

ARSA: The Voice of Aviation Maintenance 118th Congress, Second Session Legislative Priorities

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. We pursue this and ARSA's other policy objectives by engaging lawmakers in our nation's capital and their home states, encouraging grassroots action and involvement by ARSA members, raising the profile of the aviation maintenance industry, offering technical and legal expertise to analyze and respond to government actions, and promoting the industry's benefits and safety record among key audiences.

With a Federal Aviation Administration (FAA) reauthorization underway, ARSA's 2024 policy agenda is focused on FAA oversight and the industry's long-standing technician shortage. ARSA also seeks to strengthen the aerospace supply chain by enhancing competition for Department of Defense (DOD) aircraft maintenance services.

FAA REAUTHORIZATION PRIORITIES

The House passed the Securing Growth and Robust Leadership in American Aviation Act (H.R. [3935](#)) on June 13, 2023. The Senate Commerce Committee passed its FAA Reauthorization Act (S. [1939](#)) on Feb. 8, 2024. The association's priorities in the FAA bill are discussed below. To download a PDF of ARSA's detailed FAA reauthorization priorities as sent to Congress on Feb. 28, 2023, [click here](#).

Regulatory

ARSA members regularly complain that front line FAA personnel in local offices selectively enforce rules, apply them inconsistently or incorrectly, and demand compliance with agency guidance that conflicts with or exceeds regulatory requirements. At headquarters, agency leaders are slow to respond to industry recommendations to improve policy (if they respond at all), thus undermining the growth, efficiency, and global competitiveness of the rapidly evolving U.S. aviation industry. While the FAA may once have been respected as "the gold standard" of aviation regulation, that status is in serious jeopardy as foreign Civil Aviation Authorities (CAAs) benefit from better trained personnel, consistent leadership, a global perspective, and a more internally consistent regulatory framework. ARSA therefore recommends the FAA reauthorization bill do the following:

- **Enhance access to maintenance data** by directing FAA to task the Aviation Rulemaking Advisory Committee (ARAC) to review current rules and policy related to instructions of continued airworthiness (ICA, aka "maintenance manuals") and recommend guidance and/or regulatory changes to enhance ICA access for aircraft owners, maintainers, and others. Sec. [516](#) of H.R. 3935; Sec. [333](#) of S. 1939. ARSA request: Merge and retain in conference bill.
- **Improve enforcement consistency and align regulations and guidance** by directing the U.S. Department of Transportation's Inspector General to audit the Flight Standards and Aircraft Certification Services regarding the consistency and application of guidance and directing the FAA Administrator to ensure consistency in oversight through audits, more frequent updates to guidance and rules, and better documentation of findings and decisions. Secs. [252](#) and [253](#) of H.R. 3935; no parallel Senate provision. ARSA request: Add Secs. [252](#) and [253](#) of H.R. 3935 to S. 1939 and conference bill.
- **Require timely resolution of investigations** so "stale" letters of investigation sent to certificate holders do not hang as a cloud over their companies and careers for years. Sec. [208](#) of H.R. 3935; no parallel Senate provision. ARSA request: Add Sec. [208](#) of H.R. 3935 to S. 1939 and conference bills.
- **Clarify supplemental type certificate requirements** by tasking the agency to explain the differences between a major alteration that introduces a major change in type design under 14 CFR § 21.113(b) and a major alteration that does not require an Supplemental Type Certificate. Sec. [517](#) of H.R. 3935; no parallel Senate provision. ARSA request: Add Sec. [517](#) to S. 1939 and conference bill.

- **Maintain current foreign repair station oversight regime** by rejecting legislation to impose unnecessary, new mandates on U.S. aircraft operators and FAA certificated repair stations outside the United States, divert scarce FAA resources, and potentially subject U.S. facilities to foreign retaliation. Sec. [505](#) of H.R. 3935; Secs. [311](#) and [312](#) of S. 1939. Include neither provision in conference report.
- **Improve FAA operations** by creating the new position of FAA Assistant Administrator for Rulemaking and Regulatory Improvement, who is charged with, among other things, improving transparency and responsiveness relating to the agency's handling of petitions for rulemaking and exemptions. Sec. [122](#) of H.R. 3935; no parallel Senate provision. ARSA request: Add Sec. [122](#) to S. 1939 and conference bill.

Workforce

For the last decade, a shortage of maintenance technicians and pilots has threatened the aerospace supply chain and undermined the efficiency of the aviation system. The consulting firm Oliver Wyman projects the problem will get worse before it gets better, with a potential shortage of 38,000 aviation technicians by 2028. Fifty-three percent of to-date respondents to ARSA's 2024 member survey identified difficulty finding and retaining technical talent as a significant threat to their company's profitability, revenue, or workforce forecast. As such, ARSA recommends the workforce title of the FAA reauthorization bill do the following:

- **Expand and enhance the maintenance technician and pilot workforce development grant programs created by Sec. 625 of the 2018 FAA law** by increasing funding to *at least* \$15 million for each grant program, adding a new program to support aviation manufacturing workforce development, and making changes to expand eligibility and improve implementation. Secs. [301](#) and [302](#) of H.R. 3935; Sec. [501](#) of S. 1939. ARSA request: merge provisions to maximize investment and include in conference bill.
- **Improve the transition of military maintenance professionals to civil aviation** by directing FAA to conduct a rulemaking to create new military mechanic test and adjust airman certification standards accordingly. Sec. [504](#) of S. 1939; Sec. [311](#) of H.R. 3935 would create an interagency working group to improve military to civilian technician career transition. ARSA request: Include Sec. [504](#) of S. 1939 in conference bill.
- **Create a National Center for the Advancement of Aerospace** to facilitate collaboration and cooperation between aviation and aerospace stakeholders to support and promote civil and military aviation and aerospace careers. Sec. [303](#) of H.R. 3935; no parallel Senate provision. ARSA request: Include Sec. [303](#) of H.R. 3935 in conference bill.
- **Reduce barriers to entry** by directing a rulemaking to amend 14 CFR part 65 to allow mechanic certificate applicants to sit for the general knowledge test prior to meeting those experience requirements if they have completed the appropriate curriculum in conjunction with a high school program. Sec. [312](#) of H.R. 3935 establishes a working group to examine airman knowledge testing to create new opportunities for high school graduates in the maintenance industry; Sec. [503](#) of S. 1939 directs a GAO study. ARSA request: Merge and enhance proposals in conference bill to direct part 65 rulemaking.

DEPARTMENT OF DEFENSE CONTRACTING IMPROVEMENT

During a period of unusual geopolitical instability, concentration in the defense industrial base threatens the DOD's aerospace supply chain. Enhancing competition for DOD aviation maintenance services will reduce aircraft maintenance costs, improve readiness, reduce bureaucratic duplication, and expand government contracting opportunities for small and medium companies. ARSA request: Include language in the FY 2025 National Defense Authorization Act (NDAA) to 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.

To learn more about the aviation maintenance industry, its economic impact in your state, and/or ARSA's policy agenda go to arsa.org or contact ARSA Executive Vice President Christian Klein at 703.599.0164 or christian.klein@arsa.org.

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