



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

January 22, 2015

Delivered electronically by email: diana.keskinen@faa.gov
Original delivered by Certified Mail
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Diana Keskinen
Freedom of Information Act (FOIA) Coordinator
Federal Aviation Administration
National Freedom of Information Act Office, AFN-140
800 Independence Avenue, SW
Washington, DC 20591-0002

Re: Freedom of Information Act Request – Aviation Safety Quality Management System

Ms. Keskinen:

The Aeronautical Repair Station Association (“ARSA”) respectfully submits this request for records and information from the Federal Aviation Administration (“FAA” or “the agency”) pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552, *et seq.*, and Department of Transportation (“DOT”) regulations, 49 C.F.R. part 7.

The records and information specifically referenced below are requested regardless of format, medium, or physical characteristics, and include all responsive electronic records and information.

ARSA requests all documents, records, and communications pertaining to the FAA’s development and implementation of International Organization for Standardization (“ISO”) 9001:2008 accreditation. This request includes those documents located at both FAA Headquarters and all regions.

This request includes but is not limited to:

- (a) Any records pertaining to the certification body or bodies the FAA hired to develop its quality management system and conduct certification activities.
- (b) The FAA’s ISO 9001:2008 certificate and any supporting accreditation documents required to be developed during and after ISO certification to establish compliance with ISO 9001.
- (c) FAA Order VS 1300.2C – Aviation Safety (“AVS”) Quality Management System (“QMS”). (Previous versions of the order are available on the agency’s website.)
- (d) All policies, procedures, documents and data used to establish and maintain compliance with the ISO 9001 standard, including manuals, instructions, forms and desktop procedures.
- (e) Accreditation audit dates (both internal and from certification body), as well as all findings and corrective actions.

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Alternatively, we request that the agency post its entire QMS on its website so all persons interested in understanding and helping the agency adhere to the ISO standard do not have to file FOIA requests.

Fee Waiver Request

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii), 49 C.F.R. § 7.43(c), and FAA Order 1270.1, ARSA requests a waiver of fees associated with processing this records request.

ARSA is a non-profit corporation, organized under section 501(c)(6) of the Internal Revenue Code. Pursuant to Order 1270.1 classifications, ARSA meets the criteria for status as an “**other requester.**” Order 1270.1 also provides six factors for determining fee waivers. Each factor is addressed below.

(1) Whether the subject matter of the requested records concerns the operations of the Federal Government.

The requested documents concern the operations of the federal government and the FAA’s safety and service goals. Indeed, the QMS is used to establish compliance with the agency’s legal obligations; for instance it is used to disposition public comments on draft documents and notices of proposed rulemaking. To ensure proper coordination of efforts, it is essential the public understand the FAA’s QMS.

(2) Whether the disclosure is likely to contribute to an understanding of the Federal Government operations or activities.

The agency’s stated objective is to improve quality of service; however, no mechanism exists to enable entities outside of the FAA to understand the QMS process. Disclosure of the requested material is essential to understanding the manner in which the agency interacts with the public and regulated parties.

(3) Whether disclosure of the requested information will contribute to the understanding of the public at large, as opposed to the individual understanding of the requester or a narrow segment of interested persons.

The requested material enables and ensures the public at large can gain an understanding of the operations of the FAA. The public must understand how the government conducts its business; the QMS is an inherent part of that process and must be made publically available. These documents provide concrete benefit to the aviation industry by ensuring it knows how to communicate with the aviation safety organization; they also contribute to necessary public understanding of the FAA’s operations.

(4) Whether the contribution to the public understanding of Federal Government operations or activities will be significant.

Disclosure of the requested documents can significantly alter the landscape of interactions between the FAA and those it serves. Public understanding of the QMS will enable those affected

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by AVS action to work within the system effectively and efficiently and enable others to hold the agency accountable to its own policies and standards.

(5) Whether the requester has a commercial interest that would be furthered by the requested disclosure.

This request is purely for non-commercial purposes. ARSA is a non-profit trade association representing the aviation maintenance industry. Following the disclosure of the records, ARSA will conduct a thorough review of the stated objects and their implementation. ARSA will ensure it understands the system so it may provide recommendations to the agency and publish its findings for the industry and general public via its website www.arsa.org. Any commercial benefit the association receives will be merely a by-product of effective representation of the aviation maintenance industry.

(6) Whether the magnitude of any identified commercial interest to the requester is sufficiently large in comparison with the public interest in disclosure that disclosure is primarily in the commercial interest of the requester.

The magnitude of any commercial interest is de minimis and ARSA does not stand to benefit financially from the requested documents. Conversely, the stated public interest is significant and is beneficial to the FAA, the aviation industry, and the general public as a whole.

The aforementioned factors clearly indicate that ARSA is entitled to a waiver of fees associated with processing this request. In the event that this fee waiver request is denied, ARSA requests notification of estimated fees and will pay such amount up to a maximum of \$250.

Conclusion

ARSA looks forward to receiving the FAA's response within 20 business days of this request. Please do not hesitate to contact our offices should you have any questions or concerns.

Best Regards,



Zach F. Bruckenstein
Advocacy Manager