

Aeronautical Repair Station Association

the hotline

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Sarah Says

We do it for you

By Sarah MacLeod, ARSA Executive Director

Every job has good and bad days. I have opined for years that nobody calls the Association when they are having a good day. Many calls are generated by adverse queries or reactions from a representative of the FAA or other government agency. Recently more calls are coming because of congressional actions or inaction and negative media coverage.

Helping people sort out regulatory compliance issues has always been part of our daily job; the people can be government representatives or from a member company. It takes hard, grinding work and determination to reach the nut of an issue and affect a resolution. The Association seeks industry-wide solutions, which take longer to crack and solve. These efforts are supported by the income from membership dues, training, and our annual Symposium; additional membership contributions support the legislative efforts and successes.

However, the Positive Publicity Campaign is above and beyond the monies collected from the “normal” sources as is sponsorship for the annual Symposium. We do not ask for “extra” financial support for unnecessary endeavors; these efforts are essential to the well-being and vitality of the aviation industry. For example, the forces against reasonable and prompt application of governmental mandates are evidenced by [reaction](#) of the president of the U.S. trade union the AFL-CIO’s Transportation Trades Department to a letter urging the Secretary of the Transportation Security Administration to keep the promise to issue final repair station security regulations by the end of the year.

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Sarah Says, continued

Even though the letter was signed by a strong contingency of multiple interests, it is ARSA that is “against” adequate security measures. Is the maintenance industry going to continue to be the weakest link or will it support efforts to ensure positive media input through the work of this trade association?

There are plenty of negative stories about aviation maintenance that are inconsistent with good safe, security business practices, let alone good industry or government policies. The international aspect of our industry makes it even more important that ARSA become a stronger spokesman for the maintenance provider. We are dedicated and determined to take on the negative forces, we do it for you—please add the Association’s special funds to your yearly budget so we may do more.

To support ARSA’s Positive Publicity Campaign and combat efforts to paint the industry in a negative light, please [click here](#) or contact [Jason Langford](#).

To help ensure the success of the 2013 Legislative Day and Annual Repair Symposium, contact [Keith Mendenhall](#) or visit [here](#).

Legal Briefs

FAA ICA policy, part V

By Craig Fabian, ARSA vice president of regulatory affairs & assistant general counsel

Although we anticipated concluding our legal brief series on instructions for continued airworthiness (ICA) last month, the FAA’s recent answer to ARSA’s 2009 request for a legal interpretation compels continued discussion. Although it was issued in response to a narrow question, the legal interpretation provides helpful clarification regarding ICA requirements generally.

ARSA’s [request](#) centered upon component maintenance manuals (CMMs) referenced in an airworthiness limitations section (ALS) of the ICA, and whether those CMMs were considered ICA as a result of that reference. Specifically, ARSA had in mind mandatory requirements such as critical design configuration control limitations (CDCCL) for maintaining ignition source prevention features of fuel tank systems as assigned under special federal aviation regulation (SFAR) 88.

As expected, the FAA response confirmed that all component maintenance manuals (CMMs) referenced in an airworthiness limitations section (ALS) are ICA that must be made available as required by [§ 21.50\(b\)](#). Of course, that means a design approval holder must make the ICA, and changes to the ICA, available to any person required to comply with the ICA. In discussing that aspect of



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Legal Briefs, continued

the rule, the FAA noted that a properly rated repair station with a need to comply (required to comply) could include a repair station in possession of a component to be worked on or one having a contract, work order, or some other (undetermined) indication that it was required to comply with the ICA. In stating that it “offer[s] no opinion on what minimum indicia of need would trigger the *make available* requirement” (emphasis in original), the FAA suggested that the FAA and industry work together to establish a reasonable threshold criteria. Despite that caveat, the illustrations provided in the interpretation help establish an immediate threshold for activating the “make available” requirement under § 21.50(b) – that is, a repair station with possession of a component to be worked on, or having a contract or work order to work on a component.

In addition, the interpretation briefly touched upon the issues of cost, and trade secrets or proprietary data. Regarding cost, the FAA stated that “it would expect [design approval holders] to provide ICA at a reasonable fee to requestors required to comply with terms of the ICA” since “a [design approval holder] could make ICA effectively *unavailable* by charging an exorbitant fee” (emphasis in original). The FAA used stronger language to address trade secrets or proprietary data in light of the regulatory requirement for ICA by stating that:

With regard to potential enforcement of § 21.50(b), the FAA would not view favorably a [design approval holder’s] denial of necessary maintenance instructions (ICA) to a maintenance provider with a valid need for them based on a claim of unwillingness to disclose trade secrets or proprietary information. A [design approval holder] may not limit who may perform maintenance on its products to a select few maintenance providers with whom it has made exclusive arrangements to provide those ICA.

Combined with its [March 23, 2012 Policy Memorandum](#) on restrictive language in ICA – which was also mentioned in the interpretation – it appears the FAA is moving closer to recognizing its own requirements in § 21.50(b). ARSA is encouraged by these developments, and it will continue working to help the agency fully appreciate its ICA rules.

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Regulatory Lookout

FAA extends 145 comment period

On Aug. 17, the FAA [granted](#) 90 additional days to the comment period of the agency's [rewrite](#) of part 145 rules. Those wishing to comment on the proposed rule changes now have until November 19.

The extension of the comment period was in response to a [request](#) from ARSA and eight aviation industry associations asking for more time to comment, stressing the significant operational and financial ramifications for the small business dominated repair station industry. The groups also highlighted the difficulty that many repair stations face in preparing to comment on such a robust rulemaking proposal.

ARSA will continue to work in concert with its allies to solicit and compile industry comments. The additional time allows for a more comprehensive response that will undoubtedly improve any final rulemaking.

For a side-by-side comparison of the changes the new rule would impose, [click here](#).

FAA updates training AC for 145s

The FAA recently [updated Advisory Circular \(AC\) number 145-10](#) that provides information on developing the repair station employee training programs required by 14 CFR section 145.163. The change adds an appendix on European Aviation Safety Agency (EASA) training requirements and Web links to related information.

FAA soliciting comment on cargo cabin restrictions

The FAA is seeking public comment on its study exploring ways of developing physical or procedural means to restrict access to the flight deck of cargo aircraft.

In response to a requirement in the 2012 FAA Reauthorization and Reform Act ([P.L. 112-95](#)), the FAA prepared the [report](#) weighing various methods for securing the flight deck and concludes that the present rule provides the necessary safety and security.

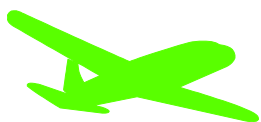
Comments on the report and its conclusion are due Sept. 12; visit the draft documents page on the FAA Flight Standards Service [website](#) for details.

Approved alcohol testing devices updated

The Department of Transportation (DOT) has updated the conforming product lists (CPL) for alcohol testing devices. The devices on the CPL list are the only ones permitted for use in DOT testing programs.

The updates are for screening devices measuring Alcohol in Bodily Fluids (ASDs) and Evidential Breath Alcohol Measurement Devices (EBT). The ASD or EBT devices can be used for alcohol screening tests, but *confirmation* tests require use of EBT devices.

A total of nine new instruments were added to both the EBT and ASD CPLs, and four instruments were removed from the EBT CPL. To view a revised ASD CPL click [here](#); an updated EBT CPL is available [here](#).



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Final Documents/Your Two Cents

"Final Documents": This list includes Federal Register (FR) publications such as final rules, Advisory Circulars (ACs), policy statements and related material of interest to ARSA members. For proposals opened for public comment, see **"Your Two Cents."** The date shown is the date of FR publication or other official release.

"Your Two Cents": This is your chance to provide input on rules and policies that will affect you. Agencies must provide the public notice and an opportunity for comment before their rules or policies change. Your input matters. Comments should be received before the indicated due date; however, agencies often consider comments they receive before drafting of the final document begins.

"Final Documents" and **"Your Two Cents"** are available at <http://www.arsa.org/FDYTC>.

A Member Asked

By Craig Fabian, ARSA vice president of regulatory affairs & assistant general counsel

Q: What is the primary difference between an FAA Order and an FAA regulation?

A: A regulation is issued by the agency under the [Administrative Procedure Act \(APA\)](#) that has the force and effect of law (e.g., rules in the Code of Federal Regulations (CFR) and airworthiness directives issued under 14 CFR part 39). Unless there is a good cause exception, a regulation requires:

- 1) publication of a proposed rule in the *Federal Register*;
- 2) invitation for public comment;
- 3) consideration of public comment; and,
- 4) publication of a final rule in the Federal Register. The vast majority of federal regulations are issued using this process.

On the other hand, an Order is considered an "internal agency mandate." It is issued by the agency, *for its staff*, to explain the agency's position on a question not directly answered by a statute or regulation. Orders, like other non-legislative rules (e.g., advisory circulars, notices, general statements of policy), are not created under delegated authority from Congress and do not have to go through notice and comment under the APA.

For example, Order 8900.1, also known as the Flight Standards Information Management System or [FSIMS](#), is meant to be binding (or provide direction) *only to FAA employees*, and not the public at large. However, if an inspector feels bound to act in a particular way because s/he is directed to do so by a statement in FSIMS, that decision has real practical effect for those subject to FAA regulation.

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Quality Time

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Health care law must be repealed in full

By Rep. Adrian Smith (R-Neb.)



*Editor's Note: ARSA periodically invites lawmakers and leading policy experts to write columns for **the hotline** to allow our readers to hear directly from those involved in the policy process. This month's columnist is [Rep. Adrian Smith](#) (R-Neb.). Rep. Smith represents Nebraska's Third Congressional District and is serving his third term. He sits on the House Ways & Means Committee. The views expressed by Rep. Smith do not necessarily reflect those of ARSA.*

In the aftermath of the Supreme Court's decision to uphold most of the President's health care law, Americans deserve to know what the decision means and what steps Congress will take to repeal the law in full to lower health care costs while increasing access to care.

The Court ruled on a 5-4 vote the federal mandate compelling individuals to purchase health care was Constitutional under Congress' power to tax. I respectfully disagree with the decision, in part because the requirement to purchase minimum health coverage was clearly written as a mandate, not as a tax. Even the President and other Democrats have argued strongly the mandate is not a tax.

However, the ruling eliminates the possibility the Court would overturn the entire law, instead leaving the responsibility of repeal in the hands of Congress. Said another way, the choice to repeal or leave the law in place lays entirely in the hands of the American people. On this point, Chief Justice John Roberts was quite clear.

Further, simply because the law is Constitutional does not make it good policy; nor does it mean the American people deserve policy they don't want rammed through on an entirely partisan basis.

Our health care system is broken and this law is making it worse, not better. More than two years after passage, health care costs continue to rise and millions of Americans are faced with losing the health coverage they were promised they could keep. The non-partisan Congressional Budget Office (CBO) estimates as many as 20 million Americans could lose their current health benefits with this law in place, and the cost of health insurance will rise by \$2,100 per family by 2016.

The law expands the size and scope of government. The estimated cost of the law has nearly doubled to \$2 trillion according to CBO. Furthermore, the law already has added more than 12,000 pages of regulations to the Federal Register.

The House of Representatives already has passed legislation which repeals the health care law in its entirety. If the Senate and President refuse to join us in this effort, we will continue to undo the law piece by piece. The House already has passed, and the President already has signed into law, nine provisions to repeal or defund portions of the law.

However, repeal alone is not enough; our health care system is broken and needs patient-centered reforms which would lead to lower costs and greater access to care. Therefore the House of Representatives will pursue market-based policies which reduce costs. This process will begin in the Ways and Means Committee, where I will continue efforts to find real health care solutions to benefit all Americans without tax increases and onerous government mandates.

Learning from the experience of Obamacare, we will not rush to pass a massive bill without the support of the American people. Instead, we will take a step-by-step approach and build consensus around commonsense ideas to lower the costs and expand access to care.

The Supreme Court ruling was a setback but not a defeat, and with the support of the American people and Nebraskans, we will repeal this law. Our resolve and the stakes for the future of America's health care system never have been higher.

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Employment Law & Repair Stations

What is “Association discrimination”?

By Jonathan W. Yarbrough <jyarbrough@constangy.com>. Constangy, Brooks & Smith, LLC, 80 Peachtree Rd., Ste. 208, Asheville, NC 28803-3160. © Copyright 2012 Jonathan W. Yarbrough ALL RIGHTS RESERVED

Jonathan is experienced in representing employers in employment law issues; his pragmatic approach can also help keep relationships with employees from becoming difficult. Please contact him for questions regarding employment relationships.

Association discrimination is in the provisions of the Americans with Disabilities Act (“ADA”), which forbids an employer from discriminating against “a qualified individual because of the known disability of an individual with whom the qualified individual is known to have a relationship or association.” Further, the ADA’s definition of a “qualified individual” addresses whether an individual with a disability can perform the essential functions of a job with or without accommodation. Obviously for purposes of association discrimination, the term must refer to a person qualified to do one’s job.

Association discrimination has been described to encompass: “expense,” “disability by association,” and “distraction.” That is, an employee may not be fired or suffer some other adverse personnel action because:

- (1) The expense category: When the employer attempts to avoid the cost of treating the disabled associate. For example, the employee's spouse is under the company's health plan and has a disability that is costly to the employer.
- (2) The association category is when the employer fears that the employee will contract the disabling. For example, the employee's sexual partner is infected with HIV and the employer fears that the employee may also have become infected. Or one of the employee's blood relatives has a disabling condition that has a genetic component and the employer fears that the employee is likely to develop the disability as well (Note: the latter discrimination is also prohibited by the Genetic Information Nondiscrimination Act).
- (3) The distraction category: The employer believes that the employee is distracted by an associate's disability. For example, the employee is somewhat inattentive at work because a spouse or child has a disability that requires attention, yet not so inattentive that the employee's work is adversely affected.

It is important to emphasize that association discrimination does not require an employer to provide reasonable accommodation. That duty only applies to a “qualified individual with a disability” not to an employee who is associated with a disabled person. For example, if the employee with a disabled spouse violates a neutral employer policy concerning attendance or tardiness, s/he can be dismissed even if the reason for the absence or tardiness is to care for the spouse. No accommodation is required.

Two cases illustrate how accommodation discrimination has been applied.

An employee's health insurance paid a significant amount of money for the treatment of medically compromised premature twins. Expenses included treatment for respiratory distress, jaundice, apnea, and sepsis. There was some probability, unknown at the time, that the children could develop serious physical or mental handicaps as they grew older. The employee was terminated after the twins had fully recovered and appeared to be healthy and normal. The court eliminated disability by association and distraction discrimination categories as there was no evidence of either. The court then rejected the claim of “expense” discrimination in that there was no concrete evidence that there would be further medical expenses for the children. The court accepted the employer's evidence that the employee was a new hire who failed to obtain an adequate understanding of the product he had been hired to sell and was terminated for that reason.

In the second case the employee was asked but refused to work on weekends because she had to care for a disabled daughter. The employee was terminated in part because she refused to work on weekends and in part because of performance issues. She was hired in 2006 as a part-time secretary and promoted to full-time in February 2008. In November 2008, the year before her termination, she was issued a warning concerning her performance issues. (She had, however, been given a 5% raise just before she was terminated which she alleged was a merit raise but which the employer alleged was merely an “across-the-board” raise given to all full time employees – a lesson for another day!)

In any event, the employee claimed that the termination violated the ADA association discrimination provision, specifically the distraction category. However, the employer offered evidence that it knew that the employee's daughter was at times distracting and upsetting when it made the decision to promote her to a fulltime position. This evidence undercut the employee's claim that the termination was based on the employer's unfounded fears that the daughter's disability would adversely affect her work.

The real focus of the employee's complaint was the employer's failure to accommodate her need to care for a disabled child by mandating weekend work. The court pointed out that the employer was not required to accommodate her in that she was not a qualified individual with a disability. Furthermore,

she was asked to work alternative weekends with another employee, indicating that she was treated no differently in being asked to work weekends.

The association discrimination provisions of the ADA are not as commonly addressed as the disability provisions. Nevertheless, employers need to be aware of this area of the law.

The Next Generation of Aircraft Technicians

Bridging the training technology gap

By [Raymond Thompson](#), Western Michigan University, College of Aviation, 237 N. Helmer Rd., Battle Creek, MI 49037 © Copyright 2012 Raymond Thompson ALL RIGHTS RESERVED.

Raymond Thompson is president of the Aviation Technical Education Council and associate dean of the College of Aviation at Western Michigan University. A long-time mechanic and commercial pilot, he has been involved in technician education in the U.S. and Middle East since 1983.

Editor's Note: This is the eighth in a series of articles from Mr. Thompson in which he provides information on supporting aviation maintenance technician schools (AMTS) and the next generation of mechanics.

In 1965, Intel Co-founder Gordon E. Moore first elaborated what has become known since as [Moore's Law](#). In essence, Moore believed that the number of transistors on an integrated circuit would double approximately every two years. While aviation technology has not changed at that rate, the evolution of electronics, materials, and propulsion have changed the nature of aircraft.

Government regulation has not kept pace.

The minimum required curriculum for an approved 14 Code of Federal Regulation (CFR) part 147 school was last updated in 1992. Schools have attempted to keep up with changes in technology but have only been able to do so in focused areas at relatively low levels. While the mechanic's certificate has always been a "license to learn," the disconnect between the regulation and technology has widened the gap between the knowledge level of a newly minted certificate holder and industry expectations.

Aviation technical schools have labored to align regulatory demands with industry needs. In 2008 the Aviation Rulemaking Advisory Committee (ARAC) delivered [recommendations](#) to the FAA to address the gap. The ARAC proposed a two-fold process to meet this goal: 1) move the subject elements into a vehicle that does not require a rule change such as an operating specification, and 2) utilize a cyclical review process with industry to adjust the minimum curriculum.

To accomplish this, the first challenge is to determine the minimum knowledge and skills required of a new mechanic. Every aviation entity has different needs, so what are the common elements that every new 14 CFR part 65 certificate holder needs to know? Schools want graduates hired, and while a school may never be able to produce mechanics that are 100 percent productive on the first day, it is in the school's best interest to educate graduates who require minimal training upon hiring.

Once a baseline of knowledge and skills is established, with periodic reviews and necessary updates, the next challenge is to outfit every school with the tools to meet demand. Under the current rule, a shop or laboratory is limited to 25 students per instructor. Schools do not have to have individual pieces of equipment for every student. In fact, certain types of instructional aids, such as mock-ups, engines, and aircraft, may have a ratio as high as eight students. That works for certain types of instruction, but groups of two or three are often more appropriate for proper learning. Transfer those numbers to the latest technology and equipment acquisition costs quickly become prohibitive, especially for the number of pieces really necessary.

The equipment issue is fundamentally one of cost. Unlike the electronics industry, the regulatory requirements and limited availability continue to make aviation products prohibitively expensive. There are practical reasons for schools to limit tuition charges. Many public schools continue to experience reductions in funding. Student loans are more difficult to obtain and political battles have cast uncertainty over future federal student aid. For industry, donating new equipment is a major expense that impacts customer costs. Is there opportunity for something in the middle that allows schools to modernize at a reasonable cost to both schools and industry?

In the coming months, ATEC will host a special industry meeting to review the ARAC curriculum recommendations. During that meeting, we can begin the discussion about how to facilitate obtaining the necessary equipment for each school. As ARSA members, we know each of you is keenly interested in workforce development. We will invite you to be part of this conversation.



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Legal Waypoints

Indemnification – the “I” word (Part 2)

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Steven is an experienced counselor to businesses operating in many industries, including aviation. He provides templates, tools and training to improve contracting efficiency, close deals faster and control costs.

Last month, in “Part One of Indemnification – the “I” word,” the basis for apprehension when we spot an indemnification provision in a contract was briefly explained. In this article, I offer a way to raise your game and better parse out the risks found in indemnification provisions. By focusing on three key questions fluency with these provisions can be quickly improved.

Key Question #1: Who are the parties?

It is important to make sure you understand who is who, and who is taking on a responsibility. In other words, who is indemnifying whom?

Keep in mind the words used to identify the parties in the indemnification provision may or may not match those defined in the preamble of the contract or elsewhere. The parties could be identified by their company names or by defined titles such as Contractor and Company. It could just as easily be Owner and Consultant; Contractor and Subcontractor; Indemnitee and Indemnitor; or Promisee and Promisor. The key is to understand who is who at the start. If this basic information is unclear, reading and interpreting the rest of the provision will be confusing at best.

Once each party's designation is clear in the text of the provision, identifying which party is taking on the responsibility to indemnify the other can be determined. If you are a party taking on a

responsibility—caution is the order of the day. Regardless of whether the provision is unilateral or mutual (reciprocal) it is essential to understand how you are being asked to take on an indemnification responsibility.

Key Question #2: What risks are being assumed or transferred?

Now that we understand who is who, and who is indemnifying whom, we can move forward to finding the risks being assumed or transferred. Typically, one party will be indemnifying the other “against all suits, claims or liability” related to certain specified risks such as “bodily injury, death or property damage,” “breach of contract” and/or “violations of applicable law.”

This step involves spotting the nature of the risks being assumed or transferred so they can be assessed in light of the proposed transaction. Some risks will represent higher levels of exposure than others.

Once the risks are identified we need to find the answers to Key Question #3.

Key Question #3: How are the risks allocated?

In this step focus on finding the “trigger” of the indemnification obligation, look for language like, “to the extent”; “resulting from”; “arising out of”; “in connection with”; or some combination or variation of these words. It is essential to assessing the nature of the allocation of the risks assumed.

For example, we might see that one party agrees to indemnify the other “to the extent” of the first party’s negligence or willful misconduct in the performance of certain services, and/or for its failure to comply with the terms and conditions of the agreement.

With this approach, in just a few minutes, we were able to parse a complex provision and check some key issues - who are the parties, what are the risks, and how are risks allocated?

Using these simple principles and steps you have a way to ask questions, enter into a productive dialog with your management and counsel, or the representatives of the other party, and get your deal done.

Union dos are mostly don’ts

By Ty Moore, Obadal, Filler, MacLeod & Klein, P.L.C. legal intern

Editor’s Note: *This article provides a brief overview of the National Labor Relations Act and does not constitute legal advice. If you have questions or are facing an organizing campaign, consult an attorney familiar with union and workplace laws.*

“We’d like to form a union” is not a phrase that an employer looks forward to hearing. Even the best employee relationships and policies cannot guarantee that employees will not discuss or explore the idea of unionization, and it is important to be aware of laws that limit the ability to impact such efforts. The National Labor Relations Act restricts employers’ actions when they become aware of organizing activities. Here are a few important rules to remember:

DON’T: Prohibit employees from soliciting for a union during non-work time or from distributing union literature during non-work time.

Non-work time includes time before or after work and breaks. Maintaining overbroad company policies that prohibit soliciting of any kind or distributing information for any purpose could also violate employees’ rights if they can reasonably believe the policy prohibits discussion of union activity.

DON’T: Question employees about their union support or activities in a manner that discourages engagement in that activity.

Even asking an employee a simple “yes or no” question about whether that employee supports organizing a union can be an unlawful interrogation.

DON'T: Fire, demote, or transfer an employee because s/he supports unionization.

Reducing an employee's hours or changing shift times are also improper actions. If an employee can demonstrate that such action occurred because of involvement with union activity, the employer must show that the action would have happened regardless of the employee's union activity.

DON'T: Threaten to close the workplace if workers unionize.

An employer can explain the economic consequences it foresees from unionization, so long as the prediction is *fact-based*. Messages that emphasize unionization has led to closings at other businesses can constitute a threat. Threats of unspecified reprisals are also unlawful (e.g., “you never know what could happen”).

DON'T: Promise or grant promotions, pay raises, or other benefits to discourage—or encourage—union support.

Providing economic benefits to employees after learning about organizing efforts is *presumptively coercive*, and the employer must provide an explanation for the benefit other than the threat of unionization, such as a planned wage increase as part of normal business operations.

DON'T: Prohibit employees from wearing union hats, buttons, t-shirts, and pins in the workplace. Employers can only prohibit such items when they may jeopardize employee safety, damage machinery or products, or unreasonably interfere with an employer's public image. These *special circumstances are construed narrowly*; customer exposure or standard employee uniforms are not sufficient reasons to prohibit such items.

DON'T: Spy on or videotape peaceful union activities and gatherings or even pretend to do so.

An employer creates an unlawful impression of surveillance when an employee would assume from the employer's statement that the union-related activities are under surveillance. Merely telling an employee that you are aware of union activities without revealing how you know could create an unlawful impression of surveillance.

DO: develop an effective plan to demonstrate the benefits of a non-union workplace.

Employers can hold meetings during work hours to discuss the factual economic implications of unionization. Additionally, generally nonemployee organizers can be excluded from the company's property, provided employees are accessible outside the workplace and excluding the nonemployees does not unfairly discriminate against the particular organization.

Advertise in *the hotline*

With rates as low as \$150.00 (display ads) and \$50.00 (text-only), advertising in ***the hotline*** is a great way to reach thousands of people in the aviation industry, including certificated repair stations, manufacturers, air carriers and suppliers!

<http://www.arsa.org/hotline.advertising>

ARSA Action

Complete ARSA's repair survey today

ARSA launched a survey to support its advocacy programs on a range of issues including Instructions for Continued Airworthiness, the proposed rewrite of part 145, and repair station security procedures.

ARSA is asking that one representative from all FAA-certificated part 145 repair stations set aside approximately 15 minutes to complete the anonymous survey by Sept. 21. To provide your response, please visit: <https://www.surveymonkey.com/s/ARSASummerSurvey>.

— ADVERTISEMENT —



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Symposium 2013: *You* are the key ingredient!

This year's symposium will return to the Ritz-Carlton Pentagon City, just across the Potomac river from downtown DC, on March 20-22, 2013.

ARSA's gathering always features important information to keep your repair station compliant with the latest government developments; but, the key to a successful symposium is **you!**

As your company plans for next year, make sure that attending [ARSA's 2013 Annual Legislative Day and Repair Symposium](#) is in the budget.

As the maintenance industry's premier, advocacy, educational, and networking event, ARSA's legislative day and symposium provide valuable insight and intelligence that equip you with the tools for

success. To ensure the sessions meet your needs, please let us know if you would like to see anything discussed. Drop us a line at arsa@arsa.org.

While you're thinking about the coming year, don't forget the many valuable sponsorship opportunities for the Annual Legislative Day and Repair Symposium. Sponsorships are a great way to target the industry leaders in attendance and get your message in front of an audience of maintenance pros. To view available opportunities and make your pledge today, visit <http://www.arsa.org/node/630> or contact ARSA Director of Web Content and Publications [Keith Mendenhall](#).

ARSA supports efforts to modernize 147 curriculum

ARSA [filed comments](#) with the FAA supporting [Blue Ridge Community College's \(BRCC\)](#) efforts to modernize the requirements for aviation maintenance training at schools licensed under 14 CFR part 147.

BRCC, a part 147 certificated institution offering an associate degree in aviation maintenance technology, recently filed a [petition for reconsideration](#) with the FAA. The [original petition](#) sought permission to alter its curriculum to keep up with changes in aircraft technology. The FAA rejected BRCC's request, maintaining that the current distribution of hours ensures industry and safety needs; ironically relying on industry feedback received in the early 1980s.

In its reconsideration petition, BRCC argued that curriculum requirements have changed little since first promulgated in 1962 and the hours of instruction distribution no longer reflects modern standards. The hours of instruction vis-à-vis the mandated subjects inhibit voluntary enhancement of those standards. Redistributing the mandated hours to reflect the demands of modern industry would allow BRCC and similar programs to provide the safety and educational training the requirements originally intended to produce.

ARSA's comments strongly support BRCC's contentions and the Association agrees that the current curriculum mandates are outdated and hamper efforts to provide industry with personnel familiar with new aircraft technology. The Association takes issue with the FAA's statement that "the hours of instruction, as a minimum, contained within 14 CFR § 147.21 continue to prepare a student to meet training standards as sought out by industry."

Allowing BRCC to redistribute mandated curriculum hours would ensure the institution remains competitive while allowing it to teach students skills that match current industry demands. Since there are no indications that a proposed rule revising the outdated curriculum requirements in part 147 is forthcoming, a petition for exemption from the rule is the only relief available.



ATA e-BUSINESS FORUM

Register now for the ATA e-Business Forum to be held **October 22-24, 2012 in Scottsdale, Arizona**. The ATA e-Business Forum is the industry's premier event to learn about the latest developments in information exchange to support engineering, maintenance, materiel, cyber-security and flight operations. In addition to learning about the airline industry's most widely accepted e-business specifications (Spec 2000, S1000D, iSpec 2200, Spec 42 and Spec 2300), learn how the industry has attributed significant savings and operational efficiencies to the use of these global specifications.

Special Guests:

Keynote Presenter: Ray Valeika, Consultant (Retired Senior Vice President TechOps, Delta Air Lines)

Lunch Presenter: Richard Aboulafia, Vice President Analysis, Teal Group

[Agenda>>](#) | [Register Now>>](#) | [Call for Speakers>>](#) | [Sponsor / Exhibitor-Demo Opportunities>>](#)

ARSA requests and receives comment extension for MAG AC

On Aug. 27, ARSA [requested](#) an extension of the comment period for draft Advisory Circular (AC) [145-11](#) which provides guidance on how U.S.-based repair stations may obtain, renew, or amend a European Aviation Safety Agency (EASA) approval utilizing the [Maintenance Annex Guidance](#) (MAG).

In its request, the Association stressed that there are still outstanding issues being resolved, such as [part-tagging requirements](#), which would affect the guidance when addressed.

On Sept. 4, the ARSA received an email from the FAA announcing a 45-day extension of the comment period. For more information and to comment, [click here](#).



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Positive Publicity Corner

A strategic investment

By Jason Langford, ARSA director of communications

As summer draws to a close, many begin to think about the coming year and its challenges. When planning and mapping strategies to meet those challenges, consider the value of investing in ARSA's positive publicity campaign (PPC).

ARSA's PPC is committed to cultivating the business, legal, and regulatory environment for repair stations. The campaign's focus is on improving the image of contract maintenance in the face of false security and safety concerns raised by self-interested detractors.

Evidence of the PPC's impact can be seen in ARSA's improved ability to get its message out in the face of attacks. Just recently, the Transportation Trades Department (TTD) of the AFL-CIO responded to an ARSA-coordinated letter to Department of Homeland Security Secretary Janet Napolitano; the TTD attacked the Association's position regarding the ban on the certification of new foreign repair stations.

Putting the industry's foes on the defensive demonstrates how the PPC is getting our message through. Additionally, news coverage included ARSA's response, serving as a reminder of how the PPC has allowed ARSA to bring balance to reporting.

The PPC's success and capabilities are limited by its budget. Why can't your company help ARSA achieve more by [donating \\$5,000 to the PPC?](#)

The investment in the [PPC](#) by a few [companies](#) has made a big difference for everyone in the maintenance industry. Your investment will help ARSA further enhance its advocacy efforts for the contract repair industry. For more information on how you can help the PPC contact ARSA's Communications Director [Jason Langford](#).

As part of ARSA's ongoing [Positive Publicity Campaign](#) (PPC), the association is actively working to enhance the media's understanding of our \$50 billion industry and its vital importance to global civil aviation. To accomplish this goal, ARSA monitors media coverage about aviation maintenance to spread the word about the valuable role repair stations provide their communities in jobs, economic opportunities, and community involvement. These are some of this month's top stories highlighting the industry's contributions.

[AAR expands logistics footprint in Asia](#) (*AviationPros.com*)

[ESCC dean: aviation education demands increasing](#) (*Dothan Eagle*)

[HEICO Corp. acquires Niche Aircraft Component Repair Company](#) (*The Wall Street Journal*)

[Lufthansa to add 90 jobs at Tulsa facility over next few years](#) (*Tulsa World*)

[Delta TechOps invests in new MRO technology for engines](#) (*Aviation Week*)

[Industries aiding airport growth; eight new hangars have been built](#) (*MidlandFreePress.com*)

[UAF buys airport hangar for aviation maintenance program](#) (*NewsMiner.com*)

[Vocational high school graduates from Solo to learn aircraft maintenance](#) (*The Jakarta Post*)

[Aero Center expanding: New hangar in Minot will accommodate more, larger planes](#) (*Minot Daily News*)

[Mid-American Aviation soars to new location with lease in Webster](#) (*Banker & Tradesman*)



Staples Business Advantage, which is **free to join for ARSA members in good standing**, offers a top-level customer service program designed to reduce your total cost to acquire office supplies, including cleaning, break-room and related industrial supplies to furniture and even electronics.

ARSA on the Hill

By Daniel Fisher, ARSA vice president of legislative affairs

In August, ARSA's legislative team coordinated a visit and ARSA PAC check delivery for Rep. Adam Schiff at Fortner Engineering's Glendale, Calif. facility ([see related article](#)).

ARSA helped organize a multi-industry group [letter](#) to Homeland Security Secretary Janet Napolitano inquiring about the Transportation Security Administration's progress on reaching its "fourth quarter of calendar year 2012" [commitment](#) to complete the repair station security rules and stressing that continued inaction is unacceptable.

The Association was represented at a meeting of tax lobbyists with Senate Finance Committee staff about extending 100 percent bonus depreciation through at least 2012 to encourage capital investments by companies.

The legislative team attended a briefing on the impact sequestration will have on the FAA and the broader aviation industry.

ARSA continued to expand the reach of its political program by fundraising for ARSA PAC.

Government Affairs Committee members were encouraged to engage lawmakers and candidates through town hall meetings.

Bills on the Hill

ARSA queries DHS on long overdue repair station security rule

ARSA, along with 11 other aviation organizations, reminded Department of Homeland Security (DHS) Secretary Janet Napolitano about the urgent need to finalize repair station security rules.

The Aug. 20 [letter](#) inquired about the Transportation Security Administration's (TSA) progress on reaching its "fourth quarter of calendar year 2012" [commitment](#) to complete the security rule. The letter made clear that the aviation industry expects TSA to meet the deadline and that continued inaction is unacceptable.

"The ban on new foreign repair station certificates is having a detrimental impact on U.S.-based aerospace companies looking to tap into rapidly expanding overseas markets. The longer the prohibition is in effect, the more damage it will cause our nation's competitiveness in aviation and exports," the groups told Napolitano.

In 2003, Congress enacted VISION-100 - Century of Aviation Reauthorization Act, which required the TSA to issue security rules for all aviation repair stations by August 2004. When TSA failed to meet that deadline, lawmakers (in the 9/11 Recommendation Implementation Act) demanded the security regulations be completed by August 2008. The penalty for failure to comply: the FAA was barred from issuing new foreign repair station certifications.

ARSA has long decried the punishment of an entire industry due to a delayed rulemaking and has led the charge to end the prohibition. Rather than encourage the agency to act, the ban has only punished the aviation industry and weakened U.S. leadership in aviation maintenance services.

With the fourth quarter of 2012 approaching, TSA must be reminded of the need for action.

"While the FAA is prohibited from certificating new foreign repair stations, U.S. aerospace companies of all sizes are paying the price. Punishing industry and preventing economic growth because of bureaucratic delay is unacceptable and must end," said ARSA Vice President of Legislative Affairs Daniel Fisher.

ARSA believes if the agency does not meet its self-imposed deadline, Congress must take action and lift the ban on new foreign repair stations.

Sequestration would devastate aviation industry, economy

While much of the focus of sequestration has been on the Defense Department, all government agencies will be affected, including the Federal Aviation Administration (FAA).

On Jan. 2, 2013, the deficit reduction measures contained in the Budget Control Act of 2011 ([P.L. 112-25](#)) are scheduled to cut approximately \$500 billion from non-defense spending, in a process known as budget sequestration.

While details are unknown, it is certain that sequestration will have a negative effect on the aviation industry and the entire economy unless Congress acts to prevent this draconian measure from taking effect.

According to an [economic study](#) commissioned by Aerospace Industries Association (AIA), sequestration is expected to take a \$1 billion bite out of the FAA's \$15.9 billion budget annually for the next nine years. Because sequestration would exempt \$2.4 billion in annual grants from the Airport Improvement Program (AIP), the agency's budget for operations and various safety initiatives would bare a greater burden, impacting inspections, certifications, NextGen implementation, and air traffic control operations.

The AIA study also indicates the enormous economic implications of sequestration. Lost output by the aviation industry is estimated between \$9.2 billion and \$18.4 billion, leading to as many as 132,000 jobs lost. Furthermore, should sequestration delay implementation of NextGen, roughly \$40 billion and 700,000 jobs could be lost by 2021 due to an overworked, outdated, and inefficient air transportation control system. Those figures increase to \$80 billion and 1.3 million jobs by 2035.

Congress must come up with a mechanism by the end of the year to prevent these catastrophic cuts. Visit ARSAAction.org to tell your lawmakers that our industry and our economy cannot take this blow; we must do whatever necessary to prevent sequestration.

Support ARSA's Positive Publicity Campaign

It's no secret; the contract maintenance industry suffers from an image problem. Years of baseless attacks have created a hostile media environment, and worse yet, has blinded some lawmakers and portions of the public to the benefits of aviation contract maintenance.

ARSA's [Positive Publicity Campaign](#) (PPC) confronts these challenges; its message is clear: repair stations make air travel safer, create air carrier efficiencies, contribute to the economy, and generate jobs.

PPC resources support industry economic impact studies, defend the industry in the national media, and monitor media coverage. All industry stakeholders are asked to support the campaign through a financial contribution. Make your [pledge](#) today!

Huerta likely to remain unconfirmed through election

Michael Huerta's nomination to serve as FAA administrator will remain in limbo through the November elections.

Sen. Jim DeMint (R-S.C.) has vowed to block executive branch appointments until after the polls close on November 6, including Huerta's confirmation to serve as the agency's chief. At the time of the committee's approval, no senator had voiced opposition to Huerta.

While DeMint is the only senator to object to Huerta's nomination, it is probable another Republican senator would have put a hold on his confirmation prior to November. The position is a five-year term and GOP senators would prefer to wait for the outcome of the presidential election before confirming an FAA chief that would be able to serve through the first four years of a possible Romney administration.

CBO warns of recession if "fiscal cliff" not averted

On Aug. 22, the Congressional Budget Office (CBO) [warned](#) that the U.S. economy will enter another recession if Congress fails to avert the "fiscal cliff" of tax increases and spending reductions set for the end of 2012.

The Bush-era tax cuts, the payroll tax reduction, and the alternative minimum tax (AMT) cut patch are set to expire at the end of the year. Additionally, sharp reductions in Medicare's payment rates are scheduled to take effect and the estate tax will revert to pre-2001 levels (55 percent rate, \$1 million exemption). These expiring provisions are in addition to the \$1.2 trillion in automatic spending cuts set to go into effect in early 2013 from the sequestration process ([see related article](#)).

The CBO cautions that the US economy will contract by 0.5 percent and unemployment will rise to 9.1 percent in 2013 if Congress doesn't:

- extend all expiring tax provisions indefinitely (except the payroll tax reduction in effect in calendar years 2011 and 2012);
- index the AMT for inflation after 2011;
- maintain current Medicare payment rates for physicians' services; and,
- prevent the automatic spending reductions.

Due to partisan gridlock, many fear lawmakers will be unable to forge a consensus that avoids such a nightmare. ARSA has been warning lawmakers about the impending economic damage that will result without action.

The Association urges Congress to temporarily extend the Bush-era tax cuts to give lawmakers time to complete comprehensive tax reform and find an alternative to the automatic spending cuts.

To urge your lawmakers support for action to avoid this looming fiscal catastrophe, be sure to visit ARSAAction.org.

Members of the Association may display the Member Web Badge on their company Web site. Contact arsa@arsa.org for information.



Facility visits critical component to political program

Hosting a facility visit is the best way to demonstrate a repair station's contribution to the local business community and the safety of global aviation.

On Aug. 23, Rep. Adam Schiff (D-Calif.) visited Fortner Engineering's Glendale, Calif., repair shop. Schiff experienced first-hand the level of complexity associated with keeping aircraft components in top shape and discussed in great detail with the company's executive team the daily challenges repair stations face.

ARSA Senior Vice President Gary Fortner also presented an ARSA PAC check to Rep. Schiff as part of the Association's ImPACT program. A cornerstone of ARSA's political efforts, which helps triangulate the relationship between the legislative affairs team, members "back home," and lawmakers.

"Rep. Schiff and other lawmakers fortunate enough to tour a repair station can put a face to the contract maintenance industry. Not only are they better equipped to understand how the industry might be impacted by all kinds of legislation, but they've helped establish an important relationship with leaders in their districts. I would highly encourage all ARSA members to schedule facility visits from your lawmakers," stated ARSA's Vice President of Legislative Affairs Daniel Fisher.



Gary Fortner, vice president, engineering & quality control (right) , and Bob Fortner, vice president, general manager (left) explain the manufacturing process of the test tooling for the CFM56-7B (7373NG) Thrust Reverser Non-Locking Actuator to Rep. Schiff (center).

Please contact [Daniel Fisher](mailto:Daniel.Fisher@arsa.org) for help coordinating your congressman or senator's visit your repair station.

ARSA PAC gears up for election

With the Nov. 6 rapidly approaching, ARSA PAC wants to ensure that all members are fully engaged in the electoral process. [Give solicitation to ARSA PAC now](#) so that the legislative team can communicate freely about strategic activity during the political season.

Federal law requires ARSA to have explicit permission before sharing details about its political program. Only executive and management employees at ARSA member companies may provide such consent.

[Direct the leaders of your company to this solicitation consent form](#) and join the ranks of fellow industry advocates who have chosen to play an important role in ARSA's political program! If you have any questions about ARSA PAC, please contact ARSA Communications Coordinator [Josh Pudnos](#) at 703 739 9543.

2012 ARSA PAC Contributors

Capitol Hill Club (\$1,000)

Bill Perdue, SONICO

Jim Perdue, SONICO

Washington Team (\$500)

Marshal S. Filler, ARSA

Gary Fortner, Fortner Engineering

Lynn Fortner, Fortner Engineering

Robert Fortner, Fortner Engineering

Sarah MacLeod, ARSA

Christian A. Klein, ARSA

Bill Rathmanner, Aero Design Services

145 Club (\$145)

Russell Buckley, Auburn Aerospace, Inc.

Jose Eduartez, A.I.R.S.

Daniel Fisher, ARSA

Randall Herman, Mid-America Aviation

John Hunter, HEICO

Gary Jordan, Jordan Propeller Services

Mike Leland, Commercial Jet

Brian Loomer, AAR Aircraft Services

Jim Meyer, Aviation Repair Solutions

Barry Muhler, Aviation Repair Resources

Jennifer Weinbrecht, Component Repair Technologies

ARSA Members Getting Members Program

There is no better advertisement than a satisfied member, and members are the best people to get others to join. [Click here](#) for information on how to get another company to join ARSA and **save on your membership**.

Become an ARSA Champion!

ARSA Champions are members who help to actively promote the Association and its activities, and work to get other companies to join. By providing informational brochures at trade shows and industry meetings, ARSA Champions ensure we obtain the support we need to provide even more and better services. [Click here](#) for more information on becoming an ARSA Champion!

Have you seen these candidates?

Throughout the election season, ***the hotline*** is introducing readers to the candidates running in some of the most critical Senate campaigns. This month we examine Florida, where the incumbent Democrat, Sen. Bill Nelson, will fight off a challenge from Republican Rep. Connie Mack.

Sen. Bill Nelson (D-Fla.)



Sen. Nelson is seeking a third term in the U.S. Senate.

Nelson serves on the Commerce, Science & Transportation Committee, where he is chairman of the Science & Space Subcommittee and a member of the Aviation Operations, Safety & Security Subcommittee. He also sits on the Finance Committee, serving as chairman of the Energy, Natural Resources & Infrastructure Subcommittee, as well as the Budget, the Select Intelligence, and the Special Aging Committees.

A graduate of Yale University and University of Virginia School of Law, prior to his election to the Senate Nelson served in the Florida House of Representatives, six terms in the U.S. House of Representatives, and as Florida's treasurer and insurance commissioner. He also spent six days orbiting Earth as a payload specialist aboard the space shuttle Columbia. Nelson lives with his wife, Grace, in Orlando. They have two children.

Bill Nelson's Campaign Office:

Bill Nelson for U.S. Senate
1516 East Colonial Drive
Suite 101
Orlando, FL 32803-4726
<http://nelsonforsenate.com/>

Rep. Connie Mack (R-Fla.)



Rep. Connie Mack is in his fourth term representing Florida's 14th congressional district.

Mack is a member of the Foreign Affairs Committee, where is chairman of the Western Hemisphere Subcommittee. He is also a member of the Oversight & Government Reform Committee.

A graduate of the University of Florida, Mack served in the Florida House of Representatives and was a business executive before his 2004 election to the U.S. House. Mack lives in Fort Myers and is married to Rep. Mary Bono Mack (R-Calif.). He has two children and two stepchildren.

Connie Mack's Campaign Office:

Friends of Connie Mack 2012
PO Box 519
Naples, FL 34106-0519
<http://conniemack.com/>

For more information about these and other candidates, visit www.ARSAAction.org.

Get the *ARSA Dispatch* for weekly news briefings—[Click here to subscribe!](#)

International News

CASA to GA: Don't fret over part 145

The Australian Civil Aviation Safety Authority (CASA) recently dismissed as “disturbingly misinformed” concerns within the general aviation maintenance industry that new part 145 regulations will treat general aviation and transport category aircraft the same.

CASA is developing a rule that would impact the general aviation community and is consulting with industry stakeholders.

New regulations governing maintenance of transport aircraft enter into force June 26, 2013.

“All this means, contrary to some of the ill-informed statements now being made by some people, that the anticipated new maintenance rules for the non-regular public transport sectors have not been determined, and will not be predetermined,” said CASA Director of Aviation Safety John McCormick.

To read the full CASA statement, [click here](#). For more information on CASA's transition to new rules covering regular transport category aircraft, [click here](#).

Japan looking to toss 100 aviation regulations

Japan's Ministry of Land, Infrastructure, Transport, and Tourism is exploring a proposal to eliminate 100 aviation regulations to improve its competitiveness in air transport.

The aim of the review is to ease low cost carriers' access to Japanese markets and is expected to slash up to ¥3 billion from airline operating costs. The rewrite could bring a host of other changes, including allowing pilots over the age of 60 to command flights and making it easier for mechanics and copilots to meet qualification requirements.

While the proposal is widely viewed as beneficial for Japan, the ministry must the measures would not compromise safety in anyway.

International Roundup

Editor's Note: To provide more international coverage, ARSA presents a monthly roundup of world events pertaining to the industry.

[Aviation: Israel to join Europe](#) (European Commission)

[European climate law poses problems for U.S. airlines, policymakers](#) (National Journal)

[British Airways Engineering expands training capabilities](#) (Director of Maintenance)

[1500 students to go through Lufthansa training courses](#) (AviationPros.com)

[ALTA and UBM Aviation join forces to launch major airline MRO event in the Latin America and Caribbean region](#) (AviationPros.com)

[Gulfstream expands Latin America market](#) (SavannahNow.com)

[FL Technics breaks ground on 16,000 square meters of MRO facilities in Russia, for single-aisle and wide-body aircraft](#) (Avionics Intelligence)

[Boeing: Asia-Pacific needs thousands of pilots, technicians](#) (Fox Business)

[Ethiopian has grand plan to expand Addis Ababa maintenance operation](#) (Aviation Week)

[Jet Aviation restructures EMEA and Asia organization](#) (AIN Online)

Member Spotlight

StandardAero, Tempe, AZ

StandardAero is one of the largest independent aviation service companies in the world. It provides extensive service to commercial, military, business aviation, helicopters, and industrial operators. StandardAero has facilities worldwide, and a customer base spanning 80 countries.

With over 300 years of collective experience, customers receive the benefit of exceptional knowledge from employees committed to superiority and innovation. The ultimate goal of StandardAero, and the standard it judges itself by, is to provide service that give its patrons peace of mind; secure in knowing work will be performed with competence and care, while getting the product back in the air as quickly as possible.

For more information, visit <http://www.standardaero.com/>

Are you an ARSA member who would like to be in the "Member Spotlight?" If so, please contact Keith.Mendenhall@arsa.org.

What's In It for You

This month: Discounts on legal fees through Obadal, Filler, MacLeod & Klein, P.L.C.

By Jennifer Goodwin, ARSA membership & senior administrative coordinator

Nothing is free, especially good advice. Luckily, for ARSA members, good advice comes with paying the membership dues.

Unfortunately, good advice isn't always enough. At some time it's likely that your head has been in your hands and you have wished for a regulatory expert to magically appear. Those are the times you need more than just advice – you need comprehensive and dedicated help.

ARSA's executive staff is not only some of the most recognized experts in the field, they're also lawyers. So when push comes to shove and you really need help, membership benefits include discounts on legal fees from the law firm of [Obadal, Filler, MacLeod & Klein, P.L.C.](#) The firm has a long history and lots of experience in aviation safety and regulatory compliance, including managing ARSA. The money saved could pay the yearly membership dues. For more information, email jennifer.goodwin@arsa.org.

Welcome New Members

[Embry-Riddle Aeronautical University](#), Daytona Beach, FL

[NVISmetrics, LLC](#), San Diego, CA

[Rumpel & Associates Inc. dba G&G Avionics](#), Lubbock, TX

[Stephen Bennett](#), San Marcos, TX

[Sunrise Mountain Avionics](#), Las Vegas, NV

[Thomas Electronics](#), Regents Park NSW, Australia

ARSA Regulatory Compliance Training—Questions

Part 1: General Comprehension

Level 1: For anyone working in aviation

§ 65.92: Inspection authorization: Duration.

- (a) Each inspection authorization expires on March 31 of each odd-numbered year. However, the holder may exercise the privileges of that authorization only while he holds a currently effective mechanic certificate with both a currently effective airframe rating and a currently effective powerplant rating.
- (b) An inspection authorization ceases to be effective whenever any of the following occurs:
- (1) The authorization is surrendered, suspended, or revoked.
 - (2) The holder no longer has a fixed base of operation.
 - (3) The holder no longer has the equipment, facilities, and inspection data required by §65.91(c) (3) and (4) for issuance of his authorization.
- (c) The holder of an inspection authorization that is suspended or revoked shall, upon the Administrator's request, return it to the Administrator.

Question 1: Under this rule, once an inspection authorization is issued, it does not expire.	Question 2: Under this rule, a holder of an inspection authorization must maintain a fixed base of operation to avoid suspension or revocation.
A—True. B—False.	A—True. B—False.

Question 3: Under this rule, a holder of an inspection authorization must hold a currently effective mechanic certificate.	Question 4: Under this rule, an inspection authorization can be suspended or revoked if the holder no longer has the required equipment, facilities, and inspection data.
A—True. B—False.	A—True. B—False.

Name	_____	Date	_____
	Clearly Print the Name of the Person Taking the Test		Date Test was Completed
Score	_____	Hours	_____
	Enter as x (number correct) of y (number of questions)		Time Credited for Test
Approved by	_____		
	Signature of Supervisor or Person Administering Test		

ARSA Regulatory Compliance Training—Answers

Correct answers are in **bold**

Part 1: General Comprehension

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 - (2) The holder no longer has a fixed base of operation.
 - (3) The holder no longer has the equipment, facilities, and inspection data required by §65.91(c) (3) and (4) for issuance of his authorization.
- (c) The holder of an inspection authorization that is suspended or revoked shall, upon the Administrator's request, return it to the Administrator.

Question 1: Under this rule, once an inspection authorization is issued, it does not expire.	Question 2 Under this rule, a holder of an inspection authorization must maintain a fixed base of operation to avoid suspension or revocation.
A—True.	A—True. (Correct answer; an inspection authorization ceases to be effective whenever the holder no longer has a fixed base of operation.)
B—False. (Correct answer; an inspection authorization expires on March 31 of each odd-numbered year.)	B—False.

Question 3 Under this rule, a holder of an inspection authorization must hold a currently effective mechanic certificate.	Question 4: Under this rule, an inspection authorization can be suspended or revoked if the holder no longer has the required equipment, facilities, and inspection data.
A—True (Correct answer; a holder of an inspection authorization may exercise the privileges of that authorization only while he holds a currently effective mechanic certificate.)	A—True. (Correct answer; an inspection authorization ceases to be effective whenever the holder no longer has the equipment, facilities, and inspection data required.)
B—False.	B—False.