



April 30, 2008

Support the McCaskill-Specter Repair Station Safety and Security Amendment

Dear Senator:

During debate on the Aviation Investment and Modernization Act, Senators McCaskill and Specter will offer an amendment to enhance the safety, security and oversight of foreign aircraft repair stations performing maintenance work on U.S. commercial aircraft. On behalf of the Transportation Trades Department, AFL-CIO (TTD) I urge you to support this common sense amendment and reject any second-degree amendments that will weaken the reforms included in this proposal.

The Department of Transportation's Inspector General (DOT IG) reports that 64 percent of maintenance work performed by U.S. air carriers is now outsourced, with a significant portion of that work sent overseas. We have long argued that the Federal Aviation Administration (FAA) certifies foreign stations without holding these facilities and their workers to the same standards they impose on U.S.-based repair stations. For example, U.S. mechanics, whether employed at U.S. carriers or at third party contractors, are subject to robust drug and alcohol testing as safety-sensitive workers. But foreign mechanics, working on U.S. aircraft at a FAA certified station, are not required to be tested at all. The McCaskill-Specter amendment would close this safety loophole and require the FAA within one year to amend its regulations to hold foreign mechanics working on U.S. aircraft to the same drug and alcohol testing standards that currently exist for domestic operations. If our government has declared that drug and alcohol testing enhances safety, it makes no sense to exclude FAA certified foreign stations working on U.S. aircraft from this basic requirement.

The amendment would also require FAA inspectors to physically inspect foreign repair stations working on U.S. aircraft at least twice a year, with one of those visits to be unannounced. FAA management has systematically curtailed the ability of front-line FAA inspectors to provide adequate oversight of contract repair stations located overseas – a fact well documented by the DOT IG. The Administration opposes this provision claiming that foreign countries will inspect these facilities based on Bilateral Aviation Safety Agreements. We strongly reject this approach. Repair stations certified by the FAA, working on U.S. commercial aircraft must be inspected by U.S. personnel who understand and can enforce our requirements. Foreign countries are, of course, free to inspect facilities located in their country, but they cannot serve as a substitute for direct FAA oversight.

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 • Patricia Friend, Secretary-Treasurer



We are also pleased that the McCaskill-Specter amendment would prevent stations not certified by the FAA from performing critical maintenance work. The DOT IG found in its 2007 report that there are virtually no limitations on the amount and type of maintenance work that non-certified stations are performing. The stated purpose of certifying stations is to ensure that only facilities that are capable of performing repair work safely are allowed to operate. By allowing non-certified stations to essentially do the same type of work without proper oversight and adherence to FAA rules, we are jeopardizing safety and undermining certified repair stations.

The Senate must act to address these problems because it is clear that the FAA has refused to hold foreign aircraft stations to our standards even when directed to do so by Congress. In the 2003 FAA reauthorization bill, the Senate agreed to a provision that required the FAA to come up with a plan to ensure that foreign repair stations working on U.S. aircraft are subject to an equivalent level of safety standards, oversight and quality control as those located in the U.S. The plan submitted by the FAA failed to accomplish any of these objectives and the problems outlined above have been allowed to exist for far too long.

In addition, the 2003 FAA bill required the Transportation Security Administration, in conjunction with the FAA, to finalize security rules for both foreign and domestic stations and to audit foreign stations to ensure the security rules are being followed. These rules were due in August 2004, yet a proposed rule has not been issued and the audits have not begun. The McCaskill-Specter Amendment would reiterate that the FAA cannot certify a foreign repair station that is not in compliance with security standards.

Again, I urge you to support the McCaskill-Specter amendment to ensure one level of safety and security for maintenance and overhaul work performed on U.S. aircraft – regardless of where that work is performed. If you have any questions about TTD's position or need additional information, please contact me or Mia Clarkson at 202/628-9262.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a stylized, cursive flourish.

Edward Wytkind
President