Dec. 1, 2021

From: James Nichols

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DOCKET OPERATIONS

To: U.S. Department of Transportation

Docket Operations

West Building Ground Floor, Room W12-140

1200 New Jersey Avenue, SE

Washington, DC 20590

To: Docket Operation.

James Nichols Request:

I (James Nichols, A&P # 3430499) would like to request an exemption to 14 CFR 65.91, (c), 2 which states, "To be eligible for an inspection authorization, an applicant must – Have been actively engaged, for at least the 2-year period before the date he applies, in maintaining aircraft certificated and maintained in accordance with this chapter." The statement is restated on FAA Form 8610-1 Mechanic's Application for Inspection Authorization. Block 6 on FAA Form 8610-1 states "HAVE YOU BEEN ACTIVELY ENGAGED, FOR AT LEAST THE 2-YEAR PERIOD BEFORE THE DATE OF APPLICATION IN MAINTAINING AIRCRAFT CERTIFICATED AND MAINTAINED IN ACCORDANCE WITH THE CFRs."

Information to support relief request:

Due to the COVID-19 pandemic, my prior employer permanently closed the Gulfstream Aerospace, Las Vegas, NV facility causing the break in my employment. COVID-19 has affected multiple aviation MRO's and flight departments in the Las Vegas, NV. The area became oversaturated with unemployed aviation technicians. May 2020, I was trying to contact the LAS

Vegas, NV. FSDO about the FAA Form 8610-1 authorization, but the FSDO operating status was CAT 0 and could not respond. At CAT 1 (6 months later) I was informed that no in person appointments were available until CAT 2 operations were obtained at an unknown time. I had to leave the Las Vegas, NV area to seek employment in aviation. Since leaving Las Vegas, my current employment requires me to have an Airframe and Powerplant License (which I have actively held since Aug. 2009) and obtain an Inspection Authorization. I have been in contact with Washington, DC FSDO and was informed that, I was not eligible for Inspection Authorization until April 2023, due to the COVID-19 caused break in employment.

Background and work history:

A brief background about myself. I retired from the Air Force in Sept. 2008 with over 20 years' experience as AFSC 2A373. In Aug. 2009, I received an A&P License. Afterwards I worked for the following companies as an aviation technician Defense Support Services (DS2) LLC, Battlespace Flight Services LLC, Aerotek Aviation LLC, and Gulfstream Aerospace. I had worked at the Gulfstream Aerospace facility in Las Vegas, NV. for 6 years, In May 2020 I was unemployed do to COVID-19 pandemic and facility closure.

I have endured several hardships since COVID-19, and continually try to overcome them. In April 2021, I was able to acquire a position working for the FBI's flight department in Manassas, VA. after an extensive background check. My current position Gulfstream 550 assistant crew chief, we must maintain the aircraft to ensure 100% operational and mission readiness to respond to various national and international crisis at a moment notice. Sometimes we deploy with the aircraft supporting missions worldwide.

In summary:

I (James Nichols, A&P # 3430499) I request Exemption / relief approval to test for Inspection Authorization before April 2023, so I can satisfy the requirements of my current working status in order not to incur any additional economic hardships as I am currently on a temporary waiver with the department, allowing me time to seek resolution to this issue. With my aviation experience and background. I would like to remind you during the time that I was unemployed, it was not due to any misconducts or faults on my part, the COVID-19 pandemic was the direct cause. I urge your consideration in my favor on this matter, as I wish not to incur any further hardships.

Respectfully,

James Nichols