

July 7, 2015

The Honorable Bill Shuster
Chairman
Transportation & Infrastructure Committee
2165 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Peter DeFazio
Ranking Member
Transportation & Infrastructure Committee
2163 Rayburn House Office Building
Washington, D.C. 20515

The Honorable John Thune
Chairman
Commerce, Science, & Transportation Committee
560 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Bill Nelson
Ranking Member
Commerce, Science & Transportation Committee
254 Russell Senate Office Building
Washington, D.C. 20510

Oppose Duplicative, Unnecessary “Influencing Parts” Rulemaking

Chairmen Shuster and Thune and Ranking Members DeFazio and Nelson:

The undersigned organizations, representing aviation companies, aircraft owners and operators, air carriers, manufacturers, distributors and maintenance providers urge opposition to mandating an unnecessary and duplicative Federal Aviation Administration (FAA) rulemaking pertaining to the identification and marking of “influencing parts.”

The current regulatory framework (including rules and related guidance) dealing with all aircraft parts, particularly “life-limited” and so-called “influencing parts,” has a proven safety record. Unfortunately, without any safety justification, self-interested parties are targeting the alternative parts industry by pursuing anti-competitive policies that will increase costs for private aircraft owners and operators, small and large businesses, air carriers, repair stations and the flying public. Any effort to limit competition and safety improvements by imposing new, duplicative regulations will only result in greater expenses to the aviation sector and its customers.

The FAA has limited resources and many congressional mandates. Forcing the agency to conduct an unnecessary rulemaking in an area that it has already issued regulations and guidance is a misallocation of scarce resources and creates inefficiencies. Furthermore, small businesses, which are predominant in the alternative parts sector, will bear the economic burden. While larger companies can better absorb the rulemaking process’ costs and even unnecessary regulation, those measures have a disproportionate impact on small entities. The bottom line is that no business can afford the time and few have the inclination to respond to and implement redundant rulemaking activities.

Congressional leaders have prioritized an FAA reauthorization framework that will streamline regulatory processes and provide for greater collaboration with industry; an effort that is supported by a majority of lawmakers. Any unnecessary rulemaking only misdirects limited FAA resources from the key safety initiatives and congressionally mandated priorities.

The FAA’s current parts identification and marking framework is safe and efficient. Efforts to alter it will merely divert resources from important agency safety efforts and drive up costs for U.S. job creators.

Sincerely,

**Aeronautical Repair Station Association
Airlines for America
Cargo Airline Association
Modification and Replacement Parts Association
National Air Carrier Association
National Air Transportation Association
Regional Airline Association**

cc: Members of the U.S. House Transportation & Infrastructure Committee
Members of the U.S. Senate Commerce, Science & Transportation Committee