



July 2, 2009

Support Aircraft Repair Station Language in the Senate FAA Reauthorization

Dear Senator:

On behalf of the Transportation Trades Department, AFL-CIO (TTD) I urge you to include language in the Senate FAA reauthorization bill that will enhance the safety and oversight of aircraft repair stations especially those located abroad but working on U.S. aircraft. Specifically, the FAA bill must ensure that foreign stations are inspected at least twice a year by FAA inspectors; that foreign mechanics working on U.S. aircraft are held to the same drug and alcohol testing rules as workers in this country; and that non-certificated stations are barred from performing covered maintenance work on U.S. aircraft.

Over the years, U.S. airlines have steadily increased outsourcing of maintenance work performed at facilities here 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.

Under current practice, FAA inspectors are charged with certifying foreign repair stations and then re-certifying them approximately every two years. With the increasing amount of repair work being outsourced to the 700 FAA-certified foreign facilities, inspectors have expressed serious concern that safety issues are not being addressed. For instance, in many cases if an issue is detected at a foreign repair facility, inspectors often have to wait until the following year or longer to validate whether the problem has been addressed.

The concept that we can turn over inspections of FAA stations to foreign government must be rejected. 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).

In addition, we have 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.

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Edward Wytkind, President • Patricia Friend, Secretary-Treasurer

Some in the aviation industry along with the European Union (EU) claim that two FAA inspections per year would undermine an already signed Bilateral Aviation Safety Agreements (BASA) with the EU. The reality is that there is no language in the BASA that would prohibit the FAA from inspecting foreign repair facilities twice a year. 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"

The claim that requiring two FAA inspections per year of FAA certified stations located abroad will somehow cost U.S. jobs must also be rejected. Some U.S. aviation companies have been told that if this provision becomes law, the EU will retaliate by conducting reciprocal twice-a-year inspections of European Aviation Safety Agency (EASA) certified U.S. stations. According to EASA, the repair station costs will increase over 3,000 percent; however the EU has offered no rationale for this inflated figure. The fact is that nothing in this legislation requires EASA to increase the number of times it inspects its U.S.-based certified facilities; that decision will rest exclusively with European regulators. Threatening to implement a self-imposed mandate that could cancel thousands of EASA certificates is just the latest EU scare tactic designed to influence U.S. aviation policy.

Finally, it is well known that air carriers have outsourced minor maintenance work to non-certificated facilities for years. However, a 2005 IG report revealed that air carriers also outsource critical or scheduled maintenance to these facilities. Legislative language that will prevent non-certificated stations from performing major maintenance work on aircraft is critical as these stations are not subject to the same regulation and oversight as FAA certificated facilities.

For these reasons, I urge you to support language in the Senate FAA Reauthorization bill that will enhance aircraft repair station safety and oversight. If you have any questions about this matter, please contact me directly or Mia Clarkson at 202/628-9262.

Sincerely,



Edward Wytkind
President