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RE: Criteria for Public Access to FAA Training Courses

Mr. Duncan and Ms. Baker:

The Aeronautical Repair Station Association (ARSA) has been communicating with various stakeholders regarding a certificate holder's ability to access training provided by the Federal Aviation Administration (FAA) Academy. It has come to our attention that there are no discernable criteria to determine when a training course will be accessible to certificate holders or the general public.

For example, in discussions with members of the Consistency of Regulatory Interpretation Aviation Rulemaking Committee (CRI ARC), the agency actively encouraged submission of requests to attend/access internal FAA trainings.¹ Nevertheless, agency staff indicates that internal training will not be accessible to certificate holders without providing objective conditions for a yay or nay determination.

ARSA would like to help the agency develop criteria for determining whether a course will be offered to certificate holders or the general public. The agency's default position could be to make all training content accessible unless elements concerns safety-sensitive internal procedures, contains proprietary information, or content that would not otherwise be disclosed under the Freedom of Information Act. At the very minimum, the agency should make all internal trainings regarding the Safety Assurance System (SAS) and Safety Management System (SMS) available to regulated entities since certificate holders are ultimately responsible for compliance and should fully understand the agency will apply the regulations.

AFS-900 indicated that the agency is currently developing industry-specific SAS training; however, such efforts are duplicative, expensive, and create opportunities for misunderstandings between FAA personnel and certificate holders. The success of any

¹ Non FAA personnel may request access to training materials by submitting a request through the following web portal: http://www.faa.gov/about/office_org/headquarters_offices/arc/programs/academy/tech_training/reg_stds/contact_us/request_training/.

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regulatory scheme depends on all parties having access to the same information. Granting access to FAA training will enable certificate holders to gain a greater understanding of the FAA's perspective on issues and its standard operating procedures.

Furthermore, the FAA's new compliance philosophy is focused on encouraging compliance over punitive enforcement action. In order to encourage compliance, all parties need to be on the same page and start conversations with the same knowledge and understanding of Title 14 CFR. This will only be achieved if both regulators and regulated parties receive the same training and information at the outset.

The success of this mutual training approach was evidenced by the sessions provided during earlier safety assurance system introductions and the efforts of the Airworthiness Directive Aviation Rulemaking Committee activities.

ARSA looks forward to working with the FAA on this issue. To facilitate action, we request a meeting with the appropriate parties to further develop objective criteria for evaluating current and future sessions.

Your Servant,



Sarah MacLeod
Executive Director

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