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ARSA Will Work With FAA On Repair Station Human Factors Training; Applauds Agency's Pledge To Fix Training Program Guidance

Alexandria, Va., Sept. 19, 2006—The Aeronautical Repair Station Association (ARSA) is prepared to work closely with the Federal Aviation Administration (FAA) in the agency's stated effort to mandate human factors training programs in aviation.

"The Association supports programs that ensure quality and efficiency," said ARSA Executive Director Sarah MacLeod. "Recognizing the value of human factors programs and training ensures higher and better productivity, which benefits the individual repair station and, ultimately, the entire industry."

The FAA in a September 12 letter to ARSA stated its intention to mandate human factors training for FAA-certificated repair stations by changing title 14 CFR part 145—the Federal Aviation Regulation (FAR) that covers repair stations—"to ensure human factors training is included." The agency noted that "not all repair stations will require the same level of training in human factors."

Human factors training focuses on human actions and reactions that can affect employees' abilities to perform efficiently. The Association will continue to run articles and offer classes on human factors, as it has since the requirement for repair stations to have FAA-approved training manuals became effective, and plans to increase its offerings to members in 2007.

The FAA's letter was in response to a July 27 request from ARSA asking the agency to clarify the FAR requirements for human factors training in repair stations. The Association's letter was prompted by concerns with how the repair station training program requirements, which became effective in April, are being interpreted in the field.

ARSA learned from several members that FAA inspectors, referencing language in Advisory Circular (AC) 145-10 and related inspector guidance, were taking the position that repair stations are required to have human factors in their training programs. ARSA wrote to the FAA seeking a definitive clarification.

The FAA in its Sept. 12 letter pledged to fix the guidance material. "The AC will be revised to remove the requirement that training programs must include human factors training elements," the agency wrote.

ARSA welcomed the agency's quick response.

"The Association stands for good government," said ARSA's MacLeod. "When regulations are performance-based, the agency cannot demand more than the required result. In the case of human factors training, the FAA's guidance was requiring elements beyond what is included in the relevant rule."

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About ARSA

The Aeronautical Repair Station Association (ARSA) is the only trade association dedicated exclusively to representing the interests of aircraft maintenance and alteration facilities before the Federal Aviation Administration (FAA) and other government agencies in the U.S. and abroad. Its 700 members perform maintenance and alterations on behalf of U.S. and foreign air carriers, as well as other aircraft owners and operators.

Notes To Editors

Links to letters:

ARSA's request to clarify the FAA's human factors requirements can be downloaded here:
<http://www.arsa.org/files/HFclarification72706.pdf>

The FAA's response can be downloaded here:
<http://www.arsa.org/files/faahfreply091206.pdf>

Notes on regulatory requirements:

- The FAA's repair station training program requirements are in FAR section 145.163. They went into effect on April 6, 2006. They do not include human factors training.
- Other civil aviation authorities require human factors training for approved maintenance organizations. They include the European Aviation Safety Agency (see section 145.A.30(e) of the EASA part 145 acceptable means of compliance for details) and Transport Canada (see Canadian Aviation Regulations standard 573.06). Maintenance human factors training also is included in International Civil Aviation Organization (ICAO) Annex 6.
- Many U.S. repair stations are required to have human factors training in their training programs even though it is not expressly required by FAR part 145. For instance, a U.S.-based, FAA-certificated repair station that also has EASA certification must have human factors training per EASA's regulations.

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