



**Comments on Proposal to
Rescind FAA AC 145-11A**

Submitted to the Federal Aviation Administration
to Jerome.h.sveeggen@faa.gov

August 24, 2026

**Submitted by the Aviation
Suppliers Association
2233 Wisconsin Ave, NW, Suite 503
Washington, DC 20007**

**For more information,
please contact:
Jason A. Dickstein
General Counsel
(202)-628-6776**



Aviation Suppliers Association
2233 Wisconsin Ave, NW, Suite 503
Washington, DC 20007
Voice: (202) 347-6899
Fax: (202) 347-6894
Info@aviationsuppliers.com

Respond to: Jason Dickstein:
(202) 628-6776
Jason@washingtonaviation.com

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Jerome H. Sveeggen
Federal Aviation Administration
800 Independence Ave, SW
Washington, DC 20591

Dear Mr. Sveeggen:

Thank you for offering industry an opportunity to comment on the proposal to rescind FAA Advisory Circular 145-11A. In summary, the Aviation Suppliers Association ("ASA") supports the FAA's proposal, but requests that the FAA ensure that industry has an opportunity to prevent unintended safety consequences by publishing proposed changes to the US-EU Maintenance Annex Guidance before they become final.

1. ASA Comments

The FAA is seeking to cancel [Advisory Circular \(AC\) 145-11A](#) (*Repair Station Guidance for Compliance with the Safety Agreement between the United States and the European Union*).

The FAA has identified four reasons for proposing to cancel AC 145-11A:

1. **Redundancy and Risk of Inconsistency:** In most instances where substantive guidance is provided, the advisory circular references the Maintenance Annex Guidance which means that the AC 145-11A is imply duplicative. Maintaining both documents creates the potential for inconsistency, confusion, and misinterpretation, which could undermine the effective implementation of the bilateral agreement.
2. **Resource Efficiency:** FAA resources are better directed toward the timely update of the Maintenance Annex Guidance rather than maintaining a separate AC that is slower to revise and more likely to become outdated.
3. **International Harmonization:** Reliance on the Maintenance Annex Guidance as the single source of guidance promotes greater clarity, consistency, and harmonization for certificate holders operating under the agreement.
4. **Obsolescence:** AC 145-11A currently contains obsolete content. The Maintenance Annex Guidance is updated frequently and keeping the advisory circular current is difficult.

These appear to be valid concerns supporting rescission of the advisory circular. As long as the Maintenance Annex Guidance remains available to the public, it should be sufficient for the Maintenance Annex Guidance to serve in the stead of the advisory circular.

We recognize that an FAA advisory circular represents a defined form of communication with the public (as described in FAA Order 1320.46D). The Maintenance Annex

Guidance, on the other hand, does not fit into FAA guidance, and is not open to public comment. As a consequence, relying on the Maintenance Annex Guidance as a form of communication of FAA policy with the public creates a situation where EASA is given favored input into FAA policy, while the affected U.S. parties are not provided with the same level of input.

Because compliance with the Maintenance Annex Guidance is required by a US-based repair station applicant who wants the FAA to recommend it to EASA for EASA 145 privileges, and the FAA will not act to provide such a recommendation without compliance to the Maintenance Annex Guidance, the Maintenance Annex Guidance has a *de facto* rule affect (per the definition found in 5 U.S.C. 551(4)).

ASA requests that the FAA recognize that the Maintenance Annex Guidance impacts domestic businesses by imposing requirements that represent preconditions to FAA action. The Maintenance Annex Guidance frequently includes details that go beyond the plain language of the bilateral agreement between the US and the EU (including its annexes and special conditions), so it represents an independent source of standards.

The Maintenance Annex Guidance represents a unique source of standards that must be met in order to cause the FAA to perform certain interactions with EASA on behalf of an applicant. In the past, changes to the Maintenance Annex Guidance have had unintended consequences, including undermining structures that protect aviation safety, and impeding the ability for repair stations to obtain safe aircraft parts. With this in mind, ASA requests that the FAA provide notice to the industry of future changes to the Maintenance Annex Guidance. This should be done with sufficient notice so that trade association and the public can alert the FAA to unintended consequences that may arise from proposed changes

2. Who is ASA?

Founded in 1993, the Aviation Suppliers Association (ASA) represents the aviation parts

distribution industry, and has become known as an organization that fights for safety in the aviation industry and marketplace.

ASA has over 1000 global members. ASA's members reflect the aircraft parts distribution community. Our members range from small businesses to household names like Boeing. Collectively, they lead critical logistics programs, purchasing efforts, and distribution of aircraft parts world-wide.

ASA and its members are committed to safety. ASA frequently works with the United States Government on government policies affecting the aviation industry so that the government may work collaboratively to create the best possible guidance for the industry and the flying public. ASA has a long history of working with the FAA and other Federal Agencies toward common safety goals.

ASA also actively participates in efforts to increase and support trade compliance. ASA provides regular compliance training on import and export programs and also hosts a blog in which compliance tips are provided and compliance questions are answered.

3. Conclusion

We believe that the FAA's logic in rescinding AC 145-11A appears to be sound.

We also recognize that rescission of the advisory circular will remove some of the FAA's accountability to the public for policy related to FAA actions in response to applications by domestic repair stations for related FAA support. For this reason, we ask that the FAA announce to the public future proposed changes to the Maintenance Annex Guidance with sufficient time to prevent changes that could undermine safety in aviation.

Thank you for providing this opportunity to provide comments on this proposal.

Respectfully Submitted,

A handwritten signature in black ink, reading "Jason Dickstein". The signature is written in a cursive style with a large, stylized "J" and "D".

Jason Dickstein
General Counsel
Aviation Suppliers Association