



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

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BY ELECTRONIC MAIL

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW, Room PL-401
Washington, D.C. 20590-0001
Electronic Address: <http://dms.dot.gov>

RE: Docket No. FAA-2006-26408; Notice of Proposed Rulemaking; Repair Stations

The Aircraft Owners and Pilots Association (AOPA), representing more than 410,000 members, opposes the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM) because it will lead to significantly higher maintenance costs for owners of general aviation aircraft. The proposed rule will place a substantial administrative and economic burden on operators of small repair stations that work primarily on general aviation airplanes. By the FAA's own estimate, the proposed quality system alone will burden about half of the small repair stations with an estimated \$34,500 each. This proposal is likely to increase maintenance costs for aircraft owners or force many of these small shops to surrender their certificates. The safety benefits that the FAA claims will be gained by this NPRM will be lost and could in fact be degraded if these small shops are driven out of business.

While AOPA has several concerns over the provisions contained in the NPRM, we will limit our comments to only those provisions that have the most significant impact on our members.

One-Size-Fits-All Quality System Overly Burdensome and Unnecessary

AOPA opposes the "one size fits all" approach the FAA has taken to this rule. The majority of certified repair stations are small, general aviation oriented shops with a small customer base and few employees and mechanics. The FAA's uniform approach to this rulemaking fails to take into consideration the economic and administrative constraints of these small businesses. The FAA's proposal is overly burdensome, both financially and administratively, and if enacted would result in significantly higher maintenance costs for all general aviation pilots.

The proposed § 145.211 would mandate that all repair stations regardless of size or complexity expand their current quality control system into a full blown ISO-9000 like quality system that includes self-evaluation and internal oversight mechanisms. AOPA believes that many small shops will not be able to absorb the cost of complying with this mandate, particularly if they are a one or two-person shop.

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The promulgation of this rule would likely force many small repair stations to either raise rates to recover their costs of doing business or surrender their certificates in order to maintain competitive rates for maintenance services. Many of these repair stations may, after surrendering their certificates, continue to operate as individual mechanics or under an inspection authorization. Such persons will not be exposed to the degree of surveillance currently directed toward FAA certificated repair stations. Ironically, this will result in a reduction of the FAA's safety surveillance of the aviation maintenance industry.

In the interest of safety and keeping maintenance affordable for general aviation aircraft owners, AOPA requests that the FAA exempt small repair stations from the proposed quality system requirements.

Proposed Repair Station Type Ratings Will Not Work in General Aviation

The FAA's proposal would create a "type rating" system that will not work for general aviation aircraft. The preamble to the proposal specifically says that a repair station rated for Boeing 737s could not unilaterally add a Boeing 757 rating to its capability list. Following this logic, it appears that the FAA will also require type ratings for different models of general aviation aircraft. So a repair station that is authorized to work on Cessna 172s could not work on 182s, 206s, 210s, etc. unless these models were added to the shop's capability list, which presumably requires FAA approval. AOPA members have already told us that they are experiencing lengthy delays in obtaining certification services from the FAA. By not allowing shops to add different aircraft types to their capability lists without first seeking FAA approval will only aggravate this problem.

The FAA's proposed quality system and type rating system were a bad idea when the agency originally proposed them in 1999 and they continue to be a bad idea today. AOPA requests that the FAA, considering the unique issues facing small general aviation oriented repair stations, take the necessary steps to ensure that these shops are not burdened with quality and type rating system requirements that are better suited for larger air-carrier oriented repair stations.

AOPA appreciates the opportunity to comment and we look forward to working with the FAA towards finding an alternate solution that would not unnecessarily burden small repair stations while still maintaining an adequate level of safety.

Sincerely,



Luis M. Gutierrez

Director

Regulatory and Certification Policy