



**FAA Drug & Alcohol Testing ANPRM**

*Daniel B. Fisher*

*Brett Levanto*

*Crystal Maguire*

*Aeronautical Repair Station Association*

Aviation Assembly-Royal Netherlands Embassy

June 9, 2014

# About ARSA

- Trade association based in Alexandria, VA
- Founded in 1984
- Serves \$58 billion worldwide civil aviation maintenance industry
- Operated by Obadal, Filler, MacLeod & Klein (OFM&K)

*Ensuring government support and fair oversight is challenging — ARSA does the spadework by managing aggressive public advocacy programs and providing the essential regulatory knowledge and practical advice needed to help businesses survive.*

# International Industry

- ARSA worldwide membership
  - 20 countries on five continents
- Contract maintenance expanding globally
  - Projected growth of 4.2% annually until 2024
- International environment must foster growth
  - Free from unnecessary micromanagement
  - Encourages cooperation between civil aviation authorities (CAAs)
  - Respects international sovereignty

# Legislative History

- Proposal originated from push by labor unions precipitating false safety and economic arguments
- Real motivation=hindering contract maintenance
- FAA reauthorization proposals dating back to 2008 included provisions that were much worse
- ARSA, industry allies successfully “moderated” drug & alcohol testing language in FAA Modernization & Reform Act
- “Consistent with the applicable laws of the country in which the repair station is located”

# The ANPRM

- What is an ANPRM?
- Process for comments
  - Due July 17
- What is the FAA looking for?
  - Testing laws and existing programs
  - Drugs used
  - Deterrence methods employed
- Why countries need to submit comments?

# ARSA Activities

- Filed request for extension—FAA granted 60 days
- Coordinating coalition activities
- Raising visibility of the issue through industry publications and outreach
- Conducting research and collecting information to support ARSA comments
  - Identified 64 countries with FAA-certificated repair facilities (see if there is a facility located in your country at <http://av-info.faa.gov/repairstation.asp>)
  - Sent survey to contacts at 695 companies at foreign FAA-certificated repair facilities

# Industry Survey

- Available at [www.surveygizmo.com/s3/1635615/FAA-Drug-and-Alcohol-Testing](http://www.surveygizmo.com/s3/1635615/FAA-Drug-and-Alcohol-Testing)
- Survey sent to FAA-certificated part 145 repair stations operating outside the U.S. and Canada
- Collects information regarding drug & alcohol laws in the respondent's country, whether testing is mandated, permitted or prohibited and the company's current testing practices

# Preliminary Results

- Received 17 complete responses representing repair stations in 10 countries including Argentina, China, Jordan, Malaysia, Mexico, Netherlands, Singapore, South Africa, Sweden and the United Kingdom
- According to respondents, of the 10 countries represented, 3 mandate drug and alcohol testing, 6 permit it and 1 prohibits it
- Ninety-one percent of respondents in countries that permit, but do not require drug and alcohol testing, do **not** have a screening program in place



# Action Items

- Circulate survey to maintenance providers in your country
- Continue dialogue with ARSA (use each other as resources)
- Contact your counterpart who can determine what the drug and alcohol testing laws are in your country
- Submit comments to the docket at <http://www.regulations.gov/#!documentDetail;D=FAA-2012-1058-0014>

# Questions?

