

January 17, 2018

Mr. Tim Shaver
Deputy Director, Office of Safety Standards
Federal Aviation Administration
800 Independence Ave, SW
Washington, DC 20591

VIA ELECTRONIC MAIL: Tim.Shaver@faa.gov

RE: 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.

In July of 2016, NATA provided comments to the FAA on its revision to the Guide for Developing and Evaluating Repair Station and Quality Control Manuals Advisory Circular (AC) 145-9A.

Overall, NATA is generally pleased to see the revision as repair station practices have expanded beyond what was envisioned with the last regulation revision and certainly since this AC was revised. However, after the AC was published in its final format, our members noted that the AC was missing revision change bars to reflect what had specifically changed. It forces the user to take the time to compare the old AC with the revised one, a laborious process given its 87-page length.

The use of revision bars is a best practice in document control and configuration management, in fact, the agency itself expects such a practice from industry when commenting upon FAA proposals. NATA requests the FAA look at revising the AC to show the changes that took place by using the change bar feature or another acceptable method.

We appreciate your consideration of our request.

Sincerely,

A handwritten signature in blue ink, appearing to read "John McGraw". The signature is fluid and cursive, with a long horizontal stroke at the end.

John McGraw
Director, Regulatory Affairs