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Aviation Group Client Update

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PART 145 RE-WRITE WORKING GROUP MEETS TO BEGIN ITS REVIEW

The working group tasked by the FAA through the Aviation Rulemaking Advisory Committee (ARAC) to review and reconcile FAA repair station regulations and guidance convened for its first meeting in December 2018.

Summary. The working group has been tasked with a comprehensively review of all internal and external guidance material related to <u>14</u> CFR part <u>145</u>. Based on the study, the body will recommend improvements to ensure all guidance documents:

- (1) Align with the regulations as well as U.S. law and applicable executive orders.
- (2) Are numbered to establish a relationship between the guidance and the applicable regulation.
- (3) Consistently communicate compliance expectations to agency personnel as well as the public.
- (4) Consider repair station oversight in the context of the size and work of each certificate holder.

The working group is due to deliver its preliminary report by Dec.11, 2020. However the ongoing shutdown of the federal government may delay that delivery schedule.

Background. The FAA tasking for the ARAC Part 145 assignment was announced by <u>Notice</u> on January 18, 2018. Parts 43 and 145 background references include the following:

- (1) FAA-1999-5836, 66 FR 41117, Aug. 6, 2001
- (2) FAA-1999-5836, <u>66 FR 41117</u>, Aug. 6, 2001, <u>68 FR 75382</u>, Dec. 30, 2003; <u>70 FR 76979</u>, Dec. 29, 2005; <u>79 FR 46985</u>, Aug. 12, 2014; <u>79 FR 66607</u>, Nov. 10, 2014 (SDR Reports)
- (3) FAA-2003-15085, <u>70 FR 58831</u>, Oct. 7, 2005, as amended by Amdt. 145-25, <u>70 FR 75397</u>, Dec. 20, 2005 (Hazardous Material)
- (4) FAA-2008-1154, 76 FR 52237, Aug. 22, 2011 (Restriction on hiring former FAA personnel)
- (5) FAA-2006-26408, <u>79 FR 46984</u>, Aug. 12, 2014 (Removal of voluntary surrender; bad actors)
- (6) FAA-2016-8744, <u>81 FR 49163</u>, July 27, 2016 (Direct final rule on airframe ratings needing hangars) (response to comments can be found here)
- (7) FAA-2018-0119, <u>83 FR 9176</u>, Mar. 5, 2018 (Organization name changes—correction here)

If you have any questions or would like further information, please contact Shelley Ewalt.

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