

City of Phoenix Aviation Department
 Minimum Standards Questions/Comments and Answers
 These Questions have been modified to remove any offensive terms
 Updated March 6, 2007

Q/C-1	The 3M\$ requirement is just out of the realm for an independent mechanic. ¹
A-1	The Vehicle Liability Insurance will be reduced to \$1 million for the Independent Mechanic.
Q/C-2	The state has a minimum requirement for all licensed vehicles. The City is trying to supersede State law. ¹
A-2	State minimums for vehicle liability are for public streets; The City of Phoenix Aviation Department Minimum Standards requirements pertain to vehicles being operated on the Airport Operations Areas of The City of Phoenix owned and operated airports, which do not have public access. The City of Phoenix currently requires insurance through "The Code of The City of Phoenix, Chapter 4, Section 4-18. Insurance required. Every lessee, licensee and permittee shall provide to the City evidence of current insurance coverage in such form and for such amounts and for such coverages as determined by the City." The City of Phoenix, will establish insurance requirements that will reduce the liability of The City of Phoenix.
Q/C-3	The Wing span needs to be modified to 51' or above as to not exclude Piper Malibu/Mirage single engine piston airplanes with a wing span of 50' ¹
A-3	The Scope of Activity will no longer be restricted to "Group I Piston Aircraft only," it will be based on item "b. shall not engage in Activity(ies) which they are not properly licensed and certified to perform." No restrictions on wingspan or engine type will be made.
Q/C-4	It is not feasible for an independent mechanic to obtain 3 million dollars insurance on their vehicle. We request this be reworded to stat "the minimum insurance required by the State of Arizona." ²
A-4	See A-1
Q/C-5	Group I aircraft needs to be redefined. As I read it now an independent mechanic can only work on a single engine airplane with a wingspan of up to but not including 49'. We feel that this definition needs to include multi-engine as well as single engine aircraft. ²
A-5	See A-3
Q/C-6	For an independent aircraft mechanic, there is only one type of insurance policy available and it is very expensive. AIRPORT PREMISES LIABILITY: \$1,000,000,000.00 Combined Single Limit of Bodily Injury and Property Damage Liability. There is no coverage for damage to hangars rented or owned under these policies. ³
A-6	Commercial General Liability, with a combined single limit of \$1,000,000 will be required with a change in the included coverage. "Products and completed operations," will be removed from the included coverage's.
Q/C-7	Your "aircraft group 1" does not include a significant portion of the based aircraft at deer valley. I know of at least 25 based aircraft with wing spans over 49 feet. I think 53' would be a more realistic number. Most of the larger T-hangars will accommodate a 53ft wing span. ⁴
A-7	See A-3
Q/C-8	Your stance on turbine aircraft for limiting independent maintenance operators

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	appears weak to me. I do believe there is close to 100 turbine aircraft on the field and the number is going up rapidly. 4
A-8	See A-3
Q/C-9	Your response that facilities will be available for independent operators in the future when the city has not made any plans for facilities appears misleading. Being a past "aviation advisory board member" I can not recollect any discussion by any aviation department personnel suggesting such before this meeting. 4
A-9	Changes have been made to the General Aviation Handbook which should clarify what is allowed in the t-hangars and the maintenance bays. These changes should make it easier to perform maintenance on your aircraft. As for additional facilities, you are correct; we do not have immediate plans for additional facilities.
Q/C-10	I suggest you decide on a fixed fee for the Maintenance person as "I" would really "rail" at the idea of showing you my books. I don't think the return on monitoring the bookkeeping would be cost effective. 4
A-10	A fixed fee of \$500 annually will be submitted to replace the 2% of gross fee.
Q/C-11	\$1,000,000 I guess is available for their business, but at \$10-11K per year, it would run 15-30% of their billed business. It would force them to one of 2 things, a) raise their rates, probably 50%, or b) run them out of business. 4
A-11	See A-6
Q/C-12	Based on the comment you heard, \$3million coverage for vehicles is preposterous. \$500,000 is much more realistic. 4
A-12	See A-1
Q/C-13	The city has not made a case of why this is being done. I personally believe there are diabolical forces involved here. 5
A-13	It is recommended through FAA Advisory Circular 150/5190-7; "The FAA's policy recommending minimum standards stems from the airport sponsor's grant assurances and similar property conveyance obligations to make the airport available for public use on reasonable conditions and without unjust discrimination. The process of developing Minimum Standards by the Phoenix Aviation Department began over four years ago to update existing standards and cover areas not previously addressed. Minimum Standards are being developed to 1) provide a safe operating environment, 2) promote standardized methods for engaging in approved aeronautical activities, and 3) ensure Airports' compliance with FAA orders, regulations, and guidance documents. A draft copy of these Standards are sent to the FAA and then presented in a public format for comments; the comments are reviewed by the Aviation Department Minimum Standards Committee to make any changes in the final draft.
Q/C-14	The biggest impact on me personally is the turbine exclusion rule. If the standards were implemented as proposed tonight I can not get needed maintenance performed on a King Air airplane based at DVT. I would have no way of getting a tire changed under the proposed rules. I would need to be able to call an independent mechanic who will come to my hangar to perform needed maintenance that the DVT FBO's can not do or will not do or are incompetent to

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	do. 5
A-14	See A-3
Q/C-15	During the meeting, I asked about what problems we are having at DVT and what are we trying to solve with these new standards. You said there where no problems to date and the new standards where necessary for FAA airport funding. You also said more than once that you were not trying to drive the part time mechanics off the airport. So if both of these statements by you were true then the minimum standards should be set to the present standards that now exist – an FAA mechanics license, a drivers license and car insurance that meets the Arizona requirements. 6
A-15	See A-13
Q/C-16	So I ask the question again as to what is driving these requirements. I believe the City of Phoenix is not being honest with the tenants. Something is driving these new requirements and you don't seem to be willing to share this knowledge with us. I believe it is this lack of candor that leads us to not trust any of our people in government offices. We see hidden agendas and false statements by people in all walks of life - not just the government offices. But all of this does not promote trust of city officials by the citizens of Phoenix. 6
A-16	See A-13
Q/C-17	Could you please tell me the current vehicle insurance requirement for independent mechanic at DVT? 3m sounds high. 7
A-17	The Code of The City of Phoenix, Chapter 4, Section 4-18. Insurance required. Every lessee, licensee and permit tee shall provide to the City evidence of current insurance coverage in such form and for such amounts and for such coverage's as determined by the City. This will establish for the first time a required limit for Independent Mechanics.
Q/C-18	Independent mechanics are not FBO's. They do not have fuel trucks, tugs and rental property. The only use of IM truck is to drive to a hangar/shade. This is no different than me driving my car onto airport property and going to my hangar. The 3M\$ requirement is just out the realm for independent mechanic. It also falls under restraint of trade. When this insurance is not available, the FAA also states that is in violation of an airport that accepts grants. I feel that the City of Phoenix is being totally unreasonable in their request. The state has a minimum requirement for all licensed vehicles. The City is trying to supersede State Law. No reason has been given for this exorbitant request. 8
A-18	See A-1
Q/C-19	The wing span needs to be modified to 51 feet or above as to not exclude the Piper Malibu/Mirage single engine piston airplanes with wing span of 50 feet. 8
A-19	See A-3
Q/C-20	I understand from my mechanic that the Commercial General Insurance with "products completed" coverage will be quite expensive for independents, costing them approximately a thousand a month. This seems to be a pretty expensive additional business requirement, considering the additional vehicle coverage

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	<p>being required of the independents, and the 2% taxation of their annual income. My mechanic indicates that dropping the "products completed" portion of the insurance, while retaining a million dollars in commercial general liability, would make a large impact in reducing the cost of this additional insurance requirement. And in turn, reduce somewhat the cost passed on to customers, such as me. 9</p>
A-20	See A-1 & See A-6
Q/C-21	<p>I do not know what is motivating the move to the minimum standards, whether it be that the FBO's are seeking it to reduce lower cost competition, or if a tenant has had a negative experience with an underinsured independent, or if it is a combination of these other factors and a desire for the city to generate more revenue. I do know that the full effect of the minimum standards will be an increase in cost to me, for service that I have been satisfied with prior to the proposal and implementation of these standards. 9</p>
A-21	See A-13
Q/C-22	<p>The planned changes to regulations regarding the work of independent mechanics at DVT are unreasonable and unnecessary. The insurance limits they would be required to carry for liability and for their own vehicles are exorbitant and needlessly in excess of Arizona state requirements. 10</p>
A-22	See A-1 & See A-6
Q/C-23	<p>Limiting mechanics to working on aircraft with a certain wingspan or only on DVT-based aircraft is an unreasonable restriction of an individual's right to work and inconveniences transient pilots in need of repairs who come to DVT for our great reputation. 10</p>
A-23	See A-3 &
Q/C-24	<p>First of all, the liability insurance that is being requested is excessive. I am in the insurance profession and believe that asking for \$3 mil in liability coverage an unreasonable expectation in that it is not readily available to most of the independent mechanics, and if it is expensive. I write commercial insurance and \$1 mil is the norm. Even when the state is an "additional insured" they only ask for \$1million liability. My suggestion is that you leave the limits where they are, and have the city be listed as additional insured. You are protected and so are the mechanics. 11</p>
A-24	See A-1 & See A-6
Q/C-25	<p>Vehicle liability insurance: I am confused as to why you would need this. If the mechanic has a commercial insurance policy, and has a vehicle with signage on it, he should have his vehicle covered as part of the commercial policy. If he doesn't have a company vehicle, then the state only requires 15/30/10. The amounts set forth in the Minimum Standard far exceed the minimums set by statute. If you require the mechanics personal vehicle to carry higher coverage than the state requirements, then all vehicles entering the airport should be required to carry the same. This would mean any and all employees located on the airport, including FAA employees. 11</p>
A-25	See A-1

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Q/C-26	<p>Piston engine restriction: I understand that part of this change is asking to restrict mechanics to work on only “Group I Piston Aircraft”. This is unfair to every mechanic and turbine powered aircraft owner. If a plane can land there, the owner should be permitted to choose his/her own mechanic, it is called free enterprise. In case those who drafted these ideas may have forgotten, “Free Enterprise” is one of the principles upon which this country was founded. If restrictions are made to piston only, then that is all that should be permitted to land or be stored there.</p> <p>By the way, the “Group I Piston Aircraft” is an airplane design group definition from FAA Advisory Circular 150/5300-13. This is used for airport design of runways, taxiways and infrastructure and makes no reference to aircraft maintenance, therefore this requirement is inappropriate for defining aircraft maintenance guidelines. 11</p>
A-26	<p>See A-3</p>
Q/C-27	<p>DVT based aircraft restriction: Why should Independent mechanics be restricted to only working on DVT based aircraft? Many aircraft owners at local airports do not have mechanic services available. Therefore, they use independent mechanics at DVT. Also, any itinerant pilot would be unable to obtain any maintenance service due to not being based at DVT. Any aircraft owner who has had the unfortunate situation to seek services at an airport other than their home airport will tell you this is unconscionable. What if someone needs help on a weekend? Or after hours? Are the Deer Valley FBOs going to provide 24 hour service? I know if I get stranded at another airport on a Friday night, I surely don't want to wait until Monday. I fail to see where this regulation would serve any purpose than to restrict itinerant business to the FBO's, thus creating a monopoly for this type of service work. The independent mechanics do not hurt the FBO's. They are just people like you and me trying to make a living. 11</p>
A-27	<p>Aircraft maintenance is limited to approved areas on The City of Phoenix Airports to reduce pollution and fire liabilities. These areas are defined in the “General Aviation Handbook and Storage Hangar lease agreements. The facilities on The City of Phoenix, Airports where built for the usage of based tenants. The maintenance of these facilities is partially funded through based aircraft user fees. There are a limited amount of these facilities and the airport does not receive revenues from Non-based tenants for the maintenance of these facilities.</p> <p>Independent Mechanics by the nature of their business can go to the airport of non-based aircraft and perform the maintenance at that airport. They do not by permit or lease have facilities at either DVT or GYR to perform maintenance on non-based aircraft. If an aircraft lands at either DVT or GYR and needs emergency maintenance, they should contact the FBO's for assistance. If the FBO's can not provide assistance, then the aircraft owner can contact the Airport Managers or their designee and request a waiver for an Independent Mechanic to assist them.</p>

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Q/C-28	. I understand there is an issue regarding mechanics that service aircraft at DVT as well as other airports in Arizona. It is my opinion that it is a great asset to both the pilot/owners for more than one reason. One is and most important is that the mechanics that are independent seem more qualified than the mechanics at repair stations. I say this from experience and that the independent works individually and can be observed and owners can be involved as owner assisted when possible. The system has worked well for years and really does not require involvement from persons that have not been around airports as some of us experienced pilot/owners. Please give this information due consideration as it is meant to keep the current program at status quo and keep the decision makers more informed. Also, there are pilots and mechanics that have much knowledge in regard to this issue. 12
A-28	The Independent Aircraft Maintenance Operator Minimum Standard developed by The City of Phoenix Aviation Department, was established to provide a way for the Independent mechanic to work on Phoenix Goodyear and Deer Valley Airports, in a safe operating environment, under standardized methods.
Q/C-29	As to Service Fees, we already pay Sales Tax on billings that are mostly very expensive parts. To pay an additional Service Fee is ludicrous. 13
A-29	See A-10
Q/C-30	Liability Insurance- <i>“Airport Premises Liability Insurance” (Min. Std. Attachment A) in the amount of \$3M is unacceptable and an unreasonable expectation in that it is not readily available to most of the independent mechanics operating at DVT. Understand, you the aircraft owner will be indirectly paying for this additional cost being levied on our independent mechanics through an increased hourly rate.</i> 14
A-30	See A-6
Q/C-31	<i>“Vehicular Liability Insurance” (Min. Std. Attachment A) in the amount of \$1M is unacceptable and an unreasonable. Arizona state statute sets minimum levels of financial responsibility at: \$15,000 bodily injury liability for one person and \$30,000 for two or more persons \$10,000 property damage liability The amounts set forth in the Minimum Standard far exceed the minimums set by statute.</i> 14
A-31	See A-1
Q/C-32	Service Fees- <i>in the amount of “greater of \$400 annually or 2% of gross sales” is an unreasonable requirement. This is due to the high cost associated with aircraft parts and material. The independent mechanic may receive a very small markup for any handling or storage but in general receives little monetary benefit beyond his labor. It is not unusual for a billing to have 50% of it attributable to parts and material. In the case of engine overhauls and major airframe work, that percentage goes even higher. Let’s take the case of a simple engine replacement which is a common aircraft maintenance task.</i>

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	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">Engine Cost</td> <td style="width: 15%; text-align: right;">\$30,000</td> <td style="width: 33%;">Propeller Cost</td> <td style="width: 15%; text-align: right;">\$9,000</td> </tr> <tr> <td>Labor 60Hr@\$45/Hr</td> <td style="text-align: right;">\$2,700</td> <td>Labor 8Hr@\$45/Hr</td> <td style="text-align: right;">\$360</td> </tr> <tr> <td></td> <td style="text-align: right; border-top: 1px solid black;">\$32,700</td> <td></td> <td style="text-align: right; border-top: 1px solid black;">\$9,360</td> </tr> <tr> <td>2% Gross is</td> <td style="text-align: right;">\$654 (24%)</td> <td></td> <td style="text-align: right;">\$187 (52%)</td> </tr> </table> <p><i>The engine example represents a 24% fee (\$654/\$2,700) to the mechanic as the \$654 fee will come out of the mechanics proceeds of \$2,700. The propeller example becomes even more absurd. How many of our mechanics will be able to stay in business with an additional 24% fee? This cost will be passed on to the aircraft owner. Many owners are already financially extended in maintaining an aircraft due to increased fuel, insurance and maintenance cost. This could quickly force many of our tenants to give up aircraft ownership or seek unsafe alternatives.</i></p> <p><i>A more realistic approach would be a percentage of net proceeds, adjusted gross income or an annual flat fee or a hybrid of both. 14</i></p>	Engine Cost	\$30,000	Propeller Cost	\$9,000	Labor 60Hr@\$45/Hr	\$2,700	Labor 8Hr@\$45/Hr	\$360		\$32,700		\$9,360	2% Gross is	\$654 (24%)		\$187 (52%)
Engine Cost	\$30,000	Propeller Cost	\$9,000														
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	\$32,700		\$9,360														
2% Gross is	\$654 (24%)		\$187 (52%)														
A-32	See A-10																
Q/C-33	<p>Piston engine restriction-<i>Independent mechanics will be restricted to working only on piston engine aircraft limited to a wingspan of no more than 50'. These are defined as "Group I Piston Aircraft". For turbine operators, this will preclude owners using an independent mechanic. Again, this is another unreasonable requirement with no basis and not supported by any FAA regulation. The "Group I Piston Aircraft" is an airplane design group definition from FAA Advisory Circular 150/5300-13 used for airport design of runways, taxiways and infrastructure. It makes no reference to aircraft maintenance. This requirement is inappropriate for defining aircraft maintenance guidelines. 14</i></p>																
A-33	See A-3																
Q/C-34	<p>DVT based aircraft restriction-<i>Independent mechanics will be restricted to only working on DVT based aircraft. Many aircraft owners at local airports do not have mechanic services available. Therefore, they use independent mechanics at DVT. Also, any itinerant pilot would be unable to obtain any maintenance service due to not being based at DVT. I am sure almost every aircraft owner has had to seek services at an airport other than their home airport. DVPA has had these requests from pilots as to who we would recommend. This regulation would exclude recommending an Independent Mechanic. We have mechanics that specialize in certain aircraft types making them preferred in some maintenance cases. This regulation serves no purpose other than to restrict itinerant business to the Fixed Base Operators (FBO's) creating a monopoly for this type of service work. Reports are the FBO's cannot support the existing maintenance business. 14</i></p>																
A-34	See A-27																

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Q/C-35	My mechanic tells me the new rules impose unrealistic insurance requirement as well, millions of dollars of automotive liability not required for non-mechanics driving on the ramp. 16
A-35	See A-1 & See A-6
Q/C-36	there are heavy requirements for personal liability imposed on mechanics. 16
A-36	See A-1 & See A-6
Q/C-37	the new rules restrict independent mechanics to piston aircraft even when they are qualified to work on turbines. 16
A-37	See A-3
Q/C-38	. It really is not reasonable when any tenant can operate a motor vehicle on the airport with just State required minimum liability on their vehicles. Many tenants are there every day and drive all over the airport constantly so it is just unfair that I should have to have 3 million liability to do the same thing. I would think that \$500, 000 would be way more than enough and would not require the purchase of umbrella policies to try to reach even the 1 million level. \$100, 000 would be much more fair though in my opinion. 17
A-38	See A-1
Q/C-39	. I wish that the requirement for the products completed could be dropped and that just a general liability requirement of 1 million would suffice. 17
A-39	See A-6
Q/C-40	To sum it up , the vehicle liability insurance requirement should be lowered to \$100,000 and certainly no more than \$500, 000. The Commercial General Liability insurance should be just that, general in nature with no products completed requirement which is what causes the worst of the expense. Also bear in mind that as of this date I am unable to obtain insurance at all but hopeful that I will be able to through Cannon Aviation Insurance Co. 17
A-40	See A-1
Q/C-41	The liability insurance the city is thinking of requiring is out of line. 18
A-41	See A-1 & See A-6
Q/C-42	The service fee is another point. The independent mechanics I know are not getting rich working on GA aircraft. Why not just charge a fee for a permit to cover the cost to the city for the permit. Here again high costs will be passed on to the owners. 18
A-42	See A-10
Q/C-43	I can understand a need for MINIMAL liability insurance for the mechanic to drive around the airport, but \$3M basic liability is crazy. 20
A-43	See A-1
Q/C-44	Charging a 2% fee on the gross sale of all parts is nuts. My mechanic basically passes the cost of the parts directly on to me, and I have ALREADY paid city/state sales taxes on those parts. 20
A-44	See A-10
Q/C-45	Being a piston owner, I wouldn't be affected by the piston-only restriction, but

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	why bother? There's no underlying FAA restriction to other types, and making independent maintenance unavailable to transient pilots just makes DVT that much more GA-unfriendly. 20
A-45	See A-3
Q/C-46	I feel that a \$3-million liability policy on the independent's personal vehicle (not available in the market place) is not only unreasonable but also outrageous. The State minimum is, I believe, \$15/30,000 but I personally carry \$300,000 21
A-46	See A-1
Q/C-47	What I don't support is the "2% of gross sales". 21
A-47	See A-10
Q/C-48	The proposed "Commercial General Liability" minimum standard of \$1,000,000 is excessive and unreasonable. 21
A-48	See A-6
Q/C-49	The Liability Insurance is way too high. What lawsuit or incident drives the need for \$3,000,000 of insurance? There is not a problem now so make it reasonable or eliminate it. Vehicular Liability Insurance is also too high. Why is it \$1,000,000 when the state requires only \$15,000, \$30,000 and property of \$10,000? Let's not penalize mechanics. 22
A-49	See A-1
Q/C-50	Service fees are not fair. 22
A-50	See A-10
Q/C-51	Take away the Piston engine restriction and DVT based aircraft restriction. 22
A-51	See A-3
Q/C-52	Certainly the insurance requirement as well as the 2% of gross sales are the most egregious proposals. 29
A-52	See A-1, A-2, A-6 and A-10
Q/C-53	Restricting independent mechanics to work on piston aircraft, while not directly affecting me, seems to be usurping the FAA in licensing what a mechanic may work on and services and repairs he may conduct. By imposing this restriction it would seem to assure that no mechanic will work on any aircraft valued anywhere near \$3 million. 31
A-53	See A-3
Q/C-54	Will you require this for any tenant changing his own oil or doing other maintenance items allowed by the FAA? I also do not understand the assessment against parts provided. 31
A-54	Tenants performing self-maintenance on aircraft they own, are unaffected by this standard. They must perform the maintenance in areas approved in the General Aviation Handbook and do not violate environmental policies or fire codes. Also See A-10.

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Q/C-55	First of all, on the subject of LIABILITY INSURANCE , the proposed \$3-million Airport Premises Liability Insurance is completely unacceptable and unreasonable. 32
A-55	See A-1 & See A-6
Q/C-56	Similarly, the proposed requirement for \$1-million Vehicular Liability Insurance is also unreasonable and unacceptable. 32
A-56	See A-1
Q/C-57	Fees in the amount of " the greater of \$400 annually or 2% of gross sales " is another unreasonable and unacceptable proposal. 32
A-57	See A-10
Q/C-58	Another proposed standard that appears to be unfair is the PISTON ENGINE RESTRICTION . Why would an independent mechanic or technician who is qualified and licensed BY THE FAA to work on any Group of aircraft, be restricted to piston engine aircraft, and then only on those with a wingspan of less than 50 feet? 32
A-58	See A-3
Q/C-59	The DVT BASED AIRCRAFT RESTRICTION is another proposal which appears to be written for the sole benefit of the FBOs. 32
A-59	See A-27
Q/C-60	The only requirement for use of a mechanic should fall to the owner, and the assurance by the owner that the mechanic is licensed by the FAA to perform the work required. No other license or permit should be required, therefore no other liability should be needed, thus eliminating any work performance insurance since the owner has taken that responsibility by hiring the mechanic. 34
A-60	The FAA recommends the Airport Owner Operator to protect airport users from unlicensed and unauthorized services, by developing Minimum Standards for Commercial activities allowed on the airport. By requiring Independent Mechanics be licensed and certified in the Minimum Standard we are protecting the users of the Airports. The City of Phoenix currently requires Liability Insurance under The Code of The City of Phoenix, Chapter 4, Section 4-18.
Q/C-61	As far as the proposed Airport Premises Liability Insurance, that is covered by the above and by the State of Arizona vehicle insurance requirement for registration and use of a motor vehicle. Even more importantly, the established speed limits on airport property are low enough that the damage limits should not be exceeded and by airport regulation anyone exceeding the rules already in force can be excluded from operation on the property. 34
A-61	See A-2
Q/C-62	the only charge by the airport operations to a independent contractor should at the most a small percentage of his labor charge, 34
A-62	See A-10
Q/C-63	No restriction on independent contractors should be based on type, size, or use

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	of the subject aircraft as the FAA license held by the mechanic fully covers this limitation. You should also welcome aircraft from off the airport as they would then be purchasing fuel or other services locally to improve the economy. 34
A-63	See A-3
Q/C-64	I understand the need to protect the city from liability but my concern is that the insurance requirements for freelance mechanics will drive costs up considerably and affect their availability. 35
A-64	See A-1 & See A-6
Q/C-65	I am intimately familiar with the Scottsdale Minimum Standards Plan and I have to tell you that the minimum Standards Plan that I just read for the Deer Valley Airport is pretty much a mirror policy. Except of course for the 3 million dollar liability policy that you are proposing which is a bit higher than the 1 million requirements at the Scottsdale Airport 36
A-65	The City of Phoenix, Aviation Department, Minimum Standards are developed by members of the Aviation Department, City of Phoenix Risk Management, and with the assistance of Aviation Management Consulting Group, as well the FAA.
Q/C-66	The insurance requirement is inequitable for independents and seems well beyond what should be necessary; it is far in excess of state requirements. 37
A-66	See A-1 &
Q/C-67	Service "fees": 2% of gross revenue; while this may be more reasonable for an FBO which is doing a large volume of business and getting parts at wholesale, it is unfair and inappropriate for an independent, 37
A-67	See A-10
Q/C-68	Piston restriction: again this appears to be a solution without a problem. 37
A-68	See A-3
Q/C-69	Aircraft must be based at DVT: again, this seems designed solely to favor the FBO's. 37
A-69	See A-27
Q/C-70	Insurance limits 39
A-70	See A-1 & See A-6
Q/C-71	Gross sales fees. 39
A-71	See A-10
Q/C-72	First, to charge them 2% of gross sales is extremely misguided 41
A-72	See A-10
Q/C-73	Insurance should be a matter between the provider and his clients...period. 41
A-73	The City of Phoenix currently requires insurance through "The Code of The City of Phoenix, Chapter 4, Section 4-18. Insurance required. Every lessee, licensee and permittee shall provide to the City evidence of current insurance coverage in such form and for such amounts and for such coverages as determined by the City." The City of Phoenix, will establish insurance requirements that will reduce the liability of The City of Phoenix. See A-6
Q/C-74	The third item is the discrimination against independent work on turbine-powered or larger multi-engine airplanes. 41

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A-74	See A-3
Q/C-75	I cannot help but wonder what the driving incentive truly is behind this proposal. 41
A-75	See A-13
Q/C-76	While state statutes requires \$30,000 bodily injury liability for two or more persons and \$10,000 property damage liability, the considered \$3 million in liability appears extraordinary in comparison and may not even be available to mobile operators. 42
A-76	See A-1
Q/C-77	I am concerned with the purpose of the Service Fees, 42
A-77	See A-10
Q/C-78	The restriction for independent mechanics to maintain exclusively DVT based aircraft does not immediately impact me in my current situation, although am concerned with the potential implications. In a recent situation, while traveling cross country I experienced a relatively minor mechanical failure and required support. Similarly, many aircraft owners at alternate airports do not have mechanic services available and require maintenance at locations such as DVT. 42
A-78	See A-27
Q/C-79	I think that the \$3M Liability Insurance requirement is completely unreasonable 45
A-79	See A-1 & See A-6
Q/C-80	The \$1M Vehicle Liability Insurance requirement exceeds State standards and the mechanics vehicles mostly just sit in front of a hangar. 45
A-80	See A-1
Q/C-81	On top of the costly insurance, you plan to charge the mechanics 2% of the gross sales? 45
A-81	See A-10
Q/C-82	The 50-foot wingspan limitation doesn't seem to me to have any relevance pertinent to safety or any other concern on the City's part. 45
A-82	See A-3
Q/C-83	The document appears to limit the independent mechanics to airport based aircraft only. This would limit visitors to only using one of the FBO's which are already too busy to deal with the work they have. 45
A-83	See A-27
Q/C-84	1.) The current FBO's do not have the people with experience to economically service many of the "older" aircraft. --- AND--- they don't want to be bothered with us, especially "owner-assist." 46
A-84	We have made changes to the draft Minimum Standards in an effort to keep the Independent Mechanics.
Q/C-85	2.) The proposed SERVICE FEE is a "gouge" .. Not at all reasonable. Commercial and corporate companies can pass these costs on to the end user. The private owner, has no such option. 46
A-85	See A-10

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Q/C-86	Has any progress been made in the area of multiple airport fees.? 48
A-86	Minimum Standard Airport User permits will only be for the individual airport they are issued for.
Q/C-87	Item II, 1&2, this would apply to an FBO, as far as whether or not an individual mechanic has an FAA license or not is up to the FBO and the owner of the A/C that is being worked on. It is not the job of the City to dictate that. An unlicensed mechanic can work on an A/C as long as he or she is supervised by a licensed mechanic or A/I. 49
A-87	See A-60
Q/C-88	Fees, item VI 1&2. This could apply to an FBO. If you looking at the mobile operator, a flat fee of \$400.00 per year would be a reasonable amount. As far as 2% of the gross sales, this would not be fair because most mobile mechanics just make arrangements for the purchase of parts and supplies and the owner either pays direct or reimburses the mechanic. 49
A-88	See A-10
Q/C-89	Insurance, This issue would be between the mechanic and the A/C owner. On vehicles, the state all ready has standards and I feel the City is over stepping it's bounds on insurance requirements and the amount the city is suggesting is unattainable. 49
A-89	See A-2
Q/C-90	Dictating the size and type of A/C that a mechanic can work on is not right. When a person has acquired their license, the FAA dose not say what size or type he or she can work on. 49
A-90	See A-3
Q/C-91	The A/C owner has the responsibility to make sure that qualified people work on their A/C. 49
A-91	See A-60
Q/C-92	The proposed insurance requirement is extremely excessive 50
A-92	See A-1 &
Q/C-93	the 2% fee is a tax plain and simple. We already pay tax on the parts and labor, why should we be taxed an additional 2%? 50
A-93	See A-10
Q/C-94	1) Airport premises liability. The only problem I see is with \$3M limit. It simply isn't available in the current insurance market. I write several insurance policies for aircraft mechanics in California with the highest limit available which is \$1M CSL. 52
A-94	See A-6
Q/C-95	2) Vehicular Liability Insurance. The State of Arizona already has established vehicle liability insurance standards. Reference ARS 28-4009 for minimum insurance standards. 52
A-95	See A-2
Q/C-96	The State has established a vehicle insurance verification process under ARS 28-4142.

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	C: Only a Law Enforcement Officer may request insurance verification per ARS 2-4134. 52												
A-96	See A-2												
Q/C-97	Liability Insurance- <i>“Commercial General Liability Insurance” in the amount of \$1M is unreasonable and unacceptable. A one million dollar policy is not readily available to most independent mechanics operating at DVT. Expectations of that amount will create an undue burden for the mechanic and the aircraft owner. The tenant owner will pay for this additional cost through an increased hourly rate. Reasonable and realistic should be the goal of this guideline.</i> 53												
A-97	See A-6												
Q/C-98	<i>“Vehicular Liability Insurance” in the amount of \$3M is also unacceptable and an unreasonable. Arizona state statute sets minimum levels of financial responsibility at: \$15,000 bodily injury liability for one person \$30,000 for two or more persons \$10,000 property damage liability The amounts set forth in the Minimum Standard far exceed the amount set by statute. The airport tenant should not have to shoulder the exorbitant amount called for in the standard unless and until other public facilities such as auditoriums, parks, etc. share the same burden.</i> 53												
A-98	See A-1												
Q/C-99	<p>Service Fees - <i>in the amount of “greater of \$400 annually or 2% of gross sales” is an unreasonable requirement. The independent mechanic receives a very small markup for any handling or storage. Airport Administration has minimized any storage capability by putting maximum limits on items such as batteries, tires, oil, etc. that may be stored in a hangar. This requirement is enforced through regular annual inspections. Both cases severely handicap the Individual mechanic by limiting his inventory and then essentially taxing him on the total sale. Independent mechanics generally receive little monetary benefit beyond their labor. It is not unusual to have 50% of the maintenance bill attributable to parts and material. In the case of engine overhauls and major airframe work, that percentage increases to an even higher level. For Example, let’s take the case of a simple engine replacement which is a common aircraft maintenance task. The example shows the high cost associated with aircraft parts and material relative to the cost of labor.</i></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Engine Cost</td> <td style="width: 20%; text-align: right;">\$30,000</td> <td style="width: 30%;">Propeller Cost</td> <td style="width: 20%; text-align: right;">\$9,000</td> </tr> <tr> <td>Labor 60Hr@\$45/Hr</td> <td style="text-align: right;"><u>\$2,700</u></td> <td>Labor 8Hr@\$45/Hr</td> <td style="text-align: right;"><u>\$360</u></td> </tr> <tr> <td></td> <td style="text-align: right;">\$32,700</td> <td></td> <td style="text-align: right;">\$9,360</td> </tr> </table> <p>2% Gross is \$654 (=24% of Labor) \$187 (=52% of Labor)</p>	Engine Cost	\$30,000	Propeller Cost	\$9,000	Labor 60Hr@\$45/Hr	<u>\$2,700</u>	Labor 8Hr@\$45/Hr	<u>\$360</u>		\$32,700		\$9,360
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	\$32,700		\$9,360										

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	<p><i>The engine example represents a 24% fee (\$654/\$2,700) levied on the mechanic. The \$654 fee will come out of the \$2,700 of mechanics proceeds. . The propeller example becomes even more absurd. How many of our mechanics will be able to stay in business charging an additional 24% fee? This cost will be passed through to the aircraft owner. Many owners are already financially extended in maintaining an aircraft due to increased costs such as fuel, insurance and maintenance. This could quickly force many of our tenants to give up aircraft ownership or seek unsafe alternatives.</i></p> <p><i>Independent mechanics should no be expected to operate without a fee to the city. The city seems to have taken a “one size fits all” approach in establishing a fee. This approach does not take into account the unique characteristics of aviation maintenance at the independent mechanic level.</i></p> <p><i>A more realistic approach would be a percentage of net proceeds, adjusted gross income or an annual flat fee or a hybrid of both. 53</i></p>
A-99	<p>See A-10</p>
Q/C-100	<p>Piston engine restriction - <i>Independent Mechanics will be restricted to working only on piston engine aircraft with a wingspan limited to no more than 50'. These are designated as “Group I Piston Aircraft”. For turbine operators, this will preclude owners using an Independent Mechanic. Again, this is another unreasonable and unacceptable requirement with no basis and is not supported by any FAA regulation. The “Group I Piston Aircraft” is an airplane design group definition from FAA Advisory Circular 150/5300-13 used for airport design of runways, taxiways and infrastructure. It makes no reference to aircraft maintenance. This requirement is inappropriate for use in defining aircraft maintenance guidelines.</i></p> <p><i>The restriction limiting Independent Mechanics to working only on piston engines and excluding mechanics from turbine engine aircraft has no FAA regulations basis. It restricts the tenant turbine aircraft owner to use an existing FBO or an off field facility for maintenance. As currently drafted, the minimum standard prohibits the Independent Mechanic and appropriately licensed operator from adding hydraulic fluid, changing a tire, replacing a brake pad or performing many of the activities on turbine aircraft, permitted by FAR 43.3(g) and Appendix A to Part 43 section (c), which are allowed by a licensed pilot.</i></p> <p><i>It is a known fact in the aviation community that there is a migration to the turbine power plant, especially in many of the newer built aircraft.. With this technology restriction, there is the appearance of a planned sunset provision for the planned demise of the Independent Mechanic of piston aircraft.</i></p> <p><i>The diverse amount of aircraft types at DVT (High wing, low wing, fabric, composite, metal, piston, turbine, vintage, warbird, experimental, helicopter,</i></p>

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	<i>retract, fixed-gear, etc.) has created a high degree of specialization and variety of expertise among the maintenance providers. Many of these specialties are unavailable except through an Independent Mechanic who satisfies a niche need. The Minimum Standard in its current format has DVT aircraft owners worried that many of our aircraft on the field will be unable to be maintained in a legal airworthy condition because the resource or maintenance specialty will be excluded from the airport. This has serious consequences to the tenant aircraft owner. 53</i>
A-100	See A-3
Q/C-101	DVT based aircraft restriction - <i>Independent mechanics will be restricted to only working on DVT based aircraft. Many aircraft owners at local airports do not have mechanic services available. Therefore, the use of independent mechanics at DVT is critical. Additionally, any itinerant pilot would be unable to obtain any maintenance service due to not being based at DVT. I am sure almost every aircraft owner has had to seek services at an airport other than their home airport. DVPA has had such requests from pilots as to who we would recommend. This regulation would exclude recommending an Independent Mechanic. We have mechanics that specialize in certain aircraft types making them preferred in some maintenance cases. This regulation serves no purpose other than to restrict itinerant business to the Fixed Base Operators (FBOs) creating an exclusive resource for this type of service work. FBOs at monthly "DVT Partnership" meetings report that the FBOs are overloaded and cannot support the existing maintenance business. This is reinforced by the long lead times being quoted for maintenance requested by DVT tenants. 53</i>
A-101	See A-27
Q/C-102	<i>Liability Insurance - Both the Airport Premises Liability and Vehicular Liability Insurance requirements are unreasonable and unaffordable, even if the independent mechanics were able to obtain such insurance. Having to pay these insurance rates would surely drive the independent mechanics out of business. 54</i>
A-102	See A-1 & See A-6
Q/C-103	<i>The service fees are also unreasonable without significantly increasing the cost of maintenance to the end customers. 54</i>
A-103	See A-10
Q/C-104	<i>Piston Aircraft Only Restriction - There is no basis for this restriction other than a restraint in trade preference for the Fixed Based Operators and is not acceptable. 54</i>
A-104	See A-3
Q/C-105	<i>1) Liability Insurance requirements for independent mechanics are unreasonable and should be reduced to an amount which is obtainable for them. 55</i>
A-105	See A-1 & See A-6

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Q/C-106	Vehicular Liability is unreasonable. Az State Statute requirements could be used as a guideline. 55
A-106	See A-1
Q/C-107	Service fees do not make sense. A percentage of net proceeds would be fair, and would make more sense. (A reasonable annual flat fee would also work.) 55
A-107	See A-10
Q/C-108	Piston engine restriction is not workable. The FAA circular cited is designed for another purpose. Supposing a B-17 or similar sized aircraft (such as recently visited DVT) had an engine problem, (which it did). Independent Mechanics are the only ones with the tools and the know how to repair. There are many other aircraft on the airport which require specialize knowledge and tools. DVT is an icon in the general aviation community. The SASO standards would only serve to destroy this status. 55
A-108	See A-3
Q/C-109	I understand that the \$3 million liability insurance for Airport premises liability insurance is practically unavailable to most independent mechanics, either because of very high costs (I heard \$19,000/year) or simply not available because the Insurance Companies won't even give a quote. It is not only a question of steeply increasing prices for us tenants but also possibly not having independent mechanics available. I believe that \$1 million should be sufficient. 57
A-109	See A-6
Q/C-110	Also for vehicular liability insurance, I believe that \$1 million should be sufficient. 57
A-110	See A-1
Q/C-111	On service fees I couldn't tell from the proposed rules if the fees on gross sales were based on gross labor costs, or if the fees were based on labor plus parts. It seems to me that assessing fees on the parts does not make sense. The mechanic could work a couple of hours on installing an expensive radio or other part, and have a big fee that the tenant would have to pay. 57
A-111	See A-10
Q/C-112	I do not see a justification for limiting independent mechanics to piston engine aircraft with a wingspan of no more than 50'; what is the difference between 50' and 60'? 57
A-112	See A-3
Q/C-113	Also restricting their activities to aircraft based at Deer Valley seems silly. 57
A-113	See A-27
Q/C-114	I find your insurance requirement of \$3,000,000 for Vehicular Liability to quite high and possibly discriminatory. 59
A-114	See A-1
Q/C-115	It is unclear to me as to why the City of Phoenix would want to assess a service fee to parts and materials. 59
A-115	See A-10

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Q/C-116	<p>With respects to the DVT based aircraft Restriction on IM's.</p> <p>This clause causes great consternation to me if it were to go into effect. As an aircraft owner, what if I was to breakdown at another airport and I could not get an IM to repair my aircraft because I was not based there. What would I do? Most big FBO's cannot address quick fix problems in a timely fashion. This would also apply to a transitioning aircraft at DVT. Isn't this a restriction on free trade and commerce? I should be able to choose, after personal scrutiny and assessment, the IM of my choice to work on my aircraft. This type of restriction does not apply to the private consumer and their private autos, so why should it apply to aircraft repairs? 59</p>
A-116	<p>See A-27</p>
Q/C-117	<p>FAR 65.81 (a) does not restrict a qualified A & P mechanic or technician from working on any type of aircraft. It has been suggested that the reason for the proposed limit is due to the liability level required for the Independents. Further, Independents most certainly could service the larger and/or turbine powered other aircraft if only they would expand to the level of the large operators. This argument is difficult to comprehend. Meeting this level would certainly result in a higher level of general liability insurance capability. However, if the Independents had the resources and acumen to run a large business they would probably be doing just that. 60</p>
A-117	<p>See A-3</p>
Q/C-118	<p>Additionally there are several aircraft owners at DVT that will employ only specific named technicians to work on their piston, turboprop and jet powered aircraft regardless of the liability insurance level of the service provider. Thought should be given to permitting the Independents to utilize a contract requiring the owner to assume the liability for their aircraft and thereby remove the need for the larger dollar amount and more expensive policy. The contract could additionally include language that the aircraft owner using the Independent acknowledges the lower level of liability provided and agrees NOT to seek damages from DVT or the City of Phoenix in the event of uninsured damage. Most certainly the Airport and City legal staff could help with the proper required wording to isolate the City from any liability under reasonable circumstances. That wording could be specified in the Minimum Standards document as a condition for doing such business at DVT. 60</p>
A-118	<p>See A-2</p>
Q/C-119	<p>During the City presentation of the SASO the proposed fee was planned to be 2% of gross revenues. 60</p>
A-119	<p>See A-10</p>
Q/C-120	<p>I want to comment on auto liability insurance. At the city meeting a reference was made to the level of insurance the FBOs carry. The State of Arizona has a requirement for a minimum liability for vehicles licensed in the state and that</p>

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	should be adequate for airport use. There is a complete difference in the liability policy the FBO carries versus the Independent. The FBOs equipment is limited to use on the airport or specific vehicles that may operate on the public roads. The Independent is operating a personal vehicle that is used for daily life requirements. 60
A-120	See A-1
Q/C-121	<ul style="list-style-type: none"> A reasonable request for liability insurance coverage is acceptable request, but to require \$3 million is not reasonable, even if it were obtainable. 61
A-121	See A-1 & See A-6
Q/C-122	<ul style="list-style-type: none"> An independent mechanic performing maintenance on a tenant's or any aircraft must be licensed by the FAA, or they cannot sign off the work performed. A request for a licensed FAA mechanic should suffice. 61
A-122	See A-60
Q/C-123	<ul style="list-style-type: none"> A reasonable annual fee for the privilege of performing maintenance on the field is acceptable. A percentage of gross sales is not. 61
A-123	See A-10
Q/C-124	I would not want to see any restriction limiting the Independent Mechanics work to only DVT based aircraft. 63
A-124	See A-27
Q/C-125	A token fee for registration and the privilege of being able to work at DVT. I'm not totally against a fee in this situation, however, I think in any consideration for a fee: 63
A-125	See A-10
Q/C-126	The minimum annual fee of \$400. is excessive for an Independent Mechanic that works on a part time basis. A fee limited to 2% of gross sales is more reasonable, unless the Mechanic must hire an accounting firm to assess his gross sales and provide "certified" proof to the city. Adding the 2% to what the Mechanic charges the aircraft owner as an identified cost item, and submitting copies of his invoices to the city should be sufficient. 64
A-126	See A-10
Q/C-127	The requirement for vehicle insurance of \$3,000,000., and the requirement for \$1,000,000. for commercial general liability insurance for the Independent Mechanic is totally unrealistic. 64
A-127	See A-1
Q/C-128	Based aircraft??? Are you kidding? What, exactly, is someone supposed to do that flies into DVT with a problem aircraft that our FBO's don't work on. 68
A-128	See A-27
Q/C-129	\$400.00 annually or 2% of gross? I'm not even sure how to respond to this. It's ludicrous on so many levels. The foremost being, that it is completely un-enforceable. I, as an aircraft owner, would simply buy my own parts, pay my mechanic \$5.00 an hour to work on my aircraft and \$5000.00 an hour to air up the tires on my car. 68

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A-129	See A-10
Q/C-130	. Attachment A. While I have not had the opportunity to contact Lloyds of London as of yet, it's my understanding that the insurance being required is not even attainable to independent operators. As for the vehicular insurance minimum, the City of Phoenix and the airports within are still located in the state of Arizona, are they not? Maybe I'm missing something here, but it's my belief that there are state statues that pretty much covers the minimums for vehicular insurance. 68
A-130	See A-1 & See A-6
Q/C-131	Fees of 2% gross sales are not fair to anyone. 69
A-131	See A-10
Q/C-132	The insurance requirement is too high at 3 million dollars. 69
A-132	See A-1
Q/C-133	Requiring 2% of their revenues is also burdensome and unworkable and will just lead to falsified work records. 70
A-133	See A-10
Q/C-134	Lastly, the proposed restriction which would require Independent Operators to work only on DVT based aircraft serves no purpose. 70
A-134	See A-27
Q/C-135	I find your insurance requirement of \$3,000,000 for Vehicle Liability to quite high and possible discriminatory. 73
A-135	See A-1
Q/C-136	It is unclear to me as to why the City of Phoenix would want to assess a service fee to parts and materials. 73
A-136	See A-10
Q/C-137	With respects to the DVT based aircraft Restriction on IM's. This clause causes great consternation to me if it were to go into effect. As an aircraft owner, what if I was to breakdown at another airport and I could not get an IM to repair my aircraft because I was not based there. 73
A-137	See A-27
Q/C-138	<ul style="list-style-type: none"> This proposal seeks to interfere with commerce between federally certificated maintenance repair technicians providing required service within and upon the boundary of a federally funded public use airport. 74
A-138	See A-60
Q/C-139	<ul style="list-style-type: none"> This proposal seeks to impose unlawful restrictions on privileges authorized by the Federal Aviation Administration of certificated aviation maintenance technicians. 74
A-139	See A-60
Q/C-140	<ul style="list-style-type: none"> This proposal seeks to mandate the use of only those commercial service providers authorized by the City of

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	Phoenix at its discretion. 74
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