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## 2019 Annual Conference

### ***What's in a Name?***

*By Brett Levanto, Vice President of Communications*

The association's most-loyal attendees might, right now, be wondering what happened to the Annual Repair Symposium. Don't panic: The symposium's regulatory content and compliance discussions will be as much a part of the event as ever.

***Heard enough? [Click here to register](#). (Registrations are accepted through the association's new online portal, for a quick briefing on how to use the registration system refer to this month's "[AMS Update](#)."***



Why the new name? The annual event has grown and so too has its title. What began decades ago as the Annual Repair Symposium has evolved into a week-long event including executive branch briefings, grassroots legislative advocacy and world-class regulatory compliance and business content. Each March, ARSA's signature event provides a venue for members and invited guests from around the world to network and discuss issues that matter to the repair station community.

It was getting harder and harder to list all of the components of the week side-by-side – though they're still around – so the entire experience has been consolidated verbally under the very simple "Annual Conference."

The rooms have been reserved at the Ritz-Carlton ([book yours before Feb. 18](#)) and the 2019 schedule is set (though specific details may change). See what awaits you at the conference:

### ***Tuesday, March 12: Executive to Executive Briefings***

*[Registration for this day is available only to sponsors at the Platinum, Gold and Silver levels.]*

Industry executives will participate in meetings with senior executive branch officials organized by ARSA. The day will conclude with an exclusive IATA briefing on the status of international market competition issues and the agreement reached with [CFMI](#) on maintenance data availability.



**Wednesday, March 13: Legislative Day**

After a morning of briefings and policy updates, Legislative Day participants will fan out across Capitol Hill to meet with members of Congress and committee staffers to connect the impact of the maintenance community to each state and congressional district. The day will include ARSA's release of its Annual Global Fleet & MRO Market Assessment, produced by Oliver Wyman, as well as the presentation of the association's Legislative Leadership Award.

**Thursday, March 14: Annual Repair Symposium**

As always, ARSA's regulatory experts will lead a full day of panel discussions and presentations on regulatory and business development matters. Invited participants from the FAA, EASA, Transport Canada and ANAC Brazil will join industry members to address issues impacting the ability of maintenance providers to work and grow.

**Friday, March 15: Annual Member Meeting & Breakout Sessions**

During breakfast, the president of ARSA's Board of Directors will overview the state of the association and share priorities for the coming year. Participants will then select one of two sessions to complete their conference engagement: (1) an update on ARAC's part 145 tasking or (2) a workshop on "creating careers" in aviation maintenance.

See the full preliminary agenda, learn about sponsorship opportunities and begin planning your trip: [Click here to get started](#).

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## ARSA Works

### Exemption Toolkit for “Current” Maintenance Data Requirement

On Nov. 19, ARSA released a members-only toolkit providing a draft petition for exemption – and instructions for its submission – from the requirement under 14 CFR § [145.109\(d\)](#) that repair stations have “current” manufacturer’s data available even when it is not needed and will not be used.

If you need to learn more about petitions in general and the maintenance manual currency issue in specific, check out this month’s [legal brief](#). If you’ve heard enough, get started now:

(1) Log in to the association’s secure online portal ([arsa.member365.com](#)). If you have not done so previously or have lost your credentials, enter the email address associated with your membership and follow the instructions for “Forgot Password?”

(2) From your member dashboard, select “Workspaces” from the top menu.

(3) From the workspaces page, select “Publications: Tools for ARSA Members” under the “ARSA Members” category.

(4) On the left side of the workspace screen, select “File Library.”

(5) On the file library page, select “Petition from Exemption from 14 CFR 145.109(d)” from the category drop-down.

(6) Click the filename “ARSA-145-109ExemptionToolkit-20181110.docx” to download the toolkit, which is in a Word Document format.

Keep the association informed by including [arsa@arsa.org](mailto:arsa@arsa.org) on any correspondence regarding exemption requests and use the [inquiry system](#) to submit any questions.

#### Related

While you’re requesting exemption from 145.109(d), share your experiences regarding “current” maintenance data requirements with ARSA through the following “quick question”: [arsa.org/qq-mxdata](#).

### Simple Math – Counting Bilaterals in a Quadrilateral Group

On Nov. 6-9, the Maintenance Management Team (MMT) met in Brasilia, Brazil to discuss a variety of international issues affecting their respective bilateral maintenance agreements. Sometimes referred to as the “quadrilateral group,” the MMT consists of representatives from the [National Civil Aviation Agency of Brazil \(ANAC\)](#), the [European Aviation Safety Agency \(EASA\)](#), the [FAA](#) and [Transport Canada Civil Aviation \(TCCA\)](#). The MMT is the maintenance equivalent of the Certification Management Team (CMT) involving the same four authorities.

***As implied by this article’s title, how many bilateral aviation safety agreements exist among and between the four authorities participating in the MMT? Read on to see the count.***

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Represented by its managing director & general counsel, [Marshall Filler](#), ARSA was one of several industry associations that participated in the industry-authorities day on Nov. 9. (Industry representatives also met on Nov. 8.) Joining ARSA at the meetings were representatives from the [General Aviation Manufacturers Association \(GAMA\)](#), the [Aerospace Industries Association of Brazil \(AIAB\)](#), [AIA Canada \(AIAC\)](#) and the [Modification and Replacement Parts Association \(MARPA\)](#). Several large aerospace manufacturers/maintenance providers also attended including ARSA members Boeing, Airbus, Rockwell Collins and Gulfstream.

Industry urged the MMT authorities to work toward full mutual recognition of each other's maintenance organizations, preferably on a multilateral basis. The authorities were receptive to the idea and plan to work toward this objective (EASA and TCCA already are). However, formal agreements will continue to be negotiated on a bilateral basis in the near term. MMT authorities indicated industry can still realize the benefits of mutual recognition, even if they are applied individually to the six\* pairs of maintenance bilateral agreements that exist among the four authorities (FAA-TCCA, FAA-EASA, FAA-ANAC, EASA-TCCA, EASA-ANAC and TCCA-ANAC).

Among the significant issues discussed with industry were the anticipated December release of [FAA-EASA MAGrev. 7](#), the newly-signed (but not yet effective) Maintenance Implementation Procedures (MIP) agreement between the FAA and ANAC, the revision to the TCCA-FAA MIP that will take effect in mid-November and the authorities' contingency plans for a "hard" Brexit. In that regard, the FAA, TCCA and ANAC anticipate implementation of bilateral agreements necessary to maintain a similar aviation relationship with the United Kingdom as that which exists today. EASA is preparing for a hard Brexit by processing third country approval applications from UK companies, including those relating to maintenance.

***\*If you answered the question posed by the headline correctly, take your significant other out to a nice dinner!***

### ***Filler Completes Globetrotting***

The European Aviation Safety Agency's (EASA) Engineering & Maintenance Technical Committee (EM.TEC) met in Cologne on Nov.13 for its semi-annual meeting. As he has since ARSA was invited to join the committee, Marshall Filler, ARSA's Managing Director & General Counsel, attended on the association's behalf.

Filler landed in Cologne immediately after traveling to Brasilia for an early-November meeting of the Maintenance Management Team (MMT). To review the quadrilateral group's work during that event, visit [arsa.org/mmt](http://arsa.org/mmt).

Several matters of significance were discussed by EM.TEC participants, including EASA's recently-issued [Frequently Asked Question](#) (i.e., informal guidance) further defining "occasional line maintenance," a briefing on the potential implications of a hard (i.e., no-deal) [Brexit](#), an update on the

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progress of EASA's [Notice of Proposed Amendment relating to Instructions for Continued Airworthiness](#) and an update on the recently-issued [New Basic Regulation \(NBR\)](#).

## Occasional Line Maintenance

EASA's regulation ([145.A.75\(c\)](#)) on when a repair station may perform maintenance away from its fixed location is not as broad as the FAA's (see § [145.203](#)). EASA allows "working away" under two circumstances: an AOG situation and when necessary for occasional line maintenance. Line maintenance is defined in EASA guidance (see Acceptable Means of Compliance (AMC) [145.A.10](#)). However, until Sept. 28, "occasional" was not. This resulted in non-standard interpretations by the EU competent authorities about when maintenance could be performed at "unapproved locations." It created an uneven playing field that prompted EASA to take further action after industry was unable to reach a consensus recommendation.

The recently-issued FAQ is available at [www.easa.europa.eu/faq/21265](http://www.easa.europa.eu/faq/21265).

## Brexit

An EASA attorney briefed the committee on the worst-case scenario of a no-deal Brexit. To the amazement and disagreement of all, she indicated the European Commission (EC) had taken the position (in an April 13, 2018 memo) that new or used parts certified prior to Brexit by approved UK organizations could not be used unless they were installed in an aircraft.

*For a complete review of the memo contents related to validity of parts certification as well as the status of Brexit negotiations, review the "Brexit Negotiation Update" in this edition of the hotline.*

## ICA Rulemaking

The ICA rulemaking task (RMT.0252) is proceeding apace. ARSA members may recall that the association [submitted extensive comments](#) on this subject earlier this year. An EASA Opinion is expected in the fourth quarter of 2018 with the Implementing Rule issued by the EC one year later.

## New Basic Regulation

EASA's authority or competencies over aviation safety in the EU continues to expand. The 122-page [New Basic Regulation \(NBR\)](#) was adopted by the European Parliament and Council of the European Union on July 4 and entered into force on Sept. 11. For those not familiar with the EU legal system, the NBR is similar to Title [49](#) of the United States Code (i.e., it is legislation). Consistent with today's emphasis on working smarter with available resources, it formally recognizes and endorses the use of risk-based tools to advance aviation safety and promotes proportional, performance-based rules.

The NBR covers security (including cyber-security), ground handling, licensing of maintenance personnel releasing products or parts for return to service, drones and urban air mobility, digital transformation and takes further steps to implement the Single European Sky initiative. A new Article 87 covers

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environmental protection and formalizes existing EASA activities in this area. It also provides for additional flexibility in regulating general aviation.

The association will continue its engagement with EASA both through the EM.TEC's deliberations and by participating – as it does elsewhere – in rulemaking activities, surveys and other regulatory matters related to the European regulator. Stay tuned for more updates from both sides of the Atlantic.

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## Legal Brief

*Editor's note: This material is provided as a service to association members for educational and informational purposes only. It does not constitute legal or professional advice and is not privileged or confidential.*

### **Petition for Exemption 101**

*By Christian A. Klein, Executive Vice President*

ARSA has given its members another resource to help mitigate the consequences of FAA's inconsistent enforcement of maintenance manual rules. The members-only toolkit released by on Nov. 19 provides a draft petition for exemption from the requirement under [14 CFR § 145.109\(d\)](#) that repair stations have "current" manufacturer's data available even when it is not needed and will not be used.

The problem is the FAA does not enforce its rules requiring design approval holders (i.e., manufacturers) to make maintenance data available ([14 CFR § 21.50\(b\)](#)). However, the agency aggressively enforces the requirement that repair stations possess the most current version of those documents.

Filing an exemption petition won't just help alleviate an unfair regulatory burden on your company, it will also help build the case for removing the requirement from [§ 145.109\(d\)](#) entirely and put pressure on the FAA to uniformly apply both design and maintenance requirements in addition to aligning parts [145](#) and [43](#).

Here's an overview of how the exemption petition process works:

Pursuant to [14 CFR § 11.15](#), it is "a request to the FAA by an individual or entity asking for relief from the requirements of a current regulation." [14 CFR §§ 11.61 through 11.103](#) describe the process for submitting petitions and the basis upon which they are granted.

Petitions may be submitted electronically or in paper ([14 CFR § 11.63](#)). Under [14 CFR § 11.81](#), the petition for exemption must include:

- Your name and mailing address and other contact information such as a fax number, telephone number, or e-mail address;
- The specific section or sections of [14 CFR](#) from which relief is sought;
- The extent and reason for the relief;
- The reasons why granting your request would be in the public interest; that is, how it would benefit the public as a whole;
- The reasons granting the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to that provided by the rule from which you relief;
- A summary that can be published in the [Federal Register](#), stating:
  1. The rule from which you seek the exemption; and
  2. A brief description of the nature of the exemption you seek;

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- Any additional information, views or arguments supporting the request; and
- If you want to exercise the privileges of your exemption outside the United States, the reason why you need to do so.

Items four and five above are particularly important because the public interest and safety impacts are primary factors the FAA considers in deciding whether to grant the petition.

Pursuant [14 CFR § 11.85](#), the FAA may publish the summary of your petition for exemption in the [Federal Register](#) and invite public comment. However, [14 CFR § 11.87](#) gives the FAA the flexibility not to publish a summary if the agency finds good cause why it should not delay action on your petition. If the petition is published in the [Federal Register](#), the comment period will generally be 20 days ([14 CFR § 11.89](#)). Petitioners are informed of the FAA's decision in writing ([14 CFR § 11.91](#)). If your petition is denied, [14 CFR § 11.101](#) provides a mechanism to request reconsideration.

With that background, here's how to access the ARSA's toolkit:

*(1) Log in to the association's secure online portal ([arsa.member365.com](https://arsa.member365.com)). If you have not done so previously or have lost your credentials, enter the email address associated with your membership and follow the instructions for "Forgot Password?"*

*(2) From your member dashboard, select "Workspaces" from the top menu.*

*(3) From the workspaces page, select "Publications: Tools for ARSA Members" under the "ARSA Members" category.*

*(4) On the left side of the workspace screen, select "File Library."*

*(5) On the file library page, select "Petition from Exemption from 14 CFR 145.109(d)" from the category drop-down.*

*(6) Click the filename "ARSA-145-109ExemptionToolkit-20181110.docx" to download the toolkit, which is in a Word Document format.*

Keep the association informed by including [arsa@arsa.org](mailto:arsa@arsa.org) on any correspondence regarding exemption requests and use the [inquiry system](#) to submit any questions.

Also, while the issue is front of mind, please consider submitting a comment to the Small Business Administration's National Ombudsman describing how FAA's consistent enforcement of the maintenance manual rules is negatively impacting your company. More information about ARSA's SBA initiative is at [arsa.org/sbaicacomment](https://arsa.org/sbaicacomment).



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## **ARSA on the Hill**

### **Repair Stations in the Crosshairs Again**

*By Christian A. Klein, Executive Vice President*

It's been a great year for ARSA and its members on Capitol Hill. We succeeded in including important workforce and regulatory provisions in the FAA bill. We also obtained report language in the National Defense Authorization Act to encourage the Department of Defense to make broader use of FAA approvals.

We are not resting our laurels and we're gearing up for what is going to be busy (and risk-filled) 2019.

#### FAA Law Implementation is a Top Priority...

We're already working with the FAA and other agencies and departments to implement the [new FAA law](#); we're tracking fallout from more than 30 sections. Some of our priorities are tasking FAA's Aviation Rulemaking Advisory Committee to look at ways to improve repairman certificates, participating in various stakeholder bodies created by the new law to improve FAA oversight and supporting Government Accountability Office reports on the technician shortage.

The centerpiece of ARSA's FAA reauthorization effort was legislation to create [a new grant program \(five years at \\$5 million per year\) to support aviation workforce development](#). Our focus in the months ahead will be on getting Congress to appropriate funds for the program and working with the Department of Transportation on initiation.

Getting money for workforce grants and tracking implementation of the law won't be our only priority. We'll be working to hold back the floodgates of potentially hostile legislation targeting repair stations.

#### Maintenance Faces New Risks

While we've found many allies among the new generation of Democrats in Congress, the party's old guard, which has risen in seniority and hold most key positions in the House of Representatives, is still hostile to contract maintenance.

Many of senior Democratic members of Congress (and some Republicans) bought into the negative narrative about repair stations decades ago. Unions representing airline mechanics have spread false safety, security and economic arguments to secure mandates aimed at piling new requirements on repair stations or shutting them out of the market entirely.

**Get a full briefing on what Election 2018 means for maintenance [just a little further down](#) in "ARSA on the Hill."**

As reflected by the success in FAA reauthorization, we've made progress changing the narrative by sharing data about jobs and economic impact and pointing to the industry's outstanding safety record.

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But long-standing negative sentiments persist among members of Congress...ones who will be chairing key House committees and subcommittees in 2019.

### ***Maintenance Disclosure, DHS Bills Highlight Risks***

Two pieces of legislation that emerged in the 115<sup>th</sup> Congress underscore the threat.

The Aircraft Maintenance Outsourcing Disclosure Act ([S. 3026](#) and [H.R. 6028](#)) would require air carriers to inform the public about when and where individual aircraft most recently underwent heavy maintenance. Airlines would be required to provide the information on websites, when tickets are purchased, on boarding passes, on telephone reservation systems and at the ticket counter, all in an apparent effort to shame air carriers that use repair stations. For all the frustration the legislation would create, it would do nothing to further safety and is based entirely on economic arguments (a fact one congressional staffer working in support of the bill freely admitted.)

Amid protests from ARSA and others, the legislation went nowhere in the 115<sup>th</sup> Congress. Its Senate sponsor – Claire McCaskill (D-Mo., who lost reelection in November) – was unable to attract any support. In the House, however, [the bill has five sponsors](#) (three Democrats and two Republicans), four of whom will be returning to Congress in 2019.

Worse than the Disclosure Act would be the language included in an early draft of the Department of Homeland Security (DHS) reauthorization bill ([H.R. 6063](#)). Sec. 40933 of that bill would have re-imposed a ban on new foreign FAA repair station certificates if the Transportation Security Administration (TSA) didn't complete "a security review and audit of foreign repair stations."

We dealt with the same problem many years ago after Congress first mandated [repair station security rules](#). The TSA allocated its limited resources to other, more pressing threats. The fact that another government agency (in this case, the FAA) wouldn't be able to issue new certificates and industry would suffer wasn't an effective enough [Sword of Damocles](#) over TSA's head. As a result, TSA dragged its feet for many years and a certification ban went into effect that lasted until the rules were finally issued in 2014. In very real terms, industry was punished severely because TSA thwarted a congressional mandate. In addition to preventing U.S. companies from getting overseas facilities certificated, the ban threatened to undo bilateral aviation safety agreements and subject U.S. companies to retaliation.

Although the new repair station security provision wasn't in the DHS bill passed by the House, nor in the final version (which was rolled in to the FAA reauthorization bill), it's a reminder that the threat to our industry is still very real and will become even more pronounced when members of Congress more susceptible to anti-repair station messaging are in control.

### ***Broadening Our Scope and Becoming More Engaged***

Although ARSA has traditionally focused its attention on the House Transportation & Infrastructure and Senate Commerce, Science & Transportation Committee (which have jurisdiction over FAA) those aren't the only committees needing attention. Appropriations, Homeland Security, Judiciary, Armed Services,

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Government Reform & Oversight and the tax writing Committees all the have the potential to craft legislation directly impacting repair stations.

Covering all those bases isn't easy, particularly with ARSA's limited resources. The association has one registered lobbyist (yours truly) to cover everything that happens on the Hill in 535 House and Senate personal offices and all the various committees. I'm willing to wear out the show leather on your behalf, but I can't do it alone. If we're going to be successful – and avoid being targeted in the coming year – I need your help now more than ever.

### *Attend ARSA Legislative Day*

First, mark your calendar and plan to come to Washington, D.C. for [ARSA's 2019 Legislative Day on March 13 \(in conjunction with our annual conference\)](#). It's the best opportunity to learn what's happening on Capitol Hill and to engage in the process. ARSA provides information and resources to help maximize your impact and get the most out of attendance.



*Former Phoenix Mayor (and now congressman-elect) Greg Stanton (D-Ariz.) (left) learns about the aviation maintenance and manufacturing sector from EXTEX Engineered Products General Manager Larry Shiembob during an Oct. 31 visit.*

### *Host a Facility Visit*

Second, raise visibility with the almost 100 new representatives and senators. The T&I Committee alone is likely to have 20 new members, most of whom have no idea what a repair station is or does. Take a look at [the list of new members of Congress](#). Is your representative or senator on it? If so, host a facility visit to help introduce our industry. ARSA has the process down pat and makes it easy.

### *Put ARSA PAC on Your Radar Screen*

Third, learn more about [ARSA PAC](#). It's a special account supported entirely by personal contributions from ARSA member company executives. We use the money to help elect (and re-elect) candidates who share our political philosophy and policy objectives. The PAC is also an important way to encourage grassroots development and member activism. That's why most of ARSA's PAC money is delivered personally by leading members "back home" in candidates' states.

2018 was the most active year to date for ARSA's PAC. In the runup to the 2018 congressional elections Reps. Carlos Curbelo (R-Fla.) and Ted Budd (R-N.C.) and former Phoenix Mayor (and now congressman-elect) Greg Stanton all visited ARSA member facilities to pick up PAC checks. ARSA staff met with Rep. Don Beyer (D-Va.), who represents the district where the association is headquartered, to present him with an ARSA contribution. Other members of Congress who received ARSA PAC support this year included House Education & Workforce Committee Chair Virginia Foxx (R-N.C.) and incoming House Transportation & Infrastructure Committee Ranking Member Sam Graves (R-Mo.).

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Unfortunately, federal law prohibits associations from asking members for PAC support unless they've opted-in for PAC-related communications. The first step in helping ARSA rebuild its political coffers for the next election cycle is to [give us "prior approval"](#). It's quick, easy and important.

It's going to be an exciting and busy 2019 filled with new opportunities and risks. Together, we'll make it another great year!

### **Want to Learn More About ARSA PAC?**

ARSA's Political Action Committee helps elect congressional candidates who share ARSA's commitment to better regulation and a strong aviation maintenance sector. In this critical election year, ARSA PAC has never been more important. But ARSA is prohibited from sending PAC information to members who haven't opted in to receive it.

Please take a second to give us prior approval to talk to you about ARSA PAC. Doing so in no way obligates you to support PAC. It just opens the lines of communication.

Click [here](#) to give ARSA your consent today.

## ***What Election 2018 Means for Maintenance***

The dust from the 2018 midterm elections is mostly settled, so here is some initial analysis on what the results mean for ARSA members:

### ***House Freshman Class Creates Risks and Opportunities***

At a macro level, one of the most important storylines about the elections is the number of new members of Congress. While some races are still too close to call, it's clear that around one-fifth of the 435-member House Representatives will be new next year. Educating all those newbies (and their staffs) about the aviation maintenance industry will be a massive challenge.

In the weeks and months ahead, ARSA will be wearing out the shoe leather on Capitol Hill. Members must also engage aggressively to shape the way these new lawmakers think about aviation maintenance while they're still fresh to the job. Failure to do so will result in many succumbing to negative messages about repair stations, which lead to unnecessary new burdens on the industry. If we engage

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successfully, we can build productive relationships on both sides of the aisle to achieve beneficial policy goals (e.g., getting the new technician training grant program fully funded).

Mark your calendar and plan to be in Washington, D.C. for [ARSA's 2019 Legislative Day on March 13](#), which will provide an excellent opportunity to get to know newly-elected representatives. ARSA also provides assistance to companies that want to get ahead of the game and set up facility visits for new members of Congress.

### ***New T&I Chair Will Put Repair Stations in Crosshairs***

With the Democrats capturing the House, Rep. Peter DeFazio (D-Ore.) is slated as the next chairman of the Transportation & Infrastructure Committee, which oversees the FAA. DeFazio has long been a vehement critic of contract maintenance and foreign repair stations in particular. His tone has changed little over the decades despite the correlation between increased use of contract maintenance and improved aviation safety.

As recently as this summer, [DeFazio sent a letter](#) to Transportation Secretary Elaine Chao “slamming” the FAA for “deficient” oversight of foreign repair stations. “The only thing consistent about the FAA’s oversight of these FAA-certificated facilities—which number more than 700 abroad—is its inconsistency, leaving far too many stones unturned. We therefore are utterly confused by and disappointed with the FAA’s failure to finalize a rule requiring that workers at foreign repair stations be subject to screening for alcohol and controlled substance use—just as workers at U.S. facilities are—despite two explicit Congressional mandates directing the FAA to act,” the letter said.

The good news is that Congress [recently enacted a five-year FAA reauthorization bill](#), taking away the easiest opportunity to impose unnecessary burdens. However, intense scrutiny of the FAA and industry through the T&I Committee’s oversight role can lead to new regulations and other policy changes at the agency. For example, pressing FAA to complete the foreign repair station D&A rules is likely to be a top DeFazio priority.

Despite DeFazio’s negative rhetoric, ARSA is looking forward to reshaping his thinking about the economic and safety benefits of contract maintenance. Maintainers and manufacturers employ close to 2,000 people in his home state of Oregon. Many of those companies are leading ARSA members. When Rep. DeFazio begins his chairmanship, the participation of Oregon businesses will be extremely important.

***See this month’s [ARSA on the Hill editorial](#) for examples of legislative risks in the next Congress.***

### ***Larsen Likely Next House Aviation Subcommittee Chair***

Rep. Rick Larsen (D-Wash.), the longtime ranking member of the House aviation subcommittee is likely to be its next chairman. Like DeFazio, Larsen has been a contract maintenance critic and joined DeFazio in the letter to Chao referenced above. Larsen has a much bigger aviation maintenance footprint in his

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state, where 110 repair stations employ more than 9,000 people. Washington also ranks in the top ten states with the most EASA-approved repair stations, underscoring the impact that international trade in maintenance services has on the economy.

ARSA will work aggressively to educate Larsen about the safety benefits of contract maintenance, our members significant economic impact in his state and the risk of retaliation against U.S. repair stations in Washington and elsewhere if Congress imposes unnecessary burdens on foreign FAA part 145 certificate holders.

### *Who'll Be T&I's GOP Top Dogs?*

Repair stations will fare better on the other side of the aisle. Reps. Sam Graves (R-Mo.) has been selected as the T&I Committee's ranking Republican. Graves is a pilot with keen understanding of our industry and was the lead House sponsor of the ARSA-proposed bill (H.R. 5701) that created [the new aviation maintenance workforce grant program](#) as part of FAA reauthorization.

Rep. Frank LoBiondo (R-N.J.), the current chairman of the House aviation subcommittee is retiring. Given his ties to unions, LoBiondo was unfortunately too susceptible to negative messages about repair stations. Who will replace him as the Republican ranking member is still undecided.

### *New Leadership for Senate Commerce Committee*

The Senate Commerce, Science and Transportation Committee, which has jurisdiction over the FAA, will have a new chairman and a new ranking member. Sen. John Thune (R-S.D.), the current chairman, is running to be the Senate GOP whip; Sen. Bill Nelson (D-Fla.), the committee's current ranking member lost his reelection bid.

The next Commerce chairman will be Sen. Roger Wicker (R-Miss.); the top contender for ranking member is Maria Cantwell (D-Wash.). Amy Klobuchar (D-Minn.) would likely become ranking member if Cantwell decides to keep her position as the senior Democrat of the Senate Energy and Natural Resources Committee. Wicker and Klobuchar were both cosponsors of the Senate version of the maintenance workforce grant program bill (S. 2506) and Cantwell was one of the four original sponsors.

Mississippi repair stations employ more than 1,000 people, an important grassroots toehold in Wicker's state. Cantwell's Washington is one of the states with the biggest maintenance presence and repair stations in Klobuchar's home state of Minnesota employ more than 2,600 people. ARSA will work with the new chairman and ranking member (and members in their states) to enhance their knowledge of aviation and the maintenance industry.

### *So Long, Claire McCaskill*

Many ARSA members will be pleased to hear that the Senate's most vocal contract maintenance critic, Sen. Claire McCaskill (D-Mo.), lost her bid for re-election. Over the years, McCaskill has been the lead sponsor of negative legislation targeting repair stations.

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In June 2018, she introduced [the Aircraft Maintenance Outsourcing Disclosure Act \(S. 3026\)](#). It would require air carriers to jump through numerous hoops to make passengers aware of where the aircraft on which they're traveling most recently underwent heavy maintenance (including on the air carrier website accompanying each scheduled flight, the air carrier website at the point of ticket purchase, the electronic confirmation of a ticket purchase and passenger boarding documents).

McCaskill's bill would create significant challenges for airlines while doing nothing to enhance safety. It's clearly intended to shame carriers that use contract maintenance and foreign repair stations in particular. It's a good thing McCaskill won't be around in the 116<sup>th</sup> Congress to pursue her poorly thought-out proposals.

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## Quality Time

*Editor's note: The views and opinions expressed by contributing authors do not state or reflect those of ARSA and shall not be used for endorsement purposes.*

### **Cracking the Code of Asian Aviation**

*By John Brasch and Jim Grunewald, TRIDENT Aviation Services Group*

You know the facts. You have heard of the opportunities. You may have a “slice” of the Asian-Pacific aerospace pie. You may want even more! However, Asia can be a long way from home; how can a small business ever hope to expand to a place that may be half way around the world?

Currently, Thailand is home to the largest Airbus and Boeing authorized independent aircraft structures service center in the Asia-Pacific. [ARSA Corporate Member] Triumph Group, Inc. established operations in 2006 and it has been the single most successful [green-field operation](#) in its history. Other aviation businesses are springing up or expanding existing operations across the country.

“The Asia-Pacific’s aviation industry has experienced remarkable growth over the past decade. In fact, the number of Asian airlines now totals over 230, with an estimated 27 percent of the world commercial aircraft fleet, according to global analytics firm IHS. [The region] also accounted for around 28 percent of international and 40 percent of domestic scheduled air passenger traffic last year”, recently reported Rajiv Biswas, Asia-Pacific chief economist at IHS Markit Company.

***For years, ARSA’s Annual Global Fleet & MRO Market Assessment has chronicled steady growth in Asian aerospace markets and continually forecast more. Visit [arsa.org/news-media/economic-data](http://arsa.org/news-media/economic-data) to learn more about the association’s analytical resources.***

Despite the forecasts for aerospace growth in Asia, it appears few U.S. companies are actually positioned to competitively capture the regional market. The Aerospace Council of [American Chamber of Commerce in Thailand](#) (AMCHAM) is made up of business leaders that have “cracked the code”. Its mission is to support and promote aerospace-oriented industries and continually develop effective programs for aerospace-related projects in the region. Several ARSA members already participate in AMCHAM, which advocates for free market competition in the aviation maintenance industry.

While the [Royal Thai Government \(RTG\) Board of Investment \(BOI\)](#) has established significant incentives to attract foreign aerospace investment, there is limited knowledge on how to establish, operate and sustain a successful aerospace enterprise in Thailand. Why? It’s a complex question with the primary answer being that it takes a “whole of Government approach” to establish long-term development of the aerospace industry. The BOI promotes incentives, but all levels of the RTG must demonstrate it is “in it to win it” through supporting infrastructure, providing high-quality public services and offering suitable schools that produce a well-trained workforce. These factors are essential to demonstrating the health and attractiveness of the Thai business climate to foreign investors. The AMCHAM Aerospace Council assists the BOI in that promotion.



## Quality Time

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Aerospace executives are notorious for drilling down to the details required for a successful business venture. Besides the standard list of promotional materials, there is a genuine thirst for risk-mitigation comprehension. What's really at stake is, again, "the unknown":

- Companies often do not know where to begin when it comes to green-field operations in foreign locations. At the onset, the perceived risks can often outweigh the apparent gains. Both are perceptions that need to be reduced to facts.
- There can be a "perceived feeling" or real lack of "business trust" in Asia, which must be managed – possibly through partnership with Thai businesses.
- International expansion requires numerous visits by corporate decision makers taking them away from their primary business responsibilities in their home country.
- While there are ministerial offices that will be helpful in fielding questions, there is no one place to review the process for establishing an aerospace company in Thailand.
- Questions of process and product line scalability immediately come into play for market entry.

The RTG's emphasis on developing its aerospace industrial sector represents the government's efforts to make Thailand "open for business." Regional airlines want local partners. Supplier logistics and service responsiveness matters to Asia-Pacific airlines and aerospace industry customers.

Whether you think your company is truly ready to expand to compete in the Asia-Pacific aerospace market...or not...you are right! The secret to getting ahead is to get started, and for that quest, information is the key to cracking the code.

***John Brasch and Jim Grunewald are advisors for TRIDENT Aviation Services Group [www.tridentasq.com](http://www.tridentasq.com), and the Co-Chairmen of the AMCHAM Thailand's Aerospace Council. Visit the Aerospace Council webpage at [www.amchamthailand.com](http://www.amchamthailand.com). The authors may be contacted via email (addresses listed on the TRIDENT page) for follow-on questions.***

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## **Regulatory Update**

### **Brexit Negotiation Update: Deal or No Deal?**

*ARSA has been monitoring the Brexit process closely given the potential impact and disruption it could cause for industry on both sides of the Atlantic. ARSA's [Brexit page](#) contains resources to help members understand the process and prepare for potential outcomes, including a recent presentation by the United Kingdom (UK) Civil Aviation Authority (CAA) about coordination with the FAA. This article provides an overview of recent developments in the Brexit process, particularly as they relate to aviation maintenance and manufacturing.*

After months of negotiations, officials from the European Union (EU) and the UK unveiled a draft Brexit deal in November. It includes a [585-page withdrawal agreement](#) (a legally-binding text that sets the terms of the UK's departure from the EU) and a 26-page, non-binding [statement on future relations](#) explaining the shared vision for the UK's future involvement in the EU.

The UK parliament will vote on the Brexit deal Dec. 11. If the vote is successful, the deal would also have to be approved by the EU Parliament prior to March 29, 2019 (the official Brexit date). But the outcome of the UK vote is still highly uncertain and [what would happen in the wake of a "no" vote](#) is still unclear.

If the deal is approved, a transition period would start on March 29 and run through the end of 2020. During that time, negotiators would hammer out the details of the UK's post-Brexit relations with the EU. Free movement of good and people would still be allowed during the transition period and the UK could negotiate its own trade agreements, but they couldn't take effect until the end of the transition period.

#### *What About Aviation?*

While the withdrawal agreement is silent on aviation regulatory issues, the statement on future relations does reference the subject. Paragraph 24 says that,

*"While preserving regulatory autonomy, the Parties will put in place provisions to promote regulatory approaches that are transparent, efficient, promote avoidance of unnecessary barriers to trade in goods and are compatible to the extent possible. ...The Parties will also explore the possibility of cooperation of United Kingdom authorities with Union agencies such as the European Medicines Agency (EMA), the European Chemicals Agency (ECHA), and [the European Aviation Safety Agency \(EASA\)](#). ... In this context, the United Kingdom will consider aligning with Union rules in relevant areas. (emphasis added)*

Paragraph 61 says that, "The Parties should make further arrangements to enable cooperation with a view to high standards of aviation safety and security, including through close cooperation between EASA and the United Kingdom's Civil Aviation Authority (CAA)."

## Regulatory Update

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Regulators are also preparing for the possibility that the Brexit deal fails and the UK exits the EU on March 29 with no transition agreement (“hard Brexit”). On Nov. 13, 2018 the European Commission issued a “communication” on its preparations for a hard Brexit. With regard to aviation, the document says that, “Given the specific circumstances in the aviation sector ... the Commission has invited the European Aviation Safety Agency (EASA) to start processing certain applications from UK entities in preparation for the time when the United Kingdom will not be a Member State.”

The aviation section of the communication states that:

Regarding aviation safety, for certain aeronautical products (‘type certificates’) and companies (‘organisation approvals’), [EASA] will only be able to issue certificates once the United Kingdom has become a third country. The Commission will propose measures ensuring continued validity of such certificates for a limited period of time. These measures will be subject to the condition that the United Kingdom applies similar measures. Likewise, the Commission will propose measures ensuring that parts and appliances placed on the Union market before the withdrawal date based on a certificate issued by a legal and natural person certified by the UK Civil Aviation Authority may still be used under certain circumstances.

In October, EASA began the process of accepting applications from current UK approval holders for the “Third Country” approvals that would go into effect after Brexit. According to EASA, the scope of the new EASA certificate will mirror the existing UK approval and, assuming timely application has been made, will be issued on March 30. More information on how UK approval holders can apply for their third-party certification is at <https://www.easa.europa.eu/brexit>.

Despite the planning, however, uncertainty remains, particularly as to how UK-manufactured parts will be treated by the EU post-Brexit. As reported in coverage of Marshall Filler’s participation in the November meeting of EASA’s Engineering & Maintenance Technical Committee (EM.TEC), EASA has indicated the EC had taken the position (in an April 13, 2018 memo) that new or used parts certified prior to Brexit by approved UK organizations could not be used after March 29 unless they are already installed in an aircraft. The memo states that:

Certificates confirming compliance with the provisions of the Basic Regulation and its implementing rules issued before the withdrawal date by the legal and natural persons **certified by the competent authorities of the United Kingdom** on the basis of the Basic Regulation and its implementing rules will no longer be valid as of the withdrawal date, unless such a certificate concerns a part or appliance which was installed prior to the withdrawal date and in compliance with the applicable EU airworthiness requirements, in an aircraft covered by a valid certificate of airworthiness issued prior to the withdrawal date by an EU-27 national authority on the basis of Article 5(2)(c) of the Basic Regulation.(emphasis added)

Therefore, attempts to mitigate the worst effects of a hard Brexit by purchasing UK-manufactured parts that were certified prior to Brexit (i.e., stockpiling) would not be successful. As if to confuse matters even more, the following paragraph was also included in the same April 13, 2018 memorandum:

## **Regulatory Update**

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In respect of products, parts and appliances certified before the withdrawal date and put in use in the EU before the withdrawal date and/or relevant organisations or persons requiring certification, the Commission is considering whether any steps are needed to facilitate continued compliance with EU law, including through additional guidance. (emphasis added)

How everything will fall into place is still anybody's guess, but trust that ARSA will continue to watch and report on any relevant Brexit developments. In the meantime, we'd like to hear how your company is planning. Shoot me an email at [christian.klein@arsa.org](mailto:christian.klein@arsa.org).

### **ICAO Airworthiness Panel Update**

*By Joe Sambiasi, Director, Maintenance & Airworthiness, General Aviation Manufacturers Association*

ARSA works closely with partner associations to collaborate on initiatives of common interests and to ensure its membership is provided the opportunity to contribute to activities that help shape the maintenance segment of the industry. Thus, as part of my representation of the International Business Aviation Council (IBAC) as an "Observer" on International Civil Aviation Organization's (ICAO) Airworthiness Panel (AIRP), submit this summary to the ARSA membership.

The ICAO AIRP is one of many [technical panels](#) responsible for developing and maintaining Standards and Recommended Practices (SARPS) and guidance material related to a technical area. Specifically, the AIRP's objectives relate to the continuing airworthiness and aircraft certification provisions of Annex 8 to the Convention on International Civil Aviation, maintenance provisions of Annex 6, aircraft nationality and registration marks in Annex 7, and an overarching objective of increasing the harmonization of the regulatory approach to airworthiness related certificates and approvals.

Two particular tasks within the AIRP of interest to the repair station community are the global recognition of Approved Maintenance Organizations (AMOs) and the reduction of duplicated certification and surveillance activities of AMOs. These topics were discussed at the most-recent annual meeting from Nov. 5-9 in Montreal. The following summary overviews the status of these activities.

#### **Background**

AMOs that provide international maintenance services face numerous requirements from each of the respective national aviation authorities and are subject to the localized preferences that often result in differences among and between the approval and oversight systems. Even though there were existing ICAO Standards for the certification of AMOs, those requirements were historically contained within Annex 6 (tied to the operation of Aircraft) and did not facilitate the mutual recognition or acceptance of AMO certificates issued by other contracting states.

Consequently, AMOs performing maintenance on an international basis may face a range of requirements and must maintain multiple procedures manuals, quality assurance systems and personnel requirements as well as undergo multiple inspections from the various states whose operators use its

## ***Regulatory Update***

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services. Not only is this practice inefficient and a significant burden (including financially) to an AMO, it also does not provide a stable platform for standardization of maintenance and safety practices.

These concerns were formally raised by the United States through FAA representatives at the 2010 ICAO High Level Safety Conference along with the request for ICAO to develop a globally-harmonized approach to the certification and mutual recognition of an AMO. This request resulted in the AIRP being tasked with the development of SARPs and supporting implementation and guidance material for the global recognition of AMOs and the reduction of duplicative surveillance activities.

### *Global Recognition of AMOs*

The first phase of activity focused on the global recognition of AMOs and the need to create a clear separation from operators to emphasize the concept of stand-alone AMOs. The ICAO AIRP completed this activity by transferring AMO requirements from Annex 6 to Annex 8 and by drafting guidance related to AMO certification and recognition to facilitate acceptance among contracting states. The proposed changes have been completed and accepted by ICAO and are expected to become applicable as of November 2020.

### *Reduction of Duplicative Certification and Surveillance Activities of AMOs*

The second phase of activity for the ICAO AIRP focuses on reducing the duplication of surveillance activity and determining how authorities could evolve the oversight process on maintenance organizations while still fulfilling national regulatory obligations. As a central element to the success of the initiative, the Member States determined that authorities must be more effective in the application of resources. It is crucial that States identify areas where they may improve the efficiency and effectiveness of their AMO certification and surveillance programs. As a result, the AIRP identified focus areas for Member States to consider at a national, regional and international level.

At the national level, Member States should determine where duplication or unnecessary auditing activities may be occurring and introduce more efficient surveillance processes within the State's jurisdiction. For example:

- Promote and adopt the concept of risk-based approaches to better target surveillance activity.
- Identify where/when the concept of sharing audit results between operators would be appropriate.
- Consider use of industry standards for auditing AMOs.
- Foster acceptance of AMO certificates.

At the regional level, States should work collaboratively with regional partners to conduct their fundamental oversight obligations as efficiently as possible through joint certification and surveillance programs, harmonization of regulations and by the addition of bilateral or multilateral agreements that allow resources sharing in conducting national oversight functions. The AIRP recommended this could be done by:

## Regulatory Update

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- Conducting joint certification and surveillance programs and promoting the performance of joint investigations of AMOs.
- Including all national aviation authorities who intend to certify the AMO.
- Seeking to harmonize requirements for an AMO to the greatest extent possible (via Regional Safety Oversight Organization or other collaborative mechanism).
- Considering ways to legally accept the findings of another State (may include bilateral or multilateral agreements) that would allow reciprocal acceptance of certain types of surveillance activities.

Finally, at the international level, in collaboration with ICAO and industry, States could develop a framework for shared surveillance of AMOs which would be of significant benefit in realizing efficiency and effectiveness. Such a framework could include:

- Review and report on the status of participating States' compliance with international obligations.
- Consider existing internationally accepted auditing standards (such as [IAQG 9100](#)).
- Develop common criteria for AMO surveillance obligations and outcomes that could be used by States to utilize each other's findings.
- Analyze elements contained in existing ICAO guidance documents to facilitate the harmonization and mutual recognition of AMOs as well as to facilitate the acceptance of their maintenance.
- Encourage mutual acceptance of AMOs using risk-based principles, systems approach to oversight harmonization and emphasize the goal of equivalent safety outcomes rather than exact language/requirements.

The working group tasked with these activities is expected to meet next in the second quarter of 2019. For additional information please contact Marshall S. Filler ([marshall.filler@arsa.org](mailto:marshall.filler@arsa.org)) or me ([jsambiase@gama.aero](mailto:jsambiase@gama.aero)).

***Joe Sambiase joined GAMA in 2010 and is responsible for the association's activities related to regulatory requirements governing the airworthiness, production, and maintenance of general aviation airplanes. Joe brings almost 20 years of technical experience in aviation, specifically regulatory compliance issues. For more information, visit [gama.aero](http://gama.aero).***

### ***Final Documents/Your Two Cents***

This list includes *Federal Register* publications, such as final rules, Advisory Circulars and policy statements, as well as proposed rules and policies of interest to ARSA members. [To view the list, click here.](#)

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## **Training**

### ***Preparing for, Receiving & Responding to an LOI or NPCP***

During the week of Dec. 17, the regulatory training team will present three live online sessions building on the association's "dealing with the government" resources to provide applied skills in managing letters of investigation and notices of proposed civil penalties. This process begins before an official letter or notice is received – a process known around ARSA as "prophylactic lawyering."

#### ***After the Audit and Before the LOI***

**Date & Time:** Dec. 18, 2018 at 1:00 p.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This session reviews the regulations, policies and procedures that generate letters of investigation and the best methods for responding to governmental questions.

[Click here to register.](#)

#### ***Receiving & Responding to an LOI***

**Date & Time:** Dec. 19, 2018 at 1:00 p.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This session reviews the regulations, policies and procedures that generate letters of investigation and the best methods for responding to letters of investigation.

[Click here to register.](#)

#### ***Receiving & Responding to an NPCP***

**Date & Time:** Dec. 20, 2018 at 1:00 p.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This session reviews the regulations, policies and procedures that generate letters of investigation and the best methods for responding to notices of proposed civil penalty.

[Click here to register.](#)

[Click here to purchase all three "prophylactic lawyering" sessions together and save.](#)

*Registration for an ARSA-provided training session includes:*

- *Unlimited access for 90 days to the recording made available after the live session is complete.*
- *A copy of the presentation and all reference material with links to relevant resources and citations.*
- *A certificate upon completion of the class, as well as any test material.*

*The association's training program is provided through [Obadal, Filler, MacLeod & Klein, P.L.C.](#), the firm that manages ARSA. To go directly to OFM&K's online training portal, visit [PotomacLaw.inreachce.com](#). To learn more about the association's training program and see course availability, visit [arsa.org/training](#).*

# Training

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## ***Three Sessions on Human Factors***

During the week of Dec. 17, the regulatory training team will present three live online sessions introducing key aspects of human factors in aviation maintenance:

### ***Human Factors in Context***

**Date & Time:** Dec. 18, 2018 at 11:00 a.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This session provides a general introduction to “human factors” and puts their consideration into an aviation context. It reviews the general definitions and key components of human factors understanding and reviews the rules and guidance on the subject from various aviation regulatory and oversight organizations.

[Click here to register.](#)

### ***The Dirty Dozen – Human Factors Overview***

**Date & Time:** Dec. 19, 2018 at 11:00 a.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This session introduces the “Dirty Dozen,” 12 common factors that impact human performance. It discusses these in the context of the aviation maintenance industry, describes how they lead to problems, suggests ways to mitigate consequences and explains how all 12 are interconnected.

[Click here to register.](#)

### ***The Dirty Dozen in Depth – Communication***

**Date & Time:** Dec. 20, 2018 at 11:00 a.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This course discusses communication in the aviation maintenance environment, factors that can interfere with communication and ways to mitigate those factors.

[Click here to register.](#)

[Click here to purchase all human factors content together and save.](#)

The association will continue to expand its human factors-related session offerings in 2019.





# Training

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## Part Marking

On Dec. 17, the regulatory training team will present a live online session introducing key requirements of 14 CFR part [45, Identification and Registration Marking](#):

**Date & Time:** Dec. 17, 2018 at 1:00 p.m. EST

**Instructors:** Sarah MacLeod, Christian A. Klein & Brett Levanto

**Description:** This session outlines the basic rules for aviation part marking and identification and reviews applicable guidance as it pertains specifically to the re-identification of parts while performing maintenance.

[Click here to register.](#)

## Regulatory Compliance Training

Test your knowledge of 14 CFR § 65.91 – Inspection authorization.

[Click here to download the training sheet.](#)

## Online Training Calendar

Title	Date	Time	Registration
Part Marking – Part 45 and More	12/17/18	1:00 p.m. EST	<a href="#">Click here.</a>
Human Factors in Context	12/18/18	11:00 a.m. EST	<a href="#">Click here.</a>
After the Audit and Before the LOI	12/18/18	1:00 p.m. EST	<a href="#">Click here.</a>
The Dirty Dozen – Human Factors Overview	12/19/18	11:00 a.m. EST	<a href="#">Click here.</a>
Receiving & Responding to an LOI	12/19/18	1:00 p.m. EST	<a href="#">Click here.</a>
The Dirty Dozen in Depth – Communication	12/20/18	11:00 a.m. EST	<a href="#">Click here.</a>
Receiving & Responding to an NPCP	12/20/18	1:00 p.m. EST	<a href="#">Click here.</a>

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## Membership

### ***Return to Sender – Fraudulent Email Warning***

Multiple ARSA members have reported receipt of a suspicious email from arsa@arsa.org subjected: “Shared ‘New Maintenance Data’ with you.” The message appears to come via Microsoft OneDrive. The association did not send it or any other “secure document” to any contact. If you received one delete it immediately; if you’ve already tried to access the promised document, contact your IT department.

In general, ARSA communications always provide clear instruction/reference regarding any action that should be taken by the recipient, e.g., clicking a link, visiting a website or downloading a file. If you ever have a question about an association message, or doubt the authenticity of something you’ve received, contact Brett Levanto ([brett.levanto@arsa.org](mailto:brett.levanto@arsa.org) or 703.739.9543 Ext. 103) for help.

If you’d like to open a real email from ARSA, [click here](#) to check out this week’s Dispatch (in case you missed it).

*Other communications-related instruction from the association...*

### **Don’t Let Technology Keep You from ARSA**

The association’s [new secure online portal](#) (and the associated messages and alerts it delivers to members) adds a new email domain that should be on every member’s “safe list.” Thanks to spam filters, firewalls and quarantines, it can sometimes be difficult to get into your inbox – help us get through. Get access to every newsletter, update and reminder by ensure that the following domains don’t get flagged as spam:

**@arsa.org**  
**@potomac-law.com**  
**@multibriefs.com**  
**@sendgrid.net (new)**

*Know what to look for:*

**Weekly:** The *Dispatch* newsletter is distributed every Wednesday.

**Monthly:** *The hotline* newsletter is distributed the first week of each month.

**Various:** Member alerts are distributed as necessary – usually the association sends two or three each month.

**Membership Term Dependent:** Renewal reminders begin flowing out of the system 90 days before the expiration of membership term.

To learn more about ARSA’s communications efforts — including how to advertise — visit [arsa.org/news-media](http://arsa.org/news-media). For assistance with technical issues, consult your organization’s IT department/assistant as necessary.

# Membership

## AMS Update – Event Registration

ARSA is collecting registrations for the 2019 Annual Conference – the Executive to Executive Briefings, Legislative Day and the Annual Repair Symposium – through its new secure online portal. The events team is learning about the system with every registration.

Here’s what you need to know to submit a registration form:

- (1) Open the registration link by [clicking here](#).
- (2) The general event screen will open. Click the green “register now” button in the upper right corner.



(3) If you are not logged in a prompt will appear asking for your email OR for you to indicate you are a member (which you should do). Then log in to the online portal using the email address that is associated with your membership (if you don’t know your password, click “Forgot you password?” to gain access).

(4) The event registration page will load, displaying all of the “tickets” associated with the event:

Type	Fee	Quantity
Platinum Sponsor: \$10000.00 (register below for your complimentary tickets) - Regular Fee	\$10000.00	0
Platinum Sponsor E2E Briefings complimentary tickets (please enter 5 even if you will not be assigning registrants at this time) - Regular Fee	\$0.00	0
Platinum Sponsorship Legislative Day complimentary tickets (please enter 3 even if you will not be assigning registrants at this time) - Regular Fee	\$0.00	0
Gold Sponsor: \$7500.00 (register below for your complimentary tickets) - Regular Fee	\$7500.00	0
Gold Sponsor E2E Briefings complimentary tickets (please enter 3 even if you will not be assigning registrants at this time) - Regular Fee	\$0.00	0
Gold Sponsor Legislative Day complimentary tickets (please enter 2 even if you will not be assigning registrants at this time) - Regular Fee	\$0.00	0
Silver Sponsor: \$3500.00 (register below for your complimentary tickets) - Regular Fee	\$3500.00	0
Silver Sponsor E2E Briefings complimentary tickets (please enter 2 even if you will not be assigning registrants at this time) - Regular Fee	\$0.00	0
Silver Sponsor Legislative Day complimentary ticket (please enter 1 even if you will not be assigning registrants at this time) - Regular Fee	\$0.00	0
Supporter Sponsor: \$2500.00 - Regular Fee	\$0.00	0
Contributor Sponsor: Please contact Brett Levanto with the amount you would like to sponsor or if you will be bringing jeopardy prizes. - Regular Fee	\$0.00	0
Legislative Day (Wednesday, March 13, 2019) - includes a Meal Plan for each registrant, please check the appropriate options for this event during registration - Regular Fee	\$325.00	1
Annual Repair Symposium (Thursday, March 14, 2019 and Friday, March 15, 2019) - includes a Meal Plan for each registrant, please check the appropriate options for this event during registration - Regular Fee	\$750.00	0
Guests to Club Lounge (Wednesday, March 13, 2019) - Regular Fee	\$150.00	0
Breakout Session #1: ARAC Part 145 Tasking Update (10 AM - Noon, Friday, March 15, 2019): For Annual Repair Symposium registrants only - includes a Meal Plan for each registrant, please check the appropriate options for this event during registration - Regular Fee	\$0.00	0

# Membership

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First is each level of sponsorship – Platinum, Gold, Silver, Supporter, Contributor – interested sponsors may make their commitments through this registration process and immediately reserve the complimentary E2E Briefings (March 12) and Legislative Day (March 13) tickets available to them ([see the “Sponsorship Opportunities” tab on the public event page to learn more](#)).

Following the sponsor options come the tickets associated with direct registration for Legislative Day (March 13), the Annual Repair Symposium (March 14) and guests to the Club Lounge Happy Hour (March 14) as well as the selection of breakout sessions (March 15).

To reserve any kind of ticket, use the drop-down menu to the right of that ticket to indicate the number you wish to purchase. You will not be able to select a complimentary ticket without also having selected the associated sponsorship ticket.

Click “Continue to Step 2.”

(4) In the popup screen, review and confirm your ticket purchase selections.

(5) On the subsequent screen, click the green button to the right of each ticket in order to assign a registrant to that ticket. You do not need to take this step immediately, but may simply click “Continue” at the bottom of the screen to move on.

If you click “Assign Ticket,” a prompt will appear asking you to indicate that the ticket is yours, search the member database to assign it to another member or input the someone else’s information. Since you will be reserving member-priced tickets using this process, you may not enter the name of someone who does not represent an ARSA member organization. Contact Caroline Kneip ([caroline.kneip@arsa.org](mailto:caroline.kneip@arsa.org)) for help with contacts not listed in the database.

(6) Once you’ve assigned the ticket, you will be able to indicate your attendance at the meals associated with your registration by checking the appropriate boxes. Only indicate that you will attend a meal if you have registered for the associated portion of the conference (i.e., If you are only registering for legislative day, you should only indicate you will attend meals held as part of that event).

After making your meal assignments, click “Save.”

(7) When you have completed assigning all of your tickets, click “Continue.”

(8) On the payment screen, review your registration before selecting your payment method. When you click “Process Payment” you will either be directed to complete your credit card transaction or instructed the registration process is complete. If you indicated you would pay by check or ACH/wire transfer, you will be able to download a copy of your invoice/receipt for payment.

If you have questions or issues at any time during the registration process, contact Caroline Kneip ([caroline.kneip@arsa.org](mailto:caroline.kneip@arsa.org)).

# Membership

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## **Welcome & Welcome Back – New & Renewing Members**

ARSA's members give the association life – its work on behalf of the maintenance community depends on the commitment of these organizations. Here's to the companies that joined or renewed in November:

### **New Members (Member Category)**

[Amway Aviation dba Alticor, Inc.](#), R02

[AOG Aircraft Service Inc.](#), R01

Richard Authement II, *Military*

### **Renewing Members (Member Category, Member Since)**

[Aerospace Turbine Rotables, Inc.](#), R04, 2011

[Airborne Maintenance and Engineering Services, Inc.](#), R06, 2010

[Airforce Turbine Service, Ltd.](#), R02, 2010

[Avocet Aviation Services, LLC](#), R02, 2014

[Component Repair Technologies, Inc.](#), R05, 1995

[Dan Brauhn-Indian Hills Community College](#), *Edu*, 2015

[Fieldtech Avionics & Instruments, Inc.](#), R03, 2016

[First Aviation Services, Inc.](#), *Assoc*, 2014

[Fortner Accessory Service Corp.](#), R01, 2002

[Helicopter Accessory Service East Inc.](#), R01, 1/1/2018

Peter Stonefield, *Affil*, 2010

[Safran Nacelles Services Americas](#), R02, 2017

[Thomas Global Systems, LLC](#), R01, 2012

## **Quick Question – Event Attendance**

The world is growing more digital, but high-level aviation business still requires personal attendance.

Whether at major trade shows, local fly-ins, government meetings or industry symposia, members of the maintenance industry have to make careful decisions about how to invest their resources and time on event participation. For its part, ARSA provides a premier opportunity for face-to-face engagement at its [Annual Conference](#) each March.

Knowing where its members – and other professionals – choose to spend their time will help the association refine its own events, structure communications resources and best plan for its work throughout the year. Take a moment to describe where you plan to go in 2019:

*Note: The question is displayed in its own, embedded window. If the “Submit” button is not visible on the screen, you must scroll within the survey window in order to submit your response.*

**To submit your answer, visit: [www.surveymonkey.com/r/avmro-events](http://www.surveymonkey.com/r/avmro-events).**

# Membership

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For more information about this or any other question, contact Brett Levanto ([brett.levanto@arsa.org](mailto:brett.levanto@arsa.org)).

[Click here to see what questions have been asked and answered...](#) and keep a lookout for more.

## A Member Asked...

**Q:** For the sake of satisfying the requirements of § [65.83](#), is a mechanic at a repair station “working under his certificate and rating” if he/she is not a supervisor and does not have approval for return to service?

**A:** To your point, under [14 CFR § 65.83](#), a mechanic may not exercise the privileges of his/her certificate unless within the preceding 24 months s/he has (for at least six months):

- Served as a mechanic under his certificate and rating;
- Technically supervised other mechanics;
- Supervised, in an executive capacity, the maintenance or alteration of aircraft, or
- Been engaged in some combination of those activities. (Emphasis added.)

You’ve asked whether an individual is serving as a mechanic under his/her certificate and rating – and therefore meeting the requirements of § [65.83](#) – if s/he is not a supervisor and does not issue approval for return to service.

We checked [FSIMS](#), all the [part 65-related ACs](#) and the [legal interpretation database](#) but unfortunately didn’t find anything that opined on recent mechanic experience.

Taking the regulations on their face, the question comes down to whether the individual has exercised privileges associated with being a certificated mechanic during the period in question. Privileges and limitations are set out in 14 CFR §§ 65.81 (general), 65.85 (airframe), and 65.87 (powerplant):

- [65.81](#) says, *inter alia*, that **the mechanic may perform or supervise the maintenance, preventive maintenance or alteration of an aircraft or appliance, or a part thereof, for which he is rated** (but excluding major repairs to, and major alterations of, propellers, and any repair to, or alteration of, instruments), and may perform additional duties in accordance with §§ 65.85, 65.87 and 65.95.
- [65.85](#) says, *inter alia*, that **a certificated mechanic with an airframe rating may approve and return to service an airframe, or any related part or appliance, after he has performed, supervised, or inspected its maintenance or alteration** (excluding major repairs and major alterations). In addition, he may perform the 100-hour inspection required by part 91 of this chapter on an airframe, or any related part or appliance, and approve and return it to service.
- [65.87](#) says, *inter alia*, that **a certificated mechanic with a powerplant rating may approve and return to service a powerplant or propeller or any related part or appliance, after he has performed, supervised, or inspected its maintenance or alteration** (excluding major repairs and major alterations). In addition, he may perform the 100-hour inspection required by part 91 of

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this chapter on a powerplant or propeller, or any part thereof, and approve and return it to service.

With that in mind, you should consider whether the mechanic, while working at the repair station, was *performing* work within the scope of the privileges associated with his or her certificate. If s/he is performing work s/he is individually-rated to do – particularly if unsupervised – you could consider him or her to be working under his or her certificate and rating even though the entire work scope is being performed under the repair station’s certificate.

***Editor’s note: Member questions may now be submitted through the inquiry system run through ARSA’s new online member portal. Members can use their portal access to submit inquiries by logging in through [arsa.member365.com/sharingnetwork](https://arsa.member365.com/sharingnetwork).***

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## Resources

ARSA strives to provide resources to educate the general public about the work of the association's member organizations; should you need to provide a quick reference or introductory overview to the global MRO industry, please utilize [AVMRO.ARSA.org](http://AVMRO.ARSA.org).

**[Brexit Resource Page \(Updated\)](#)** On June 23, 2016, citizens of the United Kingdom voted to withdraw from the European Union in a national referendum. This page is provided as a resource for the aviation maintenance community regarding transition negotiations between the British government and the European Commission.

**[Careers In Aviation Maintenance](#)** Every year, more people are flying. The expansion of the global middle class and improvements in technology have opened aviation markets – for passengers and cargo – to a broader public than ever before. As the the flying public gets larger, more men and women are desperately needed to keep the world safely in flight.

**[Quick Question Archive](#)** See what ARSA has asked and what's been answered and participate in the conversation about what's going on in the aviation maintenance world.

**[AVMRO Industry Roundup](#)** ARSA monitors media coverage on aviation maintenance to spread the word about the valuable role repair stations play globally by providing jobs and economic opportunities and in civic engagement. These are some of this month's top stories highlighting the industry's contributions. You can explore these stories through [ARSA's Dispatch news portal](#).

## Industry Calendar

[World Aviation Safety Summit](#) – Dubai, UAE – December 11-12, 2018

[MRO Latin America](#) – Cancun, Mexico – January 16-17, 2019

[Aero-Engines Americas](#) – Dallas, Texas – January 29-30, 2019

[MRO Middle East](#) – Dubai, UAE – February 11-12, 2019

[MRO Southeast Asia](#) – Kuala Lumpur – March 6-7, 2019

[ATEC Annual Conference](#) – Wichita, Kansas – March 17-20, 2019

[ARSA Annual Conference](#) – Washington, D.C. – March 19-22, 2019

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