

# Aeronautical Repair Station Association

## *the hotline*

January 31, 2012

Alexandria, VA

[www.arsa.org](http://www.arsa.org)

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### **Sarah Says**

## **Ready, Set, Go!**

*By Sarah MacLeod, ARSA Executive Director*

The New Year is always a good time for reflection and planning. The Association's strategy for 2012 is ambitious, but not unrealistic.

The Positive Publicity Campaign's 2012 plans have been approved by the Public Relations Committee and the Board; for more information, please see *the hotline's* newest feature, [PPC Corner](#). All members have a substantial stake in the PPC's success; the campaign will be most effective with widespread support. If your company hasn't made a contribution, [do so today](#); if it has supported this effort, get a colleague on board!

On the legislative front, it appears that we are just days away from seeing a new multiyear FAA bill. The benefits of ARSA's 2010 dues increase for lobbying is evident in the congressional [conference committee report](#), released on Jan. 31, which incorporated most of ARSA's suggested improvements to the repair station and non-certificated maintenance language. As a result, the final legislation will likely strike the right balance between safety, oversight, and operational freedom.

The FAA bill will free ARSA to focus on other legislative priorities. Chief among these is [lifting the ban](#) on new foreign repair station certifications. The Association will support members' broader interests as well, working to protect businesses from burdensome regulations and reminding lawmakers about the fine distinction between oversight and overreach.

*ARSA will be extending its reach outside the Beltway more frequently this year, hosting outreach and training sessions in your backyard.*

ARSA will bring the industry together for another successful [Annual Repair Symposium](#) in March for a few days of networking and training. Coordinating a meeting between the maintenance industry, airlines, and regulators facilitates enhanced compliance and assures that areas of contention are addressed. Along with the symposium, ARSA will host the legislative day, helping members share their concerns directly with lawmakers. Secure your spot for the 2012 Legislative Day and Annual Repair Symposium by [registering today](#).

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### **Sarah Says, continued**

By addressing your compliance questions in real time, we will be able to develop Stump ARSA online training opportunities. Speaking of which, after much effort and planning, [live online training classes will be offered throughout 2012 and beyond](#). The first classes deal with aviation part sales, purchase, receiving and stock; classes on parts 145 and 21 will follow, as well as Stump ARSA training.

ARSA will be extending its reach outside the Beltway more frequently this year, hosting outreach and training sessions in your backyard. The Association will be in [Wichita, KS Feb. 22](#), and is busily planning several other trips. When we make it to your neck of the woods, be sure to come and see us.

With workforce development, recruiting, and retention issues continually topping repair stations' concerns, the Association will increase its efforts in these areas. Look for a new monthly feature from Raymond Thompson, associate dean of the College of Aviation at Western Michigan University, on recruiting the next generation of aviation technicians. ARSA will also enhance its [MROJobsOnline.com](#) career center to connect those seeking work with those seeking workers.

Finally, the beginning of the year also brings the [2012 membership survey](#) that allows the Association to focus on items of importance to its members. To help ensure accurate data, only the primary contact at each ARSA member company is asked to participate. If you received an email about the survey, it is important that you complete it prior to the Feb. 17 deadline. Please take ten minutes to answer the questions—all comments are important and heeded.

### **Legal Briefs**

## **Aircraft Parts: Regulations Impacting the Sale**

*By Craig Fabian, ARSA Vice President of Regulatory Affairs & Assistant General Counsel*

*This article and the next few Legal Briefs will focus on regulations impacting the sale, purchase, receiving, inspection and stocking of civil aviation products. This series is presented in conjunction with ARSA's newly-released online regulatory training.*

14 Code of Federal Regulations (CFR) part 3 is short and to the point; it only has two sections, section 3.1 simply states that the part applies to any *person* (which means an individual or a company; see the § 1.1 definition of person) who makes a *record* regarding the sale or advertisement of a type-certificated *product*, or a product, part, appliance or material that may be used on a type-certificated product.

Section § 3.5(a) defines the term "product" as an aircraft, aircraft engine or aircraft propeller. It also defines "record" as basically any conveyance of information about a civil aviation article. Although not specifically defined in part 3, "type-certificated" means the product has a design approval from the Federal Aviation Administration (FAA) in the form of a type certificate.

With applicability and terms defined, the substantive elements prohibit any person from making, or forcing someone else to make fraudulent and intentionally false statements (§ 3.5(b)(1)), fraudulent or intentionally false copies or alterations (§ 3.5(b)(1)) and intentionally misleading statements



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### Legal Briefs, continued

(§ 3.5(c)(1)) or omitting material details (§ 3.5(c)(2)) when conveying information in an advertisement or sales transaction. The prohibitions extend to any statement or omission that relates to the airworthiness of a type-certificated product, or the acceptability of any product, part, appliance, or material for installation on a type-certificated product.

The elements necessary to show intentional falsification are: (1) a false statement about a material fact; (2) knowledge that the statement is untrue; and (3) intent to deceive. Fraud is comprised of those same three elements, plus (4) justifiable reliance on the false statement; and (5) resulting harm.

For omissions and intentionally misleading statements, the test whether the statement is likely to mislead a consumer acting reasonably under the circumstances. In either case, there is no violation if a person can show that the product is airworthy or that the product, part, appliance or material is acceptable for installation on a type-certificated product (§ 3.5(d)).

Also, the fraudulent or intentionally false provision in § 3.5(b) does not apply to part 43 records (§ 3.1(b)) since § 43.12 prohibits fraudulent and intentionally false statements in maintenance records (i.e., it would result in the same, or similar, charges). However, maintenance records used in sales or advertisements will be subject to scrutiny for omissions or intentionally misleading information under part 3.

There are other regulations specific to transfers of life-limited parts (§ 43.10) and aircraft (§ 91.419), along with U.S. State Department and U.S. Department of Commerce requirements for the sale of "dual use" (i.e., military and civil) parts. In addition, U.S. laws that prohibit the transmission of falsified records or conspiracies to perform illegal acts may apply; many states have similar laws.

To learn more about regulations affecting the sale of civil aviation parts, [register](#) for the first part of ARSA's three-part online series.

<b>Aeronautical Repair Station Association</b>	<b>Registration Open!</b> <b>Annual Repair 2012 Symposium</b>	<b>March 14-16, 2012</b> <b>Ritz-Carlton Hotel Pentagon City Arlington, Virginia</b>
<b>Agenda</b>	<b>Register</b>	<b>Sponsor Opportunities</b>

### Regulatory Lookout

#### Mind the Gap

The challenge of attracting and retaining student mechanics is a hot issue for ARSA and its members. To that end, the Association participates on an Title 14 Code of Federal Regulations (14 CFR) part 147 Aviation Maintenance Technician School advisory working group under the auspices of the Aviation Rulemaking Advisory Committee (ARAC).

The purpose of the working group is to evaluate the ARAC's Executive Committee's [eleven recommendations](#) issued on Dec. 5, 2008.

The ARAC recommended, among other things, a change to part 147 addressing curriculum and minimum training hours. The curriculum requirements were originally established under the Civil Aviation Administration and recodified into the 14 CFR in 1962. Since that time, neither § 147.21(b) mandated hours of instruction distribution nor the regulations dictating the curricula subject areas and items described in appendices B, C, and D have significantly changed.

Both industry and government agree that outdated part 147 requirements inhibit maintenance technician schools from keeping up with changes in aircraft technology. However, while the ARAC's final report recommended rulemaking, a proposed rule has not been issued, nor is one contemplated in the near future.

While the technology gap continues to widen, it is essential that concepts such as maintenance, resource management, human factors, communication, teamwork, and continuous quality improvement be incorporated into future curriculum. ARSA will continue to support efforts to revise part 147 and looks forward to continual involvement in working group activities.

## FAA Launches Mobile Site

The FAA launched a new version of the agency's website optimized for mobile devices.

The mobile version is optimized to provide iPhone (iOS 4+) and Android (2.2+) users a smooth browsing experience for some popular features. Mobile and tablet (iOS 4+, Android 3.1+) users will find optimized features for looking up advisory circulars, locating the closest flight standards district office, researching N-numbers, checking airport status, and catching up on FAA news.

To check out the FAA Mobile 1.0, point your web browser to [www.faa.gov/mobile](http://www.faa.gov/mobile).

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## Final Documents/Your Two Cents

**"Final Documents"**: This list includes Federal Register (FR) publications such as final rules, Advisory Circulars (ACs), policy statements and related material of interest to ARSA members. For proposals opened for public comment, see **"Your Two Cents."** The date shown is the date of FR publication or other official release.

**"Your Two Cents"**: This is your chance to provide input on rules and policies that will affect you. Agencies must provide the public notice and an opportunity for comment before their rules or policies change. Your input matters. Comments should be received before the indicated due date; however, agencies often consider comments they receive before drafting of the final document begins.

**"Final Documents"** and **"Your Two Cents"** are available at <http://www.arsa.org/FDYTC>.

## A Member Asked

By Sarah MacLeod, ARSA Executive Director

**Q:** I am having difficulty interpreting 14 C.F.R. § 43.9(a)(4). What entity should "sign off" on the FAA Form 8130-3, the repair station or a repairman? Does § 43.9 apply to repair stations indirectly performing work for part 135 air carriers?

**A:** As you know, 14 C.F.R. § 43.9(a) requires a person who maintains, performs preventive maintenance, rebuilds, or alters a component part to make an entry in the maintenance record, including the signature, certificate number, and kind of certificate held by the person approving the work.

For repair stations, the recordkeeping is found in § 145.219, which requires repair stations to keep records in accordance with part 43—

(a) A certificated repair station must retain records in English that demonstrate compliance *with the requirements of part 43*. The records must be retained in a format acceptable to the FAA.

- (b) A certificated repair station must provide a copy of the maintenance release to the owner or operator of the article on which the maintenance, preventive maintenance, or alteration was performed.
- (c) A certificated repair station must retain the records required by this section for at least 2 years from the date the article was approved for return to service.
- (d) A certificated repair station must make all required records available for inspection by the FAA and the National Transportation Safety Board.

The part 43 section that deals with *maintenance* records is § 43.9; specifically, § 43.9(a)(4) addresses approvals for return to service, which requires the person performing the maintenance to make an entry in the maintenance record including “the signature, certificate number, and kind of certificate held by the person approving the work.”

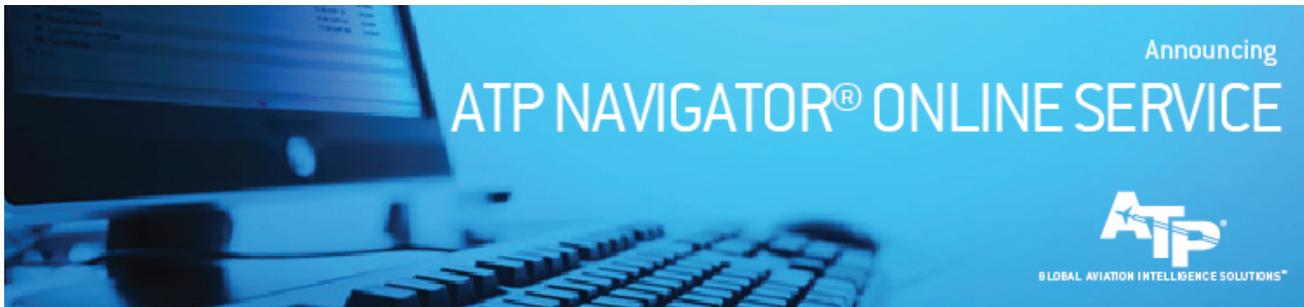
As defined by § 1.1, a “person” includes “an individual, firm, partnership, corporation, company, association, joint-stock association, or governmental entity...” Therefore, a repair station is a person under the rule and when work is performed by that “person,” it will issue the approval to return to service (i.e., enter the repair station number in block 21).

The employee issuing the approval to return to service on behalf of the repair station must also be certificated as required by § 145.157. That section states that the repair station must ensure (1) each person authorized to approve an article for return to service under the repair station certificate and operations specifications is certificated under § 65 and that (2) each person authorized to approve an article for return to service understands, reads, and writes English.

The repairman certificate is a qualification requirement. The certificate is limited by § 65.103 which states that “certificated repairman may perform or supervise the maintenance, preventive maintenance, or alteration of aircraft or aircraft components appropriate to the job for which the repairman was employed and certificated, but *only in connection with duties for the certificate holder by whom the repairman was employed and recommended.*”

So, yes, § 43.9 applies and it is the repair station that is performing the work and issuing the approval for return to service.

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## Quality Time

### Employment Law & Repair Stations

## A New Take on National Origin Discrimination

By Jonathan W. Yarbrough <[jarbrough@constangy.com](mailto:jarbrough@constangy.com)>. Constangy, Brooks & Smith, LLC, 80 Peachtree Rd., Ste. 208, Asheville, NC 28803-3160. © Copyright 2012 Jonathan W. Yarbrough ALL RIGHTS RESERVED

*Jonathan is experienced in representing employers in employment law issues; his pragmatic approach can also help keep relationships with employees from becoming difficult. Please contact him for questions regarding employment relationships.*

When does verifying employment eligibility become discrimination? Title VII of the Civil Rights Act of 1964 prohibits, among other things, discrimination based on national origin. The Act applies to employers with more than 14 employees. By contrast, the Office of Special Counsel for Immigration-Related Unfair Employment Practices (OSC) also prohibits discrimination based on national origin, but **applies to employers with 4-14 employees**.

The purpose of the OSC is to ensure that employers don't discriminate while verifying the work authorization of potential employees. The office operates much like the Equal Employment Opportunity Commission; that is, it investigates and prosecutes immigration-related employment discrimination. It may initiate investigations on its own or take cases that are filed by individuals; charges must be filed within 180 days of the alleged discrimination.

Some common OSC violations include:

### Citizenship or Immigration Status

The OSC investigates discrimination on behalf of U.S. citizens, recent legal permanent residents, refugees and asylees. Prohibited policies may include United States citizen-only hiring policies or preferring to employ undocumented workers or H-1B, H-2B, or H-2A visa workers when qualified workers are available.

Undocumented workers, nonimmigrant visa holders such as H-1B workers, or legal permanent residents who have not applied for naturalization within six months of eligibility are not covered.

### National Origin Issues

The OSC investigates national origin discrimination involved in hiring and firing decisions. While Title VII of the Civil Rights Act provides the same protection, the OSC may conduct investigations involving employers with 4-14 employees! Common violations include treating an applicant differently because of a foreign accent rather than basing a decision on the qualifications of the applicant.

### Document Abuse

In completing Form I-9 employees are permitted to choose what document or combination of documents to provide to the employer. Employers may not require more or different documents or restrict employees or particular employees to certain documents such as a permanent-resident card or an employment authorization document.

### No-Match/E-Verify Issues

A no-match letter where an employee's Social Security number does not reflect the information on government records is not itself a sufficient basis for taking adverse action against an employee. Likewise, a "tentative non-confirmation" issued by E-Verify does not necessarily mean that the worker is unauthorized; therefore, the lack of information cannot be used to make adverse employment decisions. In both cases the worker must be given the opportunity to resolve or correct the records error and be given sufficient time to do so.

The best advice to avoid discrimination charges: establish and apply uniform and consistent policies that comply with employment eligibility requirements without more restrictive or unnecessary baggage.

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## The Next Generation of Aircraft Technicians

By Raymond Thompson <[raymond.thompson@wmich.edu](mailto:raymond.thompson@wmich.edu)>. Western Michigan University, College of Aviation, 237 N. Helmer Rd., Battle Creek, MI 49037 © Copyright 2012 Raymond Thompson ALL RIGHTS RESERVED.

Raymond Thompson is associate dean of the College of Aviation at Western Michigan University. A long time mechanic and commercial pilot, he has been involved in technician education since 1983 in the U.S. and Middle East.

**Editor's Note:** This is the first in a series of articles from Mr. Thompson. Over the next several months he will provide material providing information on the importance of supporting AMT schools and the next generation of mechanics."

Boeing has issued its 2011-2030 long-term [commercial market outlook report](#) which projects the need for 247,400 new technicians worldwide; with 134,800 needed in North America. That is an average of 7,094 new technicians a year.

This is welcome news for those teaching the next generation of aviation technicians in part 147 schools; the greater the need, the more likely graduates and members of our armed forces will be employed. Unfortunately, need does not solve the issue facing schools and employers: *where will we find enough students?*

Looking at [Aviation Technician Education Council](#) (ATEC) data is not encouraging. In 1998 ATEC member schools had 11,699 students enrolled. In the same year, those schools produced 4,510 mechanic program graduates. From that group, 3,338 took jobs in aviation. In 2009, [ATEC members](#) had 9,992 students, produced 1,448 graduates, of which only 992 took jobs in aviation.

*For schools, the first step is to grab a prospect's interest early and often*

Federal Aviation Administration (FAA) certification data also isn't heartening. In 1994, the FAA awarded 12,313 mechanic certificates; in 2010, that number was a mere 5,744.

While the ATEC data may not be 100% representative of all part 147 programs, the trend is clear. Fewer people are enrolling and fewer mechanic certificates are being awarded. Looking only at the FAA certificates issued in 2010, we have significantly fewer available new mechanics than Boeing's projections demand.

The decline in students interested in aviation maintenance has deep roots. The cyclic nature of our industry, layoffs, poor economic news, and perceptions about aviation maintenance are only some of the factors that have made us less appealing. Competitors from automotive and energy like to hire our graduates and often pay them better.

Another factor is the wide range between the state-of-the-art hardware in the field and older, less sophisticated equipment found in schools. The majority of schools simply cannot afford the sophisticated level of aircraft technology and maintain a competitive cost structure for students. The schools that invest in better technology and teach content beyond the minimums required in part 147 are not always recognized. A student for a part 65 mechanic certification does not look at those factors; obtaining knowledge beyond the minimum scope of part 147 incurs greater cost and time – a significant factor for someone deciding where to obtain the education and certificate.

While the technical and financial issues facing schools seem straightforward, all in aviation maintenance need to address improving our communication with the public about what we do and the career options available. We operate out of public view, and when we do become public, few things generate groans like the sight of a technician at the gate or onboard the aircraft. Advocating this career path means selling it to students, their parents and the public.

So what to do? Over the next several months I will be discussing with *the hotline* readers how the aviation industry can help generate a vigorous interest in aviation maintenance careers. While some suggestions will involve finance, certainly not all will.

For schools, the first step is to grab a prospect's interest early and often informing them about aviation careers. By eighth grade, science, technology, education and math (STEM) lose many women and minorities. My institution works with third-graders on STEM-related aviation projects to interest young people in aviation maintenance. The seed needs to be planted early and watered often. Let's use ARSA's Positive Publicity Campaign to begin educating the public about what we do.

Next month, we will explore how you and your company can work with part 147 schools to create the next generation of aircraft technicians. Schools and industry have a symbiotic relationship and we need to work together to attract and educate the technicians we need for the future.

## What You Say Matters – So Say it in the Local Paper Too

*By Christian A. Klein, ARSA Executive Vice President*

If you're a regular reader of **the hotline**, you know how highly ARSA values your direct communication with Congress. Notes and calls to representatives and senators from industry execs are critical to advancing ARSA's legislative agenda.

Your opinion carries extra weight on Capitol Hill because you're a business leader, a job creator, and someone with unique insights about what's happening in the local economy. For all those reasons, your opinion also matters to local newspapers, which are often overlooked as a vehicle to influence what's happening in Washington, D.C.

Any congressional press secretary worth his or her salt spends time each day monitoring the media "back home". Congressional staffers scour publications for any mention of their boss's name or discussion of federal issues. Even if lawmakers don't read every local newspaper themselves, you can be sure they get clippings and media briefings. That means a letter to the editor published in a hometown newspaper can serve the same purpose as a letter to a congressional office, with the added benefit that you're simultaneously influencing voters and other elected officials.

Your letter is most likely to get published if it responds – even tangentially – to a story the paper has recently run. For example, a story about employment conditions is an excuse to talk about the aviation maintenance industry's need for a skilled technical workforce and the importance of federal investment in workforce development.

Your response to an article about the presidential race could point out that the nation is facing a glut of burdensome and nonsensical rules that inhibit economic growth and hold back the maintenance industry, such as the FAA ban on certification of new foreign repair stations.

Here are some other tips to getting your letter published:

- In the first sentence of your letter, make specific reference to the article to which you're responding.
- Be timely; don't wait more than a day or two to respond to a story.
- Keep your letter brief (200 words or fewer).
- Make one major point rather than trying to include every argument that supports your position.
- Reinforce your credentials by providing brief biographical information at the end of the letter (e.g., "The author is president & CEO of XYZ Co., an aviation maintenance company with 40 employees and three locations across the state.")
- Take a look at other letters the paper has published and mirror their style as much as possible.
- Check and follow the newspaper's submission guidelines (usually posted on the publication's website).

Also, be sure to keep ARSA in mind as a resource. [ARSA.org](http://ARSA.org) has plenty of useful information and policy data points. [ARSAAction.org](http://ARSAAction.org) (our grassroots action site) includes a zip code search tool to help you identify and communicate with the publications that serve your area. And, just as ARSA's team is always on standby to help members prepare communications to Congress, we're equally willing to help you prepare letters to local papers.

Even if your letter doesn't get published, don't be discouraged. You can be sure it was read by someone. That means it may influence future editorials and reporting. Also, by submitting a letter, you've raised your profile and identified yourself as someone with expertise about the topic. Next time they're preparing a related story the reporter may contact you for your input or for quotes.

In addition to sending letters to the editor, you can also engage reporters directly. Keep track of who's writing locally about Congress and the economy. Send those reporters brief notes with additional insights or suggesting a new angle for a story. (Their email addresses are generally available online.)

Help them put national issues in a local perspective. Offer yourself as a resource on topics like infrastructure, taxes, the housing market, etc. It takes time to build relationships and trust with reporters, but just as with your customer relationships, the long-term payoff can be big.

Direct communication with lawmakers matters; indirect communication can have a big impact too. Keep the letters coming!

—ADVERTISEMENT—

## **ARSA Online: Train to Gain – Registration Open**

Out of practice on the real aviation regulations? Stay in top shape with ARSA online training courses!

Registration is open for ARSA's Feb. 15 & 16 online live classes on the regulations versus commercial obligations in civil aviation parts sales, purchases, receipt and stocking by a 14 CFR part 145 repair station.

Click [here](#) to review the courses and to register. Hurry – only 30 seats are available for each class!

**Noncompliance can cost you - protect your repair station with ARSA Online Training Courses!**

### **ARSA Action**

## **ARSA Weighs in on Proposed FAA ICA Policy**

On Jan. 4, ARSA submitted its [comments](#) on the FAA's [draft policy](#) regarding the availability of instructions for continued airworthiness (ICA).

The Association believes that the current policy must ensure that the regulations are not used to justify contractual restrictions and to actively discourage such practices.

While ARSA is pleased to see the FAA taking an interest in this important area, it is critical that any FAA policy be enforceable. To tackle the contractual obligations and economics of "availability", the FAA must address all four fundamental issues:

- (1) Set the standard for the nature and extent of information that is essential to the continued airworthiness of an aviation product.
- (2) Set the standard for the content of ICA documents.
- (3) Determine exactly who is "required to comply" with the ICA.
- (4) Determine exactly how ICA should be "made available."

Without addressing basic requirements, it is unclear how the proposed policy will reduce the burden on maintenance providers in determining and maintaining appropriate maintenance instructions or reduce the possibility of error caused by applying an incorrect ICA.

As currently drafted, the FAA's proposed policy would have the agency reviewing private contracts, an inappropriate action. Since the FAA has not declared restrictions on the distribution and use of an ICA void as a matter of public policy, its jurisdiction is problematic. Rather, the FAA's policy should state that it will not support the implementation of non-technical provisions, such as restrictions on use of alternative parts, procedures or suppliers.

Requiring repairs or alterations only by the design approval holder (DAH) or a DAH-authorized source and statements limiting the dissemination of the data between the "operator" and its chosen maintenance provider are unenforceable under the provisions of Title 14 Code of Federal Regulations. Indeed, regulatory compliance discourages such activity.

In its comments, ARSA suggests a number of changes that, if accepted, would align the proposed policy with existing regulations in addressing ICA restrictions.

# **2012**

**ARSA Annual Repair Symposium**

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## Component Control Announced as ARSA Preferred Provider for MRO Logistics Software

ARSA has selected [Component Control](#) as its preferred provider of MRO and logistics software solutions.

"We are pleased to have Component Control designated as our association's preferred provider for MRO business management software," said Paul Hawthorne, ARSA vice president of quality. "ARSA preferred providers must have a reputation for quality, strong and credible industry references, and an established record serving the needs of our member companies. Component Control fulfills these requirements and their software will be an excellent, trusted resource for our membership."

ARSA's partnership with Component Control will present repair stations with fully integrated business software solutions specifically developed and designed for the aviation MRO industry. The use of Component Control's [Quantum](#) MRO and Logistics software will promote comprehensive and safe adherence to the regulations with which certificated repair stations must comply. It also steers 'best practice' procedures to ensure the maintenance of rigorous quality guidelines, enabling aviation repair and manufacturing businesses to optimize operational performance.

"Component Control has the largest footprint in the MRO/aviation software industry and a successful track record supporting our customers' growth ambitions, using Quantum as their operational foundation for MRO and logistics," said Z Baron, CEO of Component Control. "This designation is a testament to our software's capabilities and value for repair stations. We look forward to forging more close partnerships with ARSA members and helping them to meet the competitive challenges of today's aviation industry."

San Diego based Component Control provides its Quantum Control product in more than 50 countries and can be deployed as a single-site or multinational solution. Quantum Control, provides advanced aviation management support to original equipment manufacturers, aftermarket service divisions, component repair and overhaul companies, fixed base operators, aircraft completion centers, airlines, MRO facilities, and part distribution / redistribution companies.

Component Control will be present at ARSA's [2012 Annual Repair Symposium](#), March 14-16, 2012, in Arlington, Virginia.

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## The Auditors Are Coming...

As mentioned in last month's hotline, ARSA is preparing an independent survey to determine the audit burden currently placed on the contract maintenance industry. The survey will follow the concepts outlined in attachment 1 of the [Dec. 21, 2011 letter](#) to the contractor working a similar study for the FAA. As mentioned in that letter, information collected by ARSA will be analyzed and submitted to FAA for comparison and validation of the FAA report.

With verified data available, ARSA then intends to work with the FAA to establish a plan for reducing overlapping and duplicative audits. After all, how many times does a repair station need to show it is in compliance with part 145?

ARSA's survey will be released in February; please be ready to help end the costly non-stop audits by providing a detailed response. The better the data we collect, the louder ARSA can speak.

## ARSA suggests changes to FAA Form 8310-3

The FAA recently [solicited comments](#) on Form 8310-3, [Application for Repair Station Certificate and/or Rating](#), as it seeks renewed approval from the Office of Management and Budget (OMB) to collect that information.

ARSA submitted [comments](#) noting that the current form does not accurately reflect regulatory requirements applicable to the sale or transfer of repair station assets.

As provided in Title 14 of the Code of Federal Regulations (14 C.F.R. § 145.57(b)): “if the holder of a repair station certificate sells or transfers its assets, the new owner must apply for an amended certificate in accordance with § 145.51.”

However, verbiage in Form 8310-3 suggests that any change in ownership requires an amended certificate. This discrepancy between the rule and the Form creates confusion when an incorporated repair station merely transfers stock, not assets. Section 145.57(b) does not apply to such transactions.

ARSA therefore suggested the Form be changed to state “Sale or Transfer of Assets” instead of “Change in Ownership”. The Association also recommended that the FAA clarify differences between a stock and asset.

### Support ARSA’s Positive Publicity Campaign

Contract maintenance is under assault in the media, with bad press having negative political consequences. ARSA is working to get out the facts about the industry: Repair stations make air travel safer, air carriers more efficient, and important economic contributions. Our Positive Publicity Campaign (PPC) needs your support.

Through the PPC, ARSA has already:

- Analyzed public perceptions of contract maintenance;
- Quantified the industry’s global economic impact and positive U.S. balance of trade; and
- Determined the industry’s state-by-state employment footprint

The PPC continues to highlight the benefits of contract maintenance for global civil aviation. The campaign’s next steps will significantly enhance the Association’s public relations capabilities by adding new staff, institutionalizing economic research, more aggressively monitoring and responding to media coverage, regularizing media outreach, developing model PR procedures for the industry, and coordinating media and communications trainings on behalf of the repair station community.

For your Association to be successful, we need YOUR help. Pledge your support to the PPC today and join the ranks of industry leaders already backing ARSA’s ambitious agenda for the industry.

[Click here for more details about the PPC](#), or email questions to [Jason Langford](#), ARSA’s director of communications. Pledge your financial support [here](#).

## ARSA Needs Your Input: Take Our Survey Now!

ARSA’s 2012 member survey is up and running. This important review helps ARSA identify issues of common concern, quantify the value of its services, provide new opportunities for the years ahead, and support the Association’s advocacy on behalf of repair stations.

Open until 8 p.m. on February 17, the survey seeks answers to questions that will help ARSA better represent your interests and deliver first class service.

The Association is asking only the primary contact at each member company to set aside approximately 10 minutes of their time to complete the questionnaire.

If you received an email about the survey, you are the primary contact at your company; please complete the questions today. Responses are anonymous and will only be analyzed and distributed in aggregate form.

Your participation will ensure that the hardest working Association can work smarter and more effectively.

## Positive Publicity Corner

### Big Plans for 2012

By Jason Langford, ARSA Director of Communications

This month, **the hotline** is introducing the “PPC Corner.” This column will provide monthly updates about ARSA’s Positive Publicity Campaign (PPC), the Association’s drive to improve the public’s understanding of the contract aviation maintenance industry.

The 2012 PPC strategic plan establishes the campaign’s goals for the coming year. Approved by the PR Committee and the ARSA Board, the plan builds the campaign’s efforts and expands its reach. The major push will be developing a speakers’ bureau to advocate the industry’s message to the media, facilitating industry crisis planning, and updating the Association’s economic and employment data. These tactics will aid in achieving the campaign’s overall objective: to create a favorable business climate for the industry by improving understanding of its role.

Recently, the Associated Press [analyzed](#) commercial aviation industry data and concluded that the past decade has been its safest ever, noting continual improvements and an unwavering commitment to safety. The maintenance industry is proud of its vital role in achieving this goal, and can’t help but note the strong correlation between increased safety and increased use of contract maintenance.

From business to commercial aviation, without the dedicated support of technicians, worldwide civil aviation would halt. Therefore, the entire aviation industry has a stake in the PPC and ensuring that the maintenance industry is able to operate free from burdensome government regulations mandated by politicians who lack an understanding about the role maintenance plays in delivering flights safely and reliably.

The PPC has big goals. Central to the accomplishment of these tactics is the expansion of the campaign’s base of support. If your company has not already done so, [make a commitment to support the PPC](#) today. Be sure to stay tuned to this column for more on the PPC in the coming months.

#### Positive Publicity

As part of ARSA’s ongoing [Positive Publicity Campaign](#) (PPC), the association is actively working to enhance the media’s understanding of our \$50 billion industry and its vital importance to global civil aviation. To accomplish this goal, ARSA monitors media coverage about aviation maintenance to spread the word about the valuable role repair stations provide their communities in jobs, economic opportunities, and community involvement. These are some of this month’s top stories highlighting the industry’s contributions.

[High School Aviation Endures Bumpy Ride](#) (News Record (Greensboro, NC))

[AAR, Chicago Team To Build Aviation Workforce](#) (Aviation International News)

[Cantwell Says State Must Groom Hometown Aerospace Talent](#) (Yakima (WA) Herald)

[Component Control Endorsed As ARSA Preferred Supplier For MRO And Logistic Software](#) (Aviation Pros)

[Aircraft Maintenance Business Flies into Sioux City, Iowa Airport](#) (Sioux City Journal)

[Saudi Aircraft Deal Creates Jobs in Georgia](#) (Global Atlanta)

[Piedmont Propulsion to add 25 jobs](#) (Winston Salem Journal)

[Chromalloy Windsor, Conn. Receives Approved Organization Exposition certification from Japan](#) (AviTrader)

[‘The Sky’s the Limit’: Central High Students Learn About Aviation Careers](#) (Miami Herald)

[Aircraft Engine Centre Heats Up](#) (Winnipeg Free Press)

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## ARSA on the Hill

ARSA on the Hill presents a monthly roundup of ARSA's advocacy on Capitol Hill and the Association's efforts in coalition activities aimed at improving the national business climate.

By Daniel Fisher, ARSA Vice President of Legislative Affairs

Throughout January, ARSA met with House and Senate offices to discuss TSA's failure to finalize repair station security regulations and the need for Congress to permit certification of new foreign repair stations.

To support the Association's efforts in this endeavor, it continued to [solicit letters from members sharing the economic impact of the foreign repair station ban](#) at the request of the House Homeland Security Committee.

Members of ARSA's legislative team were present at the [Aero Club of Washington](#) luncheon to hear Transportation Secretary Ray LaHood speak about the need for a final FAA reauthorization bill. Additionally, the Association was in the room for the conference committee meeting where House and Senate aviation leaders formally blessed a bipartisan, bicameral agreement to reauthorize the FAA.

ARSA continues to coordinate its legislative agenda with its members, meeting with several Washington representatives of ARSA member companies.

The Government Affairs Committee action item for January asked committee members to [register](#) for ARSA's Legislative Day and to ensure the primary contact at their company completed [ARSA's 2012 member survey](#).

— ADVERTISEMENT —



The ATA e-Business Program is pleased to announce the latest revision of Spec 2300, Data Exchange Standard for Flight Operations (Revision 2011.2). Spec 2300 provides a concise set of information standards

and guidelines for the management, configuration and interchange of flight operations technical data.

The specification is designed to enable the cost-effective and efficient exchange of digital flight operations data between information providers and information users. This revision completes the initially defined scope for Spec 2300 and now covers all of the following types of data supporting the FCOM, MMEL/MEL, AFM and QRH, including:

- Approval: Data used to record or display the regulatory approval of flight operations data and documents.
- Dispatch: Data to inform flight crews of the allowable minimum equipment and configuration required for departure of a flight.
- Front Matter: General or introductory information for flight operations documents or topic.
- Limitations: Data that define the envelope within which the airplane and systems are designed to safely operate.

If you are not a member of the ATA e-Business Program and would like to gain unlimited access to Spec 2300 and all related e-business specifications, join the [ATA e-Business Program](#).

## Bills on the Hill

### Compromise FAA Bill Takes "Common Sense" Approach to Maintenance Oversight

*Editors Note: As [the hotline](#) heads to publication on Feb. 3, the House is expected to approve the FAA conference report (as an amendment to H.R. 658). The Senate is likely to follow suit and approve the bill on Feb. 6.*

On Jan. 31, FAA reauthorization conference committee members formally blessed a bipartisan, bicameral agreement authorizing the FAA through fiscal year 2015. The FAA Modernization & Reform Act of 2012 is expected to be approved by the House and Senate and signed by President Obama before the 23rd extension expires on Feb. 17.

“ARSA congratulates House and Senate leaders for reaching agreement on a four-year FAA bill. The Association is pleased to see the hard work of its member pay off in legislation that will allow the aviation maintenance industry to build on its outstanding safety record while remaining competitive in the global marketplace,” said ARSA Executive Director Sarah MacLeod.

“By listening to constituents and taking a common sense approach, Congress avoided the pitfalls threatening repair stations in prior reauthorization bills. The conference report will protect the more than 274,000 Americans employed in civil aviation maintenance.”

The [conference report](#) represents a significant victory for the aviation maintenance industry; proving that hard, persistent work by ARSA and its members will reap benefits. The FAA Modernization & Reform Act:

- Requires that part 145 foreign repair stations be inspected annually by FAA safety inspectors in a manner consistent with U.S. obligations under international agreements. It also allows the FAA to carry out additional annual inspections based on identified risk.
- Mandates the FAA to create a safety assessment system for part 145 repair stations, a step the FAA and ARSA have been working on for some time.
- Subjects all part 145 repair station employees responsible for safety sensitive maintenance functions on part 121 aircraft to drug and alcohol (D&A) testing consistent with the laws of the country where the repair station is located.
- Ensures effective oversight of non-certificated maintenance providers without having unintended consequences undermining the efficiency of the maintenance industry.

The legislation strikes the right balance between safety, oversight, and operational freedom. Last Congress, repair stations were faced with FAA reauthorization legislation that would have required duplicative biannual inspections of all repairs stations and would have mandated drug and alcohol testing for overseas repair stations without regard to other nation’s law, effectively forcing repair stations in countries that prohibit random testing to surrender their certificates.

These prior provisions would have added new layers of bureaucratic oversight and increased costs for repair stations and airlines with no improvement to safety. Most significantly, they would have destroyed the system of bilateral aviation safety agreements that allow U.S. aviation maintenance companies to compete internationally and threatened the United States’ \$2.4 billion positive balance of trade in maintenance services.

In October 2010, the ARSA Board of Directors approved a dues increase to ramp up the Association’s efforts on Capitol Hill. These new resources funded an intense lobbying campaign and allowed ARSA to educate lawmakers and congressional staff about the unintended consequences of their proposals. Ultimately, lawmakers adopted many ARSA suggested improvements to the bill’s repair station and non-certificated maintenance language.

ARSA will continue to work with lawmakers on both sides of the aisle and both sides of the Hill until this important legislation is enacted into law. Then we’ll work to continue to build our political visibility and effectiveness for the battles to come.

## The Security Rule Pool

With the TSA in [blue hurry](#) to issue a rule for repair station security, the ban on certification of new foreign repair stations will remain in place for the foreseeable future.

At this point, it is anyone’s guess as to when the agency will finally get around to fulfilling the demands of Congress. ARSA has therefore decided to create a security rule pool and asks its members, when do you think the TSA will issue its final repair station security rule?

### The Rule

Congress first demanded that the agency promulgate such a rule *nine years ago* when it enacted VISION 100, the nation’s last multiyear FAA bill. The TSA, knowing the security threat posed by repair stations is problematic at best, chose to neglect the mandate, leading lawmakers to prohibit the FAA from certificating new foreign repair stations until the TSA met their wishes.

In 2009, after a six year delay in promulgating the rule, and two years after lawmakers enacted the prohibition, the agency released its draft rules. Now, three years later, the aviation industry is still waiting for the agency to finish the job.

ARSA can think of no other time in history when Congress has chosen to punish private business for the failure of a federal bureaucracy.

### The Pool

Whoever guesses the date closest to the agency's release of the final rule will win two free admissions to ARSA's Legislative Day and Annual Symposium following the issuance of the rule.

The pool will remain open through the month of February. Make your best guess as to when the TSA will publish its final rule at: <http://survey.constantcontact.com/survey/a07e5k93v6ygy60jr6p/start>.

We'll see you at the Annual Symposium in 2013? 2014? 2015? 2019?

## Obama's Recess Appointments Ensure NLRB Labor Tilt

President Obama ushered in the New Year by circumventing the Senate approval process and unilaterally making three recess appointments to National Labor Relations Board (NLRB).

The move ensures that the NLRB maintains the number of members necessary for continued operation. Without the appointments, the Board would have been reduced to two members, denying it a quorum and rendering it inoperable.

Unfortunately, two of the president's nominees are labor attorneys with a pro-union background, including Department of Labor Deputy Assistant for Congressional Affairs, Sharon Block, and International Union of Operating Engineers General Counsel, Richard Griffin. While the nomination of Block and Griffin will keep the Board tilted in favor of unions, Obama also nominated Terrence Flynn, chief counsel to current Republican board member Brian Hayes.

It is clear that the administration wishes to make the Board a union-friendly body. Given the NLRB's recent activities, including its role in the Boeing case and the [proposed](#) "ambush election" rules, the addition of two more union advocates will achieve that purpose.

## ARSA PAC Kicks Off 2012 Fundraising

ARSA's Political Action Committee (ARSA PAC) is launching its campaign for the 2012 election cycle. The Association has implemented an aggressive political program plan, and nearly 90 ARSA members gave solicitation consent this month alone.

Federal law prohibits ARSA PAC from soliciting PAC contributions or encouraging participation from the general public. To be allowed to participate in the PAC, ARSA members must give written consent for solicitation. As a matter of policy, ARSA does not accept contributions from individuals it may not solicit.

If you haven't yet filled out the consent form, please join your industry peers (listed below) and [provide solicitation consent](#) today.

### Member Companies That Have Given Prior Consent

A.I.R.S.	AAT Aircraft Maintenance	Accurate Accessories, LLC
Aero Design Services Inc.	Aero Instruments & Avionics, Inc	Aero Mechanical Industries
Aero Products Component Services	Aeroframe	Aeronca, Inc.
Air Technology Inc.	Airborne Maintenance and Engineering Services, Inc.	Aircraft Component Repair, Inc.
Aircraft Electric Motors, Inc.	Airmotive Inc	American Cooler Service
Ameron Global Product Support	AOG Reaction	Auburn Aerospace, Inc.
Aviation Component Solutions, Inc.	Aviation Material & Technical Support	Aviation Propellers, Inc.
Aviation Repair Resources, Inc.	Aviation Repair Solutions	Causey Aviation Service, Inc.
Chromalloy San Diego/ Pacific Gas Turbine Center	CIRCOR Aerospace	Clero Enterprises, Inc.
Commercial Jet, Inc.	CSI Aerospace, Inc.	Delta Air Lines
Delta TechOps	Derco Repair Services	EB Airfoils

Executive Instruments, Inc.	Exotic Metals Forming Company LLC	Flightpath Services, Inc.
Fornter Engineering & Mfg, Inc	G.H. Enterprises, Inc.	GE Aviation Systems LLC
H.E.R.O.S., Inc.	Harter Aerospace	Hartford Aero Maintenance
HEICO Component Repair Group	HEICO Parts and Repair Group	Ikhana Aircraft Services
Inertial Aerospace Services, Inc.	JET Aircraft Maintenance, Inc.	Jet Aviation Specialists, Inc
LiveTV	Lynden Air Cargo	Mid-Continent Instrument Co., Inc.
Miltechnologies, Inc.	Moog Inc.	Nordam
North Coast Air	Obadal, Filler, MacLeod and Klein, P.L.C.	Pacific Aero Tech
Perform Air International, Inc	Phoenix Heliparts Inc.	Pratt & Whitney, PSD
Professional Aircraft Accessories	Quality Air Services, Inc.	Rapco, Inc.
Regional Avionics Repair LLC	Repairtech International, Inc.	Rockwell Collins, Inc.
RVR Aviation	S&T Aircraft Accessories, Inc	Safetech
Segers Aero Corp.	Shorline Marine Inc., D.B.A. Safetech	SkyWest Airlines
Sonico Inc.	Southwest Airlines	Team Aerospace, Inc.
Tempus Jet Centers	TIMCO	Unicorp Systems, Inc.
US Technicians, Inc.	Western Aero Repair	

## ***Have You Seen These People?***

This month, *the hotline* introduces readers to the leadership of the [Senate Armed Services Committee](#). This committee has oversight authority over the Department of Defense, including the armed forces and the National Guard. The panel also oversees the national security aspects of nuclear energy.

### **Sen. Carl Levin (D-MI)**



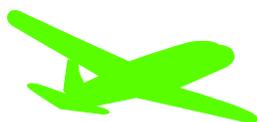
Sen. Carl Levin is Michigan's senior Senator, serving his sixth term.

Levin is the chair of the Armed Services Committee. He also sits on the Small Business & Entrepreneurship Committee and the Homeland Security & Government Affairs Committee, including the Subcommittees on Federal Financial Management, Government Information, Federal Services & International Security; the Subcommittee on Oversight of Government Management, the Federal Workforce & the District of Columbia; the Ad Hoc Subcommittee on Contract Oversight; and is Chairman of the Permanent Subcommittee on Investigations.

A graduate of Swarthmore College and Harvard Law School, Levin was an attorney, and served four terms on the Detroit City Council before his election to the Senate. Levin lives with his wife, Barbara, in Detroit. They have three children.

Senator Levin's Washington, DC office:

269 Russell Senate Office Building  
Washington, D.C. 20510-2202  
202 224 6221  
<http://levin.senate.gov/>



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## Sen. John McCain (R-AZ)



Sen. John McCain is Arizona's senior Senator, serving his fifth term.

McCain is the ranking member of the Armed Services Committee. He also sits on the Indian Affairs Committee; Health, Education, Labor, & Pensions Committee; and the Homeland Security & Governmental Affairs Committee. Additionally, McCain is the Co-Chair of the Senate National Security Caucus, and is a member of the International Conservation Caucus, and Senate Wilderness & Public Lands Caucus.

A graduate of the United States Naval Academy, McCain served as a naval officer during the Vietnam War and served two terms in the House. McCain lives with his wife, Cindy, in Phoenix. They have seven children and four grandchildren.

Senator McCain's Washington, DC office:

241 Russell Senate Office Building  
Washington, D.C. 20510-0001  
202 224 2235  
<http://mccain.senate.gov/>

For more information about these and other lawmakers visit [www.ARSAAction.org](http://www.ARSAAction.org).

## International News

### FAA, EASA Agree to MAG Modifications

The FAA and European Aviation Safety Agency (EASA) have approved [changes to the Maintenance Annex Guidance \(MAG\)](#) to the Bilateral Aviation Safety Agreement (BASA). Although this first MAG revision is dated November 22, 1011, it was not signed by the FAA until Jan. 10, 2012. ARSA is reviewing the changes.

#### International Roundup

[Nigeria Has Highest Air Safety Standard in Africa](#) (*This Day Live*)

[AeroThrust To Open Bahrain MRO](#) (*Aviation International News*)

[Airbus MRO Network welcomes Turkish Technic as New Member](#) (*AviTrader*)

[Aircraft Engineers to Shut Down Nigerian Airspace](#) (*The Moment*)

[Singapore Air Show Offers Stage for Chinese Aviation Firms](#) (*The Jakarta Post*)

[MTU Maintenance Hannover to Support Biman's CF6-50 Engines](#) (*AviTrader*)

[Execujet Malaysia Receives Cayman Island Maintenance Authorization](#) (*AviTrader*)

[Offshore MRO Providers Expected to Benefit Most from Indian Feet Expansion](#) (*Centre for Aviation*)

[Indonesia's Sriwijaya to build MRO facility for heavy checks](#) (*Flight Global*)

[Ethiopian MRO Unit Receives EASA Part 145 Approval](#) (*Air Transport News*)

### Advertise in *the hotline*

With rates as low as \$150.00 (display ads) and \$50.00 (text-only), advertising in *the hotline* is a great way to reach thousands of people in the aviation industry, including certificated repair stations, manufacturers, air carriers and suppliers!

<http://www.arsa.org/hotline.advertising>

## Member Spotlight

### Genesis Aviation, Greensboro, NC

Genesis Aviation offers quality workmanship and the highest standards of customer support available in the aviation industry. The company's production procedures and quality inspection systems has ensured it maintains a warranty rate of less than one percent.

The company has been a part of some of the industry's most remarkable growth. As a result it goes beyond the usual services of a component maintenance company to be successful and provides customers with top notch service. It is able to do this by offering many services that reduce costs, including component sales, exchanges, testing, repair, overhaul and inventory management.

Genesis Aviation is an independently owned company with the ability to custom-fit programs to meet specific requirements. It combines services and capabilities with the advantages of an immediately responsive customer-oriented company, allowing for the best of both worlds.

For more information on Genesis Aviation, visit <http://www.genesisaviation.com/>

Are you an ARSA member who would like to be in the "Member Spotlight?" If so, please contact Keith Mendenhall <[Keith.Mendenhall@arsa.org](mailto:Keith.Mendenhall@arsa.org)>.

**Connect with ARSA:**



## Welcome New Members

[Aerobearings](#), Arlington, TX

[Aero-Instruments](#), Cleveland, OH

[AvidAir International](#), Lee's Summit, MO

[Baker Aviation Maintenance](#), Addison, TX

[Cox Airparts](#), Wichita, KS

[Depot Avionics, Inc.](#), Alamosa, CO

[Esterline - Hytek Finishes](#), Kent, WA

[GAPCO](#), Charlotte, NC

[Northwest Arkansas Avionics Inc.](#), Fort Smith, AR

[Stark Aerospace, Inc.](#), Columbus, MS

# ARSA Regulatory Compliance Training—Questions

**Part 1:** General Comprehension

**Level 1:** For anyone working in aviation

## § 65.80 Certificated aviation maintenance technician school students.

Whenever an aviation maintenance technician school certificated under part 147 of this chapter shows to an FAA inspector that any of its students has made satisfactory progress at the school and is prepared to take the oral and practical tests prescribed by § 65.79, that student may take those tests during the final subjects of his training in the approved curriculum, before he meets the applicable experience requirements of § 65.77 and before he passes each section of the written test prescribed by § 65.75.

<p><b><u>Question 1:</u></b> An applicant for a mechanic certificate that is attending a part 147 certificated aviation maintenance technician school can take the oral and practical tests before passing the written test.</p>	<p><b><u>Question 2:</u></b> The student must first show an FAA inspector that that s/he has made satisfactory progress at an FAA-part 147 certificated aviation maintenance technician school.</p>
<p>A—True. B—False.</p>	<p>A—True. B—False.</p>

<p><b><u>Question 3:</u></b> The student can take the tests before graduating from the FAA part 147-certificated aviation maintenance technician school.</p>	<p><b><u>Question 4:</u></b> A part 147 student taking the oral and practical tests does not have to pass the written test.</p>
<p>A—True. B—False.</p>	<p>A—True. B—False.</p>

Name \_\_\_\_\_  
Clearly Print the Name of the Person Taking the Test

Date \_\_\_\_\_  
Date Test was Completed

Score \_\_\_\_\_  
Enter as x (number correct) of y (number of questions)

Hours \_\_\_\_\_  
Time Credited for Test

Approved by \_\_\_\_\_  
Signature of Supervisor or Person Administering Test

# ARSA Regulatory Compliance Training—Answers

Correct answers are in **bold**

Part 1: General Comprehension

Level 1: For anyone working in aviation

## § 65.80 Certificated aviation maintenance technician school students.

Whenever an aviation maintenance technician school certificated under part 147 of this chapter shows to an FAA inspector that any of its students has made satisfactory progress at the school and is prepared to take the oral and practical tests prescribed by § 65.79, that student may take those tests during the final subjects of his training in the approved curriculum, before he meets the applicable experience requirements of § 65.77 and before he passes each section of the written test prescribed by § 65.75.

<p><b>Question 1:</b> An applicant for a mechanic certificate that is attending a part 147 certificated aviation maintenance technician school can take the oral and practical tests before passing the written test..</p>	<p><b>Question 2</b> The student must first show an FAA inspector that that s/he has made satisfactory progress at an FAA-part 147 certificated aviation maintenance technician school.</p>
<p><b>A—True (Correct answer).</b> B—False.</p>	<p>A—True. <b>B—False (Correct answer; the part 147-certificated aviation maintenance technician school must show the satisfactory progress of the student to the FAA inspector.)</b></p>
<p><b>Question 3:</b> The student can take the tests before graduating from the FAA part 147-certificated aviation maintenance technician school.</p>	<p><b>Question 4:</b> A part 147 student taking the oral and practical tests does not have to pass the written test.</p>
<p><b>A—True (Correct answer).</b> B—False.</p>	<p>A—True. <b>B—False (Correct answer; the section merely allows the oral and practical tests to occur before passing the written test.)</b></p>