

# Aeronautical Repair Station Association

## *the hotline*

July 31, 2012

Alexandria, VA

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

*Mark your calendars*

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Huerta receives approval

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### ***Sarah Says***

### **It's easy**

*By Sarah MacLeod, ARSA executive director*

Whether sharing the wealth of membership or commenting on government proposals, ARSA makes life easier. The Association's does the grunt work; simplifying compliance, keeping informed and keeping *you* informed, and acting on behalf of the industry.

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ARSA's grassroots action website, [ARSAAction.org](http://ARSAAction.org), makes it easy for you to reach out to your lawmakers on important matters using pre-written letters.

Need to stay abreast of the latest news developments that impact your operations? Your Association has you covered. ARSA's [website](#) is regularly updated with news you can use. Additionally, the [ARSA Dispatch](#) delivers news and industry developments direct to your inbox every Wednesday.

Need your updates even sooner? Not a problem. Just follow us on Twitter [@ARSA\\_MRO](#) for the most recent developments.

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## Sarah Says, continued

Want to get involved in the legislative process in a small way? It is easy to hit this [button](#) and send a quick note to congress urging the [repeal of the ban on certification of foreign repair stations](#). ARSA's grassroots action website, [ARSAAction.org](#), makes it easy for you to reach out to your lawmakers on important matters using pre-written letters.

Do you want a discount on your membership costs through successful efforts to bring in new members? ARSA's [Members getting Members](#) program pays dividends for your efforts to enhance the Association's membership rolls.

Each of these elements represents hours of work you don't have to perform; maybe it is worth hitting a few buttons!

## Legal Briefs

### FAA ICA policy, part IV

*By Craig Fabian, ARSA vice president of regulatory affairs & assistant general counsel*

This month, we conclude our legal brief series on instructions for continued airworthiness (ICA). In doing so, we turn to the [amicus curiae brief](#) ARSA recently submitted to the U.S. Supreme Court.

The purpose of the brief was to point out the clear link between the congressional mandate that established the FAA and the ICA regulations. ICA content and distribution requirements in Title 14 Code of Federal Regulations (14 CFR), along with the fact that such information is essential to continued airworthiness and to the work performed by maintenance providers, were promulgated according to lawmaker directives, which also require the agency to follow those regulations.

The FAA [policy statement](#) opposing ICA usage limitations – which started this *Legal Brief* series – took a step in recognizing one aspect of that mandate; ARSA's *amicus* brief asserts that the agency is required to do more.

The brief pointed to federal law authorizing the FAA to create regulations necessary for carrying out its mandate, which includes promoting safe flight by prescribing minimum standards for design and construction, as well as inspection, servicing and overhauling aircraft and related parts. The law states that the FAA can only issue a type certificate after determining minimum design standards are met.

After establishing that statutory foundation, the brief turns to the regulations. We identified the “design” rules established to satisfy the law's mandates and highlighted the requirement for design approval



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## Legal Briefs, continued

holders to furnish ICA prepared in accordance with regulations specifying their content. We also touched upon the regulatory requirement for maintenance providers to follow ICA. The brief notes the clarity of the rules and the FAA's reluctance to enforce those rules when it comes to defining ICA and making those documents available to maintenance providers. Finally, relying on federal case law, ARSA drew attention to the fact that the FAA cannot "choose" to ignore the plain language of rules it made; a federal agency must follow its own regulations!

Although it is impossible to predict the likelihood of the U.S. Supreme Court taking up the issue, ARSA hopes the FAA will take note and take the additional steps to address ICA content and provisioning.

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## Regulatory Lookout

### Clock is ticking on comment period to 145 rewrite

The time to comment on the FAA's [proposed changes](#) to the regulations (14 CFR. part 145) governing maintenance providers is rapidly slipping away.

It has been slightly more than two months since the agency revealed its proposed changes on May 21, and less than a month remains before the comment period closes on August 20, 2012. While ARSA is finalizing its comments, all interested parties are encouraged to comment on the regulatory rewrite at [www.regulations.gov](http://www.regulations.gov).

ARSA has prepared a [side-by-side comparison](#) of the current vs. proposed rule, and a [red-lined version](#) of the proposal detailing its changes. Key highlights from the proposal are also available [here](#).

### Summer survey coming soon

While the Association is busy digesting the FAA's proposed regulations, it is also in the process of preparing a summer survey to gain member input on other important matters. Stay tuned for more information in the coming weeks.

### FAA looks to revise D&A regs for air tour operators (and update D&A rules for everyone)

On July 2, the FAA issued a [notice of proposed rulemaking \(NPRM\) on certain provisions in its drug and alcohol](#) (D&A) testing regulations; [comments](#) are due Aug. 31. The changes are primarily aimed at allowing Title 14 Code of Federal Regulations (14 CFR) part 121 and part 135 operators with commercial air tour operations the option of administering one D&A testing program for both operations.

As stated in the NPRM, the driving force is the fact that, between 2008 and 2010, the FAA granted approximately 50 exemptions allowing a single D&A testing program. Further, operators who conduct part 121 or 135 operations as well as air tour operations continue to petition the FAA for exemptions. To remedy the issue, the proposal would amend [14 CFR §§ 120.117](#) and [120.225](#) to give the option of including commercial air tour operation employees under § 91.147 in a combined D&A testing program.

In addition, the NPRM recommends revisions intended to make “clarifying” or “correcting” changes in the current rules. Specifically, these changes include:

- Clarifying that operators must obtain a letter of authorization from the local flight standards district office (FSDO) in order to conduct air tour operations under § 120.117 by aligning the wording with § 91.147 (currently, § 120.117 states that operators intending to begin commercial air tours must “register with the FAA” while the § [91.147](#) requirement is to “Obtain a Letter of Authorization”);
- Reorganizing existing text to alleviate confusion about the requirement that supervisory training, as well as employee training, must be documented as part of each employer’s employee assistance program (EAP);
- Amending § [120.115](#) to remove the practice of approving D&A testing plans (originally, antidrug and alcohol misuse prevention programs were submitted to the FAA drug abatement division for approval; the FAA states that it discontinued the practice in 2004 – around the time when repair stations obtained operations specifications paragraph A449 to certify compliance – but the language was never removed from the Code of Federal Regulations);
- Correcting the omission of a reference in § [120.221](#) indicating that on-duty use of alcohol is grounds for permanent disqualification from service (inadvertently left out of the May 2009 D&A testing program final rule that moved D&A testing regulations into part 120); and,
- Clarifying in § 120.115 that employers must include documentation of the training given to both supervisors and employees in their employee assistance programs (the requirements are currently numbered in such a way that it appears that employers need only retain employee training records).

As always, it is important to stay abreast of rule changes since, like in this instance, the agency may take the opportunity to include “ancillary” corrections or clarifications to the regulations involved (see all but the first bullet, above). The end result may therefore impact a wider audience than suggested by the title in the Federal Register. As the saying goes, you can’t always judge a book by its cover (or the potential effect of a proposed rule by its title).

## **Part 147 school petitions FAA for curriculum upgrades**

[Blue Ridge Community College](#) (BRCC), a part 147 certificated institution offering an associate degree in aviation maintenance technology, recently filed a [petition for reconsideration](#) to the Federal Aviation Administration (FAA). The [original petition](#) requested that BRCC be allowed to alter its program curriculum to keep up with changes in aircraft technology.

BRCC argued that curriculum requirements have changed little since first promulgated in 1962 and the hours of instruction distribution no longer reflects the standard to which maintenance technicians must work. The mandated hours of instruction vis-à-vis the mandated subjects and items inhibit voluntary enhancement of those standards. Redistributing the mandated hours to reflect the demands of modern industry would allow BRCC and similar programs to provide the safety and educational training the requirements originally intended to produce.

Despite rapid advances in technology since the requirements were first adopted, the FAA [denied](#) BRCC’s petition for exemption, maintaining that the current distribution of hours continues to ensure industry and safety needs; ironically relying on industry feedback received in the early 1980s.

While industry working groups have sent rulemaking [recommendations](#) to the FAA, there are no indications that a proposed rule is on the horizon. Thus, BRCC asserts that an exemption from the rule is the only relief available.

BRCC also requested that the appeal be published and made available for comment (the original petition was not published), so that industry may have the opportunity to weigh in. In response, the FAA published the appeal in the *Federal Register* for public comment. Comments can be [submitted online](#) and must be received on or before August 16, 2012.

## ***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>.

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## ***A Member Asked***

*By Craig Fabian, ARSA vice president of regulatory affairs & assistant general counsel*

**Q:** Section 43.13(a) requires persons performing maintenance to use "current" methods, techniques and practices provided by the manufacturer. What about older service bulletins that are simply deleted without being specifically revised or superseded by a newer version? Does deleting a bulletin from active publication make that bulletin "non-current"? Or can the deleted bulletin still be considered "current" but "inactive" due to low demand? I know that the manufacturer will say, but what does FAA policy say?

**A:** It is important to consider all the words in [14 CFR § 43.13\(a\)](#); which states:

Each person performing maintenance, alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance shall use the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques, and practices acceptable to the Administrator, except as noted in [§ 43.16](#). (*Emphasis added*)

So, as it relates to § 43.13(a), the question is whether the "older" information contains "other methods, techniques, and practices acceptable to the Administrator." That is, will following the "older" information result in returning the article to at least its original or properly altered condition as required by § 43.13(b) If so, the regulatory requirements have been satisfied.



Of course, if an FAA airworthiness directive (AD) mandates the use of specific maintenance instructions, the “older” methods, techniques, and practices could not be used. In that case, you must follow only the instructions identified in the AD or obtain an Alternative Means of Compliance (AMOC).

Although, for purposes of your question, § 43.13(a) clearly allows other methods, techniques, and practices in addition to those prescribed in the current manufacturer’s maintenance manual, the FAA has addressed “current maintenance instructions” in a different context (i.e., “current maintenance instructions” in the context of § 91.409(f)(3) and current inspection programs) in [a legal interpretation dated December 5, 2008](#). That interpretation notes that its rationale applies to all “similarly worded regulations.”

Essentially, the FAA states that “[a]n interpretation of the regulation that would allow manufacturers unilaterally to issue changes to their recommended maintenance and inspection programs that would have future effect on owners of their products would not be legally correct [because it] would run afoul of the APA [Administrative Procedure Act].” Following the plain language of its own regulation and its previous thought process, a very [recent FAA legal interpretation](#) specifically addressing § 43.13(a) follows the rationale in this response.



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## Quality Time

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### *Employment Law & Repair Stations*

## Obesity: A disability?

By [Jonathan W. Yarbrough](#), 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.*

Until recently, obesity was unlikely to qualify as a disability under the Americans with Disabilities Act unless it is the result of an underlying physiological condition such as, for example, a thyroid condition.

### So what’s changed?

To qualify as disabled, an individual must demonstrate that he or she suffers from an impairment that substantially limits a major life activity. Recall that the Americans with Disabilities Act (ADA) has been amended and the amendments (ADAAA) include a vastly expanded definition of “major life activity.” In addition, there appears to be an ever increasing lax interpretation of “substantially limited.”

## **What is obesity?**

Obesity is defined as having a body mass index of 30 or more. Morbid obesity is defined as having a body mass index of 39 or more – 50% to 100% above the idea body weight or 100 lbs. above ideal body weight. The question now is what about the person whose obesity is not caused by some underlying physiological condition but by undisciplined over eating of fattening and unhealthy food and drink and a lifestyle that consists of sitting in front of the TV every night and whose main exercise is walking from the couch to the kitchen for a snack?

First, it is a known fact that obesity leads to disabling and often life-threatening health conditions such as diabetes, sleep apnea, high blood pressure and heart disease – all of which clearly qualify as disabilities in and of themselves.

Second, obese, especially morbidly obese individuals have mobility problems which may well substantially limit the major life activity of getting around.

All of this leads to the case in point. A Montana court recently held that an applicant for a “safety sensitive” conductor trainee position with a railway company with a body mass index of near or above 40 was disabled. The company offered the applicant a conditional offer of employment upon the successful completion of, among other things, a physical examination. The company subsequently informed the applicant that he was not qualified for the position because of the “significant health and safety risks associated with extreme obesity.” He was told that he would not be considered for the job unless he either lost 10% of his body weight, or completed additional physical examinations at his own expense. Even so, he was not guaranteed a job.

Apparently, the applicant successfully completed additional physical exams and set out to complete an expensive sleep study and to lose 10% of his body weight. Nevertheless he was not hired and filed suit against the company alleging that the company discriminated him because of his obesity.

The issue was whether an otherwise healthy individual who is nevertheless morbidly obese qualifies as disabled under the ADAAA and the court answered in the affirmative.

The case raises additional issues. If obesity, without more, is a disability, can a formerly obese person be rejected for employment because he has a “record of such impairment or can he be ‘regarded as’ disabled,” the second and third definition of “disability”?

The significance of this new twist to the ADAAA could be unlimited as employers struggle with accommodations for what is proving to be a workforce of an ever increasing population of “obesities.”

### **Support ARSA’s Positive Publicity Campaign**

It’s no secret; the contract maintenance industry suffers from an image problem. Years of baseless attacks have created a hostile media environment, and worse yet, has blinded some lawmakers and portions of the public to the benefits of aviation contract maintenance.

ARSA’s [Positive Publicity Campaign](#) (PPC) confronts these challenges; its message is clear: repair stations make air travel safer, create air carrier efficiencies, contribute to the economy, and generate jobs.

PPC resources support industry economic impact studies, defend the industry in the national media, and monitor media coverage. All industry stakeholders are asked to support the campaign through a financial contribution. Make your [pledge](#) today!

## *The Next Generation of Aircraft Technicians*

# Mentoring A&P students

By [Raymond Thompson](#), Western Michigan University, College of Aviation, 237 N. Helmer Rd., Battle Creek, MI 49037 © Copyright 2012 Raymond Thompson ALL RIGHTS RESERVED.

*Raymond Thompson is president of the Aviation Technical Education Council and 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 in the U.S. and Middle East since 1983.*

**Editor's Note:** This is the seventh in a series of articles from Mr. Thompson in which he provides information on supporting aviation maintenance technician schools (AMTS) and the next generation of mechanics.

All of us can recall the individuals who had a profound effect on our professional development. I remember my experience with the certificated mechanic who maintained the aircraft I used for flight training. By letting me assist with the work, he sparked curiosity in the technical side of aviation, fanned my interest in the industry, and provided valuable guidance for my career.

Today, mentoring students and young mechanics is more important than ever. Mentors can share a lifetime of experience in a way that complements education and training; it cuts through the din of the modern world with a personal touch.

As aviation professionals and educators, it is our job to encourage and promote the development of aviation technicians. While students entering aviation maintenance technical schools (AMTS) have already demonstrated a commitment to the industry, many lack an accurate picture of the available career options. Mentors provide a bridge to opportunities and help prepare students for entry into the workforce and long-term career success. Mentors play a valuable role in retaining student interest and attention to the maintenance industry.

Mentoring varies widely; it can be formal or informal, regular or intermittent, group or individual. Some schools have structured mentoring programs. Others encourage participants from industry to connect with students through online resources. For most students, mentoring starts as an opportunity to interface with a working or retired professional to learn the details about the maintenance field. Mentors can answer a range of questions for students about industry standards and practices, career paths, and educational options. As working (or retired) professionals, mentors provide information on the breadth and depth of our field, helping students make informed choices.

Becoming a mentor is easy—contact your local AMTS! Many mentors use chat or email to connect with students, while others prefer personal meetings. You decide the method of contact, the scope, nature, and duration.

Early mentoring allows you to learn about the student, their interests, goals, and plans (or lack thereof!). This provides information to help the student develop plans, set goals, and follow particular interests. Mentors can give assignments that encourage students to explore options and think creatively about long term goals. In essence, mentors are part of the student's educational process.

There are no prerequisites to being a successful mentor, only a willingness to share your experiences and a desire to see people succeed. An attraction to working in education is the gratification of seeing students applying your knowledge. Mentors enjoy giving back to the profession and make important contributions to the development of the next generation of technicians.



So far, this series of articles has discussed industry participation in recruitment and professional development, and relationships between businesses and local schools, all programs that typically involve only a few individuals or executives from a maintenance organization. Being a mentor, however, is something everyone in aviation maintenance can participate in. A few hours of investment in a student can make the difference between turning a passion for aviation maintenance into a career, or taking the training to another industry.

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## Legal Waypoints

### Indemnification – the “I” word (Part 1)

By [Steven E. Pazar](#), Attorney at Law, 11 Carriage House Lane, Boxford, Massachusetts 01921. © Copyright 2012 Steven E. Pazar ALL RIGHTS RESERVED.

*Steven is an experienced counselor to businesses operating in many industries, including aviation. He provides templates, tools and training to improve contracting efficiency, close deals faster and control costs.*

We all know indemnification provisions when we see them - those long, complex provisions that seek to allocate risk among parties to a contract. We have a general appreciation for the indemnification concept – shifting responsibility for a loss from one person to another and compensating someone for a loss already sustained. But a general appreciation for a concept doesn't help us much when it comes time to read, interpret and negotiate the details of these often poorly drafted provisions. To do a better

job of managing contractual risks we need to understand why these provisions seem so much more difficult to deal with than other aspects of business relationships.

Think about your own experiences reading contracts; most tend to follow a similar form. The first few provisions are usually commercial in nature – the scope of work, the schedule, the compensation – all commercial terms generally written in plain English. Then you get to the liability related provisions – the standard of care and warranty, the insurance requirements, maybe a consequential damages disclaimer or a limitation of liability – again not too bad to read and understand, especially with the help of your risk manager or broker on insurance questions.

Now, somewhere in the liability provision mix is the indemnification provision; the one that raises concern. We just see the provision title “indemnification” or the word “indemnify” and know that there is a good chance that this provision is trouble. All other issues can be dealt with fairly effectively; if we have trouble with the indemnification provision, at best it will cause delay, (a deal killer in absentia) or at worst it could kill the deal directly.

Why do we have this reaction? What makes indemnification provisions seem more difficult to read and interpret than the rest of the contract?

Well, indemnification provisions are not written in what you could even remotely call “plain English.” They tend to include long, complex sentences and are full of exceptions, exclusions, limitations, and references to other provisions. They will contain more “legalese” – words that are not part of most people’s vocabulary.

Indeed, the provisions are often poorly drafted. Think about how easy it is to go online, find a provision titled indemnification and paste it into the contract. When the provisions are flawed from the start or evolve into edited versions that lack no relationship to the intent of the current parties or the original drafter, it complicates an already problematic situation. I find that a large percentage – not a majority, but somewhere near one-third of all indemnification provisions – are incomprehensible; a key driver for the uneasy feeling we have when we start to read these provisions. We know based on our own experience that one in three provisions will have a problem that will have to be fixed before the deal can close.

So now we know why we have a higher level of apprehension with the indemnification provisions in a contract – how can we move forward? How can we raise the game and close deals without putting the company at increased risk?

Stay tuned—next month In Part Two of “Indemnification – the “I” word,” I offer a simple approach to reading, interpreting and negotiating these provisions more effectively.

**ATA e-BUSINESS FORUM**

Register now for the ATA e-Business Forum to be held **October 22-24, 2012 in Scottsdale, Arizona**. The ATA e-Business Forum is the industry's premier event to

learn about the latest developments in information exchange to support engineering, maintenance, materiel, cyber-security and flight operations. In addition to learning about the airline industry's most widely accepted e-business specifications (Spec 2000, S1000D, iSpec 2200, Spec 42 and Spec 2300), learn how the industry has attributed significant savings and operational efficiencies to the use of these global specifications.

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*Keynote Presenter:* Ray Valeika, Consultant (Retired Senior Vice President TechOps, Delta Air Lines)

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## Revised compendiums now available

As a [membership benefit](#), ARSA members receive the Association's newsletter, *the hotline* each month. To make it easier and faster to dig up past articles, ARSA has created "compendiums" of *the hotline's* most popular columns, including—

- **Legal Briefs** (1994-2011). Own over 17 years of compliance knowledge in this revised compilation, which incorporates articles published since the column's inception. This goldmine of compliance knowledge answers questions such as: *What steps must I take during voluntary disclosure? What should we do when we receive an un-marked part? What requirements must a repair station comply with prior to shipping hazardous materials?*
- **Employment Law** (2004-2011). These articles, written by guest author and employment law attorney Jonathan Yarbrough, address issues and give practical solutions for issues surrounding whistleblowers, employee lawsuits, unemployment claims, drug problem disclosures, and employee recordkeeping requirements. This compilation is an update to the previous release, which included articles published through 2007.
- **Export Compliance** (2005-2010). This compilation, written by guest author Jack Brodbeck, assists repair station personnel in understanding and complying with import and export regulations. Articles cover applicable law, available resources, a "best practices" kit, and much more. It's a must read personnel at companies that export inventory or expertise. This compilation revises the prior version that included articles through 2007.
- **Intellectual Property** (2007-2011). **NEW!** ARSA's newest compendium, written by guest author and IP attorney Al Givray, provides valuable information on intellectual assets, patents, copyrights and trademarks and practical solutions to problems surrounding customer licenses, trade secrets and inventor knowledge.

The updated Compendiums are available for purchase on ARSA's [website](#).

### ARSA Action

## ARSA responds to alarmist NPR report on contract maintenance

On June 27, NPR ran an interview that disparaged the safety record of the airline industry while raising false and unproven safety concerns about the use of contract maintenance.

ARSA reached out to the program's producers and requested an opportunity to set the record straight. The Association volunteered its senior staff for response and offered up interviews with members of ARSA's speaker's bureau, a cadre of aviation professionals that ARSA has identified as willing to speak on the record about contract maintenance.

In its response, ARSA highlighted the outstanding safety record of the airline industry while noting that the unprecedented level of safety is no accident; it's the result of a commitment to safety by air carriers, manufacturers, and maintenance companies, and a complex system of government oversight.

The interview with Bill McGee, a consumer advocate who writes about the airline industry, paints an alarmist view of airlines' safety record while neglecting the simple fact that we are living in the safest period in the history of aviation. McGee also raises concerns about foreign repair stations working on U.S. aircraft and implies that work done offshore is less safe and held to a different regulatory standard than work done by the air carriers themselves.

ARSA is continuing its outreach in response to this story and will continue to monitor the media and respond to reports that perpetuate a false and misleading picture of the maintenance industry's contributions to civil aviation.

To view ARSA's response [click here](#).

## **Symposium 2013: Mark your calendars**

[ARSA's 2013 Annual Legislative Day and Repair Symposium](#) will be here before you know it, so mark your calendars and make plans to attend today!

The maintenance industry's premier networking and educational event will again be housed at the Ritz-Carlton Pentagon City, just across the Potomac from downtown DC on March 20-22. Participants can expect days packed full of valuable information and insights from legislative, regulatory, and industry leaders and insiders.

ARSA is putting together the schedule for next year's activities, and it wants to know: what topics would you like to see discussed? Input helps ensure that the Symposium is tailored to the industry's needs. So, let us know at [arsa@arsa.org](mailto:arsa@arsa.org) the subjects that would be beneficial for coverage or recommendations for speakers.

Don't forget the many valuable sponsorship opportunities that exist for the annual legislative day and repair symposium. Sponsorships are a great way to target the industry leaders in attendance and get your message in front of an audience of maintenance pros. To view available opportunities and make your pledge today, visit <http://www.arsa.org/node/630> or contact ARSA Director of Web Content and Publications [Keith Mendenhall](#).

## **ARSA stresses aviation safety in television interview**

In an [interview](#) with Long Island, New York television station News 12, ARSA Vice President of Regulatory Affairs Craig Fabian stressed the maintenance industry's unwavering commitment to safety.

"Safety is the number one priority for our members; it is paramount in the industry," Fabian tells reporter Drew Scott.

While the news report notes "various industry groups refused to comment for this story," ARSA was happy for the opportunity to underline the maintenance industry's stance on safety.

Using the resources of the Positive Publicity Campaign, the Association looks for ways to share the industry's advantages for the global aviation industry. ARSA agreed to appear on-camera to discuss how maintenance professionals implement FAA Airworthiness Directives and repair station compliance with those federal mandates. Though Fabian's interview was cut short to meet airtime demands, he spoke to the many ways repair stations work in concert with the FAA and airlines to continually make air travel safer.

The Long Island station was focused on the delays and controversies surrounding the FAA's mandated fuel tank explosive suppression systems. The story is part of the station's annual anniversary coverage of TWA flight 800.

To view the interview, visit [here](#).

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## Survey paints picture of industry audit burden

ARSA is working closely with international aviation authorities to reduce the overwhelming number of contract maintenance audits. The Association recently conducted an industry survey to get an accurate picture of the audit burden repair stations face.

Conducted in tandem with a Federal Aviation Administration (FAA) project seeking to measure and quantify the audit impact on repair stations, ARSA will submit the results to the FAA for comparison and validation with the agency's own research on the issue.

The survey found—

- On average, each repair station receives a combination of 19.5 onsite and paper audits per year with an average cost of \$1,751.00 per audit. (Note: total cost is based on employee costs and audit hours provided by each survey respondent.)
- The average repair station performs 19 onsite and/or paper audits per year on its maintenance contractors at a cost of \$1,119.00 per audit.
- Internal audits average seven per year at a cost of \$1,659.00 per audit.
- Repair stations expended an average of \$18,150.00 per year on the fixed costs associated with auditor training, travel, and onsite facilities (e.g., temporary offices, phones, computers, etc.) for customer and government auditors.
- The average annual cost of audits exceeds \$85,500.00 per year per repair station. This is an estimated industry annual burden in excess of \$105 million.



- More than two-thirds of respondents (67.6 percent) are in favor of a true “third-party approach” to auditing and data sharing.
- More than four-fifths of respondents (86.7 percent) support the concept of Certification Authority Mutual Acceptance (i.e., regulators fully accepting each other’s surveillance).
- 100 percent of respondents are FAA certificated, 80 percent hold EASA certification, and eight percent hold certifications from other civil aviation authorities.
- Surprisingly, almost two-thirds of respondents (62 percent) do not have any commercial certifications like ISO 9000, AS9100 or AS9110; 21 percent hold ISO 9000, Twenty-six percent hold AS9100 and ten percent hold AS9110.

The online survey was conducted from late February through late April. Multiple e-mails were sent to member companies to respond and the industry at large was invited to participate. The survey system was configured to prevent multiple responses. One hundred and five maintenance companies responded representing 220 repair station certificates. Ninety-three percent of respondents were based in the United States. Based on a total population of 4,200 FAA repair station certificates, the survey has a 6.4 percent margin of error. Industry burden is based on an estimated 1,229 repair stations that support air carriers.

Thank you to all the ARSA members and other repair stations that participated in the survey. Stay tuned for more on ARSA’s efforts to simplify repair station auditing.

## ***Positive Publicity Corner***

### **Soaring to new heights**

*By Jason Langford, ARSA director of communications*

The resources invested in the [PPC](#) by a few [companies](#) have made a big difference for everyone in the aviation maintenance industry. This special fund enabled ARSA to establish a communications program, placing the Association on the frontlines of the battle to improve the image of the contract maintenance industry. In fact, the PPC has made ARSA the leading advocate for the maintenance industry among the media.

The PPC’s mission is simple: turn the tide of public opinion about aviation maintenance by spreading the facts about the industry’s positive contributions to safety and important economic contributions. Early research revealed that the public is largely unaware of the industry and upon hearing of its benefits is inclined to view contract maintenance favorably.

To make the case, the Association quantified the industry’s benefits in dollars and cents. This was accomplished through a series of [economic reports](#) that, for the first time, measured the industry’s global economic impact, its employment picture in the United States, and the real-world benefit of bilateral aviation safety agreements. The research enhanced ARSA’s credibility in the FAA reauthorization debate; playing a major role in beating provisions that would have jeopardized the industry’s employment picture.

The PPC has stretched its resources to the max; your help will allow the PPC to grow and expand. Indeed, the campaign’s options for continued industry research and proactive PR strategies are limited not by imagination, but by budget.

A new round of economic research is needed to update the original study from four years ago. The price tag for the project runs into the tens of thousands of dollars, greatly exceeding current PPC

resources. Updating this research is critical for to demonstrate that the maintenance industry is a jobs and economic juggernaut to policymakers and the public.

The Association needs to grow its communications program to engage in even more outreach efforts targeting not only external audiences, but to improve its ability to provide accurate information and resources for the industry itself.

[The campaign needs your help today.](#)

To put things in perspective, [only 17 companies](#) have stepped up to the plate and demonstrated commitment in 2012. A tiny percent of ARSA's membership is shouldering the cost of the industry's communication program.

The PPC will soar to new heights and accomplish more in the years ahead; to do that, [contribute your portion here](#).

For more information, or to pledge your support verbally, contact ARSA's Communications Director [Jason Langford](#).

*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.*

[During aviation hearing, Sen. Cantwell says U.S. must produce more skilled workers to stay ahead](#) ([politicalnews.me](#))

[A Stroll in the Sky, After a Lifetime in the Hangar](#) ([The New York Times](#))

[Del. officials celebrate new aircraft facility](#) ([BloombergBusinessweek](#))

[Del Tech's Airframe Maintenance Technology Program adds two planes](#) ([CapeGazette.com](#))

[Aircraft maintenance firm Mecaer Aviation Group to open at Hagerstown, Md. Airport](#) ([Canada.com News](#))

[Airport owner has hopes for 600 new jobs](#) ([AviationPros.com](#))

[Boeing projects exponential growth in demand for airline pilots, maintenance technicians](#) ([PRNewswire](#))

[BBCC aviation maintenance program to expand](#) ([Columbia Basin Herald](#))

[A pilot's stance on overseas contract maintenance](#) ([USA Today](#))

[Son carries on family business](#) ([The Selkirk Journal](#))

[PAG expands facility](#) ([AIN online](#))



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## **ARSA on the Hill**

*By Daniel Fisher, ARSA Vice President of Legislative Affairs*

In July, ARSA's legislative team met with Reps. Mike Pompeo (R-Kan.) and Tim Walberg (R-Mich.) to deliver ARSA PAC support to their reelection efforts and discuss the Association's legislative priorities ([see related article](#)). Both Pompeo and Walberg have been great allies for repair stations on Capitol Hill and we look forward to working with them for many years.

ARSA submitted a [statement for the record](#) in conjunction with the Senate Commerce, Science & Transportation Committee's Aviation Subcommittee hearing on July 18, entitled "The Global Competitiveness of the U.S. Aviation Industry: Addressing Competition Issues to Maintain U.S. leadership in the Aerospace Market." The statement details the important role aviation maintenance services play in ensuring the competitiveness of the American aerospace industry and the need for lawmakers to pursue policies that respect bilateral agreements, encourage exports, and allow U.S. repair stations to compete internationally.

The legislative team discussed with Senate and House Aviation Subcommittee staff the pending Department of Transportation Inspector General's report on FAA repair station oversight. Additionally, ARSA continued to engage lawmakers on the detrimental impact the foreign repair station certification ban is having on the aviation maintenance industry.

ARSA staff participated in a conference call with Texas Gov. Rick Perry's Director of Aerospace, Aviation, and Defense on future coordination between the Association and the governor's office on issues important to Texas repair stations.

Government Affairs Committee members were encouraged to invite candidates, lawmakers, and congressional staff to their facilities. The most effective way to show your elected officials the positive impact your repair station has on the local community and the aviation industry is to give them a tour of your facility ([see related article](#)).

## **Bills on the Hill**

### **Commerce Committee approves Huerta nomination**

On July 31, the Commerce, Science & Transportation Committee unanimously approved Michael Huerta's nomination to be Federal Aviation Administration (FAA) administrator. The full Senate must now give its consent.

Huerta has been acting administrator of the agency since late last year after former FAA chief Randy Babbitt resigned. Prior to leading the FAA, Huerta served as deputy to Babbitt.

While there is currently no public opposition to Huerta's nomination, Republicans are unlikely to allow his confirmation prior to the November election. The position is a five-year term and GOP senators would prefer to wait for the outcome of the presidential election before confirming an FAA chief that would be able to serve through the first four years of a possible Romney administration.

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## Congressional staff tours Component Repair Technologies

Hosting facility visits for elected officials and their aides is one of the best ways to equip lawmakers with a better understanding of the aviation maintenance industry; it brings awareness of the real world consequences of legislative and regulatory actions.

On June 28, Component Repair Technologies' (CRT) welcomed Kevin Hoggatt, director of economic development and special projects in Sen. Rob Portman's (R-Ohio) Columbus office, to its Mentor, Ohio location. Hoggatt, formerly a congressional aide in Portman's Washington, D.C., office, first met CRT leaders during ARSA's Legislative Day two years ago. Consequently, he was familiar with the maintenance industry's top policy priorities.

Of particular interest to Hoggatt was the challenge of finding a skilled workforce to satisfy the technical needs of CRT and the industry as a whole. At the meeting, Hoggatt connected CRT to Gov. John Kasich's (R-Ohio) workforce development office.

"Bringing congressional staff and members of Congress into our facilities is the best way for repair stations to connect with lawmakers. It not only provides them with a better understanding of the role our business plays in the aviation industry, but it can open a whole new door of resources to us," commented CRT Quality Manager Sharon Giancola.

CRT's engagement with their elected officials continued on July 19, with a visit from Stephen Caviness, faith based community and economic development liaison in Rep. Marcia Fudge's (D-Ohio) district office. Like Hoggatt, Caviness showed great interest in the industry's skilled worker shortage and wanted to learn more about the jobs available at Component Repair Technologies.



Sen. Rob Portman aide Kevin Hoggatt (left) meeting with Component Repair Technologies President Rich Mears.

Both Hoggatt and Caviness attended ARSA's Cleveland outreach luncheon in June.

ARSA is ready to help your company host a visit from your congressional delegation or their staffs. For assistance, please contact ARSA's Vice President of Legislative Affairs, [Daniel Fisher](#).

### 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>

## ARSA urges Congress to support aviation maintenance industry

ARSA submitted a [written statement](#) to the U.S. Senate Subcommittee on Aviation Operations, Safety, & Security detailing the important role aviation maintenance services play in ensuring the competitiveness of the American aerospace industry. The statement will be included in the official record for the committee's July 18 hearing, "The Global Competitiveness of the U.S. Aviation Industry: Addressing Competition Issues to Maintain U.S. leadership in the Aerospace Market."

ARSA's statement features the substantial and positive [economic impact](#) aviation repair stations have on the economy, highlights the important role Bilateral Aviation Safety Agreements (BASAs) play in ensuring competitiveness, and discusses the negative impact of the present [ban](#) on new FAA foreign repair station certificates.

As one of the United States' leading exports, aviation maintenance contributes \$39.1 billion annually to the U.S. economy and maintains a \$2.4 billion positive balance of trade. This trade surplus makes the United States the world's leading exporter of maintenance services with the more than 4,000 FAA certificated U.S. repair stations employing more than 274,000 Americans in all 50 states. A recent survey of ARSA members found that the industry is optimistic about growth prospects in the coming year with more than 60 percent of respondents planning to add workers in 2012.

"Repair stations have long been, and continue to be, a vital part of the aviation industry and our nation's economy. As the U.S. economy recovers, we should be nurturing small and medium-sized aviation maintenance companies, not obstructing their ability to export and compete internationally," reads ARSA's statement

To facilitate competitiveness, ARSA recommends that lawmakers support the conclusion of new BASAs and remove the prohibition on the FAA's certification of new repair stations.

BASAs are government-to-government arrangements that allow cooperation between aviation safety regulators in areas including design, production, flight operations, environmental certification, and maintenance. BASAs dramatically reduce regulatory compliance costs for the aviation maintenance industry, make government oversight more efficient, help repair stations be more profitable, and ensure the competitiveness of the U.S. aerospace industry.

Despite the positive impact of aviation maintenance and its role as a leading American export, U.S. international competitiveness is undermined by a nearly four-year congressional restriction on the FAA's ability to certificate new foreign repair stations. This has shut American companies out of opportunities in rapidly developing overseas markets, weakening U.S. leadership in this critical area. The longer the ban is in effect, the more damage it will cause to the country's edge in aviation maintenance services. Although TSA has committed to completing the security rules during the fourth quarter 2012, if the agency does not meet its self-imposed deadline, Congress should take action and permit the FAA to once again certificate new foreign repair stations ARSA told lawmakers.

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## New legislation to micromanage FAA

Rep. Michael Burgess (R-Texas) introduced the Airline Maintenance Safety Act ([H.R. 6002](#)), requiring individuals authorized to approve “covered work” for return to service outside the United States on part 121 aircraft to hold a mechanic’s certificate. It would also duplicate the requirement of part 65 that individuals be able to read, write, speak, and understand English.

Under current regulations, a certificated repair station may only authorize individuals to approve an article for return to service if they meet certain technical qualifications and understand, read, and write English. In its [notice of proposed rulemaking \(NPRM\) to 14 CFR part 145](#), the FAA has already proposed requiring all individuals who approve work for return service to also “speak” English.

H.R. 6002 is another example of Congress attempting to micromanage the industry and the FAA. While unlikely to go anywhere, the legislation is an unwarranted distraction from Congress’ vital responsibilities.

As was pointed out in an interesting [blog post](#), the legislation runs counter to Rep. Burgess’ public [statement of principles](#) that declare the representative’s opposition to “legislation that is redundant, unnecessarily expands government control over our freedom, or increases the role of the federal government in your life.”

## FAA still in charge

America’s newest surface transportation law ([MAP-21](#)), signed by President Obama on July 6, softened a controversial provision that would have given the National Park Service (NPS) unprecedented authority over national park airspace.

A proposal from Sens. Lamar Alexander (R-Tenn.) and Ron Wyden (D-Ore.) in the Senate-passed bill would have vested sole authority in the NPS to deny air tour applications. The aviation industry worried that the provision would impact the FAA’s ability to regulate airspace, threatening safety standards. Many in the air tour business also viewed the amendment as a direct attack on their businesses and employees.

In its final incarnation, however, the law maintained the FAA’s primacy over national airspace. In a nod to the measure’s sponsors, the NPS will be able to deny new or expanded air tour applications to operate over Tennessee’s Great Smoky Mountains and Oregon’s Crater Lake National Park if the park director determines those operations “would adversely affect park resources or visitor experiences.” The law also requires Grand Canyon tour operators to employ “quiet aircraft technology” within 15 years and mandates the FAA to provide incentives to those that convert to advanced noise prevention equipment sooner.

## ARSA PAC: Helping the helpful candidates

ARSA PAC made two recent contributions to help reelect lawmakers that tirelessly advocate for the association’s policy priorities.

On July 19, ARSA PAC presented a \$1000 check to [Rep. Mike Pompeo’s](#) (R-Kan.) campaign. Pompeo, a member of the House Energy & Commerce Committee, founded Thayer Aerospace prior to his election to Congress. He spoke at ARSA’s Wichita outreach luncheon in February and has been an ardent supporter of the aviation maintenance industry. Pompeo maintains the [America Flies website](#).

On July 25, ARSA PAC made a \$1000 contribution to [Rep. Tim Walberg’s](#) (R-Mich.) reelection efforts. Walberg is a member of the House Homeland Security Committee’s Transportation Security

Subcommittee and has been leading efforts in pressuring the Transportation Security Administration to finalize repair station security rules so the FAA can issue new foreign repair station certificates. He also serves as chairman of the House Education & Workforce Committee's Workforce Protections Subcommittee and as a member of the Oversight & Government Reform Committee.

"Congressmen Pompeo and Walberg have demonstrated their commitment to policies that will help repair stations continue to grow and prosper free from government interference. Both of these lawmakers have an in-depth understanding of the aviation industry and have worked to educate their colleagues about the important contributions aviation maintenance makes to local communities, job creation, and most importantly—aviation safety. ARSA PAC's contributions to the reelection efforts of Reps. Pompeo and Walberg help ensure that friends of our industry remain in Congress while elevating ARSA's voice on Capitol Hill," stated ARSA's Vice President of Legislative Affairs Daniel Fisher.

#### [Have you given solicitation consent to ARSA PAC yet?](#)

Solicitation consent allows ARSA PAC to communicate freely about our political activity with ARSA members who understand that what happens on Capitol Hill impacts business.

Federal law requires ARSA to have explicit permission before communicating further about its political program. Only executive and management employees at ARSA member companies may provide such consent.

[Direct the leaders of your company to this solicitation consent form](#) and join the ranks of fellow industry advocates who have chosen to play an important role in ARSA's political program! If you have any questions about ARSA PAC, please contact ARSA Communications Coordinator [Josh Pudnos](#) at 703 739 9543.

#### **2012 ARSA PAC Contributors**

##### ***Capitol Hill Club (\$1,000)***

Bill Perdue, SONICO

Jim Perdue, SONICO

##### ***Washington Team (\$500)***

Marshal S. Filler, ARSA

Gary Fortner, Fortner Engineering

Lynn Fortner, Fortner Engineering

Robert Fortner, Fortner Engineering

Sarah MacLeod, ARSA

Christian A. Klein, ARSA

Bill Rathmanner, Aero Design Services

##### ***145 Club (\$145)***

Jose Eduarte, A.I.R.S.

Daniel Fisher, ARSA

Randall Herman, Mid-America Aviation

John Hunter, HEICO

Gary Jordan, Jordan Propeller Services

Mike Leland, Commercial Jet

Jim Meyer, Aviation Repair Solutions

Barry Muhler, Aviation Repair Resources

Jennifer Weinbrecht, Component Repair Technologies

**Members of the Association** may display the Member Web Badge on their company Web site. Contact [arsa@arsa.org](mailto:arsa@arsa.org) for information.



## ***Have you seen these candidates?***

Throughout the election season, ***the hotline*** is introducing readers to the candidates running in some of the most critical Senate campaigns. This month we look at North Dakota, where Republican Rick Berg and Democrat Heidi Heitkamp vie for the seat of outgoing Sen. Kent Conrad (D).

### **Rep. Rick Berg (R-N.D.)**



Rep. Rick Berg is currently a freshman representing North Dakota's at-large congressional district.

Berg is a member of the House Ways & Means Committee, where he sits on the Social Security; Select Revenue Measures; and Human Resources Subcommittees.

A graduate of North Dakota State University, Berg founded Goldmark Commercial Corporation, a commercial real estate firm, and served as a Montana state representative before his 2010 election to the House. In the Montana legislature, Berg served in top leadership positions, including speaker

of the house and house majority leader. Berg lives with his wife, Tracy Martin, in Fargo. They have one son.

Rick Berg's Campaign Headquarters:

Berg for North Dakota  
1111 Westrac Drive Ste. 108  
Fargo, ND 58103  
<http://www.bergfornorthdakota.com/>  
 @RickBergND

### **Heidi Heitkamp (D-N.D.)**



Heitkamp has served as an attorney for the Environmental Protection Agency, as State Tax Commissioner, and as North Dakota attorney general.

In 2000, Heitkamp ran an unsuccessful bid for governor.

A graduate of the University of North Dakota-Grand Forks and Lewis and Clark Law School, Heitkamp currently serves on the board of directors of Dakota Synfuels Gas Company. Heitkamp lives with her husband, Dr. Darwin Lange, in Mandan. They have two children.

Hedi Heitkamp's Campaign Headquarters:

Heidi for North Dakota  
PO Box 1577  
Bismark, ND 58502  
<http://heidifornorthdakota.com/>  
 @Heidi4ND

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



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## International News

### New safety equipment required for Canadian aircraft

On July 4, Transport Canada [announced new regulations](#) giving owner/operators two years to install a terrain awareness and warning system (TAWAS) on private airplanes with six or more passenger seats. The new regulations replace the current requirement for a ground proximity warning system (GPWS) under section [605.37](#) of the Canadian Aviation Regulations.

TAWAS provides the flight crew much earlier acoustic and visual warnings of a collision, and does so under conditions where GPWS cannot. TAWAS is used by aviation authorities in Europe and the United States, and commercial Canadian aircraft flying internationally are already equipped with the system.

The change is largely expected to impact aircraft flying in Canada's remote arctic region. Transport Canada anticipates the change saving approximately \$215 million in accident prevention over a 10 year period. More information is available [here](#).

### International Roundup

**Editor's Note:** To provide more international coverage, ARSA presents a monthly roundup of world events pertaining to the industry.

[Middle East region can offer the global aerospace industry its talent](#) ([gulfnews.com](#))

[Two companies vie for engine-repair and components business Aveos Fleet Performance, Inc.](#) ([The Montreal Gazette](#))

[Boeing to help Indonesia to address safety issues](#) ([Air Transport World](#))

[Regional aircraft maintenance center to be built in Georgia](#) ([Bernama.com](#))

Lufthansa Technik receives CAMO approval from United Arab Emirates (*AviTrader*)

EASA mandates fuel tank work for A318s, A319s, and A320s (*Aviation Week*)

Nova Scotia gives Jazz Aviation \$16.5 million to expand maintenance base (*Herald Business*)

India's new director general of civil aviation assures no skimping on maintenance checks (*Business Standard*)

Spirit AeroSystems and China Airlines sign supply agreement (*AviTrader*)

Mexico takes flight as hub for aerospace industry (*The Miami Herald*)

EU to reduce allowable surplus of carbon permits in ETS, potentially raising price (*Reuters.com*)

## ***Member Spotlight***

### **Gyro Specialist, Inc., North Hollywood, CA**

Gyro Specialist Inc. (GSI) is an independent repair station providing superior service in overhaul and repairs of gyros, ADIs, HSIs, course indicators, flight directors and other equipment.

GSI has over 40 years of experience and knowledge, enabling it to provide cost-effective overhauls and repairs with maximum value for end users and operators. Its skilled and dedicated technicians train continually to stay informed of current developments. The company is committed to the principles of safety, efficiency, quality, and fairness and pursues every opportunity to keep costs low and pass those savings on to customers.

GSI is proud to deliver the personalized service of a small company while offering the in-house capabilities of a large facility. The business delivers customers the best in personal service and support any time, day or night, including no additional charge for AOG service. All of the GSI's work is done in-house, in accordance with manufacturer's specifications and/or FAA approved data, reducing costs to customers.

For more information, visit <http://www.gyrospecialist.com/>

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

## ***What's In It for You***

### ***This month: Aviation Alliance Insurance Risk Retention Group (AAIRRG)***

By Jennifer Goodwin, ARSA membership & senior administrative coordinator

Who doesn't want to save money? In a few clicks and phone call, we can help save you up to 35% on your liability insurance.

In case you have not paying attention, in 2010 ARSA helped to create an insurance program that can dramatically reduce your product liability costs. Our risk retention group (RRG) is available exclusively to part 145 certificate holders who are ARSA members. Each insured member is an owner of the RRG, receives shares of the RRG, and is eligible for financial distributions from potential underwriting profits. With 88 members and growing, their continued success could be your success.



Out of all of the benefits you receive exclusively as an ARSA member, this is a deal that you can't afford to pass up. For more information, visit the AAIRRG [website](#). Or, if you're ready to start saving now, call 707 963 2400.

## **Welcome New Members**

Avionics Specialist, Inc., Memphis, TN

Lone Mountain Aviation, Inc., Las Vegas, NV

M&M Hi Tech Fa, LLC dba MAPCO, Lexington, OH

## **Sponsor the Symposium** *Aeronautical Repair Station Association* **2013** *Annual Repair Symposium*

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**Both full and partial sponsorships are available.** A full sponsor pays the entire cost of an item; a partial sponsor pays an amount towards the item cost. *Note: Partial sponsors will receive a pro-rated discount on complimentary registrations.*

**Pledge Now - Pay Later!** You can commit now to be a sponsor, and wait until Symposium registration opens until you are invoiced. This gives you the opportunity to get involved early, but also allows for plenty of time to make payment arrangements. [Click here for sponsorship opportunities!](#)

**ARSA Legislative Day and Annual Repair Symposium: March 20-22, 2013**

# ARSA Regulatory Compliance Training—Questions

Part 1: General Comprehension

Level 1: For anyone working in aviation

## § 65.91: Inspection authorization.

- (a) An application for an inspection authorization is made on a form and in a manner prescribed by the Administrator.
- (b) An applicant who meets the requirements of this section is entitled to an inspection authorization.
- (c) To be eligible for an inspection authorization, an applicant must—
- (1) Hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating, each of which is currently effective and has been in effect for a total of at least 3 years;
  - (2) 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;
  - (3) Have a fixed base of operations at which he may be located in person or by telephone during a normal working week but it need not be the place where he will exercise his inspection authority;
  - (4) Have available to him the equipment, facilities, and inspection data necessary to properly inspect airframes, powerplants, propellers, or any related part or appliance; and
  - (5) Pass a written test on his ability to inspect according to safety standards for returning aircraft to service after major repairs and major alterations and annual and progressive inspections performed under part 43 of this chapter.

An applicant who fails the test prescribed in paragraph (c)(5) of this section may not apply for retesting until at least 90 days after the date he failed the test.

<b>Question 1:</b> Eligible applicants must hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating.	<b>Question 2:</b> An eligible applicant must have been actively engaged in maintaining aircraft for only one year.
A—True. B—False.	A—True. B—False.

<b>Question 3:</b> An applicant's fixed base of operations does not have to be the place where the inspection authorization will be exercised.	<b>Question 4:</b> An applicant who fails the written test on the ability to inspect can retest immediately.
A—True. B—False.	A—True. B—False.

Name	_____	Date	_____
	Clearly Print the Name of the Person Taking the Test		Date Test was Completed
Score	_____	Hours	_____
	Enter as x (number correct) of y (number of questions)		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

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  - 1. Hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating, each of which is currently effective and has been in effect for a total of at least 3 years;
  - 2. 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;
  - 3. Have a fixed base of operations at which he may be located in person or by telephone during a normal working week but it need not be the place where he will exercise his inspection authority;
  - 4. Have available to him the equipment, facilities, and inspection data necessary to properly inspect airframes, powerplants, propellers, or any related part or appliance; and
  - 5. Pass a written test on his ability to inspect according to safety standards for returning aircraft to service after major repairs and major alterations and annual and progressive inspections performed under part 43 of this chapter.

An applicant who fails the test prescribed in paragraph (c)(5) of this section may not apply for retesting until at least 90 days after the date he failed the test.

<b>Question 1:</b> Eligible applicants must hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating.	<b>Question 2</b> An eligible applicant must have been actively engaged in maintaining aircraft for only one year.
<b>A—True</b> (Correct answer; an applicant must hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating.)  B—False.	A—True.  <b>B—False</b> (Correct answer; an applicant must have been actively engaged, for at least the 2-year period before the date he applies, in maintaining aircraft.)

<b>Question 3:</b> An applicant's fixed base of operations does not have to be the place where the inspection authorization will be exercised.	<b>Question 4:</b> An applicant who fails the written test on the ability to inspect can retest immediately.
<b>A—True</b> (Correct answer; an applicant must have a fixed base of operations, but it need not be the place where he will exercise his inspection authority.)  B—False.	A—True.  <b>B—False</b> (Correct answer; an applicant who fails the written test may not apply for retesting until at least 90 days after the date he failed the test.)