and is not needed. It requires additional personnel.

145.207 (n) list of subcontractors. This is unreasonable. This is a constantly changing and expanding list, and would require additional time to keep list updated and approved.

145.203 Capability list. Again, an enormous task to keep updated. Further the “self-evaluation” procedure is not specified, leaving it open to local interpretation, or to be specified later with an Advisory Circular.

There are just too many things wrong with this proposal, to be able to list them all. But the effects of the proposal will be profound. It will basically put many repair stations out of business, driving the cost of aviation sky high and put the future of aviation into a death spiral. I cannot emphasize this. Please do NOT approve the current 145 rewrite as written.

Thank You,

A handwritten signature in black ink, appearing to read "Daniel A. Neil". The signature is fluid and cursive, with a large loop at the end.

Daniel A. Neil
Avionics Shop, Inc.