



The Update Report

The Airline Suppliers Association

Volume 9, Issue 12

December 2001

YOUR ASSOCIATION IN ACTION

A Brief Look at Gov't Affairs in 2001

This is a just a brief look at some of ASA's accomplishments in 2001.

As part of its commitment to continuing professional education, ASA conducted regulatory training workshops throughout the country. In addition, hazardous materials shipping was flagged as an issue for many ASA members so this year ASA began teaching a two-day hazmat course designed to meet the regulatory requirements for training.

ASA is committed to improving quality systems in our industry. An important part of this is the FAA's AC 00-56 Voluntary Accreditation Program. ASA worked with the FAA to develop a revision to the advisory circular that will make this program even better. The revision has been completed and is currently going through FAA formalities before being released.

An important part of any quality system is the review of documentation. As the industry moves toward a more uniform use of the 8130-3 tag, it has become increasingly necessary for distributors to obtain 8130-3 tags on demonstrably airworthy parts that do not already have them. ASA successfully lobbied the FAA to issue Notice 8130.70, which made it possible once again for DARs (maintenance and manufacturing DARs) to issue the tag for parts in a distributor's inventory.

ASA also worked with the FAA on the international negotiations that went into the latest revision of Order 8130.21C (8130-3 instructions). While this revision did not solve all of our problems, it represents one more incremental step towards global harmonization—the sort of harmonization that will make it easier for companies to do business smoothly without regard to international borders.

Much of what ASA does is "invisible" because it is defensive in nature: halting bad government practices before they become law. For example, ASA was able to divert several initiatives aimed at FAA-regulation of e-commerce with no real safety benefit. In each case, the result would have been more headaches for distributors with few, if any, benefits. ASA was able to channel these initiatives toward more productive goals aimed at safety enhancement.

ASA was one of the first organizations to pursue low-interest loans for industry following the September 11 terrorist attacks. While other organizations pursued cash grants like those already given to the air carriers, ASA worked closely with members of Congress to assure the SBA that Congress would 'cover' SBA's decision to issue loans. ASA chose the realistic form of relief, pursued it, and was instrumental in making SBA emergency loans available to the industry.

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** Any member with a repair station or who does business with repair stations should see the ARAC survey at: <http://www.airlinesuppliers.com>

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A Message from ASA's President

Earlier this month we received sad news about one of our colleagues. James Kornak, Manager of QA at Jet International passed away. James was only 34 years old and leaves a wife, Martha, and 5 year-old daughter, Rhiannon. James was an avid supporter of ASA and was a member of the QA committee.

Steve Govaker, President of Jet International, said "James was one of the original Jet people when I became owner. James was a very loyal and supportive Jet employee and I considered him a friend. For a business owner, there really is not any better employee than James Kornak. I'll miss him tremendously."

A college trust fund has been established for Rhiannon, please contact Steve Govaker at (847) 657-9364 for information regarding the trust fund.

ASA Name Change

On January 1, 2002, the Association will change its name to "The Aviation Suppliers Association."

ASA is doing this to recognize the fact that our members distribute parts for more than just airlines. We service the entire aviation industry. Recent events have shown that the industry must stand together as a whole - air carriers, regional air carriers, repair stations, general aviation, business aviation, manufacturers ... and the distributors that make the aircraft parts flow among all of them.

The process to change the name involved putting the matter before the ASA Board of Directors (who approved the name change unanimously and the voted to put ther matter before the ASA Membership), and the Association Membership (who overwhelmingly voted in favor of the proposal at the

2001 ASA Annual Conference).

Many of the members who voted in favor of this proposal appreciated the fact that the name change will not change the Association's acronym (ASA), and the Association has not asked accredited companies using the accreditation logo to change their letterhead until they run out of existing stocks of stationary.

Another important feature to the name change is that the Association will have, for the first time, a logo that is solely identified with the membership, and that is distinct from the accreditation logo. Now, members who are not accredited (including associate members who often cannot be accredited) can still proudly advertise their affiliation with ASA.

As soon as we receive the approval for the name change from the State of Delaware, information regarding the name change and a license agreement for usage of the membership logo will be forwarded to the members.

Best wishes for a happy and healthy new year,

Michele Dickstein

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The Update Report

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The Update Report

provides timely information to help Association members and readers keep abreast of the changes within the aviation supply industry.

The Update Report

is just one of the many benefits that the Airline Suppliers Association offers members. For information on ASA-100, the ASA Accreditation Program, Conferences, Workshops, FAA guidance like Advisory Circulars, Industry Memos, or services and benefits, contact the Association.

The Update Report

For information on special package rates for advertising, contact the Association at (202) 730-0270.

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REGULATORY UPDATE

We Need *Your* Input on Repair Station Ratings

A government-industry partnership is working on *more* changes to the repair station rules, and that group needs the help of everyone in the industry to decide what needs to be changed and what needs to be left alone.

The Aviation Rulemaking Advisory Committee (ARAC) for Air Carrier and General Aviation Maintenance Issues is the ARAC group that has overseen regulatory negotiations on maintenance issues ranging from the most basic questions, like changes to Part 43, to the most perplexing conundrums, like major-minor distinctions. This ARAC group recently took on a new task: analyzing the concerns that were omitted by the FAA in developing the new FAR 145

repair station rules. In particular, the group will address repair station ratings and QA systems.

These are issues that will certainly affect repair stations; but they are also likely to affect the companies that employ repair stations—including any parts distributor that uses repair stations to perform repairs, alterations or overhauls on inventory.

Following the recent ARAC meeting on this subject, ARAC decided that the appropriate way to start was to solicit input from any and all repair stations, and repair station *customers*, on how the existing system of repair station ratings can be improved. A survey is now available on the ASA web site that allows any interested

party the opportunity to offer their views on what the current repair station ratings actually mean, what the ratings *ought* to mean, and what issues or problems the respondent has encountered.

ASA is collecting this information in electronic form so that it can be merged with the information being collected by other trade associations in the industry. Responses must be e-mailed to ASA by Friday, January 18th, 2002.

This survey is not limited to repair stations alone! Responses from the rest of the industry are needed! ASA strongly encourages anyone and everyone who deals with repair stations

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New FAA Program Focuses on Aging Aircraft Wiring

As the average age of the transport airplane fleet in the United States increases, the FAA is devoting increased attention to safety issues surrounding the operation of aging aircraft. The FAA recently unveiled a new program aimed at monitoring and improving the continued safety of aircraft wiring systems throughout the life of an aircraft. The Enhanced Airworthiness Program for Airplane Systems (EAPAS) is the result of an extensive study of aircraft wiring systems done in cooperation with industry. EAPAS combines a variety of near- and longer-term actions into a plan to increase awareness of wiring system degradation, implement improved procedures for wiring maintenance and design, and spread that information throughout the aviation community.

The new initiative is an outgrowth of the FAA's Aging Transport Non-Structural Systems Program, established in 1998. The systems program is modeled after the aging structures program started over ten years ago. The focus on wiring arose out of the crash of TWA Flight 800 in July 1996. The investigation into that aircraft's fuel tank wiring eventually expanded into the examination of all aircraft wiring systems (encompassing cables, connectors, and wiring harnesses) and the way they age. To facilitate the process, the FAA established a formal advisory committee in 1999. This committee, called the Aging Transport Systems Rulemaking Advisory Committee (ATSRAC), is made up of representatives of aircraft manufacturers, transport airplane operators, user groups, aerospace and industry associations, and governmental agencies.

ATSRAC oversaw the first systematic study of the state of aircraft wiring, examining both in-service and retired

commercial airliners. ATSRAC investigations discovered over 3,300 wiring discrepancies within 81 airplanes and identified 182 of those for further review and possible corrective action. The investigators found that wire degradation can occur with age and be accelerated by exposure to moisture, vibration and mechanical stress, and temperature variation. The problem can be compounded where improper installation or repair, contamination, or inadequate maintenance has caused further exposure to these conditions. In addition, wiring assemblies that were certified safe when designed may, over the years, be transformed in their construction

New FAA regulations and policies affecting aging wiring assemblies could lead to significant overhaul of electrical systems in aircraft—this could result in some older aircraft being decommissioned

by rerouting or other modifications that diverge from the original safe design philosophy. Accordingly, actions contained in the EAPAS plan extend beyond correcting the aging phenomenon alone.

The near-term elements of the EAPAS plan are designed to accomplish rapid safety improvements based on existing, fully analyzed data. These actions will increase the "margin of safety" for aging airplanes by taking essential regulatory corrective action, promoting better maintenance procedures, increasing knowledge through training and guidance for FAA engineers and inspectors, and sharing information with industry worldwide.

Under the EAPAS plan:

- The FAA Flight Standards Service (AFS) will issue an aging systems handbook information bulletin focusing on "lessons learned" from the ATSRAC programs.
- AFS will propose the adoption of operations specifications (OpSpecs) for aging systems maintenance and training programs and a handbook change to explain to principal maintenance inspectors (PMI) the OpSpecs issues and subsequent rule changes.
- The FAA will complete a wire systems training program for Aircraft Certification Office (ACO) engineers and designated engineering representatives (DER).
- The FAA will issue model-specific Notice of Proposed Rule (NPRM) Airworthiness Directives (AD) based on ATSRAC recommendations.
- The FAA has published a wire installation drawing policy letter to promote consistency of installation.
- AFS will develop internal guidance and an advisory circular (AC) for service difficulty reporting (SDR) rules.
- The FAA will communicate its EAPAS Implementation Plan to airworthiness authorities worldwide.
- Original equipment manufacturers will distribute to operators a "lessons learned" document.

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Europeans Restricts Use of Coniferous Wood Packing Materials

As of October 1, 2001, companies shipping goods to the European Union in packing materials made of coniferous woods such as pine, spruce, or fir must now ensure the wood is treated for pests, or find alternative packing materials. Concerns over the spread of the pinewood nematode in Europe have prompted the Commission of the European Communities to adopt emergency measures requiring the treatment and marking of all new and used coniferous non-manufactured wood packing material (NMWP) originating in the United States, Canada, China, or Japan and departing on or after October 1st to prevent introduction of the pest.

The pinewood nematode is a microscopic eelworm that has ravaged pine forests in Japan and China.

European concern over the possible introduction and establishment of the pinewood nematode has heightened over the past couple of years after an outbreak in Portugal and interceptions of the pinewood nematode in NMWP from the United States, Canada, China, and Japan. Officials have not positively identified the source of the outbreak in Portugal, but packaging material is believed to have been the likely pathway.

Non-manufactured wood packing (NMWP), also called solid wood packing material or SWPM, is defined as "wood packing other than that comprised wholly of wood-based products such as plywood, particle board, oriented strand board, veneer, wood wool, etc., which has been created using glue, heat, and pressure or a combination thereof."

For the purpose of the European Union's emergency measures, NMWP includes coniferous pallets, crating, packing blocks, drums, cases, load

boards, pallet collars, skids, etc., but not dunnage. This includes many of the wooden crates and pallets used to protect aviation parts in the warehouse and in shipping.

The U.S. Department of Agriculture (USDA) expects that a significant portion of U.S. exports will be affected by the measures since most goods are transported using NMWP. It is estimated that upward of 30 percent of the 450 million new pallets produced annually, and a higher percentage of the new pallets used for exports, are made entirely of or partially of coniferous lumber. A significant proportion of the pallets and containers already in circulation also are made entirely of or partially of conif-

New EU regulations could have a significant impact on the wooden boxes and pallets we use for international shipping

erous lumber. The EU has stated that existing pallets will have to meet the same requirements as new pallets. European NMWP that is clearly marked as being from Europe will be acceptable as long as it meets U.S. requirements.

NMWP made entirely of hardwoods are exempt from the EU emergency measures, so no marking of this material is required. Nevertheless, the National Wooden Pallet and Container Association (NWPCA), the largest organization of wooden packaging professionals in North America, is

developing an optional mark for "hardwood only" NMWP using the designation "NC - US" to denote non-coniferous materials from the United States.

The EU emergency measures allow the use of coniferous NMWP that have been subjected to one of three treatment options: heat treatment (HT), fumigation, or chemical pressure impregnation (CPI). In all cases treated wood must bear a mark indicating the organization that treated the NMWP and the location of that organization. The EU requires that the HT program be an official program with official marks. The EU has indicated that any coniferous NMWP that does not comply with the requirements will be refused entry, destroyed, or treated to eliminate the risk of the pinewood nematode prior to entry. This will likely necessitate the off-loading of any cargo from the NMWP, and may cause considerable delay.

All three of the treatment options approved by the European Union are available to exporters in the United States. The USDA Animal & Plant Health Inspection Service (APHIS) recommends the use of the heat-treatment (HT) option since that is the only "long term measure" currently listed in the IPPC draft standard.

The Heat Treatment (HT) Program

The American Lumber Standards Committee (ALSC) in coordination with APHIS and the NMWP industry has developed an official program for the HT option. The program will require solid wood packing material assemblers to enroll with a grading agency affiliated with the ALSC and to acquire HT marked lumber from approved lumber mills. The program

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What Are Your Boxes and Pallets Made Of?

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will include on-site inspections of NMWP manufacturing facilities to verify compliance. On-site inspections will be done by inspection agencies accredited by ALSC. The ALSC's policy on NMWP and NMWP enforcement regulation are available for review at <http://www.aphis.usda.gov/ppq/swp/policyonnmwp.pdf> and <http://www.aphis.usda.gov/ppq/swp/enforcementregulations.pdf>, respectively. Two official marks have been approved for the agencies: one mark for NMWP using 100% HT treated lumber and another mark for NMWP containing heat treated coniferous lumber and untreated non-coniferous wood (HTC/NHTNC).

Companies interested in participating in the HT program should contact one of the following agencies accredited by the American Lumber Standards Committee:

- National Hardwood Lumber Association, Memphis, TN, 901-377-1818
- Northeastern Lumber Manufacturer's Association, Cumberland Center, ME, 207-829-6901
- Northern Softwood Lumber Bureau, Cumberland Center, ME, 207-829-6901
- Pacific Lumber Inspection Bureau, Federal Way, WA, 253-835-3344
- Package Research Laboratory, Rockaway, NJ, 973-627-4405
- The Packaging Department, Bloomington, MN, 952-967-9400
- Redwood Inspection Service, Novato, CA, 415-382-0662

- Timber Products Inspection, Conyers, GA, 770-922-8000
- West Coast Lumber Inspection Bureau, Portland, OR, 503-639-0651
- Western Wood Products Association, Portland, OR, 503-224-3930

Fumigation of NMWP

The EU emergency decision does not specify the use of any particular fumigant or an officially approved mark, but it does require use of a fumigant that meets an officially recognized technical specification. In the United States, the Environmental Protection Agency (EPA) is responsible for registering and establishing technical specifications for pesticides. All fumigants are restricted-use pesticides and they may only be purchased and applied by licensed commercial pesticide applicators. Although it is a violation of Federal law for commercial applicators to apply a pesticide in a manner inconsistent with the EPA label, it is the State, not the Federal government, that licenses commercial applicators.

Because of these considerations, APHIS has provided the following advice to exporters using coniferous wood packaging materials:

- Fumigation may be used to meet the EU treatment requirement for coniferous NMWP.
- Fumigation must be done by licensed pesticide applicators following the EPA-approved label specification of the fumigant used.
- Methyl bromide is the fumigant recommended by

APHIS, phosphine is an approved fumigant by the EU as well. Always follow manufacturer's instructions when applying any restricted chemicals.

- The name of the pest control company/applicator, the two-letter code for the state of origin, and the state pesticide applicator number should be shown on the coniferous NMWP.
- For fumigated NMWP APHIS has developed a recommended mark that has been officially endorsed by the NWPCA.

NMWP Made with CPI Wood

The large-scale use of pressure-impregnated wood is problematic owing to environmental concerns in some EU countries. For instance, the Netherlands has recently prohibited the commercial importation of wood impregnated with copper compounds because of environmental concerns. In spite of this, the EU emergency measures do not require a specific chemical treatment or an official mark for NMWP made with CPI coniferous wood. In most cases, CPI wood contains quality marks and is a distinct color (due to the treatment process) so it cannot be mistaken for untreated wood. Like fumigants, CPI chemicals are regulated by the EPA and may only be applied by facilities that are licensed by State governments. APHIS recommends the following for NMWP facilities that use CPI coniferous wood:

- NMWP assemblers must use coniferous wood that is pres-

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EU Locks-Out Certain Boxes

Wiring

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sure impregnated by a licensed wood preserver using a treatment officially approved by the American Wood Preservers Association.

- NMWP assemblers should mark each piece of NMWP (pallet, crate, spool, etc.) with a mark indicating the name of the location of the NMWP assembler.
- APHIS has developed recommended marks that have been endorsed by the NWPCA for NMWP assemblers using pressure impregnated coniferous wood. Please note that the recommended mark for NMWP made entirely of CPI wood is different than the mark for NMWP made of mixed CPI coniferous and non-treated non-coniferous wood.

Other International Initiatives

The EU measures are not the only ones of their kind. China already regulates coniferous NMWP from the

United States, and Australia requires all NMWP to be fumigated. Many other countries, including Brazil, Argentina, and Russia, have indicated an interest in imposing stricter restrictions on NMWP.

Such precautions are likely to become even more widespread in the next few years. The International Plant Protection Convention (IPPC), which is recognized by the World Trade Organization as the official international plant protection organization, is now considering a draft international standard with measures very similar to those of the EU that would apply to all NMWP, coniferous and hardwood. The draft standard, which is currently being circulated for country comment, is tentatively scheduled for adoption in April 2003. Interested parties can find the draft standard on the USDA web site at <http://www.aphis.usda.gov/ppq/swp/NCMark.pdf>.

For further information on the new requirements, see the APHIS web site at <http://www.aphis.usda.gov/ppq/swp/eunmwp.html>. APHIS has also prepared a Frequently Asked Questions page explaining the emergency measure at <http://www.aphis.usda.gov/ppq/swp/eunmwpsfaqs.html>.

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Longer-term actions in the EAPAS plan will institutionalize the management of aircraft wiring systems by revising existing federal regulations concerning design, certification, maintenance and continued airworthiness of aircraft wiring systems. Under current plans, TC and STC holders will be required to make changes to existing Instructions for Continued Airworthiness (ICAs) based on the Enhanced Zonal Inspection Program (EZIP). In addition, parts 91, 121, 125, and 129 of the Federal Aviation Regulations (FAR) will be amended to include the EZIP. Improvements to certification standards and ICAs in FAR Part 25 will also be required. The EAPAS rules will be developed through specific tasking to ATSRAC.

EAPAS' longer-term actions also will improve reporting and analysis of wire problems and foster research and development in the areas of arc fault circuit breakers, automated wire inspection tools, wire separation and wire performance.

The full text of the EAPAS plan is available under the "Reports, Publications & Documents" section at: <http://www.faa.gov/apa/newsroom.htm>.

REGULATORY UPDATE

FAA Clarifies Policy on ICAs

The FAA has issued a notice to clarify its policy on when an applicant for a type certificate (TC), supplemental type certificate (STC), or amended type certificate (ATC) must submit Instructions for Continued Airworthiness (ICAs).

This has been a particular concern for STC applicants, as the FAA has enforced different standards from one

office to the next. FAA Headquarters has stated unequivocally that ICAs are now required for **all** STC and ATC applicants, regardless of the date of application for the original TC.

ICAs are often a concern for the companies that install parts. ASA members might want to begin asking whether there are ICAs associated with the parts they purchase

(particularly when the part is known to be associated with an STC), and to ask for those ICAs when they are known to exist. There is presently no requirement to do this, but a distributor that can provide ICAs to its customers may find that this is a valuable value-added service.

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FAA Clarifies Policy on ICAs

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The clarification is intended to resolve ongoing differences in interpretation of 14 CFR section 21.50(b) caused by two memoranda issued by the FAA Office of Airworthiness in 1982 and 1983. The memoranda stated that 14 CFR 21.50(b) applied only to TC, STC, and ATC projects whose original certification basis included a requirement for ICA as amended on September 11, 1980 (effective January 28, 1981). The 1983 memorandum went on to state that the FAA was initiating a project to amend 14 CFR 21.50(b) to reflect this interpretation. This project never took place. FAA legal counsel has determined that these memoranda did not change the plain meaning of 14 CFR 21.50(b). Accordingly, FAA is rescinding both memoranda.

The FAA asked for public comment on this action before issuing final guidance, and issued interim guidance in the form of a six-point implementation plan:

1. Effective immediately, each applicant for a TC, STC, or ATC must submit a complete set of ICAs.
2. Design approvals for STCs and ATCs should not be issued until Aircraft Certification Office (ACO) and Aircraft Evaluation Group (AEG) personnel have accepted the ICA.
3. The FAA will not address certification projects previously approved without ICA at this time. It will not require development of ICA for those products unless ACO and AEG personnel determine that ICA are necessary to prevent or correct an unsafe condition.
4. The ICA for an STC or ATC need only address continued airworthiness with respect to the design

change for which application is made, as well as parts or areas of the aircraft affected by the design change. The FAA considers such ICA "complete" for the purposes of 14 CFR 21.50(b).

5. An applicant's submitted assessment of the need for ICA may satisfy the "complete set of ICA." If the assessment shows that the certification project did not change any information, procedures, process, requirements, or limitations in the current ICA, or require new ICA, and the FAA concurs, no further ICA development is necessary.

- a. A statement should be placed on the design approval indicating that additional ICA change is not required.
- b. For an STC, that statement may be placed under the "Limitations and Conditions" section.

6. If previous ICA or maintenance documents do not exist, or were developed before January 28, 1981, the ICA submitted for a design change should follow the format and contents specified in the appropriate airworthiness standards (14 CFR parts 23-35) appendix to the extent possible.

FAA Offices have been told to give consideration to any submittal of ICA containing the essential information to maintain the design change in an airworthy condition. The FAA plans to provide follow-on guidance in the future on development and submittal of ICAs.



ASA President Michele Dickstein with FAA SUPs Program Office Manager Ken Reilly



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ARAC Investigates Ratings & QA Systems Proposals

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in any capacity, as a customer or otherwise, to take the time to make their voice heard.

Rules affecting repair stations can have far-reaching effects throughout the parts industry. Changes in the rating system can affect a repair station's authority to perform particular repairs. This could disrupt established business relationships between a repair station and its customers where a repair station finds that it must apply for a new rating to continue performing work it had been performing previously under its prior ratings. Customers could feel the effects in terms of longer turn-around times or higher bills as the repair station passes along administrative costs associated with updating its ratings.

By participating in the survey, businesses can help the ARAC determine the best way to improve the current rating system, and do so in a way that causes the least problems for everyone in the industry. The more responses the ARAC gets from industry, the better it will be able to substantiate its findings when it makes its final recommendations to the FAA, and the more likely the FAA is to implement those recommendations.

ARAC's Mission: Helping Complete Unfinished Business

When the FAA issued its long-awaited revision of the Part 145 repair station regulations in July, it refrained from issuing final rules on two of the more contentious aspects of those regulations: changes to the current system of repair station ratings and a rule requiring the introduction of mandatory quality assurance programs in all repair stations. Both pro-

posals in the June 1999 Notice of Proposed Rule Making (NPRM) attracted a large volume of overwhelmingly negative comments from industry. As a result, the FAA has established the Part 145 ARAC to study both issues and develop recommendations on how to improve the proposed rules.

Sarah MacLeod, Executive Director of the Aeronautical Repair Station Association, is the ARAC Assistant Chair responsible for maintenance issues. As such, she leads the group investigating repair station issues. David Cann, the newly appointed Manager of the Continuous Airworthiness Maintenance Division of the Flight Standards Service (AFS-300), represents the FAA. The committee is made up of a wide range of associations representing people and businesses, foreign and domestic. The committee used the inaugural meeting to establish a work plan that will allow it to complete its assigned tasks in five further meetings between now and April 2002.

Ratings

ARAC's first task is to recommend a rating system for aeronautical repair stations that mitigates problems experienced with the existing rating system and accommodates the continued growth of the industry.

A repair station's rating or ratings establishes the types of work it is authorized to perform. The existing system recognizes six main categories of ratings: airframe, powerplant, propeller, radio, instrument, and accessory, each of which is further subdivided into two to four classes further specifying the subcategories of products the facility may maintain or alter. The FAA also issues limited ratings

that allow a repair station to perform more narrowly defined tasks.

When the FAA issued its proposed changes to Part 145 several years ago, it proposed to restructure and modernize the current rating system. Among the changes proposed were:

- redesignating the radio rating as an avionics rating,
- creating a new, separate rating for computers,
- reorganizing the airframe rating from four classes into seven, and
- eliminating the manufacturers maintenance facility rules (a separate set of rules analogous to a rating).

Industry reaction to the proposed changes was mostly negative. Numerous parties commented that the changes were not worthwhile because the new system was just as complicated and restrictive as the old system. Others took issue with specific proposals such as continuing to classify auxiliary power units as accessories rather than powerplants. Still others favored adopting the rating systems in use in Canada or Europe.

One of the ARAC's key tasks is to identify which problems it intends to fix. To that end, the committee has designed the survey to evaluate how both the industry and FAA officials understand and interpret the privileges and capabilities of each rating and/or class, to identify problems that have arisen under the current system, and to solicit recommendations for improving it. The results will eventually be incorporated in the committee's final report that shall identify various options for rating systems, describe

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The original proposed rule changes to Part 145 can be accessed on the Internet at:
http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=1999_register&docid=fr21jn99-21

New Leadership Confirmed at FAA Flight Standards

The promotions and reassignments continue at the FAA. Associate Administrator for Regulation and Certification Nicholas Sabatini has announced that James J. Ballough has been named Director of the Flight Standards Service. Louis C. Cusimano has been named Deputy Director.

"Jim Ballough and Lou Cusimano are outstanding individuals with the proven ability to lead our Flight Standards work force," said Sabatini. The Flight Standards Service promotes aviation safety and ensures compliance with the operations and maintenance safety standards for air carriers, commercial operators, air agencies, airmen and airwomen, and civil aircraft. It develops and recommends policies, regulations, standards and programs for the global aviation community.

Ballough will lead an organization of more than 4,500 safety inspectors and other aviation professionals. His primary responsibilities are to set safety standards for the aviation industry and oversee regulatory compliance. Ballough joined the FAA's Washington headquarters staff in June 2001 as acting manager of the Continuous Airworthiness Maintenance Division. Previously, he managed the Flight Standards Division in the FAA's Eastern Region, overseeing 14 field and four international offices. He also worked in the same division as an assistant division manager, technical branch manager, and principal maintenance inspector.

Ballough joined the FAA in 1986, after working for Eastern Air Lines for more than 10 years, primarily in the maintenance area. He also worked in the avionics field for Allied Bendix Aerospace starting in 1974.

Ballough holds an FAA mechanic certificate with airframe and powerplant ratings. He has studied at Embry-Riddle Aeronautical University, the Kennedy School of Government at Harvard University, Florida Atlantic University, and the Pittsburgh Institute of Aeronautics. He served in the United States Army from 1970 to 1973.

Cusimano has more than 31 years of aviation experience, 24 of them at the FAA. He served as acting director of the Flight Standards Service, as well as in a variety of key management posts. Cusimano has managed the Air Transportation Division, Certification and Surveillance Division, General Aviation Division, and Technical Programs Division, as well as the Safety Programs Division, Office of System Safety. He served as an aviation safety inspector prior to joining the Washington headquarters staff.

REGULATORY UPDATE

ASA Member Input Sought as Customers of Repair Stations

(Continued from page 144)

the advantages, disadvantages, and economic impact of each option, and recommend a preferred rating system.

Quality Assurance Systems

ARAC's other task is to recommend a quality assurance program that reflects industry requirements and accounts for the varying scope of repair station operations. Current regulations require repair stations to practice quality control by inspecting items that have undergone maintenance, preventive maintenance, or alteration prior to approving them for return to service. In its June 1999 proposed rule, the FAA suggested expanding

this obligation in two ways. First, it would have required repair stations to more directly oversee the work of their contractors, whether certificated or not. Second, it would have required repair stations to establish a quality *assurance* system that monitors the effectiveness of the repair station's procedures, training, and inspection, in addition to the existing quality *control* (inspection) procedures.

Many repair stations already have quality assurance systems in place, even though the federal aviation regulations have not required them so far. Questions remain, though, about what level of complexity would be required

for an "acceptable system," and how the FAA could enforce a quality assurance system requirement without crossing the line into micromanaging the company's business rather than affecting safety.

The first steps in these projects are taking place. By completing the survey on ASA's website, you can make an important contribution to the development of these regulations. It is impossible to tell what the results will be at this early stage—ARAC could recommend comprehensive new rules or it could recommend that no regulatory change is necessary. Your input could be essential to the final result of this process.

Issues of the Update Report Are Now Online!

Are you reading a borrowed copy of the Update Report? Subscriptions to the Update Report are now FREE to persons in the aviation industry or the government. To receive your free subscription, send your name, title, company, address, phone number, fax number and email address to ASA. Our email address is info@airlinesuppliers.com and our fax number is (202) 730-0274.

Back issues of the Update Report are now on-line! Missing a prior issue? Issues of the Update Report are being added to the ASA web site about one month after they are published. Complete sets of volumes six through eight, and the first ten issues of volume nine, are now on-line!

UPCOMING EVENTS

* = Look for ASA personnel on the speaking program

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| Feb. 14-16 | Heli-Expo , Orlando, FL. Register on-line at http://www.heliexpo.com . |
| Mar. 12-13 | FAA Forecast Conference "Planning for the Future in an Uncertain Environment," Washington, DC. Call Helen Kish at (202) 267-9943. |
| Mar. 16-18 | * PMA's & Spare Parts for Aircraft & Aircraft Engines , Miami, FL. Call (207) 892-5445 |
| Mar. 18-20 | Commercial Aviation Industry Suppliers Conference , Los Angeles, CA. Call (310) 203-9603. |
| Apr. 9-11 | MRO Conference & Exhibition , Phoenix, AZ. Call (800) 240-7645. |
| Apr. 19-20 | Aeronautical Repair Station Association , Ritz-Carlton Hotel, Alexandria, VA. Call (703) 739-9485. |
| Apr. 25-27 | * Aircraft Electronics Association , Palm Springs, CA. Call (816) 373-6565. |
| June 23-25 | * ASA 2002 Annual Conference , Four Seasons Hotel, Las Vegas, NV. Call (202) 730-0271 for details. |

Send Us Your Email Addresses!!

ASA will soon be changing the delivery method of the **Update Report** - it will become an emailed periodical. This means we will need your current email address if we are going to be able to send it to you. Please send the name and preferred email address of anyone in your company whom you think should get the Update Report to: **info@airlinesuppliers.com**. Please send us your email address even if you think we already have it. Thanks!!

Happy New Year from everyone at ASA!

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