



*A bold voice for transportation workers*

May 18, 2010

**Reject Attempts to Weaken Aircraft Repair Station Safety  
Provisions in House-Passed FAA Reauthorization Bill**

Dear Representative:

As Congress works on reconciling the House and Senate passed versions of the Federal Aviation Administration (FAA) reauthorization legislation, we understand that industry and foreign lobbyists are asking Members to support efforts to weaken the aircraft repair station safety provisions included in the House-passed bill. We urge you to reject these efforts.

The House-passed Aviation Safety and Investment Act of 2010 (H.R. 1586) takes several steps to raise the bar on safety and oversight on critical maintenance work that is outsourced by U.S. carriers. Specifically, the bill requires that foreign repair stations working on U.S. aircraft are inspected at least twice a year by FAA inspectors and that foreign mechanics working on U.S. aircraft are held to the same drug and alcohol testing rules as workers in this country. I should note that these measures have been included in an FAA reauthorization bill that has passed the House three times over the past three years and that the drug and alcohol provision was specifically added as an amendment on the House floor by Representative Ted Poe (R-TX).

The aircraft repair station safety provisions in the House bill are measured and urgently needed. U.S. airlines have steadily increased outsourcing of maintenance work performed at facilities within this country and abroad. According to the Department of Transportation Inspector General (IG), major air carriers outsourced an average of 64 percent of their maintenance expenses in 2007, compared to 37 percent in 1996. For heavy airframe maintenance work performed in the same year, which includes complete teardowns of aircraft that can take up to seven weeks, the figure jumps to 71 percent. Out of all the heavy airframe maintenance work that is outsourced by major air carriers, 27 percent is performed by foreign repair stations.

Despite these facts, some are urging Congress to reject the House provisions and instead exempt FAA-certificated foreign repair stations from biannual inspections in countries with bilateral aviation safety agreements (BASAs). The claim that two FAA inspections per year would undermine an already signed BASA with the EU is misplaced. The reality is that there is no language in the BASA that would prohibit the FAA from conducting biannual inspections at foreign repair stations. In fact, Article 15 of the agreement supports the authority of a party to, "Determine through its legislative, regulatory and administrative measures, the level of protection it considers appropriate for civil aviation safety . . . ."

**Transportation Trades Department, AFL-CIO**

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Edward Wytkind, President / Larry I. Willis, Secretary-Treasurer



Arguments that requiring two FAA inspections per year of foreign repair stations working on U.S. carriers will actually cost U.S. jobs are also without merit and must be rejected. Domestic aviation facilities certified by the European Union exist because there is a commercial need for those facilities and foreign carriers rely on these facilities to fill specific needs. It is not in the EU's interests to close these facilities down in some exaggerated effort at retaliation. It is completely within the rights of the U.S. to regularly inspect facilities certified by the FAA and working on U.S. aircraft. And this bill does not take any discriminatory action against the EU or other foreign repair stations.

According to the DOT IG, when foreign authorities do inspect FAA-certified stations, they do not always provide the FAA with sufficient information about what was inspected and the problems discovered. In fact, the IG report revealed that inspection documents given to the FAA were found to be incomplete or incomprehensible in 14 out of 16 files (88 percent).

TTD has long argued that the FAA does not hold foreign repair stations and their workers to the same safety standards as those imposed on U.S.-based repair stations. For example, while U.S. mechanics employed either at U.S. carriers or third-party contractors are subject to robust drug and alcohol testing, mechanics at foreign repair stations working on the same aircraft are not held to equivalent rules. To address this problem, workers at foreign repair stations working on U.S. aircraft must be held to the same drug and alcohol testing rules as workers at U.S. stations, as mandated by the House-passed legislation.

There is absolutely no substitute for direct FAA oversight of work performed on U.S. aircraft and stations working on U.S. aircraft should be held to the same standards, including drug and alcohol testing, that we require for work done in this country. As the House and Senate work toward an agreement on FAA reauthorization, I strongly urge you to support inclusion of the House-passed provisions that will enhance aircraft repair station safety and oversight. If you have any questions regarding this matter 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 flourish at the end.

Edward Wytkind  
President