



Support the Langevin Amendment on Aircraft Repair Station Security

March 8, 2006

Dear Representative:

At tomorrow's Subcommittee mark-up of the Transportation Security Administration Reorganization Act (H.R. 4439), Rep. Langevin intends to offer an amendment that will enhance the security of repair work on U.S. aircraft that is done at third-party stations located both in this country and abroad. On behalf of the Transportation Trades Department, AFL-CIO, and specifically our two airline mechanic unions, the International Association of Machinists and Aerospace Workers (IAM) and the Transport Workers Union of American (TWU), I urge your support for this amendment.

For almost two decades, transportation labor has pushed for higher standards and stronger enforcement of aircraft repair work performed overseas. In particular, we have always argued that the same standards applied to U.S. facilities and their employees should apply to repair stations based overseas. As outsourcing has increased to dramatic levels, and with the events of September 11 a clear reminder of what can happen when our aviation system is breached, the security issues inherent in third-party maintenance have become critical, but unfortunately have gone unaddressed.

In fact, in 2003, we specifically asked both the Transportation Security Administration (TSA) and the Federal Aviation Administration (FAA) to temporarily close down certain foreign repair stations until security audits of these facilities could be conducted to identify and fix vulnerabilities. Unfortunately, the Administration dismissed our call for action.

To address this problem, Congress included a provision (Section 611) in the FAA Reauthorization Act (Vision 100) to require TSA, in consultation with the FAA, to issue final regulations governing domestic and foreign aircraft repair stations. These regulations were due in August, 2003 (180 days after enactment), but to date no final, or even proposed rule, has been issued by TSA.

The TSA is also required, pursuant to Section 611, to conduct security audits of foreign stations. Those audits are supposed to be completed 18 months after the security rules are finalized, but since the regulations are at a standstill, the clock on conducting the audits has not even begun. The end-result of this foot-dragging by the TSA and FAA is that nothing has been done since September 11, despite explicit Congressional directives to address these security issues.

Transportation Trades Department, AFL-CIO

888 16th Street, NW • Suite 650 • Washington, DC 20006 • tel: 202.628.9262 • fax: 202.628.0391 • www.ttd.org
Edward Wytkind, President • Michael A. Ingraio, Secretary-Treasurer



The Langevin Amendment would finally force TSA to act on the original 2003 Congressional requirement. Specifically, the amendment would give TSA 60 days to issue the security regulations that are now 19 months late. If this deadline is missed, TSA would have to issue an order prohibiting the use of foreign aircraft repair stations for the maintenance of U.S. aircraft. Once the regulations are issued, the order will be lifted and can be suspended for U.S. aircraft to use these stations in emergency situations. The deadline on the security audits will be moved up from 18 months to 9 months which is clearly justified given that TSA has ignored this requirement since 2003.

The amendment would also require TSA, in drafting the regulations, to ensure that there are “comparable security standards” between in-house maintenance and repair work that is sent to third-party contractors. As part of this objective, workers at third-party stations would be subject to the same employee background checks as workers employed at in-house facilities.

This is a common-sense amendment that will close a security loophole that has remained open for far too long. I urge you to support the Langevin amendment when it is offered tomorrow morning.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a large, stylized flourish at the end.

Edward Wytkind
President