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## ARSA Works: Air Carrier Contract Maintenance Requirements Timeline

**December 15, 1997:** FAA introduces Air carrier Operations Specifications (OpSpec) paragraph D91 in Flight Standards [Handbook Bulletin for Airworthiness \(HBAW\) 96-05C](#).

**February 3, 1998:** FAA distributes Flight Standards [Handbook Bulletin for Airworthiness \(HBAW\) 98-01](#), providing guidance for principal inspectors to evaluate contractual relationships between air carriers and maintenance providers.

**July 8, 2003:** Department of Transportation (DOT) Office of Inspector General (OIG) releases [Report No. AV-2003-047](#) criticizing FAA's oversight of air carrier contract maintenance programs.

**September 30, 2005:** FAA distributes Flight Standards [Handbook Bulletin for Airworthiness \(HBAW\) 05-08B](#), providing guidance and directions for completing a team focused, in-depth inspection of a Part 145 certificated domestic repair station.

**September 30, 2005:** FAA distributes Flight Standards [Handbook Bulletin for Airworthiness \(HBAW\) 05-09C](#), providing information and guidance to the Regional Flight Standards Divisions and to Part 121 air carrier teams responsible for conducting detailed in process/task inspection.

**September 30, 2005:** FAA issues [Order 8300.10 Chapter 132](#) to provide guidance in the performance evaluation/inspection and assessment of the air carrier's contracted maintenance program/system.

**November 17, 2005:** ARSA [testimony](#) before the Aviation Subcommittee of the Senate Commerce, Science & Transportation Committee addresses the increased use of contract maintenance.

**December 15, 2005:** DOT OIG releases [Report No. AV-2006-031](#), auditing FAA oversight of non-certificated repair facilities.

**October 20, 2006:** FAA distributes Flight Standards [Handbook Bulletin for Airworthiness \(HBAW\) 06-05](#), "Air Carrier's Outsource Maintenance Provider Oversight Responsibilities (Certificated Repair Stations/Noncertificated Facilities)."

**March 29, 2007:** ARSA [testifies](#) before the House of Representatives' Aviation Subcommittee regarding contract maintenance's vital role in civil aviation.

**September 11, 2008:** FAA issues [AC 120-16E](#), describing the scope and content of air carrier maintenance programs.

**September 30, 2008:** DOT OIG releases [Report No. AV-2008-090](#), again criticizing FAA oversight of air carriers' contract maintenance programs.

**February 2, 2009:** House Transportation & Infrastructure Committee Chairman James Oberstar (D-Minn.) introduces the FAA Reauthorization Act ([H.R. 915](#)). The legislation's [Sec. 310](#) mandated the Federal Aviation Administration issue air carrier contract maintenance regulations. The provision was overbroad and unworkable.

**May 21, 2009:** The House passes the FAA Reauthorization Act ([H.R. 915](#)), 277-136.

**July 14, 2009:** Senate Commerce, Science & Transportation committee Chairman John D. Rockefeller, IV (W. Va.) introduces the FAA Air Transportation Modernization and Safety Improvement Act ([S. 1451](#)), including [Sec. 522](#), which also mandated disruptive carrier contract maintenance regulations.

**November 25, 2009:** FAA policy "[Revised OpSpec Paragraph D091 and Initial and Follow-up Surveillance](#)" becomes effective, providing information about issuance of revised OpSpec paragraph D091.

**November 25, 2009:** FAA policy "[OpSpec D091, Requirements Air Carrier Maintenance Providers](#)" becomes effective, providing information about the change from use of the term "substantial maintenance" to "essential maintenance."

**July 22, 2010:** ARSA submits [comments](#) to draft AC 120-CMP recommending a number of substantive changes to the guidance outlining the regulatory interface between air carriers and their maintenance providers.

**January 2011:** The 113<sup>th</sup> congressional session commences. Anticipating legislative action regarding air carrier contract maintenance requirements, ARSA affirmatively suggests [legislative language](#) to ensure effective oversight of non-certificated maintenance providers without undermining the efficiency of the maintenance industry.

**January 5, 2011:** ARSA submits [comments](#) to the DOT's Future of Aviation Advisory Committee (FAAC) in response to misstatements about contract maintenance made during the Labor and World-class Workforce Subcommittee's discussions.

**January 27, 2011:** Senate Commerce, Science & Transportation Committee Chairman John D. Rockefeller, IV (D-W. Va.) introduces the FAA Air Transportation Modernization & Safety Improvement Act ([S. 223](#)), including the problematic provision ([Sec. 522](#)) from the prior congressional session.

**February 11, 2011:** House Transportation & Infrastructure Committee Chairman John Mica (R-Fla.) introduces the FAA Modernization and Reform Act ([H.R. 658](#)), including [Sec. 315](#), which incorporated many of ARSA's suggested improvements.

**February 17, 2011:** The Senate passes the FAA Air Transportation & Safety Improvement Act ([S. 223](#)), 87-8.

**June 7, 2011:** FAA issues [Change 1 to AC 120-16E](#), explaining what the terms “maintenance program” and “air carrier maintenance program” mean.

**February 1, 2012:** House and Senate resolve differences between the chambers’ FAA reauthorization bills and file the [conference report](#). The final legislation’s [Sec. 315](#), included many of ARSA’s suggested improvements.

**February 3, 2012:** The House passes the FAA Modernization & Reform Act, 248-169.

**February 6, 2012:** The Senate passes the FAA Modernization & Reform Act, 75-20.

**February 14, 2012:** President Obama signs the FAA Modernization & Reform Act of 2012, following 23 short-term operating extensions of the agency’s prior authorization law (VISION-100) ([P.L. 112-95](#)).

**November 13, 2012:** Adhering to the congressional mandate, the FAA releases [a notice of proposed rulemaking](#) (NRPM) on air carrier contract maintenance requirements.

**November 15, 2012:** The FAA releases [Advisory Circular 120-16E](#), “Air Carrier Maintenance Programs.”

**February 12, 2013:** At the urging of ARSA and other industry groups, the FAA [extends](#) comment period for the NPRM.

**March 13, 2013:** ARSA submits comprehensive [comments](#) to the docket, urging the FAA adhere to congressional intent and the FAA Modernization & Reform Act’s plain language.

**March 4, 2015:** FAA releases [final rule](#) on air carrier contract maintenance requirements.