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AIRCRAFT REPAIR STATION SECURITY RULE COMPLIANCE CHECKLIST

On Jan. 13, 2014, the Transportation Security Administration (TSA) finalized the aircraft repair station security rules ([Docket No. TSA-2004-17131; 49 CFR part 1554](#)).

While the final regulation applies to **all** repair stations certificated by the Federal Aviation Administration (FAA) under 14 CFR part 145 (except those located on U.S. or foreign government military bases), only certain repair stations are required to implement “Security Measures.”

Compliance is mandated by February 27, 2014.

(I) Repair Station Location

(A) My FAA-certificated part 145 repair station (or any of its fixed location(s)) is located—

- On an air operations area (AOA) or security identification display area (SIDA) of an airport covered by an airport security program under [49 CFR part 1542](#) in the United States; **or**
- On the security-restricted area of any commensurate airport outside the United States regulated by a government entity; **or**
- Adjacent to an AOA or SIDA of such airports, *if* there is an access point between the repair station and the airport that is large enough to move a large (12,500 lbs.) aircraft.

If you checked one of the boxes above, please move onto [\(II\)](#) below.

(B) None of my FAA-certificated part 145 repair station’s fixed locations are located on or adjacent to an airport as described in (A).

If you didn’t check one of the boxes above, your repair station isn’t required to comply with the regulation’s “Security Measures”; however, your facility is subject to “Security Directives” released by TSA and unannounced inspections.

Develop internal procedures that ensure the following will take place when a TSA Security Directive is received:

- Commenting on the Security Directive by submitting data, views, or arguments in writing to TSA;
- Acknowledging receipt of the Security Directive (by certified mail or e-mail with delivery notification) as outlined in the notification;
- Specifying the method by which security measures have been or will be implemented to meet the effective date;

- Notifying TSA (by certified mail or e-mail with delivery notification) to obtain approval of alternative measures if the repair station is unable to implement the measures in the Security Directive; and
- Restricting the availability of the Security Directive and the information contained in the document to persons who have an operational need to know unless TSA grants prior written consent.

If the repair station's fixed locations are not located on or adjacent to an AOA or SIDA of an airport covered by a security program under [49 CFR part 1542](#) **DO NOT PROCEED TO THE NEXT SECTION. Show the TSA the measures you have taken to comply with the elements in (I)(B) if an inspection is conducted.**

(II) Points of Contact (POCs)

- (A) Appoint and verify POCs background, as outlined in (V) below.**
- (B) After designating POCs that are available 24-hours, seven days a week who are responsible for compliance with the regulation and who will serve as the primary person(s) for security-related activities and communications with TSA—**
 - Provide the TSA representative or the International Industry Representative (IIR) (from the original notification letter) the name(s) and contact information for all POCs. Information should be delivered by certified mail, return receipt requested or e-mail with delivery notification. If your repair station didn't receive a letter from TSA, immediately contact the airport security coordinator to connect you with the correct TSA representative.
 - Adjust the POCs list as needed and provide updated information to TSA by certified mail, return receipt requested or e-mail with delivery notification.
- (C) Confirm POCs are aware of new job responsibilities and have a thorough understanding of the rule's requirements (provide training if necessary).**
- (D) Ensure all repair station employees direct security related inquiries only to POCs.**
- (E) Make appropriate adjustments to office procedures, policies, job descriptions, and internal guidelines to address the new POC requirements; inform all employees of the updates and provide training as appropriate.**

(III) Security Measures

- (A) Execute security measures when all of the following occur:**
 - A large (over 12,500 lbs.) aircraft is on the repair station ramp or property; and,
 - The large aircraft is capable of flight (able to take off, has fuel, engines, etc.); and

- The large aircraft is unattended (a repair station employee is not physically in the presence of the aircraft or on board the aircraft, or does not have direct visual observation without the aid of technology).

(B) Security Measures—prevent the unauthorized operation of unattended large aircraft capable of flight by using at least one of the following:

- Blocking the path of the aircraft to prevent movement. If a vehicle is used to block access to the aircraft, the vehicle's key must be controlled;
- Parking the aircraft in a locked hangar and control the key to the hangar;
- Moving stairs away from the aircraft and shut and, if feasible, lock all cabin and/or cargo doors, and control the key; and/or
- Other means, only after approved in writing by TSA, as outlined in [\(VIII\)](#) below.

(C) Adjust aircraft induction procedures

- Adjust procedures for accepting dominion and control of large aircraft; detail the means to prevent unauthorized access and operation as set forth in [\(IV\)](#).
- Inform employees of the new procedures and provide training as appropriate.

(IV) Controlling the Ability to Operate the Aircraft

(A) Control keys (or other approved means) used to prevent the unauthorized operation of large unattended aircraft capable of flight by:

- Using a lock box, safe, or other secure means that guarantee authorized access only; and,
- Making the access available only to an authorized individual who has undergone the required background verification.

(B) Provide proper training for employees on controlling the ability to access and operate large, unattended aircraft.

(V) Background Verification

(A) Verify background information for individuals designated as (1) TSA POCs and (2) those having access to the means used to prevent the operation of large unattended aircraft under [\(IV\)](#), by confirming the employee has one of the following:

- A valid airman (mechanic or repairman) certificate issued by the Federal Aviation Administration.
- A security threat assessment or comparable security threat assessment pursuant to [49 CFR part 1540, subpart C](#), such as by holding an AOA or

SIDA identification media issued by an airport operator that holds a complete program under [49 CFR part 1542](#).

- Completed and passed a security threat assessment from any commensurate airport outside the United States regulated by a government entity (repair stations located outside the United States only).
- Verified employment history for the most recent five year period or the time period since the employee's 18th birthday, whichever period is shorter.
- Other means, only after approved in writing by TSA, as outlined in [\(VIII\)](#) below.

(B) Method and Proof of Verification—obtain written confirmation:

- A front and back copy of the airman's certificate or the written response from FAA's airman certification branch.
- Validating an AOA, SIDA badge or comparable security threat assessment authentication requires confirmation by the airport security office.
- Verifying employment history via telephone (provided the date of communication and who verified the information is recorded), email, or in other written communication (If there is a gap in employment of six months or longer, without a satisfactory explanation of the gap, employment history is not verified).

(C) Maintain the following records:

- Front and back copy of the airman's certificate or the written response from FAA's airman certification branch.
- Written record of AOA, SIDA badge or comparable security threat assessment validation with airport security office. If done by telephone, the date of communication and who verified the information should be documented.
- Written employment verification records (email or written responses) for the most recent five year period or the time period since the employee's 18th birthday, whichever is shorter. If the information is verified telephonically, document the date of the communication and with whom the information was verified. The repair station must retain employment history verification records for at least 180 days after the individual's employment ends.

(VI) Security Directive Compliance

(A) Security Directive's must be received and implemented by:

- Acknowledging receipt of the Security Directive (by certified mail or e-mail with delivery notification) as outlined in the notification;
- Specifying the method by which security measures have been or will be implemented to meet the effective date;
- Notifying TSA (by certified mail or e-mail with delivery notification) to obtain approval of alternative measures if the repair station is unable to implement the measures in the Security Directive;

- Restricting the availability of the Security Directive and the information contained in the document to persons who have an operational need to know unless TSA grants prior written consent.

(VII) Other Recordkeeping Requirements

(A) In addition to the background records outlined in (V) above, the following must be kept and maintained by a POC and made available, in English, to TSA officials upon request:

- Names and 24-hour contact information for all POCs; and
- A list of all employees responsible for controlling access to an unattended, large aircraft.

(B) All other records that establish compliance with the regulations, including:

- All communications between the company and TSA.
- Original TSA notification letter.
- Requests submitted to TSA for “other means” of preventing the operation of large, unattended aircraft capable of flight.
- Requests submitted to TSA for “other means” of verifying POC and authorized employee background.
- Approval of “other means” of preventing the operation of large, unattended aircraft capable of flight.
- Approval of “other means” of verifying POC and authorized employee background.
- Other guidance issued by TSA related to compliance.

(VIII) Applying for “Other Means”

(A) To obtain approval for “other means” under (III) and (V):

- Provide a written detailed description of how the alternative method will either (1) prevent the unauthorized operation of an unattended large aircraft or (2) adequately confirm POC or employee background verification.
- Provide other means requests to TSA or the International Industry Representative (IIR) contact listed in the original notification letter by certified mail, return receipt requested or e-mail with delivery notification.
- Inquire routinely with the TSA or IIR contact in writing by certified mail, return receipt requested or e-mail with delivery notification on the request’s status to ensure a timely response.

(B) Refrain from implementing any alternative means until receiving TSA’s written approval.

(C) Maintain all records of communication with TSA pursuant to the request and approval.