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Repair Stations (Docket No. FAA–2006–26408)

The Aircraft Electronics Association (AEA) appreciates the opportunity to comment on the recent Notice of Proposed Rulemaking (NPRM) on revising the system of ratings, the repair station certification requirements, and the regulations on repair stations providing maintenance for air carriers.

The Association represents more than 1300 aviation businesses worldwide, including repair stations that specialize in maintenance, repair and installation of avionics and electronic systems in general aviation aircraft. AEA membership also includes instrument facilities, manufacturers of avionics equipment, instrument manufacturers, airframe manufacturers, test equipment manufacturers, major distributors, and educational institutions.

While there are a number of suggested administrative changes to the regulations that the association has no objection to, overall AEA does not support the proposal as written. The proposal makes significant and wide ranging changes without adequate justification, inadequate cost-benefit analysis and false assumptions.

The FAA claims that this proposal “is necessary because many portions of the existing repair station regulations do not reflect current repair station aircraft maintenance and business practices, or advances in aircraft technology.” The AEA represents nearly one-fourth of all FAA certificated repair stations and this proposal has no correlation to the business models of today’s repair station industry. And while there is some slight adjustment to address modern avionics technologies, the proposal does not retain the technology, support, or business model supporting the 80 percent of the legacy technology currently in operation today. And at a time when the use of integrated avionics is expanding in modern aircraft, the Agency’s proposal to remove the ease of accountability provided by the radio and instrument ratings is not supported by any safety measure and would likely result in a decrease of safety oversight.

Rather than revolutionary changes contained in the current NPRM, the FAA should have proposed an evolutionary change to allow a growing adoption to new, modern business practices and technologies.

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The Regulatory Evaluation, Regulatory Flexibility Determination, International Trade Impact Assessment, and Unfunded Mandates Assessment is false and misleading. The Agency has underestimated the “one-time” application process for the reissuance of the repair station certificates, however, the FAA has not addressed the recurring increased costs of the proposed repair station training program, nor have they accounted for the recurring costs of a bi-annual review of all repair station capabilities. Each of these represents a significant cost to the repair stations.

In addition, the Agency has not adequately addressed the financial impact on the general public of essential Flight Standards paralysis caused by the processing, review and acceptance of re-applications of the more than 5000 current repair stations. There are currently more than a dozen FAA Flight Standards District Offices who have implemented a local “sequencing” process for new applicants with some FSDO’s simply not accepting ANY new applications while other applicants have been in the queue for over 24 months. Based on the FAA’s current inability to manage the “normal” flow of new applicants, it is clear that the FAA’s proposal to reissue all repair station certificates in the first 24 months is not realistic and, more to the point, will result in no new applicants being processed for at least 2 years.

In closing, the Aircraft Electronics Association generally does not support this proposal regulation as written. A section by section review is attached with recommended changes.

The Aircraft Electronics Association appreciates the opportunity to comment on this proposed regulation and the opportunity to propose these safety-enhancing additional changes. Should you have any questions, please do not hesitate to contact us at (202) 589-1144 or e-mail at: ricp@aea.net.

Sincerely,



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