

July 20, 2016

VIA ELECTRONIC MAIL: susan.traugott.ludwig@faa.gov

Ms. Susan Traugott  
AFS 300/AFS340

**RE: PROPOSED AC 145-9A, Guide for Developing and Evaluating Repair Station and Quality Control Manuals**

The National Air Transportation Association (NATA) is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state and local governments. NATA's nearly 2,300 member companies are a vital prerequisite for a vibrant general aviation sector providing fuel, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, and fractional aircraft program management. As a result, our members are impacted by the FAA's revision to the Guide for Developing and Evaluating Repair Station and Quality Control Manuals Advisory Circular (AC) 145-9A. We therefore appreciate the opportunity to submit comments.

Overall, NATA is generally pleased to see the revision as repair station practices are expanded beyond what was envisioned with the last regulation revision and certainly since this AC was revised. However, our repair station members provided very detailed comments to the AC and are provided in the coordination form and in this letter as well.

General comments from NATA Maintenance Committee Members:

This AC still conflicts with the 14 CFR 145 regulations and the FAA Order 8900.1 Vol. 2 Ch 11. Even the Order chapter 2-1293 GENERAL and item H Recommendation for Manual Development states: "There are some recommendations included in this handbook referenced from Advisory Circular (AC) 145-9, Guide for Developing and Evaluating Repair Station and Quality Control Manuals, current edition, which are not required by the regulations. They have been included to assist the inspector and

certificate holder/applicant in developing a more complete description of the repair station's overall functions, responsibilities, and quality control procedures.

However, in practice, the Inspectors are told to make the repair stations comply with the whole Order and Advisory Circular. The SAS DCT checklist also states the AC and Order. Inspectors are requiring 145 manuals be "SAS Compliant" instead of a regulation reference, they state the Order or AC. This is outside the regulations and causes much concern and arguments with the industry.

A suggestion to provide clarity would be if the AC, Order, and DCTs had an asterisk next to the sections that may be preferred or used to "help" by the FAA, but are not required by the Regulations.

1. 1.6.1. Document no longer suggests using portions of ISO manual or other quality system to show compliance. NATA is not clear on why not.
2. Page 1-2 item 1.4.11 Line Maintenance. Still very confusing to the industry especially for those who work on on-demand Charter Part 135 aircraft. A literal implies that a 145 would need a Line Maintenance authorization to work on a charter 135 aircraft. In the past, our members were told if it is not the airlines then line maintenance is not required. If that is the case, then state scheduled air carriers only.
3. Page 1-3 Item 1.4.16 and 17 Mobile Field Service or Unit. What about a storage or dispatch location where no work is performed but employees are stations until dispatched to another location to perform the maintenance? The dispatch locations should be added.
4. Page 1.4 item 1.4.26 Temporary/Temporarily. The note is very helpful and greatly welcomed.
5. Page 1-5 item 1.6.5.1.3 Organizational Chart. Item 3, the executive functions seems inappropriate and should be eliminated. Some executives have nothing to do with the actual maintenance of the aircraft, parts, tooling, or personnel of the repair station, so are not needed. The only people who use the organization chart is the FAA. If it was removed, no one in the repair station would notice. Item 5 and 6 are

covered in the employment summaries and do not need to be here so they should be removed. This conflicts with Chapter 3 of this AC and adds many things not required.

6. Page 1-6 item 1.6.5.1.5 Description of Operations. The items 1 through 4 with the Note have many things that are way beyond the requirements of the rule. There is only one “may” which leads many industry and FAA personnel to assume that they are required. Many of those things are found elsewhere in the manual. This is redundant and confusing on what is required. Since facilities change quite often, can the facilities section be placed in a separate manual to ease the updating of this section?
7. Page 1-7 item 1.6.5.1.9 Contracting. The title is wrong as it only states “Contracting” while the rule speaks to Contract Maintenance. The repair station contracts many things besides contract maintenance, so what procedures are required for Contracting or Contracting Maintenance? There are a lot of assumptions that are made by this AC and the Order that it only is required for non-certificated maintenance vendors, while our members are not sure when they are in compliance with the rule.
8. Page 1-9 Item 1.7.2 Meeting Manual Requirements. States “The Repair Station **should**” which in accordance with 14 CFR 1 1.3. should is permissive, however, many FAA Inspectors and Managers ignore that and make it mandatory. Should remove or revise.
9. Page 2-2 Item 2.1.5 #6. There is no rule to make this a manual item. The rule states it must be made available- a procedure to make it available. This should be removed.
10. Page 2-3 the Note at the bottom of the page. This is a good note and will help when the FAA requires our members to print out a manual because they do not like any electronic format.
11. Page 4-4 Item 4.2.4.3. This item requires too much information. A large company would need to document all the tooling (even specialized tooling) and would take thousands of pages. The FAA has to ensure we have or have access to the required tools before you certify the repair station or add something to the operations

specifications. This appears to be required in the manual for the FAA only. The repair station does not need.

12. Page 4-6 Item 4.3.2 CL the Note Above the requirements of the rule. The repair station is to perform the evaluation to self-evaluate and revise the CL. However, the Note requires an acceptance signature on the list. There is no requirement for the FAA to sign acceptance. The repair station is just to have a procedure to **INFORM** the FAA not have the FAA accept the document.
13. Page 4-7 Item 4.3.4.2 #6. Does not belong in this section but should be in the RSM under the revision section for the CL or next paragraph (4.3.5).
14. Item 4.3.6 Person Responsible for Maintaining the CL, 4.3.7 Maintaining the CL, and 4.3.8 revising the CL. This is inappropriate and should be changed. Nowhere in the rule is the FAA to sign and accept the CL. It is just to be **notified**. By rule this is a repair station function. The section for 5 days is highly inappropriate as well. Many times the aircraft has been added, repaired, and approved for return to service before the 5 days has happened. What if the designated person is on vacation? Do we have to designate an alternate? Since signing the acceptance is not regulatory, then the 5 days has no real meaning and should be removed.
15. Page 4-10 Item 4.5.2 Note. The note reference to working outside the country causes some question then about those with a D100 approval. Is it only for those without the D100 or do those with D100 have to ask permission as well? A D100 approval is not constrained by where the aircraft is in the world. Maybe a note like this belongs in the D100 section (4.5.3). This whole section seems out of place. Why put all those procedures into place for something a repair station might not plan on ever doing. If a repair station does plan to do this, then it is added to the manual and the D100 authorization is given.
16. Pages 4-12, 4-13, and 4-14 Item Recurring work 145.203(b) (OpSpec D100 Required). This section helps repair station meet the demands of the customers however, there seems to be much overreach with what is required. There also seems to be too much micromanagement - requested AC refers to flexibility and mobility yet requires more supervision.

17. Page 4-16 Item 4.6.5 Line Maintenance Authorization. Once again, for those performing this type of maintenance for on-demand charter air carriers operating under Part 135, this seems to apply, but they are not required to have this operation. This is confusing. A statement why on-demand Part 135 operators are not included would be a big help to both the industry and the FAA.
18. Page 4-28 Item 4.10.5 Service Difficulty Reports (SDR). There still seems to be a disconnect with what the FAA feels is a serious failure and what repair stations feel is a serious issue. This may help.

Sincerely,

A handwritten signature in blue ink, appearing to read "John McGraw".

John McGraw  
Director, Regulatory Affairs