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FAA-99-5836-560

AVAT-1



ARM

Era Aviation, Inc.

6160 Carl Brady Drive
Anchorage, Alaska
99502

July 9, 2001

The Honorable Norman Y. Mineta
Secretary of Transportation
400 Seventh Street, SW
Washington, D.C.

Re: Docket No. FAA-1999-5836- New Part 145 of the Federal Aviation Regulations
Compromise Proposal: Delay Effective Date of Upcoming New Part 145 Rules Until
Effective Date of Second Phase Part 145 Rule Changes.

Dear Mr. Secretary:

Era Aviation, Inc. is a business that consists of domestic and international helicopter operations and an Alaska based regional airline. Our three repair stations play an important role in the success of our company's operations as well as supporting the operations of numerous other air carriers in Alaska. Era joins in the concerns expressed by the Aeronautical Repair Station Association (ARSA) in its letter to you dated May 2, 2001 regarding the upcoming final rule on Part 145 of the Federal Aviation Regulations (FAR).

We understand that the FAA has been working to revise Part 145 for 26 years. The FAA is on the verge of issuing its final rule and is very reluctant to stop the process to address extremely important areas of regulation, namely the need for a new rating system, mandatory quality assurance programs, operating at multiple locations under the same quality system and training program requirements. We can sympathize with the FAA's desire to "capture the gains" contained in the upcoming final rule, by issuing the "final" Part 145 rule now and addressing the remaining areas as a new regulation project. No one likes to see prior progress lost.

However, the FAA's two-step approach has a significant adverse impact upon our industry and the efficiency of our repair stations' operations. We, along with all other repair stations, will be asked to go through an extensive recertification process that will take at least two years, at substantial taxpayer cost only to have the process repeated once the second phase of Part 145 changes are finalized.

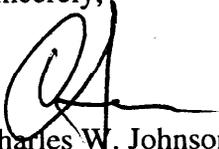
Era understands that ARSA has taken the position that the final rule making process should be halted and reopened so that the other key issues are addressed now before any rule is finalized. Era would like to propose a compromise that should satisfy the FAA's concerns about not losing their rule making gains to date, while at the same time, preserving taxpayer dollars and scarce FAA resources, and the resources of repair

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stations that must ultimately recertify under the final rule. Era proposes that the upcoming final rule on Part 145 have a delayed effective date that is tied to the effective date of the second phase of Part 145 regulation changes. This should satisfy the FAA's concerns because the language of the upcoming final rule will not be on the table for retooling, and the industry and the FAA will avoid the wasteful process of having to go through two separate recertification processes. Instead, the repair stations will not apply to the FAA for recertification until the second wave of changes is finalized.

We appreciate the opportunity to express our views on this important subject and hope that our comments will assist you in your deliberations.

Sincerely,



Charles W. Johnson
President

cc: The Honorable Jane F. Garvey
Representative Don Young
Senator Ted Stevens



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