

with regard to the new 145.217 and the removal of appendix A. I believe removal of appx A will leave the rule to ambiguous to effectively regulate. Currently with appendix A certain limits can be placed on which maintenance functions can be contracted out and how many of these functions can be placed on the list required by 145.11(a)(3). I also believe adding an explanation of the FAA's reasoning for this rule in the preamble comments section will provide additional guidance for agencies and ASI's.

Currently the list required by 145.11(a)(3) is limited by Appendix A. If appendix A is removed this list could grow unless additional guidance is provided to explain exactly which maintenance funtions are to be regulated. As an example: accessory overhaul. Every airframe or engine rated repair station will contract out to accessory shops, the overhaul of certain items (Overhaul being the maintenance function). The airframe rated shop may be capable of overhauling only certain types of brakes and not others. What would be listed. Each type of brake or nothing at all. This would certainly cause open interpretation among ASI's to be to broad. In turn the maint. function list could be required to be revised each time a new ASI is assinged to the operator. 145 is already viewed as a very ambiguous rule that is difficult to enforce. (Example: what requirement is there for the agency to perform work in accordance with its inspection procedures manual. Currently the agency is only required to maintain it. This is true of the all items required by 145.11(a)). Additionally no rule in 145 requires the list in 145.11 (a) (3) be maintained after original certification, but FAA order 8300.10 requires the inspector to enforce its use.