



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

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Delivered by Email to: 7-AWA-ARC-FOIA@faa.gov
claudia.arnold@faa.gov

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Claudia Arnold
FOIA Coordinator
Federal Aviation Administration
Office of Quality Integration and Executive Services
800 Independence Avenue, SW
Room No. 802-West
Washington, DC 20591-0002

**RE: Revised Freedom of Information Act Request
FOIA# 20160408 – Aviation Safety Quality Management System**

Ms. Arnold:

The Aeronautical Repair Station Association (“ARSA”) respectfully submits this revised 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. This request seeks the information from both FAA headquarters and all regional offices regardless of format, medium, or physical characteristics, and includes all responsive electronic records and information. When responding to this request, please include the above-referenced number for internal tracking purposes.

ARSA seeks information pertaining to the FAA’s Quality Management System (“QMS”) for the Aviation Safety Organization (“AVS”). More specifically, documents and information related to the FAA’s development, implementation, and accreditation of the International Organization for Standardization (“ISO”) 9001:2008 standard. To that end, ARSA requests the following:

- (a) A copy of the FAA’s ISO 9001:2008 certificate.
- (b) The name of the certification body or bodies the FAA hired to accredit the QMS.
- (c) A complete copy of the current AVS QMS manual, or copies of its constituent parts, that were developed during the accreditation process and used to show compliance with the ISO standard. For example, some of the QMS manual (e.g., [AVS QMS: The Office of Rulemaking Committee Manual, Rev. 40 \(Feb. 2, 2015\)](#)) is already available; the remaining sections of the manual or manuals are requested.
- (d) The accreditation audit dates (both internal and for external certification bodies), as well as all findings and corrective actions.

Alternatively, ARSA requests the agency post its entire QMS on its website. The QMS is the way in which the agency conducts business with the public and regulates aviation safety. It is essential

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that the public knows how the FAA formulates policy, it ensures consistent interpretation and application of regulatory requirements, and responds to industry stakeholders. Making the QMS materials available on the FAA's website will increase public's understanding of how the agency complies with its statutory and legal obligations through the ISO standard, increase transparency and accountability, and alleviate the need to respond to numerous FOIA request for the same information.

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.

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(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 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, which educates its members and the public on compliance and interaction with the FAA. 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.

(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,



Ryan M. Poteet, Esq.
Regulatory Affairs Manager