

the hotline

AERONAUTICAL REPAIR STATION ASSOCIATION

97-11

November 1997

SARAH SAYS

Don't Be Eaten Alive

Very few companies can afford to pay attention to every new regulation or law passed by the myriad of legislators and agencies that can impact business. You just don't have the time or energy to fight each and every battle. From the neighborhood "home owners" association to the local county and city governments, to the state legislature, to the laws passed by our federal representatives and finally to the environmental (EPA), health and safety (OSHA) and aviation (FAA) agencies; each of these entities has the power to put you down and out, personally or professionally. It is enough to scare you into the mountains where survival depends upon your own two hands and luck.

Survival in the business world depends upon many people working together to reach a common goal. The goal expressed by your Board of Directors of the Aeronautical Repair Station Association is to create a level playing field in the regulatory arena. We have been and are dedicated to making sure the regulations can be interpreted and enforced evenhandedly, whether a large company like Boeing is involved or a small two person general aviation shop. The regulations are there to ensure that all certificate holders work toward one goal — airworthiness.

Aviation manufacturers have had long-term relationships with the agencies that impact their business. They have learned to work together under one trade association to ensure their interests are addressed in

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LEGAL BRIEFS

This "Legal Brief" series is brought to you by Marshall S. Filler of the Law Firm of Filler, Weller and Tello, P.C. Marshall's firm has a close association with the Association not only because he supports the work of the maintenance industry in his practice, but because he is married to the Executive Director. Marshall's firm represents the whole spectrum of aviation entities, from air carriers to manufacturers, distributors and repair stations. His law firm is listed as Contributing Editors to our publication so if you wish to contact them, please refer to the newsletter's second page.

An Essential Link

As one of the most highly-regulated industries in the world, aviation relies upon written manuals, procedures, reports and other records to ensure and document compliance with all pertinent requirements. Foreexample, when the Federal Aviation Administration (FAA) conducts an inspection of an airline, repair station or manufacturer, it demands that the certificate holder demonstrate that their approved or accepted systems are not only sound but that they are being followed and are periodically audited to evaluate their effectiveness.

The reason for this emphasis on systems, written procedures and attention to detail is obvious. Mistakes in this business, as we know all too well, can have tragic consequences.

One of the fundamental concepts that Sarah and I teach in our regulatory compliance training courses is

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NEW MEMBERS

Advanced Aerospace
Air Accessories & Avionics, Inc.
Aviation Hydraulics, Inc.
SIA Engineering Company

SARAH SAYS

Continued from page 1—

legislative and regulatory issues. The large air carriers also have an effective lobbying effort in the legislative and regulatory branches of government. The maintenance industry has not been the most consistent about standing together in these arenas. These entities have always believed that the survival of their business depended upon individual companies being ahead of the curve, not upon working together to ensure that all have an equal chance.

Without united efforts, the regulations can be used to eat you alive. Surely survivors can see the trend, yet many individual businesses still do not believe that a united effort is worth supporting. These companies still tell me that they will not join the association because "so-and-so is a member" (usually a competitor) or because "why should I join, Sarah, you will do the work anyway" (let someone else pay for the good of all) or because "why should my competitor know what I know" (like the association reveals confidential

information) or because "you didn't save me money last year" (did you ask your quality department how much time we saved you). This short-sighted view of the current business world will create long term loss.

No one company has the time or resources to review the *Federal Register* and comment on pending regulatory changes. No one company can keep up with the FAA policies and procedures that impact the bottom line. Large companies recognize that joining together can save them all time and money. It amazes me that small companies will not make the investment in their own future — no wonder they are being eaten alive. ■

Editor's Note

the hotline's editorial staff made a major *faux pas* last month by not acknowledging the enormous contribution made by Mr. James W. Tello from the Law Firm of Filler, Weller and Tello, P.C. Except for "Sarah Says" and "Legal Briefs," Jim single-handedly wrote all the articles in last month's publication. We cannot possibly make up for our oversight; we can only hope that we can be forgiven and that Jim will not withhold his excellent prose from us in the future! ■

the hotline

the hotline is the monthly publication of the Aeronautical Repair Station Association, the not-for-profit international trade association for certificated repair stations.

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LEGAL BRIEFS

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what we call "links in the chain." Simply stated, it means that the design, production, operation and maintenance rules are interdependent and that they form the links of the airworthiness chain. These individual links form the chain of safety and regulatory compliance.

Unfortunately, in actual practice, there are occasions where the links have not been properly formed or are broken. This Legal Brief is the first in a series of articles about a situation where an essential link has not been properly formed.

Federal Aviation Regulation (FAR) 21.50(b) requires each holder of an FAA design approval, for which application was made after January 28, 1981, to furnish a complete set of Instructions for Continued Airworthiness (ICA) to the owner of the product for which the design approval is issued.

Typically, the ICA is provided to the owner at the time the first product is delivered. Thereafter, the ICA and their updates must also be made available to any other person required to comply with their terms.

The intent of the ICA is to ensure the availability of maintenance and alteration information "essential to the continued airworthiness of the product". For an aircraft, the ICA must also include the ICAs prepared for each engine and propeller, and for each required appliance, including information relating to the interface between those appliances and products.

The ICAs must be prepared in accordance with the pertinent airworthiness standards contained in FAR Parts 23, 25, 27, 29, 31, 33 and 35. The instructions and their updates can consist of manuals or sections of manuals that describe the systems and characteristics of the product, provide the instructions for performing maintenance and specify any airworthiness limitations (such as mandatory replacement times and structural inspections) required by the approved type design.

The reason FAR 21.50(b) is so important is obvious. The information provides the foundation upon which maintenance and alteration must be performed. For aircraft registered in the United States, that means compliance with FAR Part 43, most notably, Section 43.13(a).

This rule requires that maintenance or alteration be performed in accordance with the manufacturer's maintenance manuals, the ICAs or other methods, techniques and practices acceptable to the Administrator.

The entire maintenance system relies upon the creation and dissemination of the basic data required to be included in the ICAs. Part 135 operators must

comply with the manufacturer's recommended maintenance programs (14 C.F.R. § 135.421). Each Part 145 repair station must maintain, in current condition, all manufacturer's service manuals, instructions and service bulletins related to the articles that it maintains or alters (14 C.F.R. § 145.57(a)).

Although other methods, techniques and practices can be acceptable to the Administrator, it would be impractical and unwise to require each maintenance provider to produce its own maintenance procedures for each product or component. The reason for including FAR 21.50(b) in the regulations was to provide the consistent and basic information necessary for the continued airworthiness of civil aviation products.

This essential link in the regulatory chain has not been properly formed by the FAA. The requirement that approved design holders ensure that this basic information is prepared and disseminated has not been adequately enforced.

The type certificate holder may refer to its equipment or appliance manufacturer for this basic information, however, it does not relieve the type certificate holder from making sure the ICAs are prepared and disseminated in accordance with the rule. This is particularly troubling when the component or appliance manufacturer does not prepare the information or refuses to supply the information to maintenance entities.

Ironically, this link may have been formed commercially, at least in the case of large transport category aircraft. For instance, most large aircraft type certificate holders have elaborate product support agreements with their prime suppliers.

These agreements require that the supplier prepare and provide maintenance information for their products and make them available to all owners, lessees and operators of their aircraft and to the designees of those owners, lessees or operators.

These commercial requirements are based upon information contained in the World Airline Suppliers Guide and in Air Transport Association Specification 100, documents prepared by the air carriers to help standardize the data and material required to be provided by prime aviation manufacturers and their suppliers.

Nevertheless, certain type certificate, supplemental type certificate and other design approval holders have refused either to prepare the information required by the regulation or to provide the information to maintenance entities required to comply with the terms of the ICAs.

The FAA must adequately form this essential link by providing the necessary guidance material for the public and their own work force to ensure the proper preparation of the ICAs and by aggressively enforcing the rule once everyone understands their regulatory duties. ■

REGULATORY LOOK-OUT

SUPs Still Eating Time

The industry Suspected Unapproved Parts (SUPs) Task Force met on November 18-19. The Task Force, made up of most of the aviation trade associations, as well as representatives from major manufacturers, parts suppliers, aviation technicians and consultants, is dedicated to providing input to the documents and policies produced by the Federal Aviation Administration's SUPs Program Office.

During the first day of the recent meeting, the FAA presented a preview of the SUPs National Seminar. The six-hour presentation covers the policies set forth in FAA Order 8120.10A, which outlines the FAA's Suspected Unapproved Parts Program.

This writer would like to state that the FAA folks from the Oklahoma City Training Center have done a tremendous job disseminating confusing, conflicting and unworkable material.

The Seminar attempts to reconcile the definitions of "approved" and "unapproved" parts and the regulatory requirement of only installing airworthy parts during maintenance or alteration.

Since the Seminar is based upon the FAA Order, and not the regulations, it is very confusing, conflicting and difficult to teach. The team developing the Seminar promised the Task Force they would take the suggestions made during the "dry run" seriously in the final version of the Seminar.

The Task Force took the second day to provide information to the FAA on the Draft Advisory Circular 21-29B, Detecting and Reporting Suspected Unapproved Parts. Persons who had provided comments to the docket were given a chance to fully explain their position to the FAA and to clarify their comments.

Additionally, the group was informed that the Draft Advisory Circular PAAT III will be withdrawn from draft status and be replaced with a document amazingly similar to the Draft Advisory Circular submitted by the ARAC in 1996.

The final document presented for review was Draft Advisory Circular 140-XX, entitled "Enhanced Receiving and Inspection System/Plan." The documents presented for review will be commented on by the Task Force members and their selected committees or associations.

Several other actions were taken by the Task Force including finalizing a document encouraging the FAA to take specific actions to reduce the introduction of "unapproved" parts into the stream of commerce. Those recommendations included full and accepted use of the Form 8130-3 for all Production Approval Holders, implementation of the advisory material on undocumented parts (PAAT Phase III), expedited recordkeeping recommendations, the encouragement of enhanced inspections of incoming material by certificate holders and enhancement of Order 8130.21 to include some specific recommendations from the Task Force.

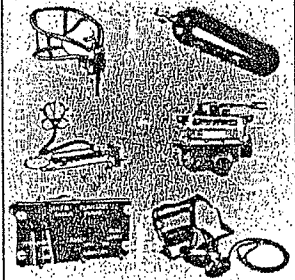
New Order On the Streets

The new, revised, improved version of Order 8130.21 (now B), Procedures for Completion and Use of FAA Form 8130-3, Airworthiness Approval Tag was issued by the FAA Production and Airworthiness Certification Division on November 7, 1997.

The revision makes a couple of significant changes to the issuance of the Form 8130-3. Use of the form for "identification" has been eliminated; in its place the production approval holder issues a "domestic airworthiness tag." The new policy specifically allows the issuance of the Form for split bulk shipments from blessed production approval holder facilities IF the original Form 8130-3 was issued under several specified circumstances. The Form can be used by certain certificate holders to designate parts as "new unused," provided specific steps are taken.

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The steps to fill out the Form have also been changed in several ways worth noting. Instead of using the word "various" to indicate several eligibilities for installation, Block 9 now should include the words "to be verified by installer" or "TBV by installer" and for TSO articles, the words should be "TSO Article N/A." Block 13 wording has also changed with respect to "domestic" shipments and "exports."

Those entities that have computer generated forms need to take special note of these changes to ensure continued compliance with FAA policy. Members may obtain copies of the new order by faxing their requests to ARSA at (703) 739-9488. Others should request the new order from the FAA or download it from the Internet by contacting "faa.gov" on the worldwide web.

Check Your Nut Holes

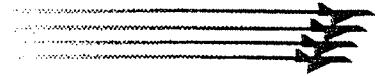
Flight Standards Information Bulletin (FSIB) for Airworthiness (FSAW) Number 97-23 provides information and instructions to principal maintenance inspectors (PMIs) on ensuring the proper inspection of JT8D-200 number 5 bearing inner race retaining nuts (P/N 554330).

During the investigation into an uncontained engine failure of a Pratt&Whitney JT8D-200 series engine the condition of the bearing inner race retaining nut revealed blockage of the oil feed holes. The FAA is concerned that the blockages could have caused a lack of lubrication and cooling to the number 5 bearing which resulted in a fracture of the high pressure turbine rotor shaft and the subsequent failure of the high pressure rotor turbine blades.

Although the FSAW is directed at the FAA inspectors, repair stations and air carriers should ensure that the inspection set forth in the Pratt&Whitney engine manual (Part Number 773128, for the JT8D-200 series Pratt engines; ATA Section 72-52-17, inspection 01) is conducted on the number 5 bearing inner race retaining nut. The FAA is looking for information on the specific cause of the blockages, so before you clean the contamination from the feed holes, report the condition directly to Christopher Spinney of the Engine Certification Office at (617) 238-7175 or at his Internet address: christopher.spinney@faa.dot.gov so we can help the FAA determine the source of contamination. Indeed, if you do not find contamination, you may wish to report that condition to Mr. Spinney. ■

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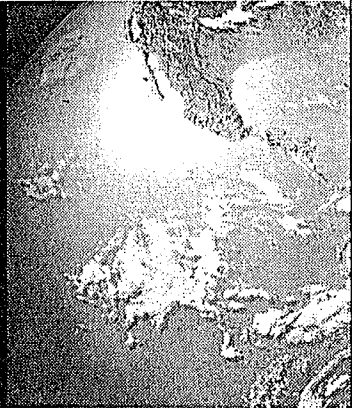
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ARAC UP-TO-DATE

The Major Issue

During a recent meeting of the Aviation Rulemaking Advisory Committee for Air Carrier and General Aviation Issues, an extensive discussion of the definition of "major repair" took up a significant portion of the gathering.

Among the participants in the discussion were Tom McSweeney, Director of the Aircraft Certification Service and Richard Gordon, Deputy Director of the Flight Standards Service. These policy makers helped the ARAC clarify issues revolving around the words "if improperly done" contained in the Part 1.1 definition of major repair.

The Working Group grappling with this issue has developed a draft Advisory Circular setting forth the criteria for developing data associated with any repair or alteration activity that is not otherwise contained in maintenance or alteration documents.

In other words, if the correction to the discrepancy found is not contemplated or covered by the manufacturer's maintenance or alteration instructions or other data acceptable to or approved by the Administrator, the draft Advisory Circular sets forth the type of data that must be developed to substantiate any corrective action contemplated.

However, the Advisory Circular does not directly address the words "if improperly done" in the definition since any action taken during maintenance could be improperly performed, which by default could make all repairs major.

The realities of the maintenance world do not contemplate that all repairs be considered major; therefore, guidance from FAA policy makers was sought. Although no conclusions were reached, the entire group agreed that the current definition of major repair was trying to accomplish three different (and possibly conflicting) objectives.

First, it was attempting to define conditions that the FAA wants addressed based upon data approved by a properly authorized engineer.

Second, if a repair is defined as major, it must be properly inspected after accomplishment, in Part 91 operations, by a person holding an Inspection Authorization under Part 65, or in the airline world, typically by a Required Inspection Item (RII) qualified person.

Third, if the repair is deemed major, specific maintenance recordkeeping requirements must be met. The general consensus was to review the implications of removing the words "if improperly done" from the definition.

Parts and Production

The Aviation Rulemaking Advisory Committee for Certification Issues Parts and Production Working Groups submitted a draft Notice of Proposed Rulemaking (NPRM) for legal and economic review.

These reviews are supposed to be the final steps taken by the Working Group prior to final submission to the ARAC. The legal beagles at the Federal Aviation Administration (FAA) made numerous comments that the Working Groups will attempt to resolve in December.

It has also come to the Assistant Chair's attention that an internal FAA review of the document has generated numerous comments from regional and field offices.

Since the document has not changed substantially in the past year, the Assistant Chair wrote a letter to the FAA expressing his dismay at these eleventh hour difficulties.

Despite the volume of words being exchanged, the Association is hopeful that the Working Group will be able to resolve most of the true problems and present the ARAC with a final document early next year. ■

OVER THERE ... INT'L NEWS

Meet 'em in America

The Federal Aviation Administration, the United States Trade and Development Agency (TDA) and the Metro-Dade Aviation Department have organized the second "Americas Conference on Aviation."

This conference will be held in Miami, Florida, at the Hyatt Regency Hotel on September 1-3, 1998, and brings together the aviation leadership from Latin America and the Caribbean to meet with representatives from the U.S. Government and industry.

The theme of the 1998 conference is "Aviation Safety, Systems Integration and Training." It is anticipated that attendees will include the Directors General of Civil Aviation, and senior officials with responsibilities for air traffic control, training, system safety, airport development and aviation infrastructure financing.

For further information, contact Ms. LeeAnn Moore in the FAA Office of International Aviation: TEL: (202)267-8108; FAX: 202-267-5032; e-mail: leeann.moore@faa.dot.gov.

For information on exhibiting at the conference, please contact Ms. Carol Newmaster: TEL: (703) 522-5717; FAX: 703-527-7251. ■

QUALITY TIME

Rolling the Clock Back

On October 9, 1997, the United States (U.S.) House of Representatives Aviation Subcommittee held a hearing on H.R. 145, the Aircraft Repair Station Safety Act of 1997. The legislation was introduced by Representative Robert Borski (D-PA) and is co-sponsored by over one hundred fifty (150) Members of Congress. The legislation is strongly supported by organized labor. Congressman Borski has introduced the bill in several previous Congresses, but this was the first public hearing on the issue since the FAA revised FAR Part 145 in 1988.

The legislation has three major provisions. First, it would repeal the 1988 amendments to Part 145. Among other things, these amendments eliminated the geographic restriction which previously allowed foreign repair stations to be certificated only if they performed maintenance on U.S.-registered aircraft and components operated wholly or partly outside the U.S. Today's regulations allow a foreign repair station to perform maintenance on any U.S.-registered aircraft and components.

Second, H.R. 145 would require foreign repair stations to be certificated under the same rules as

domestic repair stations. Although the requirements in Part 145 are substantially similar for both types of repair stations, foreign repair stations are not required to comply with the drug and alcohol testing rules under Part 121 nor are FAA-certificated persons required to be employed at those entities.

Third, H.R. 145 would revoke the certificate of any repair station if it knowingly used "substandard" parts in performing maintenance.

Witnesses at the October 9th hearing included Representative Borski, the FAA and a panel of industry representatives. The industry panel consisted of three witnesses who testified in support of the legislation (all labor union representatives) and three witnesses in opposition of the bill, Robert Robeson of the Aerospace Industries Association (AIA), Walt Coleman of the Regional Airline Association (RAA) and Texas Pneumatic Systems, Inc. (TPS), a Part 145 domestic repair station based in Arlington, Texas. TPS' testimony was presented by its President, Bernard E. Rookey. Bernie is also ARSA's current President and Board Member.

Organized labor testified that the bill would enhance safety and protect U.S. jobs. The witnesses claimed that many foreign repair stations performed inferior work compared to their domestic counterparts and that many U.S. airlines sent their maintenance overseas only because it was cheaper. This, in turn, resulted in a loss

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of U.S. jobs. The unions primarily represent workers at major U.S. airlines, some large domestic repair stations and U.S. type and production certificate holders.

The industry panel strongly disagreed with the union witnesses. They cited the absence of any objective evidence to support the "safety" argument and countered that globalization of the aviation industry (and the current Part 145) had created opportunities for domestic repair stations to perform work on foreign-registered aircraft and components. They cited the fact that most of the regional airline aircraft are manufactured overseas and cautioned the Subcommittee that foreign governments would have no choice but to retaliate if H.R. 145 was enacted. This retaliation would result in similar "extreme" restrictions being imposed on the ability of U.S. repair stations to work on foreign-registered products. The industry panel cited the fact that the JAA alone has certificated over one thousand (1,000) repair stations in the U.S. compared to only five hundred (500) FAA-certificated foreign facilities worldwide.

Specifically, Bernie Rookey testified that although TPS has only been in existence for three years, it has grown to over fifty (50) employees and anticipates revenues of nearly \$10 million in 1997. He pointed out that over twenty percent (20%) of TPS' revenue is derived from foreign customers and that this creates jobs in the U.S. The company also holds certification from the Joint Airworthiness Authorities (JAA) of Europe as well as several other foreign civil air authorities, thus allowing it to perform maintenance and alterations on components to be installed on aircraft registered in those countries.

In light of the Clinton Administration's alliance with organized labor, the FAA took no official position on the legislation. However, Guy Gardner, Associate Administrator for Regulation and Certification testified that the FAA did not believe that "safety" was an issue. Gardner stated that the work performed by foreign repair stations is comparable to U.S. facilities and that the FAA had adequate inspector resources to monitor the operations of all repair stations, regardless of their location.

When the Congress returns from its recess in January, organized labor is expected to push for Senate consideration of a similar bill, S.1089, introduced by Senator Arlen Specter (R-PA). Supporters of the legislation are expected to push for a "mark-up" of H.R. 145 in the House Aviation Subcommittee or try to get the bill added as an amendment to another piece of aviation

legislation.

ARSA encourages its members and other readers of *the hotline* to let their Congressional representatives know how they feel about H.R. 145 and S.1089. Undoubtedly, the proponents of the bills are trying to roll the clock back ten years and undo a large part of the globalization efforts undertaken in the maintenance arena. In view of the substantial political muscle of organized labor and the Congressional support of H.R. 145, the aviation industry will have to be vocal and active participants in the legislative process if they are to prevent this legislation from becoming law in 1998.

GAO Results: It's Only Logical

The General Accounting Office (GAO) issued the results of an audit conducted to examine the Federal Aviation Administration's (FAA) oversight of the repair station industry. Congress requested that the GAO review the nature and scope of the FAA's oversight, how effective the FAA follows up on deficiencies discovered at repair stations and the steps the FAA has taken to improve the oversight of repair stations. On the 24th of November, the GAO responded to Senator Ford's request with GAO/RCED-98-21.

The trouble with the audit is that the questions have built in answers. The request to review the steps the FAA is taking or has taken to "improve" the oversight of repair stations assumes that there is a problem with the oversight of repair stations. The fact that any procedure can and should be improved gets lost in answering the question of whether we have stopped beating our spouses.

This basic flaw makes the Association reluctant to agree with the GAO conclusions. Ideally, one should reach good conclusions and make logical recommendations based upon a complete understanding of the underlying issues. In this case, the recommendations are obvious extensions of current requirements based upon incomplete information and uninformed assumptions.

The GAO recommends that the FAA take four actions. First, that the FAA should use more teams to conduct repair station inspections. GAO found that individual inspectors failed to make as many "findings" during routine inspections as teams did during their inspections. This was based upon the findings reported from National Aviation Safety Inspection Program

See Quality Time, page 10—

*"ARSA encourages its
members to let their
Congressional representatives
know how they feel about
H.R. 145 and S. 1089."*

QUALITY TIME

Continued from page 9—

(NASIP) and Regional Aviation Safety Inspection Program (RASIP) reviews. It is an obvious fact that if more people spend more time auditing, they will find more discrepancies. It was also observed that the NASIP and RASIP teams use standardized checklists that are used infrequently by individual inspectors. Again, if you conduct an inspection in a focused, systematic fashion, you will make more observations, hopefully, in a more objective manner.

The report does not acknowledge that findings are not necessarily violations. During testimony at the National Transportation Safety Board (NTSB) ValuJet hearings, the then Deputy Director of Flight Standards stated that the FAA considers a NASIP inspection to be successful if fifty-one percent (51%) or more of the findings have validity. Also, it is logical to assume that a company's assigned inspector will not make as many "findings" because the repair station's system for regulatory compliance is better understood by that inspector than by a team unfamiliar with the company's procedures.

As a follow-up to the first recommendation, GAO also urged that the FAA specify the documentation that should be kept in the repair station's files in order to record any findings and corrective actions taken. Upon review of domestic repair station files kept by the FAA, the GAO observed that they could not determine whether appropriate corrective action was taken from the information kept in the local office file.

Inspectors apparently are not uniformly notifying entities of the specific findings of an inspection, nor are they maintaining a copy of any response from the repair station. This made it impossible for the GAO to determine whether appropriate follow up and/or corrective action was taken by the FAA or the repair station.

The inspection work force has been begging for more clerical help for several years. Inspectors state that they currently spend over twenty-five percent (25%) of their time on paperwork. The work force believes its job is to ensure companies are in compliance with the regulation and that they need adequate clerical support to ensure they are properly documenting their required activities.

As a result of this dilemma, many of the routine "findings" made during inspections are communicated verbally to the repair station and corrective actions, if any are required, are taken without an exchange of documentation. While this is not a particularly good or wise practice, particularly for the repair station, the underlying reason should be acknowledged so it can be appropriately addressed.

The GAO also recommended that the data being fed into the computer system used to record findings and corrective actions be improved. It was pointed out that the Program Tracking and Reporting Subsystem (PTRS) should, at a minimum, contain: (i) an indication that the repair station had been inspected and the results of that inspection; (ii) an indication that the deficiencies were communicated to the repair station; (iii) an indication of the disposition of the deficiencies. This system is supposed to enable the FAA to plan surveillance activities, schedule manpower, evaluate accomplishments, analyze results for patterns or trends so that planned activities can be efficiently managed.

Again, the inspector workforce has been requesting that they be furnished with adequate computer equipment and clerical help for years. Contrary to media headlines, because of the inadequacies in the PTRS and in other documentation, the GAO could not tell whether the inspectors were doing an adequate job in either their inspections or their follow-up. GAO, therefore, could not (and did not) come to the conclusion that the repair stations were not quickly and thoroughly bringing themselves into compliance. Instead, the report states that "it was impossible to assess" whether or not compliance was an issue because of lack of documentation and good reporting practices.

The old adage, garbage in means garbage out, is of particular concern because the implementation of the Safety Performance Analysis System (SPAS) is based upon the information received from the PTRS.

The SPAS is supposed to help the FAA focus resources on those entities and areas that pose the greatest risk to aviation safety. As the GAO has pointed out a number of times, "...if the data on which SPAS is based are not complete and accurate, FAA could be limited in its ability to identify trends and target inspection resources." Finally, the GAO recommended that the changes to Parts 66 (aviation technician requirements) and 145 (repair station requirements) be expedited.

Although the findings and recommendations are not based upon the most objective view of the situation, it is hard to argue with their logic. Team oversight, particularly of large or complex repair stations, makes sense. Accurately documenting and recording findings and corrective actions based on sound regulatory reviews is logical. Expediting needed rule changes is a fundamental tenet of good government. I just wish GAO's underlying reasoning made as much sense as its conclusions.

Copies of this report may be ordered in one of the following ways—web: <http://www.gao.gov/cgi-bin/ordtab.pl>; e-mail: orders@gao.gov; telephone: (202) 512-6000; fax: (202) 512-6061; mail: U.S. General Accounting Office, P.O. Box 37050, Washington, DC 20013. The first copy is free; additional copies are \$2 each. ■



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UPCOMING EVENTS

Mark Your Calendars Now

The annual ARSA Repair Station Symposium will be held April 24-26, 1998, in Crystal City, Virginia (just outside Washington, DC). The preliminary agenda for the event will be forwarded in January.

February 15-17, 1998

Helicopter Association International will host its 50th Anniversary HELI-EXPO in Anaheim, California. To obtain more information, please call (703) 683-4646.

March 7-11, 1998

The Alaskan Air Carriers Association's 32nd Annual Convention and Trade Show will be held in Anchorage, Alaska. For information, please call (907) 277-0071.

March 10-11, 1998

The American Institute of Aeronautics (AIAA) will host an aviation safety meeting, which will include discussion of the progress of a five-fold reduction in the President's 10-year rate of aviation accidents. For details, contact AIAA Customer Service at (800) 639-2422 or (703) 264-7500; Fax: (703) 264-7551; Website: www.aiaa.org.

March 11, 1998

The Air Transport Research International Forum (ATRIF) will hold its annual meetings at the Omni Shoreham in Washington, DC. ATRIF will reflect current issues and topics which are of utmost concern to the commercial aviation industry. For more information, contact Bob Barnett at (503) 731-7116 (phone) or (503) 731-7080 (fax).

March 12-14, 1998

The Women In Aviation Conference will be held in Denver, Colorado. For details, call (937) 839-4647.

March 16-18, 1998

The National Business Aviation Association International Operators Conference will be held in San Antonio, Texas. For more details, call (202) 783-9000.

March 23-27, 1998

The Federal Aviation Administration working with the National Business Aviation Association will hold its Eighth Annual General Aviation Forecast Conference. The conference will discuss the status of industry and government programs and initiatives as well as future opportunities and challenges facing the industry. For more information, contact Helen Kish (202) 267-9943 (phone); (202) 267-3324 (fax) or NBAA Amy Carter (202) 783-9369 (phone); (202) 862-5552 (fax). ■

the
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