

145234



Maintenance Operations

October 9, 2001

Document Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street
S.W. Washington, D.C. 20590-0001

Subject: Direct Final Rule – Request for Comments
14CFR 91, 121, 135, and 145
Docket No. FAA-1999-5836 - 612

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DEPT OF TRANSPORTATION

Dear Sir or Madam:

We have reviewed the subject Direct Final Rule regarding certain updates and revisions to the regulations for repair stations and offer the following comments.

14 CFR Part 145.4, Definition of Terms

1. In 145.3(b), the new term “article” is confusing; it is the same as the definition of “product” contained in 14 CFR Part 39.1.
2. 145.3(d)(2) definition of line maintenance is different from the industry. Line Maintenance has a broader function than the FAA describes, in the sense that it invariably requires specialized training; this sub-section requires clarification.
3. Definitions should be contained only in 14 CFR Part 1 to maintain consistency by using a single source of reference.

14 CFR Part 145.51, Application for Certificate

1. FAR 145.51(a)(7) requires that the applicant submit to the FAA for approval the Repair Stations training program. FAA personnel may not have adequate knowledge to approve a training program or course. In 145.51(a)(7), replace the phrase “for approval by” with “that is acceptable to.”

14 CFR Part 145.153, Supervisory Personnel Requirements

1. 145.153(b)(1) requires supervisors to be certificated under Part 65. This imposes additional regulatory burden on the CRS. The CRS is already authorized under Part 43 and certificated under Part 145. Requiring additional Part 65 certification of supervisors is unnecessary. The quality control procedures of the CRS along with the technical repair

data will maintain compliance. We recommend changing this section to require certification of the Accountable Manager and a reasonable number of employees in leadership positions to have a functional knowledge of the FARs to ensure compliance.

2. Foreign CRS personnel should be required to have the same level of knowledge of the FARs. This section, as written, confuses knowledge of the work performed with knowledge of the FARs. There should be no distinction between Foreign and U.S. policy if operating under FAA certification. The foreign repair station should have the same knowledge of the FARs as the U.S. domestic facility. Revise this section to remove the distinction among U.S. employees and foreign employees regarding their qualification/certification status.

14 CFR Part 145.155, Inspection Personnel Requirements

1. This section implies a job classification or an organizational reporting requirement of personnel. Inspection is a task performed at various stages of maintenance frequently requiring different skill and knowledge levels. We recommend that this section be revised to recognize that inspection may be a task not requiring a department or personnel classification.

14 CFR Part 145.157, Personnel authorized to return articles to service

1. 145.157(a) requires all persons releasing articles to service to be certificated under Part 65. 14CFR 43.7(c) authorizes the CRS to release article to service. The quality control system and training system of the CRS should be sufficient for the CRS to designate individuals to release article to service without additional certification under Part 65.
2. We recommend elimination of the distinction between a foreign and U.S. domestic CRS.

14 CFR Part 145.161, Records of management, supervisory and inspection personnel

1. Rosters of personnel and their work summaries are available. However, prior employment work history is often contained in employment applications within the individual's personal employment file. Provide the latitude to allow the CRS to construct the Work Summary for an individual when needed, or at the request of the regulatory agency. This would prevent constructing specialized work summaries for all individuals creating work for records that are rarely reviewed after employment.

14 CFR Part 145.211, Quality control system

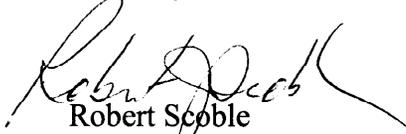
1. Include in reference 145.211 (2)(c), Repair Stations performing maintenance for operators with a Continuous Airworthiness Maintenance Program (FAR 121, 135) must maintain copies of the operators maintenance and inspection standards.

2. Revise 145. 211 (c)(4) to include notification for all revisions of the Quality Control Manual or Quality Control Section of the Repair Station Manual. We recommend changing this paragraph to read: Procedures for revising and notifying the certificate holding district office of all revision to the Quality Control Manual or Quality Control Section of the Repair Station Manual.

Appendix A

1. We have no objection to the deletion of Appendix A.

Sincerely,



Robert Scoble
Manager, Aircraft Inspection

Cc: Jim Takeuchi, United Airlines - SFOEG