

**Part 145 Working Group
Status Report to the
Aviation Rulemaking Advisory Committee**

Sarah MacLeod and Ric Peri

Working Group Chairs

Thursday, December 13, 2018

Members of the Part 145 Working Group

Paul Cloutier
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Brent Hart
Analyst

Thuy Cooper
Analyst

Justin Smith
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Senior Business Process Manager

Sarah MacLeod
Executive Director

FAA—Flight Standard Services
Repair Station Branch

Federal Aviation Administration
Office of Rulemaking

Federal Aviation Administration
Office of Rulemaking

Quality Aviation Instruments, Inc.,
D/B/A QAI

GE Engines

GE Engines

Aeronautical Repair Station Association

Members of the Part 145 Working Group

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Triumph Group Operations

Aviation Technical Services

United Technologies Corporation

United Technologies Corporation

Pratt & Whitney

United Technologies Aerospace Systems DBA

Hamilton Sundstrand Worldwide Repair

Rockwell Collins

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Program Manager

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Sam Porter

Senior Quality Manager

Delta TechOps

Delta TechOps

Delta TechOps

Gulfstream

Aircraft Electronics Association

Sikorsky

A Lockheed Martin Company

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General Aviation Manufacturers Association

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Air Methods Corporation

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Wysong Enterprise

Gary Daniel
Avionic Certification

Wysong Enterprise

Stephen R. Wysong
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Senior Manager, Quality Control

Steven Brewer

Manager Structure Engineering

Bill Hanf

Owner

Samuel Edwards

Administrative Manager

Jeffrey Orth

Senior Regulatory & Compliance Specialist

United Airlines, Inc.

Kalitta Air

Green Mountain Avionics

Boeing Commercial Airplanes

Boeing Global Services

Recognized Observers to the Part 145 Working Group

Brian Koester
Manager, Flight Operations & Regulation

Carol Giles
Aircraft Maintenance and Systems
Technology Committee Liaison

National Business Aircraft Association

National Air Transportation Association

SUMMARY OF TASKING

- Comprehensive review of internal and external guidance material – relate to laws and regulations – on certificating and overseeing all part 145 repair stations
 - ✓ Orders, notices, advisory circulars, job aids and safety assurance system (SAS) Data Collection Tools (DCTs)
 - ✓ Laws, executive orders
- Recommend improvements to guidance documents to ensure they—
 - ✓ Align with regulations, laws and executive orders
 - ✓ Annotate the applicable regulations, laws or executive orders
 - ✓ Are numbered to establish a relationship between the guidance and the underlying regulation
 - ✓ Communicate agency expectation of compliance to the public and FAA workforce in a comprehensive and consistent manner, with tools to ensure application and evaluation is based on performance-based oversight
 - ✓ Account for oversight of repair stations vis-à-vis amount, type, scope and complexity of the certificate holders' work and its size
- Develop a preliminary and final report containing the recommendations

SCHEDULE

- Preliminary report within 24 months from the first meeting of the Part 145 Working Group (December 11, 2018 means no later than Friday, December 11, 2020)
- Final report will be submitted no later than 12 months after the preliminary report is forwarded to the FAA by ARAC (earliest week of December 13, 2021).
- Working group meetings to conduct the study
 - ✓ First Thursday of every month starting February 7
 - Review laws, regulations, executive orders and guidance material
 - Align guidance to public and FAA workforce with regulation
 - ✓ Twice yearly face-to-face for 2-1/2 days – invite subject matter experts and realign detail work with overall tasks – May 7-8; November 13-14

STATUS OF TASKING

- First meeting December 11 to 13
- Reviewed issues and task
- Developed schedule for working group meetings
- Developed draft outline of review process
 - ✓ Provided scope of laws, regulations and guidance material
 - ✓ Provided background to part 145 rulemaking(s)
 - ✓ Provided matrix to capture laws, statutes, executive orders, regulations (including preambles) guidance material (internal and external, including legal interpretations)

AREAS of ARAC CONSIDERATION

Hopefully always none, otherwise advised.