



## Collaboration with the FAA from an Industry Perspective

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Industry Perspective



### **Background**

- For 25 years, the Aeronautical Repair Station Association (ARSA) has represented the aviation maintenance, design, and production industries
- ARSA is focused on national and international regulatory compliance
- It has developed expertise in reading, applying, and improving aviation safety regulations

## People

- Staff includes lawyers experienced in aviation safety and legislative matters, and licensed mechanics with years of industry experience
- Individuals supporting operations, quality, finance, membership, and communications are knowledgeable, friendly, and helpful
- The associated law firm represents individual clients on transportation-related legislative and aviation safety regulatory matters

## Offerings

- The Association created “model” manuals, human factors training materials, and offers online training courses
- ARSA distributes an electronic weekly journal, a monthly newsletter, and posts information relevant to the aviation maintenance industry on its website
- The Annual Repair Symposium gathers the civil aviation authorities and industry to share knowledge and network on substantive business, regulatory, and legislative issues

## ARSA in Action

- The Association tackles matters of general concern; it provides solutions to enable formal clarifications or interpretations
- The Association provides substantive comments to proposed rules and draft policy or guidance
- ARSA participates in industry events and government committees and working groups

## How it Looks Inside ARSA

- The Association interfaces with regulated parties and the regulating authorities at the same time
- As a result, it promotes and fosters compliance while working to improve rules, guidance, and harmonization
- Its “legal” bias forces it to deal with regulations versus reality

## How it Looks Outside ARSA

- The regulations take a “holistic” approach:
  - Design—requires data showing compliance with airworthiness standards
  - Production—requires that fabrication result in compliance with the design
  - Operations—requires “flying” within design limits
  - Maintenance—requires returning an article to “at least” its original design condition

## How it Looks Outside ARSA

- Governmental stovepipe issues:
  - Engineering and production separate from “flight standards”
  - Flight standards separates operations from maintenance
  - Result: misunderstanding, miscommunication, bad management, disparate treatment, and duplicative actions by agency and industry, particularly for companies with multiple international certificates

## How it Looks Outside ARSA

- Industrial stovepipe issues:
  - Engineering separate from operations
  - Business separate from “quality”
  - Result: misunderstanding, miscommunication, bad management, inability to separate business issues from regulatory compliance issues

## How it Looks Outside ARSA

- Inability to “standardize” within FAA
  - Training on the actual regulations suck
  - Reporting sequence
    - Local to Region
    - Region to AFS-1
    - AFS-300 policy branch
    - Chain of command is murky when trying to get the local inspector to adhere to regulations and/or policy

## How it Looks Outside ARSA

- Result of lack of training and murky flow
  - Local Inspector Preference (for example, repair station capability list management).
  - Conflicting actions (such as Form 9 non-recommendation submittals).
  - Industry intimidation
  - “Good” as is feeling disenfranchised

## How it Looks Outside ARSA

- Industry’s inability to standardize
  - Stovepipes between “compliance” and “business”
  - Regulatory compliance training sucks
  - Perception of intimidation based upon LIP
  - Fear of negative media/stockholder reaction for “fighting” a SAFETY regulator

## How it Works, Both Sides

- The politics of aviation safety
  - Micromanagement by Congress
  - Over or under reaction by agency
    - TSA's current debacle
    - "Aging" aircraft directive
- What is ARSA doing about it?
  - Education, education, education— visits and letters to legislators
  - "Lift the Ban"

## How it Works, Both Sides

- Regulatory initiatives
  - Big picture
    - Audit reduction (requires interaction between AFS and AIR, international NAAs, manufactures, airlines, the whole kit and kaboodle)
    - International "harmonization" – world aviation regulations (war), not capitalized yet, but maybe in our children's lifetime

## How it Works, Both Sides

- Regulatory initiatives
  - Closer to home
    - AC 43-MAD
    - AC 120-16
  - Monitoring
    - CMMs in AWLs (CDCCL issues)
    - AD compliance issues

## Feedback

Questions? Comments? Funny anecdotes? Limericks?



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