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Professor Jody Brannon
National Director, News21
Cronkite School of Journalism and Mass Communications
Arizona State University
555 N. Central Ave.
Phoenix, AZ 85004

Dear Professor Brannon,

We are deeply troubled by News21's articles collectively titled "Travelling Dangerously in America," which appeared in the Washington Post and on MSNBC.com. The reports inaccurately portray the aircraft maintenance industry and mislead readers. As a result, we find it necessary to request that News21 revisits its analysis and address the misinterpretations of applicable regulations and contextual mix-ups we outline in this letter. ARSA is more than willing to discuss these matters at length with you.

The untold truth is the fact that air carriers' increased use of contract maintenance providers has coincided with one of the safest periods in U.S. commercial aviation history. As noted in your reports, the majority of U.S. airlines no longer perform the bulk of maintenance themselves; yet, it has never been safer to fly on a U.S. airline. That outcome is no mistake; rather, it is the result of an effective – and ever improving – network of industry controls in concert with existing regulations. Safety is vital to the aviation industry. There is no incentive for any airline or repair facility to deliver an unsafe product; doing so would result in certain economic failure.

Despite these facts, you chose to stoke public fears by catering to those who simply fear the changes that have taken place (and are taking place) in the commercial aviation industry. Again, the fact is that flying is safer today than it has ever been. Nevertheless, focus is blindly placed upon the reality that aircraft maintenance has become truly global and far more specialized. Today, U.S. airlines utilize maintenance providers whose operations are dedicated to specific engines, aircraft types and components. The generalist approach to maintenance that was employed by the airlines of yesteryear is becoming extinct. Although economics has largely driven these changes, it is not -- as you have suggested -- a reckless attempt by airlines to cut corners.

The fact is that maintaining a fleet of aircraft is extremely expensive, no matter who performs the work, and that aircraft accidents and incidents are even more costly in terms of both sheer expenditures and lost revenues. As with any business, an airline strives to operate in the most efficient manner possible. Of course, their primary role is providing safe transportation. With that in mind, it should come as no surprise that airlines would utilize the services of businesses dedicated to providing engine, aircraft or component maintenance services.

For instance, it makes little sense for an airline to purchase an expensive piece of component test equipment and establish the necessary infrastructure to use that apparatus when it will only be utilized for work on its own fleet. It may take years for the airline to recoup the cost of the tester, let alone the ancillary costs associated with operation of its own component shop. That work is provided much more efficiently by a specialized component repair facility contracted to provide that work for several airlines; the resulting cost savings are passed along to the airline customers. In either case, existing regulations require that the work be of the same quality regardless of where it is performed.

Moreover, an obvious attempt was made by News21 to paint the industry with the brush of uncontrolled greed, operating beyond the bounds of regulatory control and with disastrous results. Nothing could be

further from the truth. In addition to the standards of quality required by existing rules (irrespective of location and who performs the work), operational reliability of engines, aircraft and components is perhaps the most closely monitored metric in the airline industry. Such measuring makes sense from a business standpoint (in light of the high costs mentioned previously) and it results in increased safety (operational reliability equals safe operations). The entire aircraft maintenance industry is proud of its exemplary record in providing a safe product to the traveling public, and it is continually improving its performance as companies compete for airline business.

Similarly, confusion exists in the News21 portrayal of "non-certified shops". While it is true that specialized work such as metal plating, welding and machining is often performed by vendors that are not certificated by the Federal Aviation Administration (FAA), the work is *always* approved for return to service by a person or entity that *is* certificated. In other cases, the term simply refers to licensed mechanics working independently under the privileges of their FAA certificates. Indeed, many of the non-certified facilities discussed in the Department of Transportation Inspector General's report involve such operations; the work was performed by an FAA certificated individual rather than an FAA certificated repair station. It is simply not possible under existing regulations for an airline to have its maintenance performed willy-nilly all over the world by whomever it pleases without retaining responsibility for the work.

Along these lines, on the issue of drug and alcohol testing at foreign maintenance facilities, is News21 even aware that such testing is not required of manufacturers and assemblers of new engines, aircraft and components *within* the U.S.? That is, a non-certified machine shop (as mentioned above) is required to have a testing program to perform work for a repair station maintaining airline articles, but not for the U.S. manufacturer of the same article. That unlikely result follows the fact that workers in the U.S. who assemble entire aircraft are not drug and alcohol tested. While ARSA is not opposed to drug testing per se, this long-standing contradiction hardly makes a case for the lack of foreign drug and alcohol testing requirements as a direct indicator of unsafe operations.

Finally, ARSA's comments regarding the complicated issue of bilateral agreements and FAA oversight is misrepresented by News21. We disagree with the statement that the FAA cannot enforce its rules overseas for fear of angering the aviation authority of the foreign country. Our statement was specifically related to the current proposals in the FAA reauthorization bill that would destroy international cooperation between international aviation authorities and the FAA. Much of our regulatory structure, as well as that of other signatory countries, is premised on International Civil Aviation Organization (ICAO) requirements. Over time, agreements have been made between governments to recognize certain equivalencies that exist as a result of that common basis. For instance, the U.S. has a few maintenance agreements that have been activated with certain European countries and a much more extensive European Union agreement is in the works. It is this type of agreement that is jeopardized, and ARSA's comment related directly to this issue alone.

Because we feel strongly that News21 has a profound misunderstanding of the aircraft maintenance industry, ARSA looks forward to working with you in the future to present a more balance perspective of this important sector.

Sincerely,

A handwritten signature in black ink, appearing to be 'CK', written in a cursive style.

Christian Klein
Executive Vice President
Aeronautical Repair Station Association