



121 North Henry Street
Alexandria, VA 22314-2903
T: 703 739 9543 F: 703 739 9488
arsa@arsa.org www.arsa.org

December 13, 2007

Via E-mail to: Erik.Lieberman@mail.house.gov

The Honorable Nydia M. Velázquez
Chairwoman
House Small Business Committee
2361 Rayburn House Office Building
Washington, DC 20515

RE: Support for Small Business Regulatory Improvement Act

Dear Chairwoman Velázquez:

The Aeronautical Repair Station Association (ARSA) thanks you for your commitment to small business and ensuring that federal agencies are promulgating fair and balanced rules. We are pleased to support your proposed Small Business Regulatory Improvement Act.

ARSA is a 670 member-strong international trade association with a distinguished 22-year record of representing certificated aviation design, production, and maintenance facilities before Congress, the Federal Aviation Administration (FAA), the European Aviation Safety Agency (EASA) and other national aviation regulators and legislative bodies. While we represent a wide cross-section of the aviation industry, the vast majority of our members are small businesses.

Your proposed legislation to amend the Regulatory Flexibility Act (RFA) (5 U.S.C. § 601 et seq.) is a much needed first step to ensure agencies are thoroughly examining the impact of proposed rules on small businesses. ARSA is particularly pleased with the expansion of the term "economic impact" to include any indirect economic effect on small entities which is reasonably foreseeable. The aviation industry is a strictly regulated community, and as such the RFA and agency rulemaking activities often have both direct and indirect substantive impact on our association and our various members. We are also pleased with the expanded role the legislation gives to the Small Business Administration's Office of Advocacy, which has always provided fair and impartial analysis of a rule's potential impact on small businesses.

ARSA believes that this legislation, along with the watchful eye of Congress, will go far in ensuring that small businesses are treated fairly and accurately accounted for in the rulemaking process.

We look forward to working with you on this proposal, and future legislative efforts.

Regards,

A handwritten signature in black ink that reads "VK Scattergood". The signature is written in a cursive style with a large, sweeping flourish at the end.

Virginia K. Scattergood
Director of Government Affairs
& Legislative Counsel