Manufacturing Distributors Distributors Maintenance Operations Distributors

The Update Report

The Airline Suppliers Association

Volume 7, Issue 11 November 1999

OSHA UPDATE

Proposed Ergo Burden For Distributors

Is your workplace ergonomically optimized? A new proposed regulation could impose new liability for companies that do not invest in the latest trends in ergonomic aids. Additionally, the proposed rule could impose a completely new set of paperwork requirements on American businesses.

The proposed ergonomics rule comes from the Occupational Health and Safety Administration (OSHA). The proposal requires many American businesses to establish formal ergonomic protection programs that track employee complaints, analyze the complaints to detect patterns, and respond to the disorders that might cause the complaints. While this process represents a laudable goal of eliminating some workplace injuries, the actual implementation of the proposed ergonomic regulation promises to impose such an onerous burden on American business that it is hard to believe small businesses could survive the implementation.

Does the Proposed Rule Apply to Me?

The proposed ergonomic standard would apply to employers whose employees work in manual handling jobs or manufacturing jobs. This will include at least some of the employees in every distributor's warehouse. It will also apply to materials handling and manufacturing jobs throughout the entire industry.

The standard is job-based, so an employer only has to meet the requirements of the ergonomics standard for the jobs that are covered. This is important if the company is required to do a job-by-job hazard analysis; however this distinction may be little help to small facilities where each job requires some manual handling. It is also a meaningless distinction where a company does not have the resources to establish the sort of formal oversight programs required by the regulation (regardless of the number of jobs affected).

If you think that most of your workforce will always be exempt from the ergonomics because they do not perform manual handling tasks (sales personnel, for example), then think again. The ergonomics rule will also apply to any workplace in which an employee has reported a musculoskeletal disorder (MSD) that meets criteria established by the standard (a core activity of the job is likely to be the cause of the reported injury).

One of the elements of the required ergonomics program represents significant program oversight. This is required under the rubric of management leadership. As a matter of sound business practices in the facilities of most distributors, this management leadership will have to be extended to all employees. Extending

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Inside this Issue:

Congratulations to:

Mayday Aviation, Inc.
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Claircom Communications d/b/a AT&T Wireless Services
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for their accreditation to the Airline Suppliers Association's Accreditation Program.

Keep monitoring,
http://www.airlinesuppliers.com
for a growing list of
FAA accredited distributors;
and see page 118 for a list of distributors who were reaccredited to ASA-100 this month.

AIRLINE SUPPLIERS ASSOCIATION

A Message from ASA's President

The agenda is almost complete. Dates have been chosen. Jason is developing his opening joke. The only thing left is to register for ASA's 2000 workshop series. Registration forms will be faxed on December 5, 1999. This year we have spread the dates for the workshop over the entire year. First quarter workshops will be held in Los Angeles, Seattle, Chicago and Dallas.

The site and date of the 2000 Annual Conference has been announced, June 25-27, 1999. The Board of Directors and the Quality Assurance Committee will be holding meetings on June 24, 1999. On Sunday morning, ASA will hold it annual golf tournament at the Las Vegas Paiute Golf Resort. A room block has been established and the Four Seasons is already taking reservations. The hotel will honor the room block for 3 days before and after the meeting, for those members who want to take a little vacation time while in Las Vegas. Based on the early responses, we expect attendance to be larger than in years past., so it is probably a good idea to book your rooms early.

ASA is improving a number of aspects of the Accreditation Program. ASA-100 is being revised and will be released by years end. The changes incorporate the outstanding Letters of Interpretation (LIs). A copy of the revised ASA-100 will be mailed to each ASA member and to each ASA-100 participant company. ASA will also be placing ASA-100 on the internet, for your convenience.

ASA's 2000 Membership Directory inquiry form has been faxed to all members. If you have not yet sent in you updates please make sure you do so before the deadline. Membership Directories will be sent to all ASA members as well as the industry contacts in our database.

This year ASA will provide each of its members with a holiday gift. The gift is a surprise, but it comes in a cardboard tube and will be delivered by mail to all members. It probably won't make it in time for Christmas, but hopefully for New Years.

The mystery gift was created by the Training Subcommittee of the ASA Quality Assurance Committee (QAC). The Subcommittee is chaired by Brian Christensen of Baron International Aviation. The QAC chair and vice chair, Larry Collings of Time Aviation and Jay Rosenberg of International Airline Support Group, have provided superb leadership to the QAC.

Have a wonderful holiday season,

Michele Schweitzer

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. Subscription cost is $120.00 US per year.

Year of Aviation Ends Quietly

Congress has adjourned until late January, which means the "Year of Aviation" is now officially over.

Congress dubbed 1999 the Year of Aviation, and intended to pass sweeping reforms to make aviation ready for the 21st century. Congress was unable to agree on a final bill, so the year of aviation will end without any major aviation legislation.

Modernized air traffic control, greater airline competition, and restored honesty for the Aviation Trust Fund were the primary goals of the legislation that was debated; however a number of provisions in the bill could have had a significant effect on the way distributors do business. Part-marking requirements for removed life-limited parts could have reduced distributor's concerns over lost paperwork. The proposed legislation also included provisions to make aviation parts fraud a federal crime, punishable with millions of dollars in fines and much jail time, and to require the FAA to rescind certificates from persons involved with counterfeit parts - both of these were meant to discourage improper conduct that endangers aviation safety without infringing on normal business operations.

The year is not a total loss. Congress works on a two year schedule, so that work done in an odd year (like 1999) carries over to the following even year (like 2000). Congressman Bud Schuster (R-PA), who chairs the Transportation and Infrastructure Committee has vowed that next year Congress will "fulfill our commitment to make our skies as safe as they can be." This gives Congress another chance to pass comprehensive reform and it may give industry another opportunity to make sure comprehensive reform meets our needs.

Schuster and Ranking Minority Member Jim Oberstar (D-MN) are both ardent supporters of our nation's aviation infrastructure. Schuster was angered by a recent Senate proposal to reduce spending on aviation (budget problems at the FAA are already having an adverse affect on FAA operations - see the article on page 119 of this issue), and responded with strong rhetoric, insisting that "the nation is hurtling towards aviation gridlock and potential disaster in the sky."

Most of the argument centers around the way that transportation trust fund money has been locked up in an accounting trick that made past deficits look smaller by retaining trust fund surpluses and counting them toward general fund revenues. Schuster has been trying for a number of years to change this 'blue smoke and mirrors' approach to budgeting; he feels that the budget surplus makes these accounting tricks no longer necessary. He directed harsh words against other members of Congress, particularly those in the Senate, when he said "I question our priorities when in these times of trillion dollar budget surpluses, with air travelers investing billions more into the Aviation Trust Fund, we cannot find the commitment to make our aviation system safe and competitive."

Despite his disappointment, Schuster remains confident that a compromise can be reached next year. He claims the House "made tremendous progress in working out [their] differences with the Senate" on comprehensive aviation reform.

Americans will have a few months to ponder this before any real activity occurs as Congress has adjourned for the year. The Senate plans to reconvene on January 24 and the House plans to reconvene on January 27.

ASA Focuses on Education for 2000

The Airline Suppliers Association is pleased to announce that the 2000 Annual Conference will be held in Las Vegas, Nevada on June 25-27.

The Association has selected the Four Season Hotel as the Conference Site. The Las Vegas Four Seasons Hotel is a beautiful facility that was recently honored as one of only 60 hotels worldwide to receive AAA's top rating of five diamonds. It is the *only* Las Vegas hotel to *ever* receive this rating.

The Association plans to continue in its tradition of sponsoring the best educational program of any aviation conference. This year's speakers include the top figures affecting aviation parts law, policy and business.

There are plenty of new challenges facing distributors. This conference will present the issues, and the strategies for surmounting the challenges facing our businesses.

ASA plans to mail conference information shortly after the first of the year. New information about the Conference will be posted on ASA's website as it becomes available.

For the third year, ASA will sponsor a members-only Annual Workshop. The full-day workshop is presented in ten different cities, to make attendance convenient for ASA members. It will be a completely new program, but it will continue to focus on the changes and new developments among the rules and policies that affect aircraft parts distribution. As in prior years, the workshop is designed to be accessible to even the newest employees, so it provides useful information for everyone from the newest to the most seasoned employees. In particular, it appeals to employees in the Quality, Receiving, Purchasing, Sales and Engineering Departments of most ASA member companies.

Best of all, this workshop is considered an ASA membership benefit, so it is very affordably priced: just $50 per person. Where else can you get annual training for such a low rate?

Workshops sold out last year, so be sure to respond as soon as you receive your registration form in December.

A full syllabus of the workshop program, with other important information, is available on ASA's website.

Congratulations to:

Aircraft Suppliers International
San Clemente, CA

Aviation Spares & Svcs International
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Aviation Systems International
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Time Aviation Services, Inc.
Sun Valley, CA

for their reaccreditation to the Airline Suppliers Association's Accreditation Program.

ASA
AIRLINE SUPPLIERS ASSOCIATION

EMPLOYMENT LAW UPDATE

Family Leave Could Be a New Burden on Businesses

On November 30, President William Clinton announced that the Labor Department would propose a rule that lets states use their unemployment insurance to offer paid leave to new parents. He said "the initiative would be totally voluntary for states."

The Federal government has a long history of tying so-called voluntary programs to receipt of federal funds (like the relationship between the 55 mph speed limit and federal highway funding). It is unlikely that such a program would remain "totally voluntary" for very long.

Where states opt to implement this plan, it will not be voluntary for businesses. And someone will have to pay for it.

Currently, unemployment insurance is paid for by unemployment insurance taxes on a company's payroll. Workers who are laid-off or terminated are generally eligible to collect benefits, although workers who quit or are fired "for cause" may not be eligible to collect. A company's unemployment tax rate is generally affected by the company's former employees who collect unemployment. For a company that has not had former employees file for unemployment, the state unemployment tax rate may be as low as 0%. In some states, the rate can rise to as high as 9%. New companies usually start in the 1.5 to 3.5% percent range, and can see their rate adjusted based upon history.

Under the proposal, this same pool of money would also pay for parental leave. Either a company with employees taking parental leave would bear the costs through increased tax rates, or payroll tax rates would be increased uniformly for all businesses to cover the new expense. Unlike income taxes, where revenues are offset by business expenses, payroll taxes affect a company whether it is having a profitable year or an unprofitable one.

Many businesses today offer paid parental leave for their employees. Others cannot afford to offer this sort of leave. If the 'paid-leave' proposal is adopted, then all business would be required to pay for this sort of leave through the unemployment tax.

The proposed regulation should be published in the Federal Register soon. When it is, ASA will make the information available to the members.

AT 800 INDEPENDENCE

The More Things Change, the More They Stay ... at Home?

On November 10, President Clinton announced his intention to nominate Monte R. Belger to be Deputy Administrator of the Federal Aviation Administration. Belger has 27 years experience managing a wide variety of FAA programs, including experience as the Acting Deputy Administrator. He currently serves as the Associate Administrator for Air Traffic Services.

But not everyone in the FAA is a mover and a shaker. In fact, many in the FAA will not be moving much at all if the rumors in the FAA hallways are correct. The FAA has once again 'fixed' its budget problems by slashing the budgetary items that help keep the Administration in touch with the field. Last year's sacrificial lamb was training budgets; this year the FAA is slashing travel budgets to cover a budget shortfall reputed to be 77 million dollars.

One popular aviation safety inspector was writing letters in late November to cancel scheduled speaking appearances. He had been scheduled to conduct IA renewal training and aviation safety meetings. An FAA field office with 40 inspectors is alleged to have had its travel budget slashed to $800 this year. This wouldn't cover annual automobile mileage reimbursements.

The real tragedy of the slashed travel budget is that it will make it that much harder for the FAA personnel in Washington to keep in touch with the real world - the world where parts receiving practices are constantly improving, and quality manuals are constantly changing.

In the past, FAA personnel have used their travel experiences to learn about industry practices, and to help industry groups craft acceptable guidance for themselves. The FAA interaction with the industry "out in the field" has permitted FAA inspectors to keep abreast of an industry that continues to change. It has benefited distributors in particular, because the stringent quality systems found throughout the facilities of parts distributors are a stark contrast to the much-maligned distribution industry of ten years ago, and recent FAA guidance has reflected the safety contribution that distributors are making.

QUALITY SYSTEMS

FAA to Perform In-Depth Boeing Audit

The FAA will conduct an in-depth and comprehensive evaluation of several Boeing Commercial Airplanes Group (BCAG) facilities beginning on December 2.

This audit has been prompted by a number of recent quality issues, including non-conforming drip shields and environmental control system ducts. By themselves, none of these non-conformances would have warranted a special FAA audit of BCAG, but the recent Egyptair crash has brought enormous media attention to Boeing (despite the fact that the NTSB has not alleged any mechanical failure in that accident, and investigators appear to be pursuing a pilot error theory).

The audit will address Boeing facilities in Washington and Oregon to assure their compliance with FAA regulations. It is meant to be a cooperative effort between Boeing and the FAA. According to Liz Otis, BCAG Vice President of Quality, "Boeing welcomes this audit because it's an opportunity to validate our processes and systems and make them even better."

The FAA team will spend the first few weeks in Everett. Everett was chosen as the initial site because they have a regularly scheduled audit coming up. Follow-on activity will be in Renton and several Fabrication Division and Aircraft Systems & Interiors sites that include Frederickson, Portland and Spokane.

The FAA will be studying everything from aircraft engineering to parts receiving and the manufacturing process, including how engineering changes are incorporated. Although scheduled by the FAA to be completed by February, Boeing says these special audits could take up to four months.

Boeing is already subject to routine FAA evaluations to verify that their manufacturing practices and facilities are in compliance with applicable Federal Aviation Regulations (FARs). This special audit will supplement that regular FAA surveillance.

Stage II Aircraft, Not Dead Yet

Do you or one of your customers own stage II aircraft? Wondering what you can do with them after December 31, 1999? Worried that the aircraft may be nothing more than an overgrown paperweight on January 1? If you or your business partner owns or operates stage II aircraft, then you may have a Y2K worry that has nothing to do with computers.

As of January 1, 2000, operations of commercial stage II aircraft will be completely phased out. Stage II and stage III refer to aircraft that meet certain limits on noise emissions during take-off, fly-over and landing. The newer stage III aircraft are significantly quieter than their stage II counterparts, and stage II aircraft are being phased out for clean air and noise control purposes.

This phase-out causes a problem for those who own stage II aircraft. However, it is not an intractable problem to the extent that there are still foreign markets in which stage II aircraft may be used; further, there are also hushkits that modify stage II aircraft to make them acceptable under stage III constraints. The general concept of modifying the aircraft to make it stage III compliant can include anything from re-engining the aircraft, to utilizing the Raisbeck solution for the Boeing 727-200, which relies on optimizing the aircraft's highlift system to minimize drag for take-off and landing configurations.

The intractable problem is that the rules did not permit stage II aircraft to be brought back into the United States after December 31, 1999. Ever.

If a stage II aircraft could not land at a United States airport, then it would be impossible to modify the aircraft as it returns from foreign usage, not to mention impossible to stage an aircraft for parting-out or scrapping. Some aircraft in foreign operation need to return to the United States for maintenance or modification at the end of a lease term but can otherwise remain outside the United States and continue to operate in foreign markets that continue to accept operation of stage II aircraft. The stage III rules would prohibit such landings at United States airports.

Most of the affected stage II aircraft are Douglas DC-9, Boeing 727 and Boeing 737 aircraft with Pratt & Whitney JT8D engines. Other aircraft that are stage II compliant and in use throughout the world include the Antonov An-124, Boeing 707, and Douglas DC-8.

Congress has passed a law permitting stage II aircraft to be operated in United States airspace for certain limited purposes.

Congress has passed a law permitting stage II aircraft to be operated in United States airspace (or to or from an airport in the contiguous 48 States) after December 31, 1999 for certain limited purposes. The aircraft may only be flown in non-revenue service, and only for one or more of the following purposes:

> (A) sale, lease, or use of the aircraft outside the contiguous 48 States;
>
> (B) scrapping the aircraft ;
>
> (C) modification of the aircraft to meet Stage 3 noise levels;
>
> (D) performance of scheduled heavy maintenance or significant modification to the aircraft at a maintenance facility located in the contiguous 48 States;
>
> (E) delivery of the aircraft to an operator leasing the aircraft or return of the leased aircraft to the owner;
>
> (F) preparation, parking or storage of the aircraft in anticipation of any of the aforementioned activities; or
>
> (G) diversion of the aircraft to an alternative airport in the contiguous 48 States on account of weather, mechanical, fuel, air traffic control, or other safety reasons while conducting a flight in order to perform any of the aforementioned activities.

Note that these restrictions limit operations to the 48 contiguous states. Hawaii is actually covered by a separate provision that governs an air carrier's use of stage II aircraft flown through that state (although there are no exceptions for non-air carrier flights through Hawaii). There is no provision for flying stage II aircraft into Alaska.

The law requires the FAA to implement regulations before the end of the year (by December 29), so a regulatory procedure should be in place before the December 31, 1999 deadline.

This new provision was signed into law on November 29, 1999. It was part of H.R. 3425, which was "cross-referenced" into law by the signature of H.R. 3194. A copy of this provision is available through ASA's web site.

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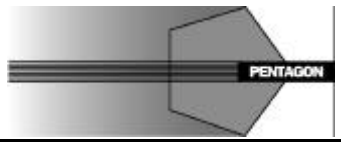

Ergonomic Quick Fixes May be Neither if they Violate Other Laws

(Continued from page 115)
the privileges afforded by the rule only to those jobs that are specifically addressed in the rule (e.g. material handling jobs) would probably cause more employee unrest among the non-covered employees than is warranted.

This provision could open any workplace to the ergonomics standard. This makes the ergonomics rule a very important and far-reaching regulation.

What Would the Rule Require?

The proposal requires all covered employers to implement at least a partial ergonomics program, which has two elements, and in many cases to implement the full ergonomic program, which has six elements.

A partial ergonomics program is required whenever employees perform material handling or manufacturing tasks. The partial program would require implementation of two of the elements of the full ergonomics program: (a) Management Leadership and Employee Participation and (b) Hazard Information and Reporting. This can represent a significant new paperwork burden for small companies.

Employers must implement a full ergonomics program if there has ever been a report of a covered MSD, or if there are persistent tales of "ergonomic symptoms." A full "ergonomics" program would consist of these six program elements:

(a) Management Leadership and Employee Participation,

(b) Hazard Information and Reporting,

(c) Job Hazard Analysis and Control,

(d) Training (initial and tri-annual recurrent),

(e) "MSD Management," and

(f) Program Evaluation.

Are There Other Options?

There is no way for a company with material handling jobs to avoid implementing the first two elements of the ergonomic program, but a company can avoid implementing the remaining four elements. A distributor whose employee has complained of a MSD may choose to eliminate the hazard that caused the MSD in lieu of establishing a full ergonomic program. OSHA calls this a "quick fix." Such Quick Fixes may be considerably more burdensome than the harmless-sounding name implies.

Because of the Electromation impediment to employee-management dialogue, the Quick Fix is not nearly as easy an option as it may seem.

A company that successfully implements a Quick Fix that eliminates the cause of the MSD is considered to have complied with the requirements of the law without implementing the remaining four elements of a full ergonomic program. The Quick Fix procedure has five elements:

(a) Promptly make available MSD management;

(b) Consult with employees about the problem, and ask them for recommendations for eliminating the MSD hazard;

(c) Implement the Quick Fix within 90 days after the covered MSD is identified, and determine within the next 30 days whether the controls have eliminated the hazard;

(d) Keep a record of the Quick Fix controls; and

(e) Provide hazard information to employees in the problem job within the 90-day period.

The Quick Fix recordkeeping requirements produce exactly the sort of records that a plaintiff's lawyer dreams about, but the most difficult provision of this five-part procedure is the most innocuous looking element!

One of the necessary elements to a Quick Fix is that employees and employers must work together in a cooperative effort to determine the best solution. It would seem that the most efficient way to handle this is for employees and management to meet together and share ideas; however other labor laws already make such a meeting illegal unless a labor union represents the workers, and the union representatives meet with management to 'negotiate' a solution.

Impediments to the Quick Fix

The problem with a meeting in which employees and management share ideas is that it bears a legal resemblance to company-dominated unions that the labor laws sought to eliminate in the 1930s. A recent case demonstrates how this law is applied.

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Quick Fix Solutions May Violate Other Labor Laws

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In 1992, the National Labor Relations Board (NLRB) held that a company named Electromation had violated the labor laws by establishing employee involvement teams which permitted employees and management to jointly discuss issues like worker safety. The Board held that such committees violated the labor law provision that was meant to prohibit employer-dominated unions.

The *Electromation* case became famous because the employee involvement teams were viewed as a positive experience by all involved. The teams permitted employees and management to find solutions to problems together, by talking about the issues, and combining employee hands-on experience with management commitment to support the solution with appropriate resources.

Congress recognized that the *Electromation* decision was a problem for American businesses. In 1996, Congress passed a bill known as the TEAM Act that would have permitted employee involvement teams for certain issues, like health and safety issues. The TEAM Act would have continued to reserve to labor unions discussion of issues like wages and benefits. Despite support for the TEAM Act in both the House and the Senate, the President vetoed the TEAM Act on July 30, 1996.

Is the Quick Fix Really Available?

The 1996 Presidential veto means that labor-management discussion groups are still illegal (despite the fact that some companies still use them successfully today). Under the scrutiny of OSHA, an illegal committee will clearly be recognized as such and may yield NLRB action against the offending company.

This means that the Quick Fix consultation and cooperation requirement cannot be implemented through a dialogue between employees and management in a non-union facility. Presumably, it could be implemented through a suggestion box, but this is no way to obtain answers to complex questions concerning workplace safety.

If the quick fix is not completely implemented within the time limits, or if another similar MSD (from the same set of activities) is reported within three years after the Quick Fix, then the employer is required to establish a full ergonomic program.

Because of the *Electromation* impediment to employee-management dialogue, the Quick Fix is not nearly as easy an option as it may seem.

Ergonomic management leadership alone seems like a full-time job in most facilities.

What is Management Leadership?

One of the elements of every ergonomic program, whether partial or full, is management leadership. Under a management leadership program, an employer must:

(a) Establish a management structure for reporting MSD signs and symptoms that holds managers accountable for meeting their responsibilities under the OSHA provisions,

(b) Train accountable managers, and provide them with resources, and information necessary to meet their responsibilities,

(c) Encourage employees to report MSD signs and symptoms,

(d) Communicate periodically with employees about the ergonomics program, provide employees with a copy of the OSHA ergonomic rule, solicit employee concerns about MSDs,

(e) Provide for prompt responses to all employee concerns about MSDs

(f) Provide employees with a way to be involved in developing, implementing and evaluating each element of the ergonomics program (but don't forget about the *Electromation* restriction).

Ergonomic management leadership alone seems like a full-time job in most facilities. Adding the additional provisions of the full ergonomic program, which includes ergonomic analysis of each job function, could devastate many small businesses.

If I Establish a Full Ergonomic program, then am I in Complete Compliance with the Law?

One of the many problems with the OSHA proposal is there is no objective standard against which to measure performance, except accident experience. If a company diligently performs a job hazard analysis, modifies the job to reflect the findings of the job hazard analysis, but the employee performing that function experiences a subsequent MSD anyway, the employer appears to have no defense to

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Partial Small Business Exception Means Heavy Burden

(Continued from page 124)
charges that the ergonomics program was faulty. This sort of strict liability assumes that science has progressed to the point where workplace MSDs may be completely eliminated. Science has not progressed to this point - the best we can do is minimize the probability of an MSD.

Further, there are no provisions for cost-benefit analysis. If a company performs a job hazard analysis and discovers a potential ergonomic hazard, the company is obliged to promptly implement feasible controls to eliminate or materially reduce the MSD hazards. If a solution is feasible, but extremely expensive, then it must nonetheless be adopted.

In other regulations of this sort, like the regulations for the Americans with Disabilities Act, there is an objective standard for what sort of expense would be considered reasonable and what level of expense would be considered unreasonable. The fact that cost-benefit analysis was left out of the ergonomic decision making process is one more reason that this proposal could have a devastating affect on American businesses.

What if I Already Have an Ergonomics Program in Place?

Many companies already have an ergonomic program in place. These companies will be permitted to continue their pre-existing programs, even if they differ from the OSHA program, if the company makes an appropriate application to OSHA, in which it demonstrates that the company's existing program 1) satisfies the basic obligation section of each program element in the OSHA standard, 2) complies with the recordkeeping requirements of the OSHA standard, and 3) was evaluated for compliance purposes *before* the effective date of the new OSHA rule.

Because the rule is anticipated to have a sixty day lead time between publication of the final standards and implementation, the window for performing the evaluation will be quite short.

Is There a Small Business Exception?

There is a partial small business exception. A company that had less than ten employees during the preceding calendar year (including part-time employees and employees provided through personnel services) is exempt from the recordkeeping requirements of this regulation. If the company had ten or more employees (remember, this includes temporary and part-time help) on even one day in the previous year, then it is required to comply with the recordkeeping requirements.

The small business exception only applies to the maintenance of records. It does not apply to the ergonomic program itself. Under the proposed regulations, a small distribution business would still be required to have a system in place that meets the management leadership, employee participation and hazard warning provisions.

What Can I Do Now?

Read the OSHA-proposed ergonomic regulations. They are written in plain English so they are quite easy to understand, and the Notice of Proposed Rulemaking (NPRM) is available through ASA's website.

If you believe that the ergonomics program would impose an onerous burden on your business without providing acceptable levels of health and safety benefit, then write to OSHA, and provide OSHA with facts that support your claim. Complete comment-filing instructions may be found in the NPRM.

You should also send a copy of your comments to ASA, to make sure that ASA's comments on this subject reflect your concerns.

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/7tur.html#11. 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

**** = ASA will be speaking there***

Jan. 20	** **ASA One-Day Workshop**, Continuing Education Series, Seattle, WA. Call (202) 730-0270.
Jan. 25	** **ASA One-Day Workshop**, Continuing Education Series, Los Angeles, CA. Call (202) 730-0270.
Jan. 24-26	**Commercial Aviation Lessors Workshop**, San Francisco, CA. Call Caroll at (44) 1892 515364.
Jan. 24-26	**HELI EXPO 2000**, Las Vegas Convention Center, NV. Send a fax to (703) 683-0341 for more details.
Feb. 8-10	**Aero-Engine Cost Management Conference**, San Francisco, CA. Call (44) 171 931 7072.
Mar. 1-3	**US Regional Conference & Valuation Workshop**, Washington, DC. Call Caroll at (44) 1892 515364.
Mar. 7-8	**FAA Aviation Forecast Conference**, Washington, DC. Call FAA at (202) 267-9943 for details.
Mar. 21-22	**Speednews Aviation Industry Suppliers Conference**, Los Angeles, CA. Call (310) 203-9603.
April 14-17	**Symposium 2000: ARSA Annual Repair Symposium**, Arlington, VA. Call (703) 739-9543.
April 17-19	**MRO 2000**, Opryland Hotel Convention Center, Nashville, TN. Fax for details: (212) 904-3334.
May 1-3	**RAA 2000 Annual Convention**, San Antonio, TX. Send a fax to (202) 429-5112 for details.
May 7-9	**ATA Engineering, Maintenance & Material Forum**, Phoenix, AZ. Call (202) 626-4000 for details.
May 7-10	**Aircraft Electronics Ass'n Convention & Trade Show**, Reno, NV. Call (816) 373-6565 for details.
May 9-11	* **PAMA/NATA Aviation Services & Suppliers Supershow**, Tampa, FL. Call (202) 730-0260.
June 25-27	** **Airline Suppliers Association**, Las Vegas, NV. More details available soon. See our website at http://www.airlinesuppliers.com. Call us at (202) 730-0270 to make sure you are on the mailing list.

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