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Comment from Aviation Suppliers Association

Posted by the **Federal Aviation Administration** on Jun 17, 2025

Docket (/docket/FAA-2025-0493) / Document (FAA-2025-0493-0001) (/document/FAA-2025-0493-0001)
/ Comment

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The repair station time estimates seem wrong. First of all, the FAA requires a hazmat training manual for initial certification. See FSIMS Vol. 6, Chap. 9, Sec. 2, Para. 6-1653(F) [<https://drs.faa.gov/browse/excelExternalWindow/DRSDOCID137895995920230711131828.0001>]; see also FSIMS Vol. 6, Chap. 9, Sec. 7, Para. 6-1755(D) [<https://drs.faa.gov/browse/excelExternalWindow/DRSDOCID152303611020230224223232.0001>]. This requires significantly more time to prepare than the 2 hours per repair station estimate. I would estimate that this should be closer to 40 hours for the hazmat manual alone. Recurrent maintenance of such manuals should be assigned at about eight hours per year. This would be in addition to the record-keeping associated with ensuring periodic training is accomplished and properly certified (in accordance with 49 C.F.R. 172.704(d)) because reviewing such training records is part of the FAA's regular oversight of repair stations. E.g. FSIMS Vol. 6, Chap. 9, Sec. 13, Para. 6-1885(B)(6); FSIMS Vol. 6, Chap. 9, Sec. 14, Para. 6-1910(B); 6-1911. In order to meet FAA inspector oversight, the records of training must be prepared and made available during periodic inspections. This imposes a more extensive record-keeping obligation than the one anticipated by the current estimated average burden.

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