

November 4, 2015

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Federal Aviation Administration
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RE: Order 8110.54B, Instructions for Continued Airworthiness

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 directly impacted by the FAA's revision to the Instructions for Continued Airworthiness (ICA) policy and draft Advisory Circular (AC) 20-ICA. We therefore appreciate the opportunity to submit comments.

NATA applauds the FAA's efforts to define and clarify the long standing ICA availability question. NATA members that are certificated repair stations have been caught up over the years in restrictive contracts and commercial efforts by the original equipment manufacturer (OEM) to prevent or restrict access to ICA's, especially at the component level. In some cases, this activity had a direct impact on safety. The FAA Order and the accompanying Advisory Circular is a big step to clarify FAA policy, and will allow the repair stations to have access to the manuals that are first, required for certification, and second, to maintain the equipment for which the repair station is rated.

NATA's only request is that the FAA ensure that the contents of the Order and AC, to the extent possible, are aligned. The effort will help continue the FAA's consistency and standardization effort that FAA and NATA have supported over the past few years.

Sincerely,

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

John McGraw
Director, Regulatory Affairs
National Air Transportation Association