

ARSA Sets Record Straight on Proposed Contract Maintenance Rule

On March 13, the Aeronautical Repair Station Association (ARSA) submitted [comments](#) on the Federal Aviation Administration's (FAA) [air carrier contract maintenance requirements](#) notice of proposed rulemaking (NPRM)

The proposed rule is the direct result of Sec. 319 in the FAA Modernization & Reform Act of 2012 (the latest FAA reauthorization). The Association points out that the agency's NPRM misconstrued the plain language of the legislation resulting in a confusing proposal that duplicates existing rules. ARSA further noted the agency went beyond the bounds of the legislative provision.

"In the process of turning the congressional mandate into functional rules, the FAA exceeded the scope of the legislation," said ARSA Vice President of Legislative Affairs Daniel Fisher. "The NPRM disregards the lawmakers' narrow focus to impose more regulation without improving aviation safety."

ARSA's comments include suggested regulatory language that recognizes existing rules, narrowly targets the mandated provisions to avoid confusion, and preserves operation realities for air carriers and repair stations.

"The NPRM contained unnecessary ambiguity where the law was clear, and created administrative provisions that would shift focus away from properly accomplishing maintenance tasks. We hope the FAA will recognize the merits of ARSA's comments and recommendations before finalizing the rule," concluded ARSA Vice President of Regulatory Affairs & Assistant General Counsel Craig Fabian.

ARSA's comments are also supported by the Airlines for America (A4A) who stated, "A4A recognizes the constructive comments of other entities, and draws particular attention to the submission of the Aeronautical Repair Station Association (ARSA). We find the ARSA comments to be well-aligned with A4A's, and we encourage FAA's careful consideration of the input." To learn more about A4A's comments please visit www.airlines.org.