

December 30, 2016

Griffin Moar  
Federal Aviation Administration  
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Washington DC, 20006

*Delivered electronically to Griffin.ctr.Moar@faa.gov*

**RE: Advisory Circular (AC) 120-72A Maintenance Human Factors Training**

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, aircraft rental, flight training, line support and business aircraft and fractional ownership fleet management. Our members are directly impacted by the FAA's revision to Advisory Circular (AC) 120-72A Maintenance Human Factors Training and therefore we appreciate the opportunity to submit comments.

NATA believes the FAA should withdraw this AC until the agency can conduct further analysis. The original AC, 120-72, was developed to establish a Maintenance Resource Management (MRM) process to correspond to the Cockpit Resource Management (CRM) philosophy at the time. With the publication of this new draft AC, the FAA is using the old MRM AC to fit a Human Factors (HF) model, resulting in a document that does not fit the proper audience.

The AC states that Human Factors training is required by the regulations, specifically in Title 14 CFR 145. In fact, Human Factors training is not required by FAA regulations; however, it is a requirement of the European Aviation Safety Agency (EASA). The FAA has taken advantage of the EASA requirement under the Bilateral to ensure that at least the repair stations with EASA certification have Human Factors training.

The current edition of Advisory Circular 145-10 Repair Station Training Program, also states that Human Factors training is regulatory, and while that AC is not up for comment, it is an area the FAA needs to further analyze for the purposes of regulatory consistency and interpretation as it relates to AC 120-72A.

NATA supports Human Factors training; however, we request the FAA make a further effort to correct this AC, and AC 145-10 to remove the language that insists Human Factors Training is regulatory.

Our specific comments are provided below.

### **Paragraph 1. PURPOSE**

This paragraph states that the AC is not mandatory and does not constitute a regulation, however this paragraph is contradictory to paragraph 7.2.

### **7-2. MxHF Implementation**

This paragraph contradicts itself and 14 CFR 145.163. Part 145.163 does not require Human Factors (HF) training. The FAA has been taking advantage of the EASA requirement to ensure that repair station personnel are trained in HF.

AC 145-10 states that HF training MUST be included; however, the AC is not regulatory and that language should be revised as well. We refer you to related correspondence submitted by ARSA which is attached to this email.

Please note ARSA pointed out that the current FAA Order 8300.10 at that time, made HF training mandatory - which again is not in Part 145 and is rulemaking by policy. ARSA requested the FAA make the changes to align with the regulations. The current FAA Order 8900.1 Vol.3 Chapter 55, page 7para (d), reflects that the old language from the 8300.10 was simply carried forward. HF training is not required by regulation. If the FAA wants to require it, then the agency should initiate related rulemaking. In the meantime, we recommend the FAA use the language suggested by NATA and ARSA in 2006.

### **Appendix A Page A-1.1. NOTE**

This NOTE states that portions of AC 120-72 remain relevant, while other portions are superseded. NATA understands the need to update advisory materials; however, this paragraph contradicts the FAA's intent to cancel the AC. If there are parts that are still good for reference, then NATA recommends they be merged into this AC. As it stands now, if this AC is cancelled, then the material may be interpreted by inspectors that it should not be used in a program.

As part of the continuing effort to ensure consistency and standardization, NATA requests that the contents of the AC and FAA Inspector policy in FAA Order 8900.1 be aligned properly.

Thank you for your consideration of your views and we stand ready to answer any questions.

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