



**FAA-EASA International Aviation Safety Conference**  
**U.S./EU Safety Agreement and Maintenance Annex**  
**Guidance**

*Marshal S. Filler, Managing Director & General Counsel*

ARSA is the only association devoted to the unique needs of the [\\$58 billion worldwide](#) civil aviation maintenance industry.

ARSA members are located on five continents and in nearly 20 countries and include global corporations as well as small, independent businesses.

ARSA is managed by the law firm of Obadal, Filler, MacLeod & Klein, which provides management, government affairs, and legal services to trade associations and transportation-related companies.

The firm's legislative and regulatory experts create the tools to navigate the maze of government mandates while enhancing efficiency, productivity and safety.

## Marshall S. Filler



Marshall Filler is a managing member of Obadal, Filler, MacLeod & Klein, P.L.C. where he represents aviation industry clients in matters pending before the agencies of the Federal government, the Congress and the courts.

He is a managing member of the law firm of Obadal, Filler, MacLeod & Klein, P.L.C., where he is engaged in the legal representation of Domestic and international aviation safety regulation (primarily design, production, operations and maintenance).

## Part Tagging Requirements

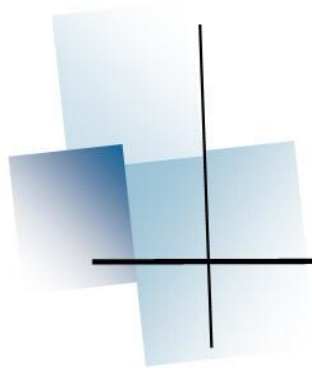
- EASA requires “trace documentation” (EASA Form 1 or FAA Form 8130) for all new articles (see [MAG](#), Section B, paragraph 10(k)).
- The FAA specifically rejected the requirement that the production approval holder issue an FAA Form 8130-3 (See the preamble to the final rule, titled “Production and Airworthiness Approvals, Part Marking, and Miscellaneous Amendments” at [74 FR 53369](#))

## Part Tagging Requirements

- EASA has also stated that “components” include detail piece-parts destined for installation into a higher assembly, creating further complications (see [EASA letter](#) dated July 6, 2011).
- U.S. businesses and FAA resources are unnecessarily burdened by this significant administrative requirement with no safety benefit.

## Acceptance of Common Release Certificate

- Triple release addressed in MAG Change 3 between U.S., TCCA and EASA
- Industry will continue to push for mutual acceptance of a single form as an approval for return to service document for use by repair facilities that are certificated by multiple national aviation authorities (see [Oct. 27, 2009 letter](#) to FAA, EASA, TCCA, CASA and NZ CAA)



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## **Marshall S. Filler**

### **Managing Director & General Counsel**

121 North Henry Street  
Alexandria, VA 22314-2903  
[www.arsa.org](http://www.arsa.org)

Tel. 703 739 9543  
Fax 703 739 9488  
[Marshall.Filler@arsa.org](mailto:Marshall.Filler@arsa.org)