



April 24, 2007

Support H.R. 1981 Raise Security Standards at Aircraft Repair Stations

Dear Representative:

Today the House Homeland Security Subcommittee on Transportation Security and Infrastructure Protection will mark up H.R. 1981, a bill introduced by Reps. Jim Langevin, Bennie Thompson, and Sheila Jackson Lee to require the Transportation Security Administration (TSA) and the Federal Aviation Administration (FAA) to stop ignoring a two-and-half year old Congressional mandate to issue and enforce security rules for third-party repair facilities that work on U.S. aircraft. On behalf of the Transportation Trades Department, AFL-CIO, and specifically our aviation unions that represent mechanics, pilots, flight attendants, FAA inspectors, and others, I urge you to cosponsor and support this important legislation.

For almost two decades, transportation labor has pushed for higher standards and stronger enforcement of aircraft repair work performed overseas. In particular, we have always argued that the standards applied to U.S. facilities and their employees should also apply to repair stations based overseas. As outsourcing has increased to dramatic levels, and with the events of September 11 as a clear reminder of what can happen when our aviation system is breached, the security issues inherent in third-party maintenance have become critical, but unfortunately have gone unaddressed.

In fact, in 2003, we specifically asked both the TSA and the FAA 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.

To address this problem, Congress included a provision (Section 611) in the FAA Reauthorization Act (Vision 100) to require TSA, in consultation with the FAA, to issue final regulations governing domestic and foreign aircraft repair stations. These regulations were due in August, 2004 (180 days after enactment), but to date no final, or even proposed rule, has been issued by TSA.

The TSA is also required, pursuant to Section 611, to conduct security audits of foreign stations. Those audits are supposed to be completed 18 months after the security rules are finalized, but since the regulations are at a standstill, the clock on conducting the audits has not even begun. The end-result of this foot-dragging is that nothing has been done since September 11, despite explicit Congressional directives to address these security issues.

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 • Michael A. Ingrao, Secretary-Treasurer



H.R. 1981 would finally force TSA to act on the original 2003 Congressional requirement. Specifically, the bill would give TSA 60 days to issue the security regulations that are now two-and-a-half years late. If this deadline is missed, TSA would have to issue an order prohibiting the use of foreign aircraft repair stations for the maintenance of U.S. aircraft. Once the regulations are issued, the order will be lifted and can be suspended for U.S. aircraft to use these stations in emergency situations. The deadline on the security audits will be moved up from 18 months to 9 months which is clearly justified given that TSA has known about this requirement since 2003.

This bill also requires TSA, in the drafting of regulations, to ensure that there are “comparable security standards” between in-house maintenance and repair work that is sent to third-party contractors. As part of this objective, workers at third-party stations would be subject to the same employee background checks as workers employed at in-house facilities.

This common-sense legislation will close a security loophole that has remained open for far too long. I urge you to support H.R. 1981 and to push for its swift approval through the House of Representatives. If you have any questions, please do not hesitate to contact me or Larry Willis 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