

November 6, 2001

Mr. Richard W. Anderson, Director
Maintenance and Material Engineering
Aviation Safety & Operations
Air Transport Association of America
1301 Pennsylvania Ave., Suite 1100
Washington DC 20004-1707

Re: Part 145 Repair Stations - Final Rule

Dear Mr. Anderson:

Your maintenance operations memorandum of August 8, 2001 requested comments on the final rule governing part 145 repair stations. The rule has been reviewed and the following comments are provided:

Section 145.153 Supervisory Personnel Requirements

This section specifically states that a supervisor must oversee the work performed. This specific assignment of responsibility does not recognize that some organizations have personnel assigned by other titles performing the functions identified. American Airlines believes, as the section heading implies, that the intent is to identify the requirements for supervisory personnel and recommends that the word "supervisor" be replaced with the more generic phrase "supervisory personnel."

Section 145.163 Training Requirements

American Airlines questions the value and the fairness of the "approval" process and recommends elimination of the requirement in favor of an "accepted" program. Currently, an "accepted" training program that is very extensive and successful supports both American Airlines 121 and 145 certificates. Given the size and the dynamic nature of an operation such as American Airlines, it is crucial a training program remains flexible and maintains the ability to respond quickly to changing training requirements. Unless the FAA provides sufficient guidance regarding structure, content and mechanism for the "approval" process that does not jeopardize current training programs that encompass both 121 and 145 maintenance, the operator will be forced to either segregate the 145 training from an already proven program or suffer the burden of the FAA's "approval" process for the 121 operation.

Should you desire to discuss these issues or require further clarification, you may contact me at (918) 292-2840.

Sincerely,

Frank Sitterly
Director, Quality Assurance