




Federal Aviation Administration

AFS-340
Day File

Memorandum

Date: *APRIL 8, 2008*

To: Mike Boler, ASW-230

From:  Jackie Black, Manager, Repair Station Branch, AFS-340

Prepared by: John Goodwin, (202)267-7424, AFS-340

Subject: Part 145 Repair Station Contracting Out

This is in response to our recent conversations about decorative plating of interior aircraft components.

Your primary question is regarding contracting maintenance functions to a non-certificated entity. As we discussed I feel guidance and regulation are clear that the repair station may not contract to a noncertificated entity any maintenance function not within the authority of its ratings and authorized in operating specifications.

For example:

ABC repair station has an airframe rating for a Falcon 20 with no limitations. Assume that, within the scope of the maintenance manual for the Falcon 20, there are complete instructions for plating of the landing gear piston. ABC may choose to contract out the plating function to a noncertificated source if the function is approved under Title 14 Code of Federal Regulations (14 CFR) part 145 section 145.217(a) and they comply with section 145.217(b).

Assume ABC wishes to send the cabin entertainment control unit bezel (from the same Falcon 20) to a noncertificated source for plating. Also assume neither the Falcon 20 maintenance manual nor the control unit instructions contain plating processes/instructions for the bezel (this particular bezel is not from an instrument requiring an instrument rated shop to perform the work). ABC could contract out the plating of the bezel to a noncertificated source, again, only if the function is approved under section 145.217(a) and they were to comply with section 145.217(b).

If ABC considers sending the landing gear piston or cabin entertainment control unit bezel (from the same Falcon 20) to the part manufacturer for plating, the manufacturers must either hold

a 14 CFR part 145 certificate for repair of the part and approve the part for return to service or ABC must treat the manufacturer as a noncertificated entity as in the examples above. A manufacturer does not, by virtue of simply being a manufacturer, have approval for return to service privileges for aircraft parts. Even in those cases of 'warranty' work. Warranty work is not an extension of manufacturing and there is no significant difference between warranty work and maintenance once the article leaves the manufacturer's quality process.

In all cases it is essential ABC comply with section 145.217 before contracting out. The function must be approved section under section 145.217(a) and if ABC is contracting to a noncertificated facility, they must comply with section 145.217(b). If ABC is not rated to perform the work or is rated for the work but not capable of complying with section 145.217(b), they cannot contract the work to a noncertificated source.

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