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States of Registry & Bilateralism

Topics of Interest in the Western Hemisphere
2018 FAA Global Leadership Meeting
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Sarah MacLeod, Executive Director

About the Aeronautical Repair Station Association

[ARSA](#) is devoted to the worldwide civil aviation maintenance industry—from its global corporations to the small, independent businesses. [ARSA](#) members are located on five continents and in nearly 20 countries.

The association's experts create tools for members to navigate the maze of government mandates while enhancing safety, efficiency and productivity.

[ARSA](#) is managed by the law firm of [Obadal, Filler, MacLeod & Klein, P.L.C.](#), which provides management, government affairs, and legal services to trade associations and transportation-centric companies.

About the Presenter – Sarah MacLeod

[Sarah MacLeod](#) is managing member of [OFM&K](#) and a founder and executive director of the [Aeronautical Repair Station Association](#). She has advocated for individuals and companies on international aviation safety law, policy and compliance issues for 30 years.

Ms. MacLeod obtained a bachelor's degree from Evergreen State College, Olympia, Washington and a law degree from Catholic University of America.

State of Registry Controls the Maintenance

In the past—“Foreign” countries accepted FAA-part 145 certificate holders’ approvals for return to service

Now—Each “state” is requiring an application for and issuance of its own part 145 certificate, which means:

- Separate “manual” with “differences”
- Specific training by the NAA
- Separate fees for the certificate and sometimes for each rating
- Multiple audits by “foreign” air carrier customers and NAAs

The Troubles with Bilaterals

- Only one is truly a bilateral; the agreement between the U.S. and Canada. Neither country issues a certificate to the other country's approved maintenance organization/repair station.
- Design and production implementation agreements are put into effective well before a maintenance agreement is developed.
- The devil is in the details and finances.

The Troubles with Bilaterals

The agreements (and their technical implementation requirements) do not provide equal certificates to the “foreign” certificate holder—

- Privileges differ
- Oversight differs
- Little to no “due process” for the “foreign” certificate holder

Questions?



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