

November 18, 2019

The Honorable Peter DeFazio
Chairman
House Transportation & Infrastructure
Committee
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Sam Graves
Ranking Member
House Transportation & Infrastructure
Committee
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Rick Larsen
Chairman
House Aviation Subcommittee
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Garret Graves
Ranking Member
House Aviation Subcommittee
U.S. House of Representatives
Washington, D.C. 20515

RE: OPPOSING “THE SAFE AIRCRAFT MAINTENANCE STANDARDS ACT”

Dear Chairmen DeFazio and Larsen and Ranking Members Graves and Graves:

The undersigned organizations representing commercial and general aviation maintainers, manufacturers, operators and service providers oppose “The Safe Aircraft Maintenance Standards Act.”

The legislation, as introduced, would threaten U.S. jobs, hurt small businesses, disrupt international air travel, and weaken the competitiveness of the U.S. aerospace industry.

This legislation is unnecessary given existing federal regulations and the scrutiny repair stations already receive from U.S. and foreign regulators, customers, and third-party accrediting bodies. While we agree it is important that the Federal Aviation Administration (FAA) complete the congressionally-mandated drug and alcohol testing rulemaking consistent with our international obligations, we disagree that the industry, which has no control over the federal rulemaking process, should be punished for the missed deadline as outlined in Section 4 of the bill.

The bill mandates onerous new record keeping and reporting requirements that do nothing to help focus regulators on safety critical information and will simply overwhelm them with irrelevant data. It puts in place regulatory requirements that would be likely impossible to implement. Further, it threatens the cooperation with other international aviation authorities (including key bilateral aviation safety partners) that is so vital to improving aviation safety.

If the legislation becomes law, the status of repair station certificates outside the United States will be threatened. Passenger and cargo airlines and general aviation operators that rely on FAA-certificated facilities around the globe will be unable to get their aircraft serviced at foreign destinations. Additionally, U.S. manufacturers and maintainers wishing to establish overseas facilities to support customers in the global marketplace would be severely limited from doing so. Finally, the hundreds of U.S. small and large repair businesses that hold foreign maintenance approvals and perform work on other countries’ aircraft (and the tens of thousands of workers they employ) would likely lose approval from foreign aviation authorities to conduct such work, resulting in the loss of international customers and U.S. jobs.

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If given the opportunity, we stand ready to work with the Committee on constructive ideas to advance safety and improve the global oversight framework for repair and maintenance facilities without the negative consequences of this legislation in terms of U.S. jobs and competitiveness.

Sincerely,

Aeronautical Repair Station Association
Aerospace Industries Association
Aircraft Electronics Association
Airlines for America
Aviation Suppliers Association
Cargo Airline Association
General Aviation Manufacturers Association
International Air Transport Association
Modification and Replacement Parts Association
National Air Carrier Association
Regional Airline Association