

ARSA: The Voice of Aviation Maintenance 2021 Policy Priorities

The Aeronautical Repair Station Association (ARSA) is the voice of the civil aviation maintenance industry. In the wake of devastating pandemic-related economic disruptions, ARSA's 2021 policy agenda is focused on recovery and restoring the vitality of the maintenance industry, the aviation sector and the broader economy. ARSA's priorities are as follows:

Provide Additional Economic Relief

The economic relief provided through the CARES Act and other legislation has allowed many aviation maintenance businesses to keep operating and pay their employees. In the face of continued economic disruptions continue and slow recovery forecasts. Congress should provide additional relief to aviation employers and workers to sustain them through the present crisis. This could be accomplished by, among other things, expanding eligibility for existing programs (e.g., Paycheck Protection and Payroll Support) and creating new ones to target assistance at sectors hit hardest by the pandemic. ARSA strongly supports the bipartisan Aviation Manufacturing Jobs Protection Act of 2021 ([H.R. 553](#)), which would create a public-private cost-sharing program to protect repair station and manufacturing workers.

Improve Competition for Department of Defense (DoD) Aircraft Maintenance Contracts

DoD can save hundreds of millions – if not billions – of dollars by more widely adopting commercial best practices. Doing so will reduce aircraft maintenance costs, improve readiness, reduce bureaucratic duplication, and expand government contracting opportunities for small and medium companies. Among other things, Congress should compel DoD to improve competition for maintenance on civilian derivative aircraft by more-readily accepting FAA approvals (e.g., Parts Manufacturer Approval (PMA) parts and Designated Engineering Representative (DER) repairs) and by improving access to the technical data required to maintain aircraft purchased by DoD.

Implement FAA Aviation Workforce Policy Directives

The 2018 Federal Aviation Administration (FAA) reauthorization law, directed the agency to take several actions to address the aviation technician shortage, including establishing a new recruitment and training grant program (Sec. 625) and tasking the FAA's Aviation Rulemaking Advisory Committee (ARAC) to recommend improvements to repairman certification (Sec. 582). While the FAA launched the grant program in January 2021, more than two years after enactment of the FAA law, the agency has not yet submitted the repairman task to ARAC. Additionally, as part of the 2020 year-end omnibus, Congress directed the FAA to overhaul its outdated, 50-year-old rules governing aviation technician training schools. Congress should use its oversight authority to speed the implementation of these important directives to help rebuild America's aviation maintenance workforce.

Protect Contract Maintenance, International Commerce in Maintenance Services

The contract maintenance model has made the aviation sector safer and more efficient while creating hundreds of thousands of American jobs. International business is an important driver of profitability for U.S. repair stations, more than [1,400 of which](#) hold approvals from foreign aviation authorities that authorize those companies to perform work on foreign-registered aircraft and related components. Similarly, repair stations outside the United States certificated by the FAA allow U.S. air carriers to operate globally and U.S. manufacturers to serve a global customer

base. Regardless of where they are located, all FAA-approved maintenance facilities must work to the same regulatory standards. Limiting the ability of U.S. air carriers to use foreign repair stations would lead to retaliation against American maintainers and undermine the competitiveness of the U.S. aviation sector. Congress should reject legislation that would disrupt the use of contract maintenance by U.S. air carriers and/or threaten international commerce in maintenance services.

Fully-Fund Aviation Workforce Development Programs

More than 40 national, state and local aviation and labor organizations support the aviation workforce grant programs created by the 2018 FAA law (see above). The 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. Congress fully funded the programs through the FY 2020 and 2021 appropriations process. Congress should once again fully fund the workforce development grant program for FY 2022 to help rebuild America's aviation workforce.

Consistently Enforce FAA Maintenance Manual Rules

The FAA aggressively enforces the requirement that repair stations possess "current" versions of maintenance manuals (14 CFR § 145.109(d)) but 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 direct the FAA to either enforce the rules consistently and fairly or update them to relieve undue burdens on industry.

Create a Training Tax Credit to Enhance Productivity and Speed Economic Recovery

Millions of Americans have been laid off or furloughed because of the pandemic. When recovery gets underway, workers will be recalled to duty or seek opportunities in new industries. These workers will require training to build and restore skills. Congress should create a worker training tax credit to help offset training costs. Doing so would benefit employees and companies alike and help build a more productive and efficient U.S. workforce.

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 should 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.

To learn more about the aviation maintenance industry, its economic impact in your state or ARSA's policy agenda go to arsa.org or contact ARSA Executive Vice President Christian Klein at 703.739.9543 or christian.klein@arsa.org.

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