



A bold voice for transportation workers

February 24, 2014

Alphonso Pendergrass
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

**RE: Petition for Exemption; Summary of Petition Received
Summary Notice No. PE-2014-07
Docket No. 2014-02249
Docket ID FAA-2014-0028**

Dear Mr. Pendergrass:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I write to oppose the petition for exemption filed by Gulfstream Aerospace Corporation, Inc. (Gulfstream) in the above captioned docket. By way of background, TTD consists of 32 affiliated unions, including those that represent FAA inspectors and aviation mechanics who have a vested interest in this proceeding.¹

TTD and our affiliates have long argued that the growing trend of outsourcing maintenance necessitates improved oversight and strong safety standards for repair stations. Gulfstream's petition moves in the opposite direction by requesting permanent exemption from requirements that ensure safety. We oppose this request for the reasons elaborated below.

If granted, Gulfstream would be exempt from 14 CFR 145.107(a)(1) which would allow the company to create a repair station organization in which the parent facility exercising managerial control would not be required to have the same ratings as those held by its satellite repair stations. As a result, the parent facility would be responsible for the quality and integrity of maintenance work for which it cannot assure is completed properly.

As TTD stated in previous comments on this issue², it would be a mistake to lift the requirement of 145.107(a)(1) as doing so would enable satellite repair stations to perform maintenance work without proper safety controls, thereby potentially jeopardizing the safety of the aircraft repaired at these facilities. While Gulfstream states that it does not have a history of sharing supervisors

¹ Attached is a complete list of TTD's affiliate unions.

² TTD filed comments in November 2012 to FAA's Repair Stations NPRM, Docket No. FAA-2006-26408; Notice No. 12-03.

Transportation Trades Department, AFL-CIO

815 16th Street NW / 4th Floor / Washington DC 20006

Tel: 202.628.9262 / Fax: 202.628.0391 / www.ttd.org

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



and inspectors among its repair stations, it fails to take into account a possible scenario in which a satellite repair station is in need of such personnel with a specific certification when none are available. It is unclear how the company would resolve such situations.

The exemption that Gulfstream seeks would be permanent, meaning the company would be free to expand its roster of satellite repair stations without having to take into account its ability to oversee the work performed there. The company clearly states in its application that it expects to add repair stations to its organization and that “the permanent granting of this exemption would relieve future complications with the addition of domestic capability.”³ The safety of U.S. aircraft should not be subjected to a company’s preference for efficiency. Granting such an unrestricted exemption presents the opportunity for maintenance to move between satellite stations while escaping an adequate level of oversight.

We note that, other than making it easier to expand its enterprise, Gulfstream fails to explain why this exemption is needed. The company does state that the FAA’s failure to approve the request would cost the agency and company time and money due to changes associated with revising the Operation Specification for six of its 11 repair stations. However, this claim is false. Gulfstream provides no explanation as to why it would need to change these Operation Specifications. Based on the information available, the disapproval of this request would maintain status quo, meaning no changes to the repair stations’ Operation Specifications would be needed, and thus disapproval of the petition would have no effect on FAA or company resources. In fact, the opposite of the company’s claim is true: approving the petition would create additional demand on FAA inspectors in order to review, assess and approve changes to the facilities’ Repair Station/Quality Control Manual System, Training Program and Operation Specifications.

Further, FAA approval of Gulfstream’s application, the first request of its kind, would set a precedent for other contract maintenance providers to seek similar exemptions. This would create an environment where contracting companies could develop maintenance networks with little overarching oversight. This would be a precarious arrangement and detrimental to safety.

This exemption would benefit only Gulfstream while at the same time reducing safety at satellite stations. In the interest of public safety, TTD opposes this petition and urges the agency to reject it.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a stylized flourish at the end.

Edward Wytkind
President

³ Gulfstream Aerospace Corporation, Inc. Application for Permanent Exemption from 14 CFR 145.107(a)(1), Accessed through Docket ID FAA-2014-0028. Page 3.



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TTD MEMBER UNIONS

Air Line Pilots Association (**ALPA**)
Amalgamated Transit Union (**ATU**)
American Federation of Government Employees (**AFGE**)
American Federation of State, County and Municipal Employees (**AFSCME**)
American Federation of Teachers (**AFT**)
Association of Flight Attendants-CWA (**AFA-CWA**)
American Train Dispatchers Association (**ATDA**)
Brotherhood of Railroad Signalmen (**BRS**)
Communications Workers of America (**CWA**)
International Association of Fire Fighters (**IAFF**)
International Association of Machinists and Aerospace Workers (**IAM**)
International Brotherhood of Boilermakers, Iron Ship Builders,
Blacksmiths, Forgers and Helpers (**IBB**)
International Brotherhood of Electrical Workers (**IBEW**)
International Longshoremen's Association (**ILA**)
International Organization of Masters, Mates & Pilots, ILA (**MM&P**)
International Union of Operating Engineers (**IUOE**)
Laborers' International Union of North America (**LIUNA**)
Marine Engineers' Beneficial Association (**MEBA**)
National Air Traffic Controllers Association (**NATCA**)
National Association of Letter Carriers (**NALC**)
National Conference of Firemen and Oilers, SEIU (**NCFO, SEIU**)
National Federation of Public and Private Employees (**NFOPAPE**)
Office and Professional Employees International Union (**OPEIU**)
Professional Aviation Safety Specialists (**PASS**)
Sailors' Union of the Pacific (**SUP**)
Sheet Metal, Air, Rail and Transportation Workers (**SMART**)
SMART-Transportation Division
Transportation Communications Union/ IAM (**TCU**)
Transport Workers Union of America (**TWU**)
UNITE HERE!
United Mine Workers of America (**UMWA**)
United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service
Workers International Union (**USW**)

These 32 labor organizations are members of and represented by the TTD

