

## **ARSA: The Voice of Aviation Maintenance 119<sup>th</sup> Congress, First Session Legislative Priorities**

ARSA is the eyes, ears, and voice of the aviation maintenance industry in the halls of the American Congress. The association's legislative efforts complement its regulatory expertise as its team tirelessly fights for repair station interests on Capitol Hill. With Federal Aviation Administration (FAA) reauthorization complete, ARSA's 2025 policy agenda is focused on FAA's implementation of congressional directives, the industry's long-standing technician shortage, and enhancing competition for Department of Defense aircraft maintenance contracts.

ARSA seeks the highest level of safety by the most efficient means possible. The top priority is ensuring aviation policy is based on facts, not fear. New laws and regulations should address legitimate safety gaps, not micromanage or undermine industry competitiveness. ARSA engages lawmakers in our nation's capital and their home states, encourages grassroots action and involvement by members, raises the legislative and regulatory profile of the aviation maintenance industry, offers technical and legal expertise to analyze and respond to government actions, and promotes the industry's benefits and safety record among key audiences.

### **FAA REAUTHORIZATION IMPLEMENTATION**

The FAA Reauthorization Act of 2024 (Pub. L. 118-53), enacted May 16, 2024, authorized agency operations through Fiscal Year 2028. ARSA urges Congress to ensure FAA accomplishes the following:

**Improve FAA rulemaking and oversight.** The bill included numerous provisions to improve the development of aviation safety regulations and guidance materials, with a particular focus on transparency, consistency, and public engagement. ARSA strongly supports swift implementation of:

- Sec. 202, creating a **new position of Assistant Administrator for Rulemaking and Regulatory Improvement** responsible for FAA's rulemaking agenda, updating outdated rules, evaluating rules for redundancy, effectiveness, and accuracy, maintaining rulemaking timelines, and processing petitions for exemption.
- Sec. 205, directing FAA to establish a **review team to improve the timeliness, performance, and accountability of regulatory material development.**
- Sec. 821, directing the Department of Transportation Inspector General to **audit FAA's Flight Standards and Aircraft Certification Services for consistency between regulations and policy, orders, and guidance** relating to repair stations, supplemental type certificates, and technical standard order authorizations.
- Sec. 822, directing the FAA Administrator to **audit the application and interpretation of policies, orders, and guidance, to update documents to resolve inconsistencies and ambiguities, and to ensure proper documentation of findings and decisions to improve consistency.**
- Sec. 209, expressed the sense of Congress that **the FAA should make greater use of docketed ex parte communications and enhance stakeholder engagement during the rulemaking process.**

**Expanding the Aviation Maintenance Workforce.** Congress has responded aggressively to address the chronic aviation technician shortage. ARSA supports swift implementation of the bill's many workforce-related provisions:

- Sec. 440 improved and expanded funding for the aviation technician and pilot workforce grant programs created in the 2018 FAA law. It also created a new grant program to recruit and train aerospace manufacturing workers. Via the appropriations process, **Congress must fully fund these critical grant programs that benefit workers and companies around the country.**

- Sec. 426, which directs the FAA to conduct rulemaking to create a military mechanic written competency test and (as necessary) develop Airman Certification Standard to **qualify military technicians for civilian part 65 mechanic certificates.**
- Sec. 405, which directed the FAA to **establish a working group to evaluate allowing high school students to take the general knowledge portion of the FAA's airframe and powerplant (A&P) mechanic exam.**

**Enhancing access to maintenance data.** For decades, ARSA members have complained about FAA's failure to enforce regulations requiring aircraft design approval holders to share maintenance instructions for aircraft, engines, propellers, and articles (Instructions for Continued Airworthiness or ICA). Sec. 349 directed the agency to establish an Aviation Rulemaking Committee (ARC) to make recommendations for improving the regulatory regime surrounding maintenance data. As ARSA and others work through the ARC to develop clear, enforceable rules, Congress must monitor ARC activities and ensure the agency implements ARC recommendations to guarantee those authorized to work on aircraft and articles has access to proper maintenance instructions.

**Ensuring U.S. operators have access to maintenance, wherever they fly.** Despite ARSA's warnings, Sec. 302 imposed new and unnecessary mandates on the FAA certificated foreign repair stations U.S. operators rely on when operating internationally. The bill requires surprise FAA inspections, potentially redundant personnel licensing, and FAA data gathering. The agency also recently issued a new rule imposing drug and alcohol testing on foreign repair station employees. All these policies disincentive foreign companies for providing services to U.S. operators and heighten the risk of retaliation against the small business-dominated U.S. maintenance sector. The new foreign repair station requirements, which remain a solution in search of a problem, should be implemented in the manner least disruptive to U.S. companies and their international partners.

***ALLOW STUDENTS TO USE 529 FUNDS FOR AVIATION TRAINING.***

ARSA supports the enactment of the Aviation Workforce Act (bill number pending), which would allow qualified distributions from qualified 529 tuition savings accounts for aviation maintenance coursework at part 147 technician schools and for pilot training at part 141 flight schools.

***DEPARTMENT OF DEFENSE (DOD) CONTRACTING IMPROVEMENT***

During a time 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. The FY 2026 National Defense Authorization Act (NDAA) should compel DOD to improve competition for maintenance on civilian derivative aircraft by more-readily accepting FAA approvals (e.g., Designated Engineering Representative (DER) repairs) and by improving access to the technical data required to compete for and perform DOD aircraft maintenance contracts.

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

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