Aeronautical Repair Station Association

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Kathy DePaepe
Federal Aviation Administration, AES-200
6500 S. MacArthur Boulevard, Room 126B
Oklahoma City, OK 73169

RE: OMB Control Number 2120-0682; FAA Form 8310-3
Application for Repair Station Certificate and/or Rating

Dear Ms. DePaepe:

The Aeronautical Repair Station Association (ARSA) respectfully submits the following comments to the agency information collection renewal in the above referenced matter.[1]

ARSA is the principal association for the aviation maintenance industry, and the content in FAA Form 8310-3 has a direct impact on its members. The association suggests that certain language in the current Form be revised to match requirements of applicable repair station regulations.

Specifically, the selection "Change in Ownership" under Block 2, "Reasons for Submission" should be changed to state "Sale or Transfer of Assets".

As provided in Title 14 of the Code of Federal Regulations (14 CFR) § 145.57(b):[2]

> If the holder of a repair station certificate <u>sells or transfers its assets</u>, the new owner must apply for an amended certificate in accordance with §145.51. *(Emphasis added)*

The current Form is misleading and creates confusion for entities that transfer stock, not assets. If a company's ownership transaction does not involve the transfer of assets, § 145.57(b) does not apply and an amended certificate is not required.[3]

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[1] The request for public comments was posted in the Federal Register on Nov. 22, 2011 (76 FR 72240).
[2] Titled, "Amendment to or transfer of certificate".
[3] Although it is beyond the scope of the comments requested, we also suggest that the FAA include a note in Order 8900.1, Vol.2, Ch. 11, Sec.2, paragraph 2-1215(B) noting the differences between a stock and asset transfer, and the inapplicability of § 145.57(b) for company stock transactions.

We appreciate your consideration of our comments.

Sincerely,

Craig L. Fabian
Vice President Regulatory Affairs and
Assistant General Counsel

cc: Steve Douglas
Rebecca MacPherson