

## ARSA: The Voice of Aviation Maintenance 2019 Legislative Priorities

The U.S. civil aviation maintenance industry employs more than 275,000 people and generates more than \$44 billion in annual economic activity. (To see the industry's impact in each state, go to [arsa.org/news-media/economic-data](https://www.arsa.org/news-media/economic-data).)

ARSA is the eyes, ears, and voice of the aviation maintenance industry in the halls of Congress. The association's legislative efforts complement its regulatory expertise as our team tirelessly fights for repair station interests on Capitol Hill.

Our top priority is ensuring that aviation policy is based on facts, not fear. New laws and regulations should genuinely improve safety, not micromanage or undermine industry competitiveness. ARSA's policy priorities for the 116<sup>th</sup> Congress are as follows:



### ***Fully-Fund New Aviation Workforce Development Programs:***

The aircraft maintenance technician shortage threatens to undermine the efficiency and competitiveness of the entire industry. To address the problem, as part of the 2018 Federal Aviation Administration (FAA) reauthorization law Congress created a new [workforce development grant program](#) supported by more than 30 national, state and local aviation organizations and labor organizations. [Sec. 625 of the FAA law](#) authorizes \$5 million per year for five years to support initiatives to recruit and train the next generation of aviation maintenance technicians and \$5 million per year to improve pilot education and address the pilot shortage. To be eligible for consideration, a maintenance-related grant application must be jointly submitted by an aviation business or union, school and local governmental entity. ARSA urges Congress to fully fund the workforce development grant programs as part of the appropriations process and use its oversight authority to ensure that the Department of Transportation rapidly initiates the programs to maximize their impact.

### ***FAA Funding and Reauthorization Implementation:***

In 2018, Congress enacted a new, long-term FAA authorization law to provide near-term certainty for the agency's budget and enhance the quality of oversight. The legislation included several provisions to improve FAA operations and employee training. ARSA urges Congress to appropriate the funds necessary for FAA to conduct efficient oversight of the industry. Congress must also fulfill its oversight responsibility and ensure that FAA implements the new law in a timely manner.

### ***Insulating FAA and the Aviation Industry from Future Government Shutdowns:***

Because of the strict regulatory oversight regime for the maintenance industry, our members' work is intrinsically intertwined with that of the FAA. More than three quarters (77 percent) of respondents to a 2019 ARSA survey indicated their operations were negatively affected by suspension of FAA's activities during the recent federal government shutdown. Delays in processing certificate applications, renewals and other approvals left repair stations, employees and customers in limbo. Congress should enact legislation to protect the nation's aviation system and the agencies that regulate it from the consequences any future appropriations lapse.

***Refrain from Imposing Unnecessary Regulatory Mandates:***

One of biggest long-term threats to the aviation maintenance sector is government intrusion through overregulation. The basic nature of the aviation industry demands that, for a company to be successful, safety and security must be the paramount concerns. Operators and airlines will not do business with companies that put passengers and valuable business assets (i.e., aircraft) at risk. Put simply: safety is good business. Congress and the FAA must understand that government and the industry share the same safety goals and should refrain from micromanaging through unnecessary agency action.

***Encourage Bilateral Aviation Safety Agreement (BASAs):***

BASAs are government-to-government agreements that reduce regulatory compliance costs for businesses by allowing cooperation between aviation safety regulators to enhance efficiencies and limit duplicative oversight. BASAs also give U.S. companies access to foreign customers. More than 1,400 U.S. repair stations are approved to work on European-registered aircraft and related components under the U.S.-European Union BASA. According to a recent ARSA study, American repair stations pay a 300 percent mark-up when applying for certification by “foreign” civil aviation authorities (CAAs) when the home country does not have a BASA with the United States. This additional cost burden undermines profitability, particularly for smaller companies. To reduce compliance costs, improve access to foreign customers, and make oversight more efficient, Congress should encourage the FAA to enter into more BASAs and should refrain from enacting legislation that disrupts current international aviation accords.

***Consistent Enforcement of FAA Maintenance Manual Rules:***

The FAA aggressively enforces the requirement that repair stations possess “current” versions of maintenance manuals (14 CFR § 145.109(d)) while the agency fails to enforce the regulation requiring design approval holders to create and make that same maintenance data available (14 CFR § 21.50(b)). As a result, many repair station small businesses face unnecessary administrative and financial burdens and loss of business opportunities. Congress should encourage FAA to either enforce the rules consistently and fairly or update them to relieve undue burdens on industry.

***Invest in Airport Infrastructure:***

The American Society of Civil Engineers has given the nation’s airport infrastructure a grade of “D”. The Airports Council International has estimated that airports will require almost \$100 billion for capital improvements over the next half decade. Congress must look for fiscally-responsible ways to expand America’s airport capacity to improve passenger mobility, enhance efficiency, and ensure the continued growth, safety and health of our aviation system.

***Improve Competition for Department of Defense (DoD) Maintenance Contracts:***

DoD can save hundreds of millions – if not billions – of dollars by more widely adopting commercial best practices. Congress should encourage DoD to improve competition for maintenance on DoD’s fleet of civilian derivative aircraft by more-readily accepting FAA approvals (e.g., Parts Manufacturer Approval (PMA) parts and Designated Engineering Representative (DER) repairs). Doing so will reduce maintenance costs, improve readiness, reduce bureaucratic duplication, and expand government contracting opportunities for small and medium aviation maintenance businesses.

To learn more about the aviation maintenance industry and its economic impact in your state, go to [avmro.arsa.org](http://avmro.arsa.org) or contact ARSA Executive Vice President Christian Klein at 703.739.9543 or [christian.klein@arsa.org](mailto:christian.klein@arsa.org).

*Last updated Feb. 25, 2019.*