

Aeronautical Repair Station Association

the hotline

November 30, 2012

Alexandria, VA

www.arsa.org

2013 ARSA

Symposium

Registration Now Open

[Click here](#) for
more information

Sarah says

Modernize and minimize

By Sarah MacLeod, ARSA executive director

In times of uncertainty limiting unnecessary actions or reactions is essential to survival. Unfortunately, government survival seems to depend upon creating bureaucracy.

The Association provided [substantive comments](#) to the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM) on part 145. The most disheartening aspect of responding to the proposal was the agency's lack of corporate knowledge.

Part 145 rulemaking activities date back to the late 1980's for cripes sake; the attempts to "modernize" the regulations governing more than 80 percent of the maintenance performed have always been behind the curve.

For example, the NPRM was the agency's second attempt to change the repair station rating system. Both attempts were overcomplicated and missed essential elements of international standards and business relationships. The controversy over "capability lists" is a red herring for both industry and the agency. The regulations do not allow any person to perform work without the proper housing, facilities, equipment, personnel and data. At any point, the FAA can demand to see the system used and determine whether the work was performed in an appropriate manner. The bug-a-boo that repair stations will be "virtual" or habitually work outside their ratings evidences a failure to understand how part 43 dictates the extent and nature of all maintenance, preventive maintenance and alteration.

Continued on Page 2

Highlights

2	Legal briefs	10	ARSA comments on proposed RS rule	15	Regulatory engagement under threat
4	Regulatory lookout	11	ARSA Board elects leaders	16	ARSA PAC has record busting year
5	Final documents/Your two cents	12	UAS integration must not distract FAA	18	International news
5	A member asked	12	Positive publicity corner	18	EU postpones emissions scheme
6	Quality time	13	Positive publicity	18	International roundup
6	Employment law & repair stations	13	ARSA on the Hill	19	Member spotlight
7	The next generation of aircraft technicians	14	Bills on the Hill	19	What's in it for you
8	Legal waypoints	14	Carol Giles is Pundit of the Year	19	Welcome new members
10	ARSA action	14	Election 2012: More of the same	20	Compliance training—Questions
10	Exciting agenda for 2013 Symposium	15	New Congress, new leaders	21	Compliance training—Answers

Sarah says, continued

Instead of grandfathering all certificates and taking its time to review submissions and issue new ratings and approvals, the agency proposed to terminate all part 145 certificates on a day certain. It threatened that if persons waited until the last moment to submit an application for a new certificate under the new requirements, their certificate would expire. The FAA has issued letters for almost two years placing “new” repair stations in a queue because the agency has no resources to process the applications. How can it possibly issue over four thousand new certificates even if it started today?

ARSA expressed its vehement opposition to separating Operations Specifications from the air agency certificate, the attempt to prevent “bad actors” and the requirement to request permission to surrender a certificate. These proposals are based on laudable goals, but will create bureaucratic delays for no discernible or enforceable results.

ARSA hopes the agency will take this opportunity to make substantive adjustments to its proposal and produce a rule that modernizes part 145 while minimizing bureaucracy.

Legal briefs

The EC-US Agreement and US due process: Part 3

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

As noted in the title of this series, our focus is how “due process” afforded by U.S. law is handled in the [Agreement Between the United States of America \(U.S.\) and the European Community \(EC\) on Cooperation in the Regulation of Civil Aviation Safety](#) (the Agreement). So far, we have touched upon the benefits derived from the Agreement, studied its language regarding cooperation between regulatory authorities in enforcement activities, and visited the scenario of a U.S.-based repair station having its European Aviation Safety Agency (EASA) privileges suspended while an investigation by the Federal Aviation Administration (FAA) runs its course. Last month, we noted that FAA cooperation under Article 8 of the Agreement was conditioned by U.S. law – specifically, that mutual cooperation and assistance in any investigation or enforcement proceeding of any alleged or suspected FAA rule violation was “subject to applicable laws and regulations.” We reasoned that Article 8 was inactive when FAA investigations or actions over alleged FAA rule violations by a U.S. repair station were ongoing; the rationale being that such measures must be accompanied by due process provided by U.S. law. This month, we expand on what the term “due process” means under U.S. law.

To begin that discussion, we look to a widely-accepted “secondary source” of legal information, Black’s Law Dictionary, which provides the following definitions:



the hotline is the monthly publication of the Aeronautical Repair Station Association (ARSA), the not-for-profit international trade association for certificated repair stations. For a membership application, please call 703 739 9543 or visit www.arsa.org.

Gary M. Fortner
President

Gary Jordan
Senior Vice President

Jim Perdue
Treasurer

Sarah MacLeod
Executive Director

Marshall S. Filler
Managing Director & General Counsel

Christian A. Klein
Executive Vice President

Keith Mendenhall
Editor, *the hotline*

Advertising in *the hotline* does not constitute endorsement or approval by ARSA. Please direct advertising inquiries to hotline@arsa.org.

This material is provided for educational and informational purposes only. It does not constitute legal, consulting, tax, or any other type of professional advice.

Law, regulations, guidance and government policies change frequently. While ARSA updates this material, we do not guarantee its accuracy. In addition, the application of this material to a particular situation is always dependent on the facts and circumstances involved. The use of this material is therefore at your own risk.

All content in *the hotline*, except where indicated otherwise, is the property of ARSA. This content may not be reproduced, distributed or displayed, nor may derivatives or presentations be created from it in whole or in part, in any manner without the prior written consent of ARSA.

ARSA grants its members a non-exclusive license to reproduce the content of *the hotline*. Employees of member organizations are the only parties authorized to receive a duplicate of *the hotline*.

ARSA reserves all remaining rights and will use any means necessary to protect its intellectual property.

© 2012 Aeronautical Repair Station Association

Be social:



Follow ARSA online!

Legal briefs, continued

Due process. The conduct of legal proceedings according to established rules and principles for the protection and enforcement of private rights, including notice and the right to fair hearing before a tribunal with the power to decide the case (also termed *due process of law*; *due course of law*).

Due Process Clause. The constitutional provision that prohibits the government from unfairly or arbitrarily depriving a person of life, liberty, or property. There are two Due Process Clauses in the U.S. Constitution, one in the 5th Amendment applying to the federal government, and one in the 14th Amendment applying to the states.

Due process stems from the U.S. Constitution, and is therefore a common thread in all U.S. law and regulation. Its forms include “substantive due process” requiring that legislation be fair, reasonable and in furtherance of a legitimate governmental objective, and “procedural due process” which relates to the right of a fair hearing before a tribunal when life, liberty or property is at stake.

The issue we raise centers upon a U.S. repair station’s lost “property” due to allegations of FAA rule violations before the repair station has had the opportunity to fully challenge the FAA’s accusations. If the FAA can simply allege violations of its rules and act upon that charge by reporting it to EASA for review and action – most likely immediate suspension of the U.S. repair station’s EASA privileges – then due process has not been provided. In that case the U.S. repair station has not had an opportunity to defend itself against the supposed violation of U.S. regulations. From a legal standpoint, we believe the FAA reporting alleged violations of its rules to EASA before the involvement of FAA legal counsel and prior to conclusion under the agency’s procedures is problematic; it does not afford a U.S. repair station the due process it is entitled to receive.

—ADVERTISEMENT—

Piper Aircraft Maintenance Libraries Now From ATP

To continue to provide the best possible safety and compliance, Piper Aircraft and ATP have partnered to bring you the most advanced, single-source maintenance library service available.

Learn More

Download the Free Information and Upgrade Kit Today
at www.atp.com/piperkit.



Regulatory lookout

FAA proposes new contract maintenance requirements

On Nov. 13, the Federal Aviation Administration (FAA) issued a [notice of proposed rulemaking](#) regarding the relationship between contract maintenance providers and air carriers that operate aircraft with 10 or more seats.

The proposal is a direct result of congressional action. Sec. 319 of the [FAA Reauthorization and Reform Act of 2012](#) (enacted on February 14, 2012) commanded the FAA to issue regulations regarding who may perform “covered work.” ARSA aggressively lobbied Congress on the provision to ensure effective oversight of maintenance providers without undermining the efficiency of the industry.

The proposal would define “maintenance provider” as “any person who performs maintenance, preventive maintenance, or an alteration for a certificate holder other than a person who is trained by and employed directly by that certificate holder.”

The NPRM would require operators to develop policies, procedures, methods, and instructions for performing contract maintenance and to include them in their maintenance manuals. While the reauthorization law only mandated this requirement for part 121 air carriers, the rulemaking expands the requirements to part 135 operators of aircraft with 10 or more seats.

The suggested regulation also requires operators to provide the entity performing work with the applicable portions of its maintenance manual. This remains consistent with the air carriers’ retaining primary responsibility for aircraft.

Finally, the proposed rulemaking mandates that part 121 and 135 operators maintain a complete and comprehensive list of each party with which it contracts maintenance and a description of the work performed.

The Association will be closely reviewing the rule over the coming weeks to ensure that the proposal is free of any unintended consequences. These new regulations would take effect one year after the publication of the final rule in the *Federal Register*.

For a document comparing Sec. 319 of the FAA Modernization & Reform Act to the NPRM, please [click here](#).

ARSA strongly encourages all repair stations to closely review the proposed regulations and [submit comments](#) before the February 11, 2013 deadline.

MAG change 2 – What you need to know

On Oct. 31, 2012, the [second revision](#) to the Maintenance Annex Guidance (MAG) was released.

The MAG, originally issued on May 3, 2011, provides detailed guidance for FAA-certificated repair stations located in the U.S. to obtain an EASA certificate (and visa-versa) under the [U.S./EU Aviation Safety Agreement](#). The guidance contains sections addressing regulatory authorities, U.S.-based repair stations, and EU-based approved maintenance organizations. The [first revision](#) was signed on Jan. 10, 2012.

With regard to U.S.-based repair stations, the most notable revisions—

- Clarify that for a U.S.-based repair station to obtain EASA approval, it must hold a current FAA certificate.
- Mandate that, for initial certification, an EASA form 9 be completed for the main base *and* each additional fixed location and line station. Thereafter, only one Form 9 is required for renewals of facilities under one approval certificate.
- Explain that in cases where the FAA specialized services ratings are not approved under the EASA rating system, the FAA will amend the operations specifications to reflect those specialized services under the

the hotline

limited ratings detailing the scope and application of the work performed. This change is a direct response to ARSA's work behind the scenes to ensure member renewals are processed expediently.

- Reiterate that required EASA payments will only be accepted *after* the applicant receives an EASA invoice.
- Require a PMI to keep regional coordinators apprised of a repair station's corrective action plan when non-recommendations are issued.
- Re-state an existing standard parts definition (see [AMC M.A.501\(c\)](#)).
- Modify language regarding approved design and repair data (Section B, Appendix 1, Paragraph 8) to align with the [Technical Implementation Procedures](#).

The MAG revision did not address issues surrounding part documentation requirements for new parts, as requested by ARSA in [April 20, 2010](#) and in a subsequent joint industry letter of [April 3, 2012](#). Also neglected were [ARSA-requested clarifications](#) regarding human factors training requirements and confusing airworthiness directive procedures.

ARSA's current [model EASA supplement](#), designed for U.S.-based repair stations currently holding or working to obtain EASA Part-145 approval, addresses the latest MAG and is available for the member price of \$300.

As a reminder, all current EASA approval holders must have a new EASA supplement in place by Dec. 31, 2012, even if renewal is not due before the end of this year.

A document highlighting all MAG change 2 revisions is available [here](#).

Stay up to date with your Association every week with the *ARSA Dispatch*

[Click here to subscribe!](#)

Final documents/Your two cents

"Final documents": This list includes *Federal Register* publications such as final rules, advisory circulars (ACs), policy statements and related material of interest to ARSA members. For proposals open for public comment, see **"Your two cents."** The date shown is the date of 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://arsa.org/final-documents-your-two-cents/>.

A member asked

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

Q: Unfortunately, an employee of our repair station has received a second verified positive result on a random DOT-FAA drug test. The employee does not hold any FAA certificates, and the first verified positive result was three years ago. We understand that the employee cannot go through the "return to duty" process again due to the second positive result; does the repair station have an obligation to file a separate report to the FAA regarding this circumstance?

the hotline

A: The employee cannot perform aircraft maintenance or preventive maintenance for an “employer” (defined in [14 CFR § 120.7\(i\)](#)) ever again. As stated in [14 CFR § 120.111\(e\)](#):

“Permanent disqualification from service. (1) An employee who has verified positive drug test results on two drug tests required by this subpart of this chapter [i.e., Chapter 1, FAA, DOT; subchapter G, air carriers and operators for compensation or hire: certification and operations; part 120, drug and alcohol testing program; subpart E – drug testing program requirements], and conducted after September 19, 1994, is permanently precluded from performing for an employer the safety-sensitive duties the employee performed prior to the second drug test.”

Although the permanent disqualification rule does not include a specific reporting requirement, the FAA “encourages” repair stations to report verified positive tests that result in permanent disqualification to the “special investigations” branch by fax to 202 267 5200, or email to AAM830@faa.gov.

Quality time

Editor’s note: The views and opinions expressed by contributing authors do not necessarily state or reflect those of ARSA, and shall not be used for endorsement purposes.

Employment law & repair stations

Finding your best employees

By [Jonathan W. Yarbrough](#), Constangy, Brooks & Smith, LLC, 80 Peachtree Rd., Ste. 208, Asheville, NC 28803-3160. © 2012 Jonathan W. Yarbrough ALL RIGHTS RESERVED

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

What attributes do employers seek?

- the ability to learn new skills
- strong leadership qualities
- team player
- respect for procedures
- accountability
- high levels of trust
- dedicated
- high levels of resilience
- detail-oriented
- adept at transferring skills across contexts/tasks
- flexibility to work in teams or independently

These skills can certainly be found in military members entering the civilian workforce.

The U.S. Army has launched a [campaign](#) with the Society for Human Resources Management to encourage hiring veterans, especially those with physical disabilities, post-traumatic stress disorder (PTSD), or traumatic brain injuries. While many injured veterans are able to return to military careers, others separate from service and enter the civilian workforce. These veterans bring determination and perspective gained from overcoming obstacles. Their disabilities do not prevent them from contributing to society but can make them more resilient, determined, and ready to serve. They are often highly skilled professionals who can strengthen an organization, increasing diversity and the bottom line.

One of the goals of the campaign is to educate prospective employers on how the veteran’s training and experience in the military translate to the civilian workplace. For example, employers are encouraged to focus on

the hotline

specific skills which enable a particular candidate to fit into their workplace. To this end, employers should ask veteran candidates questions that help them understand how the military experience applies to a civilian job.

Another goal of the campaign is to address misconceptions that employers may hold about hiring disabled veterans, especially those suffering from PTSD. In fact, the cost to an employer for implementing reasonable accommodations for PTSD or other disabilities is typically low – generally less than \$500, and often nothing!

Once employers see the value disabled veterans may bring to an organization, they still need to connect with these professionals. The [Warrior Transition Command](#) (WTC) and the [Army Wounded Warrior Program](#) (AW2) assist employers in locating injured veterans who have recently transitioned out of the military and are looking for employment, as well as those who anticipate transitioning out. Many of these veterans are available for internship programs to gain new job skills. The WTC is also available to resolve and educate employers about the value and benefits of hiring a wounded warrior.

For more information employers who are interested in hiring a wounded warrior can contact the U. S. Army at 703 325 8999 or <mailto:usarmy.pentagon.medcom-WTC.mbx.career-education-readiness-br@mail.mil>

The next generation of aircraft technicians

Working together

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

Raymond Thompson is president of the Aviation Technical Education Council (ATEC) 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 eleventh and final 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.*

Over the past year, we have discussed a variety of issues related to creating the next generation of professional aviation maintenance technicians (AMTs). The aviation industry continues to transition but one thing is clear – more certificated mechanics will be needed over the next 20 years than will likely be produce.

Great challenge brings greater opportunity. Schools and industry can influence the profession for years by working together to train the next generation of AMTs.

Industry participation is key to a successful school. Prospective students (and their parents) want to hear directly from employers about aviation maintenance careers. Working with a local school at recruiting fairs and open houses is vital to all aviation maintenance providers. Industry also plays a significant role in retention; speaking in classes, offering internships, mentoring, and opening facilities to students are excellent ways to increase motivation.

Students are keenly interested in doing “real” work, with the gap between school equipment and industry technology at many schools, providing experiences that mimic the workplace improve retention and reduce employer training costs. Currently, only a few students are able to participate in internships with an employer. The industry must do a better job of providing every AMT student with actual experience.

Schools need to be more explicit in teaching the “soft” skills; the ability to think critically and analytically, communicate clearly, and work as a team are expected, but are often not taught. Industry assumes a minimal technical skill level of a new AMT, but often finds new graduates lacking in soft skills.

Schools employ a variety of means to for students to launch their careers. Many have special courses for developing résumés, researching companies, and performing mock interviews. Industry needs to play a larger

the hotline

role in career preparation. Visit schools and talk to students: How does the industry work? What is bidding? What roles do seniority and unions play? What career steps or avenues are available?

Students have to hear this from employers, not teachers (or parents for that matter). Local businesses can offer to review resumes and engage in mock interviews for positions, providing real life feedback. The interaction is invaluable to a student while helping employers improve hiring processes.

In the last issue of **the hotline**, we discussed the “Bridging the Gap” concept. It would provide every graduate with work-training credentials, such as an apprenticeship or internship. The experience would include a minimum set of specific experiences. While requiring a significant up-front investment by schools and industry, it would reduce long-term training costs and better identify candidates for full-time employment. Current and potential students would see a structured career path, improving interest in the profession.

Over the past five years, the FAA has worked closely with industry on a part 147 rule change. The aviation maintenance schools are poised to expand their work with industry directly and through organizations such as ARSA.

In March 2013, the [Aviation Technical Education Council](#) (ATEC) will host a special session at the ARSA Symposium to obtain input into the technical curriculum content of a revised part 147.

The long term viability aviation relies on a strong technical workforce. Projections indicate that in the very near future the need for AMTs will be greater than the supply. Industry and schools must work closely on long-term solutions that reverse declining interest in an aviation maintenance career. As a part 147 rule change moves closer, it is time for schools and industry to work together on a national scale and address the challenges of creating the next generation of AMTs.

ATEC wishes to thank ARSA for the opportunity to talk about schools in **the hotline**, and looks forward to working with the association and its members to elevate the AMT profession.

—ADVERTISEMENT—



component control

Component Control, based in San Diego, is a leading developer and provider of MRO and Logistics Software solutions for the aviation industry. Its core product, Quantum Control, provides advanced aviation management support to original equipment manufacturers, aftermarket service divisions, component repair and overhaul companies, fixed base operators, aircraft completion centers, airlines, MRO facilities and part distribution / redistribution companies. Quantum is installed in over 50 countries and can be deployed as a single-site or multinational solution.

For more information, please visit www.componentcontrol.com

Legal waypoints

Warranty and standard of care

By [Steven E. Pazar](#), attorney at Law, 11 Carriage House Lane, Boxford, Massachusetts 01921. © 2012 Steven E. Pazar ALL RIGHTS RESERVED.

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.

Do you maintain or manufacture goods? Do you provide professional services? Does your company offer mixed goods and services? Regardless of the nature, keeping your business obligations and remedies for non-conformance consistent with industry practice takes diligence and sharp thinking.

the hotline

Engineers and other professionals provide services in accordance with a generally accepted professional standard of care. That standard of care does not guarantee perfection. If it did, medical professionals would be on the hot seat every time a patient, despite well-grounded advice and care, took a turn for the worse. The same logic applies to other professionals, such as design engineers or financial consultants. Presented below is an example of a professional standard of care:

“Performance of Services: *An engineer shall perform Services in accordance with the generally accepted practices of similar professionals performing similar services in the same geographic region at the time the Services are performed for Company. In the event the Services are not in conformance with the generally accepted standard of care, and the Company promptly notifies the Engineer within twelve (12) months of the completion of the Services of such non-conformance, Engineer agrees to re-perform the original Services to correct the non-conformance.”*

Contrast the typical warranty associated with maintenance or manufacture of goods obligating the provider to supply goods free from defects in materials and/or workmanship. Here the expectation is to follow or meet the specifications, supply new materials, and fabricate with accuracy and precision. If a part does not meet the stipulated requirements it is subject to rejection, replacement, and/or repair. An example of a typical warranty for goods is:

“Sale of Goods: *Seller warrants to Buyer, and Buyer’s successors, assigns, customers, and users of Goods sold by Buyer, for a period of twenty-four (24) months after acceptance of the Buyer’s product by Buyer’s customer, that all Goods provided hereunder shall be:*

- i. merchantable and fit for the purpose intended;*
- ii. new;*
- iii. free from defects in material and workmanship;*
- iv. in compliance with all applicable Specifications, Drawings, and performance requirements; and*
- v. free from liens or encumbrances on title.”*

The normal best practice in contract drafting is to keep the concepts of standard of care and warranty somewhat separate. However, it is common to see standard of care or warranty provisions that mix standard obligations of professionals with those more appropriate for manufacturers.

For example, a contract provision that requires a professional to perform services that are “free from defects,” or a purchase order with a manufacturer’s warranty that lacks exclusions for misuse, poor maintenance or storage, or faulty operation.

Worse yet, may be the right to seek recovery for not only re-performance, repair, or replacement, but field costs associated with removal and re-installation of parts due to inadequate design or faulty manufacture. In the final analysis an appropriate contract provision should be consistent with the nature of the business and the subject matter of the agreement.

Keep the following in mind regarding standards of care and warranty obligations:

- Understand the link between warranty obligations, the professional standard of care, and insurance coverage;
- Use a clear trigger for the start of the standard of care/warranty period with a clearly defined end time as well as for the remedies for non-conformance; and
- Be careful to address responsibility for field costs such as removal and re-installation of parts due to inadequate design or faulty manufacture.

Note: The sample provisions above are for illustration purposes only and are not intended for use without appropriate review in your jurisdiction.

ARSA action

Exciting agenda planned for 2013 Symposium

The March 20-22, 2013 ARSA Symposium [agenda](#) is set! It continues the strong tradition of imparting valuable information, facilitating exchange of information between regulators and the regulated, and providing networking opportunities among customers and industry peers.

Next year's agenda combines traditional programming with new elements. We'll again invite regulators from across the globe to update attendees on the latest news including the proposed part 145, continued cooperation between the FAA and EASA on the bilateral aviation safety agreement, and opportunities for further cooperation between and amongst aviation authorities such as the FAA, EASA, the Civil Aviation Administration of China, Transport Canada and the Australian Civil Aviation Safety Authority.

New for 2013 is the inclusion of targeted break-out sessions; on day two attendees will choose between workshops covering major/minor determinations, tools to obtain access to instructions for continued airworthiness, or opportunities in the military market.

As always, the Symposium will kick-off with Legislative Day, which provides the opportunity to engage congressional leaders and learn about the industry's legislative priorities. The last day begins with the annual membership meeting and state of the association address by ARSA President Gary Fortner.

We hope you'll enjoy the changes made to the coming event; to register and view the agenda, visit <http://arsa.org/arsa-symposium/>.

<p><i>Aeronautical Repair Station Association</i></p> <p>2013</p> <p><i>Annual Repair Symposium</i></p>	<p>Thanks to our sponsors!</p> <p>Aircraft Electric Motors, Inc. • JDA Aviation Technology Solutions • Segers Aero Corporation • TIMCO Aviation Services • Turbine Controls, Inc.</p> <p>Click here to sponsor the Symposium!</p>
--	---

ARSA comments on proposed repair station rule

On Nov. 19, ARSA submitted its [comments](#) to the FAA [rewrite](#) of 14 CFR part 145, the federal regulations governing repair stations.

In its submission, ARSA sought to comprehensively address the concerns and interests of all repair stations. While the proposal means to align regulations, current business models, and future safety management system requirements, the Association pointed out several deviations from that purpose—

- Absence of line maintenance rating—unlike the Canadian and European systems, and current business arrangements, the FAA is not contemplating a line maintenance rating. This is not conducive to business practices, in the past, now, or in the future.
- Permanent housing requirement—contract maintenance with mobility is necessary and certainly part of past, current, and future business models. To demand that a repair station have permanent “housing” belies reality and the ability of a company to ensure its system is under the control of a civil aviation authority.

the hotline

- Separating the operations specifications from the certificate—this would essentially allow the agency to unilaterally change operations specifications. The Association vehemently opposes the creation of separate operations specifications for repair stations. The FAA is merely adding an unnecessary burden on its own workforce and the industry.
- Preventing certain “persons” from “controlling” a certificate—the FAA is attempting to prevent “bad actors” from “controlling” the quality of a repair station’s work. Since the FAA does not have or will not expend the resources to keep a list of “bad actors,” its workforce will have no objective criterion on which to investigate ownership of these corporate applicants. Further, ARSA pointed out that there is already a federal law prohibiting similar action (see [49 U.S.C. §§ 44726 and 44711](#)).
- Preventing the voluntary surrender of a certificate—the agency’s claim that it wants to prevent “bad actors” from obtaining and maintaining a certificate is laudable; its ability to prevent that action in a fair and uniform manner is nonexistent. The increase in safety that may result from the proposal is well outweighed by the agency and industry burden.

The Association is also concerned about the agency’s cost estimates for implementing the proposed changes. For instance, the estimate does not take into account the necessity to completely rewrite operation and quality procedures to address the change in regulatory numbering. Additionally, it fails to recognize that most repair stations lack “administrative” personnel and it does not account for the training that will be necessary to ensure compliance with the mandate.

Given these concerns, ARSA believes that the FAA should issue a supplemental notice of proposed rulemaking that incorporates the substantive comments made by the Association and other interested parties that will help the agency more ably meet industry needs and maintain the highest standards of safety.

[Click here](#) to read ARSA’s comments in their entirety.

A [side-by-side comparison](#) and [red-lined](#) version of the current vs. proposed rule is available on ARSA’s website.

ARSA Board elects leaders

The Aeronautical Repair Station Association’s Board of Directors elected the Association’s officers for 2012-2013 at its fourth quarter annual meeting.

Gary M. Fortner, vice president of quality control at [Fortner Engineering](#) of Glendale, Calif. will serve as president. As a senior executive of a sophisticated, medium-sized, family owned aviation business, Mr. Fortner is well prepared to lead the Association.

Mr. Fortner understands the challenges facing the maintenance industry and has been active on ARSA’s board, providing support and guidance. Earlier this year, Mr. Fortner testified before the House Aviation Subcommittee on the critical role repair stations play in civil aviation safety.

Fortner will replace Dr. Hans-Juergen Loss, vice president, quality management, [Lufthansa Technik](#), as the Association’s top volunteer leader. Dr. Loss served two terms, spearheading the development of ARSA’s media relations and communications program while enhancing the Association’s international reach.

“I look forward to guiding the Association as it improves the operating environment for repair stations,” said Fortner. “I applaud Dr. Loss’ hard work over the past two years; the growth in the Association’s advocacy programs is a testament to his tenure.”

Gary Jordan, president and CEO of [Jordan Propeller Service](#) of San Antonio will serve as ARSA’s senior vice president. Jordan has served as treasurer since 2010.

Jim Perdue, vice president and manager of sales at [SONICO, Inc.](#) in Moses Lake, Wash. will round out the Association’s elected leadership as its treasurer. Perdue has been active with ARSA for years.

UAS integration must not distract FAA's safety focus

On Nov. 8, ARSA joined 20 of its industry partners on a [letter](#) to Acting FAA Administrator Michael Huerta cautioning that Unmanned Aircraft Systems (UAS) integration not distract from the agency's safety mission.

The introduction of UAS should not limit access to airspace or require modifications to the existing fleet beyond what is necessary to accommodate NextGen, the letter stated. The FAA must ensure that it remains the nation's preeminent air space manager and not let UAS hinder certifications of civil aircraft, repair stations, or operators. The signatories also advised the FAA that any privacy issues related to UAS should be handled by other federal agencies with expertise and jurisdiction over such matters.

Recognizing that the future of aviation undoubtedly includes remotely piloted aircraft, the industry leaders expressed their willingness to work with the FAA to bring UAS into American skies in a way that does not harm the current aviation system.

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!

Positive publicity corner

Be thankful for the PPC

By Jason Langford, ARSA director of communications

During this time of giving thanks, the aviation maintenance industry should remember ARSA's Positive Publicity Campaign (PPC).

The PPC is the industry's chief advocate, vigorously defending repair stations from misleading and hostile media reports that, in turn, drive bad policy in Washington. Recently, ARSA, using PPC resources, worked with members to counter negative reporting in *The New York Times*, which took a flawed approach in its understanding of the industry. The Association also [cautioned](#) media about the need to let the investigative process work, rather than rush to judgment with unproven theories and speculation.

In addition, the PPC is generating improved exposure for the work of the Association. For each of the first three quarters of 2012, ARSA enjoyed a threefold increase in media mentions.

ARSA is grateful to be able to serve as the voice of the aviation maintenance industry and looks forward to doing so in coming years.

To show your support for the PPC and ARSA's advocacy on behalf of repair stations, contribute today to the campaign. [Click here to pledge your support](#), or contact ARSA Communications Director [Jason Langford](#).

the hotline

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.

[Exports help local businesses expand](#) (*Great Falls Tribune*)

[Female applicants rise for aircraft maintenance training](#) (*The Wichita Eagle*)

[Phoning an aircraft engine in mid-flight? No problem](#) (*Readwrite.com*)

[Aerospace industry growth shows a promising future in flight](#) (*Idaho Statesman*)

[A fast-growing Empire rises by maintaining turboprops](#) (*Idaho Statesman*)

[Professional Aircraft Services Accessories expands, reopens](#) (*AIN Online*)

[California aircraft maintenance provider, Aviation & Defense, Inc., creates jobs in San Bernardino](#) (*AviationPros.com*)

[Rectrix Aviation launches operations at Worcester Regional Airport](#) (*The Boston Globe*)

[Titusville aircraft company spreading its wings](#) (*FloridaToday.com*)

[Maintenance company eyes CVG for 165 jobs](#) (*Cincinnati.com*)

[Jet Aviation expands maintenance capabilities in Houston](#) (*AviTrader*)

ARSA on the Hill

By Daniel Fisher, ARSA vice president of legislative affairs

In November, ARSA's legislative team continued to push lawmakers on the Transportation Security Administration repair station security rules.

The Association was also represented at meetings urging Congress to extend 50 percent depreciation bonus through at least 2013 and to continue current estate tax rates (35 percent top rate, \$5 million exemption). If lawmakers don't act on the "death" tax, levies will return to 2001 levels (55 percent top rate, \$1 million exemption).

The legislative team attended a policy briefing with House Majority Leader Eric Cantor (R-Va.) to discuss the Republican priorities for the lame duck session and the 113th Congress.

ARSA urged Congress to [strip language in the postal reform bill](#), which would limit federal employees from participating at more than one conference or meeting hosted per non-federal organization per year. The legislation could see action during the lame duck session in December. ARSA regularly invites government employees to events like the [Annual Repair Symposium](#). Any limitations attendance at these educational conferences would deprive regulators of an important resource and deny ARSA members the opportunity to engage with government officials.

ARSA also launched the second edition of its political video blog series, "[Sky Lounge](#)."

The Government Affairs Committee members were urged to head to the polls and vote on Election Day.

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



Bills on the Hill

Carol Giles crowned ARSA Pundit of the Year

ARSA is pleased to announce Carol Giles, president of Carol E. Giles & Associates, as ARSA's Pundit of the Year. Along with fame and fortune, Giles has bragging rights as the aviation maintenance industry's top pundit for the next two years. She is a member of ARSA's Speakers Bureau and the former director of the FAA's aircraft maintenance division.

Giles correctly predicted the outcome in six of the eight most hotly-contested Senate races (like many, Giles was caught off guard by Heidi Heitkamp (D-N.D.) and Tim Kaine's (D-Va.) victories). She forecasted the Democrats would retain control of the Senate by a 54-seat margin, one shy of the 55 seats the party captured on election night. Giles was also the closest to anticipating President Obama earning a second term with 332 electoral votes, estimating the incumbent would receive 338 votes.

An honorable mention goes to runner-up Ken Harmon of Harmon Hums Along in Roswell, N.M.

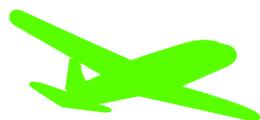
Election 2012: More of the same

After nearly \$6 billion spent, the most expensive election in American history is now over and it's clear what all that money bought us: more of the same.

President Obama was reelected handily, the Senate will remain Democratic, and the GOP retains control of the House. Here are a few notes from election night of interest to ARSA members:

- **ARSA PAC was 100 percent.** Every lawmaker supported by ARSA PAC was reelected.
- **Lost opportunities.** Republicans failed to capitalize in a year that many predicted would be fruitful. There is no better example than in Missouri, where Sen. Claire McCaskill (D), arguably the most vulnerable Democrat this cycle and a perennial supporter of anti-contract maintenance proposals, easily won reelection against a weak opponent in a state that Mitt Romney carried by nearly ten points.
- **Minnesota's 8th goes blue.** Two years ago, Chip Cravaack (R) ousted former Transportation & Infrastructure Committee Chairman Jim Oberstar (D) in the biggest upset of the 2010 election. Cravaack, a former commercial pilot, was immediately named vice chairman of the House Aviation Subcommittee and established himself as an expert on aviation issues. He lost by nearly ten points to Democrat Rick Nolan.
- **Another one bites the dust.** During the last FAA reauthorization battle, ARSA and our allies relied on the support of moderate Democrats (a dying breed) to fight off harmful amendments to the industry, such as mandating drug and alcohol testing of foreign repair stations. One of those, Rep. Leonard Boswell (D-Iowa), was defeated.
- **While another survives.** Conventional wisdom had Rep. John Barrow (D-Ga.) losing his reelection bid in a newly drawn, conservative leaning district. However, Barrow, well known to repair stations for leading efforts among Democrats against proposals that would have resulted in a collapse of the EU-U.S. BASA, survived his challenge.

In the meantime, ARSA would like to know your thoughts about the 2012 election and its impact on the industry. Email [Daniel Fisher](#), ARSA's vice president of legislative affairs, with your comments.



AAIRRG

AVIATION ALLIANCE INSURANCE RISK RETENTION GROUP, INC.

Insurance for Repair Stations

click here for information

New Congress, new leaders

While Congress still has many issues to address before the end of the year, lawmakers are planning for the next legislative session by choosing committee leaders.

Transportation & Infrastructure (T&I) Committee Chairman John Mica (R-Fla.), a long-time friend of the aviation maintenance industry, will turn the gavel over to Rep. Bill Shuster (R-Pa.). Recently elected to his seventh term, Shuster is a familiar face to the transportation industry, although his efforts have primarily focused on surface transportation, railroad, and pipelines. Shuster has indicated that he plans to focus on water infrastructure, passenger rail, surface transportation reauthorization, and NextGen implementation.

It is likely that Rep. Tom Petri (R-Wis.) will be replaced as chairman of the House Aviation Subcommittee, although his successor is still unclear.

Rep. Nick Rahall (D-W.V.) will continue as the committee's lead Democrat. However, with the retirement of Rep. Jerry Costello, (D-Ill.), Democrats will need to fill the top spot on the Aviation Subcommittee.

Meanwhile, Rep. Michael McCaul (R-Texas) has been tapped to lead the House Homeland Security Committee. It is unclear whether Rep. Mike Rodgers (R-Ala.) will continue to chair the Transportation Security Subcommittee, where he has led efforts to push TSA to issue repair station security rules. Rep. Bennie Thompson (D-Miss.) will again serve as ranking member on the panel.

On the other side of the Hill, Senate Commerce, Science, & Transportation Committee Chairman John D. Rockefeller IV (D-W.V.) is expected to remain the panel's chair. However, the retirements of ranking member Kay Bailey Hutchison (R-Texas) and her presumed successor, Sen. Jim DeMint (R-S.C.), leave minority leadership in the committee uncertain. Sen. John Thune (R-S.D.) is now the senior Republican member and will likely take over.

Sen. Maria Cantwell (D-Wash.), current Aviation Operations, Safety, & Security Subcommittee chairman, is expected to continue in that position. There could be a shake-up among Republicans, as the subcommittee's ranking member, Sen. John Thune (R-S.D.), might rise to lead the Republican side of the full committee.

The Senate Homeland Security & Government Affairs Committee will change leadership on both sides of the aisle. It looks as though Sen. Tom Carper (D-Del.) will chair the committee with Sen. Tom Coburn (R-Okla.) expected to serve as the ranking member.

ARSA looks forward to working with new committee leaders on behalf of the aviation maintenance industry during the next Congress.

Regulatory engagement threatened

An amendment ([S.Amdt.2060](#)) attached to the Senate's postal reform bill ([S.1789](#)) contains a poison pill that would prevent associations from engaging with government officials at industry conferences.

The amendment, adopted in response to congressional outrage at lavish spending for government conferences, would limit the ability of federal agencies to attend more than one conference or meeting hosted by non-governmental groups. The proposal defines a conference as a meeting held for consultation, education, or discussion that entails travel costs and is not held at an agency facility.

Earlier this year, ARSA [joined](#) thousands of organizations [encouraging lawmakers](#) to reconsider this drastic restriction on the ability of citizens to interact with government employees.

The Association regularly invites federal personnel to events like the [Annual Repair Symposium](#). Any limitations on attendance would deprive regulators from using the Association as an important resource and deny ARSA members the opportunity to interact with government officials.

the hotline

As lawmakers rush to complete end of year business, it is important that they hear about the negative consequences of this short-sighted proposal. Visit ARSAaction.org to urge your elected officials to ensure that citizens have access to regulators.

ARSA PAC closes with record-busting year

2012 proved to be ARSA PAC's most successful year ever – both in participation and dollars raised. A record-breaking 40 ARSA members invested in the Association's program. This allowed ARSA PAC to achieve "Multicandidate Status," a strategic milestone that allows contributions of up to \$5,000 to political campaigns rather than \$2,500. ARSA PAC also raised \$10,035 in 2012, \$2,035 more than the previous record year (2005).

ARSA PAC invested its war chest wisely in 2012; all six candidates whom the PAC supported were victorious on Election Day.

Candidate	W	L
Rep. Pat Meehan (R-Pa.)	✓	
Rep. Tom Petri (R-Wis.)	✓	
Rep. Mike Pompeo (R-Kan.)	✓	
Rep. Mike Rogers (R-Ala.)	✓	
Rep. Adam Schiff (D-Calif.)	✓	
Rep. Tim Walberg (R-Mich.)	✓	

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.

Grant ARSA PAC solicitation consent to learn about joining 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.

For many ARSA member companies, solicitation consent will expire this year. If you provided solicitation consent only through 2012, or even if you are unsure when your consent expires, renew your ARSA PAC solicitation consent through 2015 today.

[Click here to grant solicitation consent for 2013, 2014, and 2015.](#)

2012 ARSA PAC Contributors

Capitol Hill Club (\$1,000)

Bill Perdue, SONICO

Jim Perdue, SONICO

Washington Team (\$500)

Mark Davis, Perform Air International

Robert Fortner, Fortner Engineering

Marshal S. Filler, ARSA

Sarah MacLeod, ARSA

Gary Fortner, Fortner Engineering

Christian A. Klein, ARSA

Lynn Fortner, Fortner Engineering

Bill Rathmanner, Aero Design Services

145 Club (\$145)

David Albert, Sequa Corporation/Chromalloy

John Hunter, HEICO

Matthew Bickel, EB Airfoils

Andrew Jackson, Perform Air International

the hotline

Kip Blakely, TIMCO

Russell Buckley, Auburn Aerospace, Inc.

Ian Cheyne, BBA Aviation

Alfred Drake, Perform Air International

Jose Eduarte, A.I.R.S.

Daniel Fisher, ARSA

David Fortner, Fortner Engineering

Lori Gleeson, Perform Air International

Kristena Grossman, Perform Air International

Tom Grossman, Perform Air International

Jan Haugland, Perform Air International

Randall Herman, Mid-America Aviation

Bobby Jones, Perform Air International

Gary Jordan, Jordan Propeller Services

Dave Latimer, TIMCO

Mike Leland, Commercial Jet

Brian Loomer, AAR Aircraft Services

Jorge Mejia, Miltechnologies

Jim Meyer, Aviation Repair Solutions

Barry Muhler, Aviation Repair Resources

Christopher Rizen, Perform Air International

Jeff Stimson, Perform Air International

Jennifer Weinbrecht, Component Repair Technologies

Friends

Caroline Kneip, ARSA

Jason Langford, ARSA

Josh Pudnos, ARSA

Have you seen this person?

With the conclusion of election season, **the hotline** will begin to spotlight regulatory, legislative, and business leaders making important contributions to the aviation industry. This month we look at Gary Fortner, the head of quality control for [Fortner Engineering and Manufacturing and ARSA's 2013 President](#).

Gary Fortner

Vice President of Quality Control & Engineering



Gary Fortner has 25 years of experience in the aviation industry and is part owner and vice president of quality control and engineering of Fortner Engineering & Manufacturing. Prior to becoming involved with quality control, he served in a number of capacities including engineer. In 1998 he was appointed an FAA Designated Engineering Representative specializing in the approval of major repair and alteration of hydraulic accessory components.

Fortner has a bachelor of science in mechanical engineering from San Diego State University and a master's in material engineering from California State at Northridge. He currently serves on the board of directors for Fortner Engineering and is the president of ARSA.

—ADVERTISEMENT—

BLUESTONE PAYMENTS 
THE SOLID CHOICE FOR MERCHANT SERVICES

[Click for details](#)

International news

EU postpones emissions trading scheme

On Nov. 13, the European Commission (EC) suspended its carbon emissions laws that would have charged airlines for greenhouse gas emissions.

Following pressure from China and the United States, the Commission excluded aviation from implementation of its Emissions Trading System for one year. The regulations would have required airlines to limit carbon emissions or purchase permits to make up the shortfall. Implementation of the program risked igniting a broader trade war that would have undermined the program's success.

The move follows a decision by the International Civil Aviation Organization to search for a global, market-based mechanism to encourage airlines to reduce emissions. The EC hopes the delay will incentivize establishment of a broader international system, but has threatened to re-impose the rule without significant progress to curb emissions.

Nevertheless, the delay is largely seen as an important victory for the aviation industry, which aggressively fought the bill. Shortly before the EC announced the rules suspension, the U.S. Congress approved a measure that would have prohibited U.S. airlines from complying with the rule. President Obama signed the measure into law after the postponement was announced.

International Roundup

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

[Embraer, Kenya Airways to establish authorized E-Jet MRO service center](#) (*Aviation Week*)

[Twin initiatives to make young Emiratis high flyers in aviation](#) (*The National*)

[Shanghai Hawker Pacific gets Cayman Islands OK for maintenance](#) (*AIN Online*)

[Eurocopter joint venture expands its MRO capabilities in China](#) (*Vertical*)

[Global MRO regional market worth \\$6.7 billion](#) (*Air Transport World*)

[Pratt & Whitney Service Partners Shanghai Engine Center provides apprentice training program for Shanghai Civil Aviation College](#) (*Stockhouse*)

[First maintenance training facility for Bell Helicopter to open in China](#) (*4-traders.com*)

[Aircraft maintenance facility will boost aviation in Nigeria](#) (*This Day Live*)

[EASA orders inspections of A380 oxygen pressure systems for leaks](#) (*Aviation Week*)

[Sikorsky continues to expand its capabilities in Colombia](#) (*PR Newswire*)



ARSA membership benefit!

Staples Business Advantage 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, including furniture and electronics.

Member spotlight

Universal Air Repair, LLC, Cordova, Tenn.

Universal Air Repair achieves the highest standards of quality and service for its customers. As a subsidiary of [Universal Asset Management](#) the company has the ability to build customized solutions and is continually developing capabilities.

Universal Air Repair has an established position as a cost effective provider of component maintenance, NDI, and calibration. The company's component shop prides itself in the ability to complete testing or maintenance on-time and on-budget. Its calibration lab supports a worldwide range of industries, and its NDI program performs magnetic particle and liquid penetrant inspections at some of the most competitive rates in the industry.

For more information, visit <http://www.uarepair.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: ARSA Publications – Model Repair Station and Quality Manual

By Jennifer Goodwin, ARSA membership & senior administrative coordinator

Taking care of business day in and day out is hard enough; staying compliant with FAA regulations makes it harder. If your manual is old or outdated, it just doesn't help anymore and it's time to rewrite, but the hours that would take represent valuable time and expense for your business. Who wouldn't want to improve efficiency, communication, documentation, and traceability without having to spend months in the process?

ARSA is here to help.

The Association's Model Repair Station and Quality Manual with Integrated Forms was written to address the concerns of certificated repair stations and ensure compliance with every paragraph of the federal regulations and associated FAA guidance material. Each page is customizable and can be tailored to your company's needs. Additionally, ARSA members have access to industry experts who can help with any questions while customizing your manual. Best part: as a member, you get 50 percent off the retail price.

For more information or to order your copy, visit ARSA's online [publication page](#). Or, call the ARSA offices at 703 739 9543.

Welcome new members

[Danbury Aerospace](#), San Antonio, Texas

[Landing Gear Technologies, LLC](#), Opa-Locka, Fla.

[Schaeffler Aerospace \(Barden/FAG Aerospace\)](#), Danbury, Conn.

ARSA regulatory compliance training—Questions

Part 1: General comprehension

Level 1: For anyone working in aviation

§ 65.101: Eligibility requirements: General.

(a) To be eligible for a repairman certificate a person must—

- (1) Be at least 18 years of age;
 - (2) Be specially qualified to perform maintenance on aircraft or components thereof, appropriate to the job for which he is employed;
 - (3) Be employed for a specific job requiring those special qualifications by a certificated repair station, or by a certificated commercial operator or certificated air carrier, that is required by its operating certificate or approved operations specifications to provide a continuous airworthiness maintenance program according to its maintenance manuals;
 - (4) Be recommended for certification by his employer, to the satisfaction of the Administrator, as able to satisfactorily maintain aircraft or components, appropriate to the job for which he is employed;
 - (5) Have either—
 - (i) At least 18 months of practical experience in the procedures, practices, inspection methods, materials, tools, machine tools, and equipment generally used in the maintenance duties of the specific job for which the person is to be employed and certificated; or
 - (ii) Completed formal training that is acceptable to the Administrator and is specifically designed to qualify the applicant for the job on which the applicant is to be employed; and
 - (6) Be able to read, write, speak, and understand the English language, or, in the case of an applicant who does not meet this requirement and who is employed outside the United States by a certificated repair station, a certificated U.S. commercial operator, or a certificated U.S. air carrier, described in paragraph (a)(3) of this section, have this certificate endorsed “Valid only outside the United States.”
- (b) This section does not apply to the issuance of a repairman certificate (experimental aircraft builder) under § 65.104 or to a repairman certificate (light-sport aircraft) under § 65.107.

<p>Question 1: A person cannot be eligible for a repairman certificate if the employer did not recommend him/her for certification.</p>	<p>Question 2: To be eligible for a repairman certificate a person does not have to be specially qualified to perform maintenance on aircraft or components thereof.</p>
<p>A—True. B—False.</p>	<p>A—True. B—False.</p>

<p>Question 3: To be eligible for a repairman certificate a person must have at least 18 months of practical experience and completed formal training that is acceptable to the Administrator.</p>	<p>Question 4: To be eligible for a repairman certificate a person must be able to read, write, speak, and understand the English language, unless the applicant is employed outside the United States.</p>
<p>A—True. B—False.</p>	<p>A—True. B—False.</p>

Name _____
Clearly Print the Name of the Person Taking the Test

Date _____
Date Test was Completed

Score _____
Enter as x (number correct) of y (number of questions)

Hours _____
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

Level 1: For anyone working in aviation

§ 65.101: Eligibility requirements: General.

- (a) To be eligible for a repairman certificate a person must—
 - (1) Be at least 18 years of age;
 - (2) Be specially qualified to perform maintenance on aircraft or components thereof, appropriate to the job for which he is employed;
 - (3) Be employed for a specific job requiring those special qualifications by a certificated repair station, or by a certificated commercial operator or certificated air carrier, that is required by its operating certificate or approved operations specifications to provide a continuous airworthiness maintenance program according to its maintenance manuals;
 - (4) Be recommended for certification by his employer, to the satisfaction of the Administrator, as able to satisfactorily maintain aircraft or components, appropriate to the job for which he is employed;
 - (5) Have either—
 - (i) At least 18 months of practical experience in the procedures, practices, inspection methods, materials, tools, machine tools, and equipment generally used in the maintenance duties of the specific job for which the person is to be employed and certificated; or
 - (ii) Completed formal training that is acceptable to the Administrator and is specifically designed to qualify the applicant for the job on which the applicant is to be employed; and
 - (6) Be able to read, write, speak, and understand the English language, or, in the case of an applicant who does not meet this requirement and who is employed outside the United States by a certificated repair station, a certificated U.S. commercial operator, or a certificated U.S. air carrier, described in paragraph (a)(3) of this section, have this certificate endorsed “Valid only outside the United States.”
- (b) This section does not apply to the issuance of a repairman certificate (experimental aircraft builder) under § 65.104 or to a repairman certificate (light-sport aircraft) under § 65.107

<p>Question 1: A person cannot be eligible for a repairman certificate if the employer did not recommend him/her for certification.</p>	<p>Question 2: To be eligible for a repairman certificate a person does not have to be specially qualified to perform maintenance on aircraft or components thereof.</p>
<p>A—True. (Correct answer; to be eligible for a repairman certificate a person must be recommended for certification by his employer, to the satisfaction of the Administrator.)</p> <p>B—False.</p>	<p>A—True.</p> <p>B—False. ((Correct answer; to be eligible for a repairman certificate a person must be specially qualified to perform maintenance on aircraft or components thereof, appropriate to the job for which he is employed.)</p>
<p>Question 3: To be eligible for a repairman certificate a person must have at least 18 months of practical experience and completed formal training that is acceptable to the Administrator.</p>	<p>Question 4: To be eligible for a repairman certificate a person must be able to read, write, speak, and understand the English language, unless the applicant is employed outside the United States.</p>

the hotline

A—True.

B—False. (Correct answer; to be eligible for a repairman certificate a person must have either at least 18 months of practical experience OR completed formal training that is acceptable to the Administrator.)

A—True. (Correct answer; to be eligible for a repairman certificate a person must be able to read, write, speak, and understand the English language, unless the person is employed outside the United States and the certificate is endorsed "Valid only outside the United States.")

B—False.