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

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

ARSA STATEMENT FOR AVIATION SUBCOMMITTEE HEARING: “LOOKING FORWARD: THE FUTURE OF AMERICA’S AVIATION MAINTENANCE AND MANUFACTURING WORKFORCE”

Dear Chairman Larsen and Ranking Member Graves:

The Aeronautical Repair Station Association (ARSA) commends the subcommittee for holding today’s hearing on aviation workforce challenges, which represent a significant threat to the vitality of all sectors of the U.S. aviation industry.

ARSA is the trade association for the global aviation maintenance industry, which employs more than 288,000 Americans in all 50 states and contributes more than \$50 billion each year to the U.S. economy. A state-by-state overview of the industry’s employment and economic impact is available at arsa.org/news-media/economic-data.

While ARSA’s core members are companies certificated by the FAA and other safety regulators to perform work on civil aviation products and articles, our membership also includes manufacturers, airlines, industry service providers, educators and others with an interest in regulatory and legislative issues affecting the maintenance sector.

Background

The U.S. aviation industry is facing a technician shortage that threatens to undermine the growth and competitiveness of one of the most important sectors of our economy. More than two-thirds of U.S. companies responding to [ARSA’s 2019 member survey](#) reported vacant technician positions, a total of 4,615 openings. Those empty positions have real consequences: increasing time to complete work, driving up overtime and training costs and preventing new business development. Based on that data, ARSA projects the technician shortage is costing the U.S. aviation maintenance industry \$118.416 million per month (\$1.421 billion per year) in lost economic opportunity while well-paying jobs in a growing, high-tech global industry remain vacant.

Underscoring the long-term challenge, [the Aviation Technician Education Council projects](#) that the mechanic population will decrease five percent in the next 15 years and that new entrants make up just two percent of the technician workforce annually, while 30 percent is at or near retirement age. Underscoring that latter point, a Government Accountability Office (GAO) report requested by Congress [and released on](#)

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[Feb. 6](#), found that more than half of the maintenance technicians certificated by the FAA as of December 2018 were between 50 and 70 years old. Similarly, [Boeing recently projected](#) that North America will require 193,000 new technicians over the next 20 years.

The 2018 Federal Aviation Administration (FAA) Reauthorization Act of 2018 (Pub. L. No. 115-254) (“the act” or “the law”) included many important provisions designed to address workforce challenges confronting both the aviation industry and the FAA itself. We commend the subcommittee for recognizing the problem during the reauthorization process and making workforce a priority in the bill. ARSA appreciates that the new law gave the FAA a sizeable “to-do” list and that the agency is navigating an important and high-profile safety-related investigation. However, given that neither the agency nor the industry can function effectively without well-trained and capable employees, we are frustrated by the FAA’s slowness in implementing key provisions of the law. It is imperative that the subcommittee keep pressure on to ensure the FAA accomplishes its workforce-related tasks. ARSA considers the following to be among the most important.

Aviation Technician and Pilot Workforce Grant Programs

[Sec. 625](#) of the act directed the Department of Transportation (DOT) to establish grant programs to help recruit and train aviation maintenance technicians and educate pilots. The programs enjoy broad, bipartisan support on Capitol Hill and throughout the industry. A letter to House appropriators in support of including full funding in the FY 2020 Transportation, Housing and Urban Development and Related Agencies (T-HUD) appropriations bill was signed by 50 House members, including more than 20 from the House Aviation Subcommittee. [S. 2506](#), the 115th Congress Senate bill that formed the basis for the technician program, attracted [25 cosponsors](#) representing both parties; [H.R. 5701](#), the House companion bill, had 24. [More than 40 national and state level aviation organizations](#) are involved in our coalition to secure funding for the new grant programs.

The technician and pilot grant programs are each authorized at \$5 million per year for fiscal years 2019 to 2023. In a significant and positive development, Congress provided full funding for the programs as part [of the FY 2020 appropriations process](#). However, disappointingly, the FAA has not yet initiated the grant programs. That implementation delay is unacceptable given the current impact of the technician shortage and predictions that it is only going to get worse.

The Sec. 625 grant program confronts the challenge by incentivizing collaboration among businesses, labor organizations, schools and state and local governmental entities. We urge the subcommittee to request the agency rapidly implement the programs so that grant applications can be received in late winter or spring of 2020 and grants can be awarded this summer, prior to the start of the 2020-21 academic year. Each day of inaction represents a lost opportunity to collectively confront a problem with major consequences for the nation’s aviation system.

Enhancing the Value of Repairman Certificates

[Sec. 582](#) of the act directed the FAA administrator to task the agency’s Aviation Rulemaking Advisory Committee (ARAC) with “making recommendations with respect to the regulatory and policy changes...to allow a repairman certificate issued under section 65.101 of title 14, Code of Federal Regulations, to be portable from one employing certificate holder to another.” The law states that the administrator must take appropriate action within one year of receiving the recommendations.

Under current regulations ([14 CFR part 65, subpart E](#)), individuals employed by an FAA-certificated repair station or air carrier may apply for and obtain a repairman certificate allowing him or her to supervise and/or approve for return to service the maintenance, preventive maintenance, or alteration of civil aviation aircraft or aircraft components. The repairman certificate differs from the airframe and/or powerplant (A&P) mechanic certificate issued under [part 65, subpart D](#) in that it only qualifies the individual to work under an existing repair station or air carrier certificate, whereas an A&P mechanic can perform, supervise and approve work under his or her own authority.

When the repairman leaves the employ of the endorsing repair station or air carrier, the certificate must be surrendered and the individual must reapply with a recommendation from his or her new employer. Not only does the individual’s certificate not follow him or her into the new position – which in some cases is true even when moving to another role within the same company – there is no opportunity to speed the application process based on previously holding the certificate. The current rules undermine labor mobility, create unnecessary regulatory burdens for the individual and employer, and are an inefficient use of agency resources because regulators must process new applications each time qualified individuals move from one job to another. Making repairman certificates portable would enhance the value of the credential and encourage more individuals to seek it.

It is important to note that ARSA is not proposing to alter the requirement that repairmen must work under an employing certificate holder’s quality system, nor to eliminate the requirement that repair stations and air carriers ensure the individual be qualified to exercise the privileges of the repairman certificate by being capable of performing any tasks assigned. Our hope is that the ARAC recommendations will result in improvements to part 65 that better recognize the varied (and constantly evolving) skills and knowledge required in the aviation maintenance industry, enhance the value of the certificate for the technicians who earn it, and increase efficiency in the certification process to the benefit of workers, employers and the FAA itself.

However, more than a year after enactment, the task has not been assigned to ARAC. We appreciate that the FAA is working to fulfill many complex directives; however, the purpose of ARAC is to leverage stakeholder expertise to help support the agency’s safety and oversight mission. Assigning tasks to ARAC consumes comparatively few

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resources (particularly given that ARSA has sent the agency [a draft task](#) that achieves the objectives of the law) and puts the onus on ARAC members to initially fulfill FAA’s obligation under the act. We hope the subcommittee will urge the agency to expeditiously initiate this task.

FAA Safety Workforce Training

Recognizing that a sufficient number of well-trained FAA personnel is also essential to a safe and efficient industry, [Sec. 231 of the act](#) directed the Administrator to review and revise the agency’s safety workforce training strategy to ensure, *inter alia*, that it “seeks knowledge-sharing opportunities between the FAA and the aviation industry in new technologies, equipment and systems, best practices, and other areas of interest related to safety oversight”.

ARSA views this provision of the act as a significant opportunity to improve FAA operations. Our members are constantly frustrated by a lack of understanding within the FAA’s own workforce about the plain meaning of regulations. This lack of basic knowledge leads to inconsistency between rules and guidance and in enforcement from inspector to inspector and region to region. That, in turn, undermines efficiency, compliance and confidence.

In addition to creating opportunities for a better-trained FAA workforce, if properly implemented, Sec. 231 could also enhance industry access to FAA training so that regulators and certificate holders are trained to the same standards. In furtherance of this effort, ARSA has [urged](#) the executive directors of the Flight Standards and Aircraft Certification Services to develop criteria for determining whether FAA Academy training will be accessible to non-FAA attendees. ARSA has also [recommended](#) that the FAA accept external training providers to facilitate the knowledge sharing between the agency and industry contemplated by the act.

We urge the subcommittee to make improving FAA workforce training an ongoing priority.

Updating Technician Education Standards

[Sec. 624\(a\)](#) directed the FAA to issue a final rule within 180 days of enactment to modernize the schools certificated by the FAA under [14 CFR part 147](#) to train aviation mechanics. Sec. 624(b) further directs the agency to coordinate with stakeholders to develop and publish guidance or model curricula for AMT schools “to ensure workforce readiness for industry needs.”

Part 147 desperately needs updating and this provision enjoyed broad industry support. Frankly, it is unconscionable that curricula designed to train mechanics for jobs in the rapidly evolving aviation sector are five decades old. These ossified, out-of-date standards make it more difficult for educators to teach, for students to learn and for businesses to find capable workers. Indeed, [a recent ARSA survey](#) found that it takes

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repair stations an average of nine months to make a technician educated by a part 147 school a profitable employee (with some ARSA members saying that it takes as long as two years).

In furtherance of the act’s directive, FAA issued a [Supplemental Notice of Proposed Rulemaking](#) (SNPRM) related to its part 147 rulemaking on April 16, 2019. However, as reflected by [industry comments on the SNPRM that ARSA joined](#), the FAA’s proposal to update the rules falls far short of needs. ARSA and its allies are asking the agency to reconsider its overly prescriptive policies, to adopt an outcomes-based approach for dual enrollment programs and to give deference to Department of Education requirements in matters concerning the quality of education.

Despite the broad recognition that part 147 is in desperate need of overhaul, the FAA has not yet issued a final rule. The introduction of the Promoting Aviation Regulations for Technical Training (PARTT) 147 Act ([H.R. 5427/S. 3043](#)) by a bipartisan group of lawmakers last year is a reflection of the frustration on Capitol Hill and within the industry about FAA’s inaction. The PARTT 147 Act not only directs the agency to issue new technician school regulations within 90 days of enactment, but would also establish specific certification, operational and quality control requirements to improve part 147.

We urge support for the PARTT 147 Act and encourage the subcommittee to ensure that FAA rapidly complies with Congress’s mandate to update part 147 to reflect 21st century industry needs and learning tools.

Workforce-Related GAO Reports

We were pleased that the act requested several GAO reports on workforce issues. Specifically:

- [Sec. 232](#) directed GAO to assess FAA Office of Aviation Safety workforce and training needs, including reviewing “safety inspector and aviation safety engineer hiring, training, and recurrent training requirements” and ways FAA can work with industry and labor to establish knowledge sharing opportunities.
- [Sec. 567](#) directed GAO to study, *inter alia*, FAA’s long-term workforce and training needs, skills and qualifications needed by FAA workforce, and opportunities for knowledge sharing between FAA and industry.
- [Sec. 622](#) directed GAO to study, *inter alia*, the current and future supply of aviation and aerospace workers, factors and barriers influencing supply, best practices for recruitment and retention.
- [Sec. 624\(e\)](#) directed GAO to conduct a study on maintenance industry technical workers, including analysis of Standard Occupational Classification system, Federal employment classification, impact of regulations, recommendations on how FAA regs and policies could be improved, ways to improve coordination between business, schools and government, resources for training. This report was [released on Feb. 6](#). It recommends that the FAA take steps to use existing agency data and

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coordinate with other federal agencies to identify and gather the information the FAA needs to measure progress and target resources toward its goal of promoting a robust, qualified, and diverse aviation maintenance workforce.

Since enactment, ARSA, its members and allies have been contacted by GAO personnel involved in these and other reports. We look forward to their completion, seeing what insights they provide into FAA and industry workforce issues and working with the subcommittee to use the information to shape future policy.

Workforce-Related Stakeholder Panels

[Sec. 602 of the act](#) directed Administrator to establish a Youth Access to American Jobs in Aviation Task Force. Similarly, [Sec. 612](#) directs the Administrator to establish a Women in Aviation Advisory Board. Acting according to the [Federal Advisory Committee Act](#), the FAA solicited and received nominations to each body during the fall of 2019. According to agency sources, FAA received more than 300 applications – a sign of the high-level of interest in such industry-government collaboration – and the FAA is working with the Department of Transportation to vet candidates. ARSA believes that both initiatives will help identify opportunities to grow the aviation workforce and looks forward to engaging with the agency and other industry stakeholders to make them successful.

Conclusion

We commend the subcommittee for making workforce a priority in the recent FAA bill and for maintaining its focus in this area. If properly implemented, the workforce mandates will do much to position the agency and industry for long-term success. We look forward to continuing to work with the subcommittee, the FAA and our industry partners to fulfill the law’s objectives.

Sincerely.



Christian A. Klein
Executive Vice President

c.c. All members of the House Transportation & Infrastructure Committee