



March 3, 2006

Dear Representative:

As the Homeland Security Committee considers measures to address transportation security vulnerabilities, I wanted to share with you our concerns regarding the security of contract aircraft repair stations, especially those located in foreign countries but working on U.S. aircraft.

For almost two decades, transportation workers, led by the International Association of Machinists and Aerospace Workers (IAM) and the Transport Workers Union of America (TWU), have been working to ensure that foreign aircraft repair stations working on U.S. aircraft adhere to the same standards imposed on U.S. stations and their workers. Unfortunately, too often this has not occurred. For example, under current regulations foreign repair stations can be certified by the Federal Aviation Administration (FAA) without conducting drug and alcohol tests as required of U.S. workers at domestic stations doing the exact same type of work. In addition, FAA oversight of contract repair facilities has been heavily and repeatedly criticized by the Department of Transportation's Inspector General (IG) and the FAA's own inspector workforce represented by the Professional Airways Systems Specialists (PASS).

After September 11, security concerns inherent in third-party contractor work intensified at the same time that U.S. carriers were outsourcing a record amount of work. Yet neither the FAA nor the new Transportation Security Administration (TSA) took any steps to address this growing concern. In response, we urged the TSA and the FAA in 2003 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.

Congress quickly stepped in to fill the void. Section 611 of the FAA Reauthorization Act (Vision 100) required TSA, in consultation with the FAA, to complete a final rule imposing security standards on foreign and domestic aircraft repair stations by August 6, 2004. The TSA was further required to conduct security audits of foreign stations that were to be completed 18 months after the regulations were finalized. But to date, TSA has not even issued a proposed rule, let alone a final rule and the agency is currently 18 months delinquent in meeting this mandate. To make matters worse, the clock on conducting the audits will not even start until the regulations are finalized. TSA's foot-dragging in issuing the regulations means that nothing has been done to address this security issue and the clear will of Congress is simply being ignored.

It appears that Congress will once again be compelled to assert itself to address this problem. Specifically, Congress must force TSA to issue the rules and conduct the audits required in the 2003 legislation. It also must ensure that there is one level of security between in-house and contracted-out maintenance. On this point, it should be noted that in-house mechanics must undergo an extensive threat assessment evaluation by TSA (which includes a review of criminal records) as a condition of employment. Workers at out-sourced stations, both foreign and domestic, do not face a similar federal requirement.

Transportation Trades Department, AFL-CIO

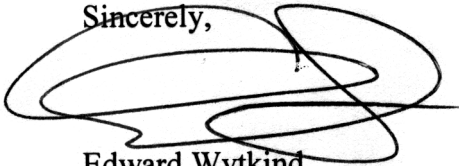
888 16th Street, NW • Suite 650 • Washington, DC 20006 • tel: 202.628.9262 • fax: 202.628.0391 • [www.ttd.org](http://www.ttd.org)  
Edward Wytkind, President • Michael A. Ingrao, Secretary-Treasurer

The IG reports that U.S. carriers outsource over 50 percent of their maintenance work and the trend is only increasing. There are now approximately 650 foreign aircraft repair stations certified by the FAA and many are located in countries which pose legitimate security risks to the United States. And this doesn't even take into account the thousands of non-certified repair stations that the IG recently found receive no FAA oversight but are performing the same type of work as certified stations.

It is clear that outsourced maintenance remains a weak-link in our transportation system and that TSA does not appear interested or willing to close blatant security loop-holes. We hope that you will step-in and bring some basic standards and oversight to ensure our aviation system remains the safest and most secure in the world.

On behalf of transportation labor, and the IAM, TWU and PASS, I look forward to working with you towards this objective.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', written over a large, loopy scribble.

Edward Wytkind  
President