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Submitted Electronically via mark.demesmaeker@europarl.europa.eu
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The Honorable Mark Demesmaeker, MEP
European Parliament
Wiertzstraat/Rue Wiertz
Altiero Spinelli 08H141
B-1047 Brussels

The Honorable Eija-Riitta Korhola, MEP
European Parliament
Wiertzstraat/Rue Wiertz
Altiero Spinelli 08F151
B-1047 Brussels

RE: Anti-Competitive Practices by Aviation Original Equipment Manufacturers

Mr. Demesmaeker and Ms. Korhola:

The Aeronautical Repair Station Association (ARSA) applauds your inquiries to the European Commission concerning anti-competitive practices negatively impacting the aviation maintenance industry. The behavior poses a significant threat to the continued viability of international maintenance, repair, and overhaul (MRO) companies. The loss of competition will result in higher costs for operators and, ultimately, the flying public.

This situation is particularly troubling in light of the fact that safety regulations require design approval holders to make instructions for continued airworthiness (ICAs) available and MROs to follow those vital instructions. ARSA has long been concerned about not only the economic impact of this problem, but also the fact that it can and will adversely affect safety by creating inconsistent maintenance practices.

ARSA is an international trade association with a distinguished record of representing certificated aviation maintenance facilities before governmental bodies and civil aviation authorities. The association has members worldwide, including repair stations, aircraft operators, manufacturers and other companies related to, or having an interest in, the maintenance, preventive maintenance or alteration of aircraft. It has expertise in the technical, legislative, and regulatory compliance aspects of this vital industry.

Government-induced predatory practices remain a chief concern for ARSA members. Some manufacturers refuse outright to provide ICAs (e.g., maintenance manuals); others charge an exorbitant amount, constructively denying access.

ARSA stands ready to provide whatever assistance is needed to assist legislative bodies worldwide understand and balance this issue.

Sincerely,

A handwritten signature in black ink that reads "Daniel B Fisher". The signature is written in a cursive, slightly slanted style.

Daniel B. Fisher
Vice President of Legislative Affairs