



March 2, 2009

**Oppose Any Amendments to Weaken Oversight and Safety
of Aircraft Repair Stations**

Dear Representative:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I urge you to oppose any amendments that will weaken the aircraft repair station provisions in the Federal Aviation Administration Reauthorization Act of 2009 (H.R. 915) when it is considered by the full committee this week.

We have long argued that the FAA certifies foreign aircraft repair stations without holding these facilities and their workers to the same standards that are imposed on U.S.-based repair stations. H.R. 915 attempts to close these safety loopholes. Specifically, the bill mandates that foreign stations be inspected at least twice a year by FAA inspectors and that workers at these facilities are held to the same drug and alcohol testing rules as U.S. stations. In addition, the bill puts an end to non-certified stations, located in both this country and abroad, from performing major and significant overhaul work.

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. It makes no sense to require U.S. mechanics to undergo various levels of drug and alcohol testing, if workers doing the exact same work — on the exact same aircraft — are exempt from this requirement simply because the station is located in another country. While some may argue that this requirement impedes the sovereignty of another country, we are not requiring that other nations change their own drug and alcohol testing requirements. Rather, if a station chooses to perform work on U.S. aircraft, that station simply must meet the same requirements as U.S. repair facilities.

In addition, unlike domestic repair stations, foreign repair stations are not subject to critical routine safety inspections performed by FAA inspectors. For years the FAA, under the Bush Administration, curtailed the ability of front-line FAA inspectors to provide adequate oversight of contract repair stations located abroad, a fact well documented by the DOT IG. Now some in industry along with the European Union (EU) continues to oppose these safety initiatives, arguing that foreign countries will inspect these facilities based on Bilateral Aviation Safety Agreements. We reject this argument.

Transportation Trades Department, AFL-CIO

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Edward Wytkind, President • Patricia Friend, Secretary-Treasurer



When it comes to the safety of aviation workers, and the traveling public, there is absolutely no substitute for direct FAA oversight of work performed on U.S. aircraft, and the FAA cannot rely on foreign authorities to strictly adhere to this country's safety standards and regulations. Moreover, according to the DOT IG, information provided by foreign inspectors is often incomplete, inaccurate or difficult to understand. Foreign authorities do not always report problems to the FAA discovered during inspection, and there is a lack of adequate oversight procedures in place to ensure the quality of their inspections.

We also reject the argument that the provisions in H.R. 915 will somehow result in retaliation from foreign entities that will result in a loss of business for U.S. based repair facilities. The provisions in H.R. 915 simply seek to impose the exact same standards on foreign stations, working on U.S. registered aircraft, that we impose on stations, carriers, and workers in this country. The U.S. aviation system is the safest and most lucrative in the world and to the extent that foreign carriers and others use U.S. facilities it is because of the expertise that we can offer. We simply do not see a rationale for so-called retaliation fears and suspect it is motivated by a desire to maintain the double-standard that exists for foreign stations.

Data provided by the Department of Transportation's Inspector General (DOT IG) indicates that 71 percent of heavy airframe maintenance work was outsourced in 2007 with about 27 percent going to foreign stations. The work outsourced to foreign stations increased 6 percent from 2003. Air carriers seeking to cut costs are increasingly contracting out their repair work to foreign stations and this trend will continue to grow. The number of FAA-certified foreign repair facilities has increased from 344 in 1994 to 698 in 2007. The safety and security implications of this rising trend in outsourcing aircraft repair is alarming particularly because foreign repair stations are not held to the same safety and security standards as domestic stations.

On behalf of transportation labor, I urge you to reject any amendment that will weaken the aircraft repair station provisions in H.R. 915. If you have questions, please feel free to contact me directly 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