



The Update Report

The Airline Suppliers Association

Volume 8, Issue 5

May 2000

REGULATORY UPDATE

Regulations, Over the Horizon

This article surveys a few of the important regulatory issues on which ASA has been working. It examines and provides status updates on the changes to the repair station rules, manufacturing rules, airworthiness approval (8130-3) rules, and delegation rules.

Repair Stations

For many years, the FAA has planned to update and revise the regulations for repair stations. Because surplus parts distributors frequently use repair stations to overhaul their inventory, any change to the repair station rules has the potential to be a significant change to our own bottom line.

The project has been on everyone's lips since the 70s, and the FAA has been working in earnest on the project since it held public meetings in 1989. After ten years of hashing through ideas, the FAA finally published its grand new vision of repair stations on June 21, 1999. The June notice of proposed rulemaking featured more stringent controls on quality systems, better oversight by repair stations over their business partners, and greater freedom for the FAA to exercise discretion with respect to the way it regulates repair stations.

Unfortunately, this grand new vision was unreasonably grand in scope. The new regulations would have been

so onerous and expensive that many smaller repair stations would have been forced to surrender their repair station certificates. Companies that previously held repair station certificates would probably perform work under the individual A&P certificates held by their mechanics. This would likely be a step AWAY from safety, as the facilities of an A&P mechanic are not open to FAA inspection the way that a repair station's facilities are subject to FAA inspection.

Some of the ideas that seemed to best promote safety were the ones that would have the most devastating effect on repair stations. The requirement that repair stations adopt ISO-9000 style management systems seemed to be promoting good business practices, but this sort of management system sometimes is too burdensome for a small business. The oversight requirement was similar to the existing requirements imposed on air carriers' maintenance departments, but the resource requirements for 5000 repair stations to maintain their own auditing staffs would have been staggering, and the real safety benefit from this duplicative effort would have been negligible.

Blame in Washington

Throughout the Federal government, there has been an apparent unwilling-

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ASA
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A Message from ASA's President

At ASA headquarters we typically receive 20-30 calls per week from members with substantive questions regarding laws, regulations, guidance and industry standards. This does not include the emails, accreditation questions or database manager inquiries. Recently we have seen a trend - in addition to the substantive calls, members have been asking about our impressions of the future of the industry.

There is no question that the industry is changing. For many companies, the market is still slow. Several theories for the downturn have been discussed: fuel prices, new aircraft purchases, increase in parting-out of aircraft, manufacturers and air carriers more aggressively participating in the market, financial problems for air carriers and distributors alike; and air carriers better managing their own inventory.

Everyone I talk to is evaluating their role in the marketplace. They're asking whether they are going to conduct business as usual, do some minor adjustments or completely change how they do business.

The biggest change coming down the road is e-commerce. My last count is 30+ companies involved in e-commerce and that number is

expected to double. How many of these companies can the market support? Are there any issues with using a site that is owned by a competitor? Should you establish your own e-commerce site on your web site? Moreover, what are the customers looking for in an e-commerce site?

ASA continues to monitor the changes. During the April Board meeting, representatives from ILS discussed some of the upcoming changes to ILS and the Board suggested improvements to the ILS system that could benefit distributors.

ASA is working on an e-commerce issue of The Update Report for later this year. I have asked 2 of the top consultants in aerospace e-commerce developments, Spencer Lin and Michael Ward, to speak at the conference on the changes in the marketplace. ILS and SPEC 2000 will be hosting workshops. On Tuesday afternoon there will be a panel discussion on hot-issues and the impact of e-commerce will be one of the topics. I look forward to seeing you all there.

Best Regards,

Michele Schweitzer

ASA 2000 Elections

At least two positions on the ASA Board of Directors will be open for election in 2000. ASA Members interested in running for these positions should submit nominations to ASA. Nominations should include the name, company name, and contact information for the nominee.

Nominations are due no later than 5:00 pm Eastern Time on June 9, 2000. Ballots will be distributed on or about July 3, 2000.

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The Update Report

is a monthly newsletter of the Airline Suppliers Association. Questions/comments should be addressed to:

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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. Subscription cost is \$120.00 US per year.

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Monday Morning General Session

Keynote Presentation by Kenneth Mead, the Inspector General of the United States Department of Transportation

Industry Update – Jason Dickstein, ASA

The European Marketplace – Harold Jones, JAA

Hazardous Materials and the Legal Hazard It Can Cause You – Marshall Filler, Filler & Weller, PC

Monday Afternoon Workshops (Select 2)

Interest-Based Negotiation – Kaye Shackford, The Mattford Group

Aviation Investigations—Protecting your Business – Harry Schaefer, US DOT OIG

Internal Auditing—Maximizing the Value of Audits – Jason Lewis, ASA & Deborah Kammers, ASA

Manufacturing Issues Affecting Distribution-TSO vs. PMA – Bruce Kaplan, FAA & Terry Pearsall, AEA

Part Marking – Jon Andresen, United Airlines

ILSmart.com - Jim Sdoia, ILS & Mark Pinsley, ILS

ATA SPEC 2000 – Brad Balance, ATA & Michael Sandifer, Continental Data Graphics

Tuesday Morning Workshops (Select 2)

Keeping Your Rat Pack Out of Court: Employment Law for Owners and Supervisors – Jason Dickstein, ASA

The Ins and Outs of Accreditation—Doing it ASA's Way – Jason Lewis, ASA & Deborah Kammers, ASA

FAA Recent Advisory Guidance – Ken Reilly, FAA & Al Michaels, FAA

Aviation Data: Propriety, Approval and Misappropriation – Paul A. Lange, Attorney

Supplier/Vendor Performance Tracking — The Why; The What; The How To – George Ringger, Solair, Inc.

ILSmart.com - Jim Sdoia, ILS & Mark Pinsley, ILS

ATA SPEC 2000 – Brad Balance, ATA & Michael Sandifer, Continental Data Graphics

Tuesday Afternoon General Session

Update from the FAA – Ken Reilly, FAA

Financial Evaluation of Your Aircraft Parts Inventory – Robert Agnew, Morten, Byer & Agnew

E-Commerce—The Way of the Future – Michael Ward, PriceWaterhouseCoopers & Spencer Lin, PriceWaterhouseCoopers

Industry Panel Discussion – You don't want to miss this one.

Special Hotel Note

The ASA room block at the Four Seasons Hotel is now full every night except Sunday and Monday, and those nights will be full soon. Other hotels are within walking distance, so please call the Association at (202) 730-0270 for lodging alternatives.

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This is a partial agenda. For the full agenda and registration form, see ASA's web site or call and ask the Association to mail/fax the full conference agenda.

Airline Suppliers Association, 1707 H Street, NW, Suite #701, Washington, DC 20006
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CONFERENCE SCHEDULE

Saturday, June 24, 2000	3:00 PM – 6:30 PM	Registration
Sunday, June 25, 2000	7:30 AM – 9:00 PM	Golf, Registration, Welcome Dinner
*Monday, June 26, 2000	6:30 AM – 9:30PM	Registration, Breakfast, Exhibits, Conference, AM/PM Break, Lunch, Exhibits, Workshops, Reception & Dinner Banquet
*Tuesday, June 27, 2000	6:30 AM – 4:15 PM	Member's Only Breakfast Meeting, Exhibits, Workshops AM/PM Break, Lunch, Exhibits, General Session

(*All events on Monday & Tuesday are at Four Seasons Hotel)

WORKSHOP SCHEDULE

Monday - June 26, 2000

PM SESSION ONLY (90 minutes)

2:00 PM – 3:30 PM

4:00 PM – 5:30 PM

Circle 2 Workshops

- (A) Interest-Based Negotiation
- (B) Aviation Investigations
- (C) Internal Auditing
- (D) Manufacturing Issues
- (E) Part Marking
- (1) ILSmart.com
- (2) ATA SPEC 2000

Tuesday - June 27, 2000

AM SESSION ONLY (60 minutes)

9:00 AM – 10:00 AM

10:30 AM – 11:30 PM

Circle 2 Workshops

- (F) Employment Law for Owners
- (G) The Ins and Outs of Accreditation
- (H) FAA Recent Advisory Guidance
- (J) Aviation Data
- (K) Supplier/Vendor Performance
- (1) ILSmart.com
- (2) ATA SPEC 2000

SPOUSE/COMPANIONS? Guest name: _____

Sunday and Monday evening social events are included in Spouse/Companion registration fee. (A Spouse/Companion is one who does not work for a company that qualifies for membership in the ASA)

For information on children's activities, contact ASA.

PHOTOCOPY THIS FORM FOR ADD'L REGISTRANTS. MAINTAIN A COPY FOR YOUR RECORDS. CONFIRMATIONS WILL BE FAXED TO REGISTRANTS.

CANCELLATION POLICY - All conference cancellations must be received in writing. Cancellations before May 20, 2000 will be charged a \$75.00 service fee. There will be no refund for cancellations received on or after May 20, 2000. There will be no refund for golf tournament cancellations by registrants. If the golf tournament is cancelled by the golf course a percentage of the golf fee will be refunded.

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Hushkit Rule: The U.S. Strikes Back

Noise and gas emissions have been important subjects of negotiation in the global arena in recent years. The International Civil Aviation Organization (ICAO) is part of the United Nations, and is responsible for oversight of such agreements.

Most people in the industry know that the European Union has established certain noise rules that require aircraft to meet the emission standards established by the EU. These criteria must be met within the original design, so hushkitted aircraft may be kept out of the European marketplace. Aircraft meeting U.S. standards are being forbidden access to other markets, and this has a disparate impact on US-manufactured aircraft because they are more likely to be of older design, which means they can only meet the standards through a hushkit.

On March 14, 2000, the United States filed a formal request with ICAO seeking dispute settlement proceedings on this issue. This is the first time the United States has made such a filing in ICAO's 54 year history.

In the complaint, the United States charges that the 15 listed nations of the European Union violated their obligations to abide by the ICAO aircraft

noise standard. Through the complaint, the United States asked the ICAO Council to order the non-compliant EU nations to comply with ICAO noise standards.

ICAO's own aircraft noise standards are performance-based, and the United States has been careful to assure that U.S. regulations meet the terms of the ICAO standards. The European hushkit rules are design standards, not performance standards, and the United States claims that they are discriminatory.

The EU has until June 26 to respond, after which time the ICAO Council may address the complaint on its merits. In the meantime, the Commerce Department is lobbying the non-EU members of ICAO to help secure a positive response to its petition.

The press had long speculated about U.S. response to the hushkit rule. There were a variety of ideas concerning U.S. retribution against the EU. Retributive approaches to the issue probably would have impeded distributors' business, because they would have hampered international trade. The formal filing with ICAO represents the best solution for distributors to this broad-based problem.

AM Safety Award

A technician at Garrett Aviation's Los Angeles, CA, maintenance facility was awarded the first annual "Time Out for Safety" award.

The award, sponsored by Aviation Maintenance magazine, honors an aircraft maintenance technician for a "specific act of maintenance heroism, for performing above and beyond the normal call of duty to enhance aviation safety."

Richard Watson received the award for his persistence in tracking down irregularities in previous repairs made on a Cessna Citation III business jet's pressure vessel. Ultimately, the repairs to the pressure vessel had to be redone to more stringent standards.

Aviation Maintenance editor Matt Thurber commented, "Too often, technicians are criticized for finding problems that delay delivery. Instead, we should be rewarding technicians for doing the right thing...we want to tell them congratulations, good work, well done!"

Nominations for the next year's award will be accepted until March 30, 2001. For more information, send email to am@phillips.com.

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ness to admit mistakes. No one wants to take the blame.

There are notable counter examples to this general rule. When the press was threatening to turn the FBI action against the Branch Davidians in Waco, Texas into a scandal of Bay-of-Pigs proportions, Attorney General Janet Reno was quick to step up before the press and explain that she was the boss of the Justice Department, and therefore if there was any blame to be levied in the Waco matter, she was the person against whom all blame should be directed. The Washington, DC press corps was so stunned by the notion of a Washington, DC politician pointing a finger at herself, rather than at someone else, that the matter died down and now occupies time on radio talk shows alongside discussions of Ruby Ridge and lone gunman theories.

Other problems in Washington, DC refuse to go away, in part because no one will admit that they are problems. How many people believe the President would have been impeached if he'd admitted to the nation in January of 1998 that he'd cheated on his wife with a 24 year old intern? Adultery is unpopular in most circles, but it is not an impeachable offense. Lying to a judge, though, gave the Republicans just the constitutional ammunition they needed to impeach the President and hobble his effectiveness for the bulk of his second term.

Fixing Repair Station Problems

Angela Elgee appears to be learning the lessons of recent political history. She is the Division Manager of the Continuous Airworthiness Maintenance Division, which is the FAA Office responsible for the Part 145 rewrite. The Division is also known in Washington by its mail stop code, AFS-300.

While it is still too early in Elgee's tenure to accurately assess whether

she will be a positive influence on regulation of the maintenance community, early signs seem to indicate that she is committed to the right causes.

Elgee explains that she came to Washington because, in her years as an FAA field inspector, she had become frustrated with the sometimes ridiculous guidance provided by FAA Headquarters to the field. In a moment of poetic irony, Elgee herself signed a flight standards handbook bulletin that represented bad policy.

And then she did the unthinkable; she rescinded the bad policy.

For most people in the private sector, rescinding bad policy just makes sense. A business practice that does not work gets replaced, or else the business itself will be replaced in the marketplace. In the government, though, rescission of a policy is tantamount to an admission that you did something wrong; and that is an admission that few are willing to make.

Angela Elgee readily admits that she acted on bad advice in issuing the bulletin, and when she recognized the problem, she acted swiftly to fix it. Elgee is new to her position, but she is already establishing a reputation for being proactive in fixing problems, and governmental officials interested in solutions are always a welcome addition to the team (at least from private industry's point-of-view).

In the case of the repair station proposal, Elgee seems equally committed to issuing a regulation that will meet the safety and enforcement goals of the FAA without damaging the industry. She recognizes that to meet this goal, she has to "fix the problem." She is being assisted in this endeavor by FAA Aviation Safety Inspector Dick Nowak, who has also been involved in development and oversight of the AC 00-56 distributor accreditation program.

Elgee seems to recognize the problems that have concerned industry. She also states that the proposed rule would be difficult for the FAA to enforce as it is currently written, because it would require FAA inspectors to regulate some matters that are not readily subject to objective verification.

Elgee and her employees have stated that AFS-300 is considering a supplemental notice of proposed rulemaking that would establish a variety of FAA revisions to the original proposal. Such changes would be designed to improve the rule across-the-board, and would be based in part on the comments submitted by industry in response to the original proposed rule.

If the FAA publishes a supplemental notice to the repair station rule, it is likely to appear in the Federal Register in November or December.

Manufacturing Rule Changes

For most of the last decade, the Aviation Rulemaking Advisory Committee (ARAC) has been working on a major revision to the procedural rules for manufacturing. This would represent a complete overhaul of Part 21, and would affect the way that designs and quality systems are approved, and would also affect the way that airworthiness approval documents are issued.

ARAC began working on this project in 1993, under the leadership of Peter Gallimore (Boeing) and Don Van Burkleo (Cessna). Originally anticipated as a short-term project, the group did not complete its proposal until late 1998. Partly because of the large scope of the project, many of the proposed changes were hotly debated and the final product represents a compromise on many subjects; a few issues still remain in dispute so the final product was transmitted with dissenting opinions attached. ARAC formally transmitted its proposal to

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the FAA on February 23, 1999.

Because there were several formal dissenting opinions, this project is likely to take some FAA resources in order to polish it up and make it ready for publication. FAA rulemaking resources are stretched to the limit, so this proposed rule is unlikely to be published in the Federal Register until next year. FAA's Production and Airworthiness Certification Division has spent some time on this project informally, tailoring it to meet the FAA's needs, but rulemaking resources have not yet been formally committed to the project.

The FAA may choose to issue a limited rule that modifies a small number of the most important changes contained in the ARAC Part 21 proposal. Such a rule would probably be designed to implement the least controversial changes, so that they could be used to improve traceability and ap-

proval concerns immediately. The success of such a limited rule may depend on the scope it covers – a rule that attempts to do too much could generate so many adverse comments that it wouldn't have been worthwhile to split it from the rest of the proposal.

The FAA is also carrying out its own internal review of the certificates and approvals that it issues. This internal review is scheduled to be complete by December of this year. This review is meant to fall within the scope of the Regulatory Flexibility Act, which requires regulatory review of this sort.

Supplemental Type Certificates

The FAA proposed a rule in 1997 that would amend the procedural regulations for certification of changes to type certificated products.

A company that wishes to introduce a major change to a type design must

apply for either a supplemental type certificate (STC) or a new type certificate. STCs are issued for a variety of alterations and modifications, like interior reconfigurations, introduction of new avionics suites, and passenger-to-cargo conversions.

The applicant for an STC needs to produce and submit to the FAA sufficient engineering data to prove that the proposed change meets all of the applicable regulatory standards and requirements. Selecting the appropriate standards to which to show compliance, is, of course, an important step in this process.

In the past, the appropriate standards were those that applied to the original design. This made sense because requiring the STC applicant to meet current standards could represent an "over-design" for the older aircraft, and could also impose conflicting standards where there is significant

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All Systems



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difference between current and prior standards

The proposed regulation would require all new STCs to meet the current regulatory requirements, and not the regulatory requirements of the original type design.

The arguments in favor of this proposal cite the fact that the airworthiness standards in the regulations have been changed to promote higher levels of safety. In some cases, the higher standards were simply better, and in other cases, changes in the types of aircraft that are flown, in the ways that we fly them, and in the volume of airspace currently used prompted the changes to the regulations.

Those who oppose the proposed change to the STC rule worry that simple alterations could become prohibitively expensive if one must alter complete systems because of one rela-

tively small change. Installation of new equipment under an STC could require the installer to upgrade all of the other affected systems to meet the new airworthiness standards, even though the prior standards have not been shown to be unsafe. Where installation of new equipment serves to increase fundamental levels of safety, a gross increase in the costs of alteration could be so expensive as to preclude an owner from upgrading the equipment in the aircraft.

Although the comment period on this proposal closed on September 2, 1997, the final rule has not yet been issued. A final rule in this area is expected sometime soon.

Airworthiness Approvals

The FAA appears to have set a long-term goal of mandating the 8130-3 at the time of parts production and then expecting the form to serve as a permanent birth record for the part. This is a key component of the ARAC pro-

posal for revising Part 21, which would not only require manufacturers to issue the form, but would also provide manufacturers with the power to issue the form themselves, instead of relying on designees. At present, only FAA designees working at a manufacturer's facility can issue an original airworthiness approval, although Europeans manufacturers can issue the comparable JAA One form with their new parts (as a privilege of their manufacturing certificates).

The right for manufacturers to issue 8130-3 forms may be part of a limited rule issued by the FAA. The limited rule would take some of the most important aspects of the ARAC Part 21 proposal (manufacturers issuing airworthiness approvals, expanded definition of standard parts, etc.) and would implement those changes in an expedited fashion. To maximize the utility of such a limited rule, it would be wise for the FAA to publish it as a NPRM before the end of this year.

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Harmonizing the Airworthiness Approvals

To support the expanded use of the 8130-3, the FAA has been negotiating with the Joint Airworthiness Authorities and Transport Canada in an effort to harmonize the airworthiness approval forms used in each jurisdiction. The final product is likely to be demonstrated at the FAA/JAA international harmonization meeting in June.

The FAA has been working on Order 8130.21C, which is the revision to the instructions for completing the 8130-3 form. This revision will answer some of the questions that have arisen surrounding the form. For example, when an air carrier releases a new surplus part with its own 8130-3, is it permitted to write "new" in block 12 or must it write "inspected" in that block? The language the air carrier uses in block 12 can make a big difference in the future value of the part

when the distributor sells it. The FAA currently seems inclined to permit the use of the word "new" in block 12 when an air carrier or repair station releases a new part, but simply having a uniform standard – any uniform standard – will be a benefit to the industry.

Unfortunately, the FAA will probably have to delay issuing Order 8130.21C, because the JAA must go through a rulemaking process before it can fully sign on the harmonized form. No one should expect that revision to be released until 2001.

Current Domestic Activity on 8130-3 Forms

In preparation for the future, when manufacturers issue 8130-3 forms for all new parts, the FAA has issued a number of documents that treat the 8130-3 form as if it were readily available from all manufacturers today. Unfortunately, the form is not always readily available, so ASA has

been working with the FAA to try to "connect-the-dots."

The FAA has pledged to once again permit Maintenance DARs to sign 8130-3 forms for demonstrably airworthy parts owned by distributors. The burden will still fall on distributors to provide sufficient documentation to demonstrate the part's airworthiness (e.g. a certificate of conformity from a production approval holder, combined with evidence that the part is still new and undamaged). This renewed DAR privilege is likely to be limited to only parts manufactured before the date on which manufacturers are required to issue the 8130-3 form. Thus, it will serve as a 'bridge' into the new documentation paradigm. If the policy memo doesn't say this explicitly, the industry should expect a revision to be issued when the FAA knows when the 8130-3 rules will go into place for manufacturers. The reason for this limitation is that parts manufactured after the

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birth-record implementation date would have 8130-3 forms already produced, and the replacement of lost or damaged forms would be covered under different rules.

ASA expects the FAA to release a memorandum on this subject soon – probably during the summer months.

Designees

Have you always wanted to be able to sign the 8130-3 form? Organizational Delegated Authority (ODA) represents another completed ARAC project; when it becomes a final rule, this could help companies acquire the privilege of issuing 8130-3s for demonstrably airworthy parts.

The FAA frequently delegates its authority to perform activities related to certification issues. Usually, the tasks that are delegated are ones that do not require the delegee to exercise a great deal of ‘governmental’ discretion.

For example, reviewing technical data to determine whether it meets the requirements of the regulations. Delegated authority permits FAA employees to focus their attention on matters that do require the exercise of discretion, like deciding whether to issue a civil penalty for a violation of the regulations.

Persons who exercise delegated authority act on behalf of the FAA. They are required to follow the same FAA internal policy that applies to FAA employees, and are expected to exercise their delegated privileges in the same manner that FAA employees exercises these functions.

The FAA’s authority may be delegated to natural persons (you and me) or to entities (companies). The ODA proposal would unify the regulations that apply to entity delegations. It would also permit the FAA to issue new delegated authority where appropriate, based on the specific capabilities of the proposed delegee.

Because the new rule focuses on qualification to wield authority, it will be possible for distributors with appropriate staff and infrastructure to apply for delegated authority with respect to FAA functions like the issuance of an 8130-3 form.

The FAA is likely to only issue such permission to the best qualified companies, but companies with multiple DARs on staff may wish to consider consolidating them under the umbrella of an ODA.

The ODA rule has been given a high priority at the FAA because delegation helps the FAA leverage its manpower and accomplish more. The ARAC group submitted the rule to the FAA over a year ago, and completed a companion Order that was also submitted to the FAA for proposed publication. Although some people in the industry believe it could be published sooner, the ODA rule is likely to be published in the Federal Register in the first quarter of 2001.



PMA Parts Finder

A Relational Database of PMA Parts and OEM Equivalents

Typical Uses

- Who’s cloning my parts?
- Find PMA alternatives
- Scope out the competition
- Is it really a PMA part?
- Build customer lists
- Find alternative addresses
- New name—same address
- Airframe and Engine
- Props and Appliances
- Find replacement parts
- Find modification parts
- Build parts/holders lists
- Print address labels
- Review supplement sheets
- Find STC information

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Customers include: Aeropostal, Air France, American, Delta, KLM, Lufthansa, Northwest, South African, BFG, B/E, GEAE, P&W, Hamilton Sunstrand, Lord, Shaw, Woodgroup, Woodward, Rapco, Wencor, even Greenland Air!

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YOUR ASSOCIATION IN ACTION

ASA Files Legal Action on Import Parts

The cover article in the April issue of the Update Report explained some of the problems with a new FAA policy memorandum [PM] that would preclude import of certain parts and would also preclude the purchase of certain parts from distributors.

There was no legal basis for the memo; in fact, it violated a variety of existing U.S. laws and treaties. More importantly, implementation of this PM could have had a devastating affect on distributors, especially those who import and export parts. ASA asked the FAA to rescind the memo, but the FAA responded that they "currently do not plan to revise the PM." After ASA met with high level FAA management, it appeared that the FAA finally recognized the prob-

lems inherent in the PM; however, the FAA's timetable for resolving the problems remained unclear.

Faced with no other way to protect the industry, ASA filed a Motion for Reconsideration with the FAA Administrator on May 22. This motion provides the FAA with a formal opportunity to correct the legal improprieties. The FAA may rescind its memo, or it may revise the memo so that the memo no longer violates the law. If the FAA fails to take either of these steps, then ASA may consider appealing this issue to the Circuit Court of Appeals.

A copy of the motion, which includes a complete legal argument, is available on ASA's web page.

ASA Passes Bylaws

The membership of the Airline Suppliers Association voted unanimously in favor of the proposed bylaws that had been mailed to members on March 1.

The bylaws codify the way that ASA has done business for the past few years. They also changed some of the ASA internal procedures to comply with standard trade association practice. A copy of the bylaws will be posted on the ASA web page.

The bylaws were passed through a proxy voting mechanism. Attorney Paul Lange was the ASA member who served as the proxy-holder for this vote, and ASA is especially appreciative of the job he did.

Find Source Documents on the Internet

Interested in one of the subjects addressed in this issue? Want to find out more? The source documents underlying many of the articles in this issue are available on the internet. Just set your browser for <http://www.airlinesuppliers.com/8tur.html#5>. This address features an index to the articles which will bring you to the original documents on the world wide web just by clicking on the description.

UPCOMING EVENTS

* = *Schweitzer, Lewis or Dickstein will be speaking there*

- June 25-27** ** **Airline Suppliers Association**, Las Vegas, NV. Registration forms are now available on our website at <http://www.airlinesuppliers.com>. Call us at (202) 730-0270 for more information!
- Sept. 9-12** * **Air Carrier Purchasing Conference**, Nashville, TN. Call (561) 434-1512 or fax (561) 434-1944.
- Sept. 13-14** **US Valuation Conference**, Falls Church, VA. Call Commercial Aviation Events: +44 (1892) 515364.
- Sept. 18-20** **Speednews Suppliers Conference in Europe**, Toulouse, France. Call (310) 203-9603 for details.
- Sept. 18-21** **European School of Aircraft Economics**, Buckinghamshire, England. Call: +44 (0) 20 7779 8681.
- Sept. 25** * **ASA Workshop**, Riverside Hotel, Fort Lauderdale, FL. Call (202) 730-0270 details!
- Sept. 26** * **ASA Workshop**, Embassy Suites Hotel, Miami, FL. Call (202) 730-0270 details!
- Sept. 28** * **ASA Workshop**, (site TBA) Atlanta, GA. Call (202) 730-0270 details!
- Nov. 5-7** **Regional & Corp. Aviation Industry Suppliers Conference**, Rancho Mirage, CA. Call (310) 203-9603.
- Nov. 6** * **ASA Workshop**, Wyndham Garden Hotel, Newark, NJ. Call (202) 730-0270 details!
- Nov. 9** * **ASA Workshop**, (site TBA) London, UK. Call (202) 730-0270 details!

ASA Annual Membership Meeting

The Airline Suppliers Association, Inc., a Delaware not-for-profit corporation, will hold its annual membership meeting on June 27, 2000, 8:00 am at the Four Seasons Hotel in Las Vegas, NV. If you have questions, please contact Michele Schweitzer or Jason Dickstein at (202) 730-0270.

The ASA 2000 Annual Conference will be held at the Four Seasons Hotel in Las Vegas, June 25 -27. Don't forget to complete a registration form (see pgs 51 -52)

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May 2000