

## **ARSA: The Voice of Aviation Maintenance 2022 Policy Priorities**

The Aeronautical Repair Station Association (ARSA) is the voice of the civil aviation maintenance industry. As the industry continues to rebuild its workforce in the wake of the COVID pandemic, ARSA's 2022 policy agenda is focused on establishing a solid foundation for continued growth:

### ***Consistently Enforce FAA Maintenance Manual Rules***

The FAA aggressively enforces the requirement that repair stations possess "current" versions of maintenance manuals (also called instructions for continued airworthiness or ICA) (14 CFR § 145.109(d)) but fails to enforce the regulation requiring design approval holders (i.e., manufacturers) to create and make that same maintenance data available (14 CFR § 21.50(b)). As a result, repair stations are regularly denied access to maintenance data, resulting in unnecessary administrative and financial burdens and loss of business opportunities. ARSA and 14 industry partners have petitioned the FAA to assign a task to the agency's Aviation Rulemaking Advisory Committee (ARAC) to address maintenance manual issues. The working group, which would be made up of stakeholders from across the aviation industry, would be charged with evaluating FAA rules and policy and making recommendations about improving ICA access. Congress should urge FAA Administrator Dickson to assign the maintenance manual task to ARAC.

### ***Enact the National Center for the Advancement of Aviation (NCAA) Act***

While Congress has responded to industry concerns about the critical shortage of aviation maintenance technicians (see below), the United States lacks a comprehensive aviation workforce strategy. The NCAA Act (S. 1752, H.R. 3482) would create a new independent entity to facilitate collaboration and cooperation between aviation and aerospace stakeholders to support and promote civil and military aviation and aerospace. Among other things, the NCAA would support the development of aviation and aerospace education curricula, promote aviation and aerospace employment opportunities, and support Armed Forces personnel seeking to transition to careers in civil aviation or an aerospace-related fields. Members of Congress should cosponsor and vote to enact the NCAA Act to help position the U.S. aerospace industry for long-term success.

### ***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). ARSA is concerned that, although the FAA has implemented the grant program, it has ignored important directives in the legislation (e.g., the requirement that schools, industry and government partner to apply for grants, thereby enhancing local cooperation and engagement). 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. That rule has not yet been issued. Congress should use its oversight authority to ensure FAA fully implement these important directives to help rebuild America's aviation maintenance workforce.

***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 Sec. 625 of 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 and 2023 to help rebuild America's aviation workforce.

***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.

***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 1,000 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.

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

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