

## **ARSA Action ~ 2006**

*The following are selected articles that appeared in the ARSA Action section of 2006 issue of **the hotline**. These articles are presented to give the reader an idea of the work the Association does on behalf of its members.*

### **January**

#### **ICA Survey Crucial to Industry's Fight for Maintenance Information**

Now, more than ever, your support and leadership in helping ARSA address the availability of manufacturer maintenance information is critical.

ARSA has released a survey that seeks to determine the extent to which Instructions for Continued Airworthiness (ICA) (a.k.a. maintenance manuals, AMM, CMM) availability and cost affect our industry's ability to do business.

It's crucial that ARSA obtain as much information from as many repair stations as possible to demonstrate to lawmakers that it's high time that the FAA adopt a sensible and fair ICA policy. ARSA will use this information as it meets with members of Congress, policymakers at the FAA, and other industry groups to discuss the current ICA policy and potential changes.

The survey will remain open until February 28, 2006. To take it, please click here:

<http://208.255.27.30/survey/survey.cfm?c=ARS18>

### **February**

#### **ARSA Announces Formation of AAIRRG**

Have you been waiting for news on ARSA's formation of a Risk Retention Group (RRG) for product liability insurance? Wait no longer: presenting the Aviation Alliance Insurance Risk Retention Group, Inc., or AAIRRG.

Since the 2005 ARSA Symposium, an initial group of ARSA's membership interested in forming a RRG has held a total of six meetings—two general meetings and four interim Board of Directors meetings. With each meeting, the group has progressed toward the formation of a RRG. Twenty-two ARSA member companies expressed initial interest in forming an RRG. Seventeen ARSA member companies were able to attend an organizational meeting in July 2005. ARSA currently has 20 member companies involved in the RRG. The journey has been a learning experience for everyone.

The RRG, which will be open only to ARSA members, has named an interim Board of Directors, elected officers and selected a name—AAIRRG. The next major steps are to select a domicile for AAIRRG, market AAIRRG to the ARSA membership, develop the risk management criteria, perform actuarial studies, obtain re-insurance and secure the capitalization required. The goal is to incorporate in September 2006.

Now is the time to get involved. For a limited time, ARSA members have the opportunity to get in on the ground floor of a business opportunity. Members that commit now will receive preferential dividend options that will never be available again.

Please note that for now, only ARSA "Regular" members can take advantage of AAIRRG.

To help you learn and understand the potential of AAIRRG, its Board of Directors has prepared a three-page question and answer document available on the ARSA Web site at this link:

<http://www.arsa.org/node/255>

Information will also be available at the 2006 ARSA Annual Symposium. At the Symposium you'll be able to [speak with AAIRRG Board members and hear firsthand about this new ARSA benefit](#).

### **March**

#### **ARSA Hill Visits Bear Fruit**

Dozens of ARSA members carved out time in their schedules March 24 to meet with members of Congress as part of ARSA's 2006 Legislative Day gathering.

On March 30, a letter from a Senator's office offered one example of why such efforts matter.

Following a visit from a constituent, Senator Joe Lieberman (D-CT) sent a letter to FAA Administrator Marion Blakey expressing concern that budget-related staff shortages at the agency are hurting repair stations. One ramification: delays in obtaining certifications.

"In a recent legislative statement, the Aeronautical Repair Station Association (ARSA) commented that 'underfunding the FAA will result in cuts to staffing and resources, slowing approval processes and interfering with the ability of the aviation industry to do business,'" Lieberman wrote. "I share their concern that excessive delays in inspection will adversely affect the development and expansion of this important industry in Connecticut."

Lieberman asked Blakey to provide his office with "your policy for staffing inspection facilities and your goal for meeting requested inspections."

The "legislative statement" Lieberman referred to is ARSA's position that that Congress must fully fund the amounts authorized for the FAA in the Vision 100-Century of Aviation Reauthorization Act. The Bush administration has proposed funding the FAA's operations accounts at \$8.366 billion in Fiscal Year 2007, or some \$300 million above the \$8.064 billion level authorized in Vision 100.

This would allow the FAA to hire about 300 new employees, including about 116 aviation safety inspectors, thus alleviating some of the present staff shortages.

The higher operations figure comes at a price, however. The FAA's funding level for the Airport Improvement Program, which provides funding for airport infrastructure, is \$2.75 billion, or about \$1 billion below the authorized level.

ARSA is urging Congress to fully fund the FAA's accounts—both operations and infrastructure—at their authorized levels.

### **Reach out and touch someone**

ARSA regularly reaches out to lawmakers and other government officials and makes our views known on key issues like FAA's budget. Such efforts are, after all, a trade association's primary function.

The best way to buttress such efforts is for members to reach out on their own, underscoring ARSA's position with real-world examples from their own backyards. While the letter from Senator Lieberman's office was the result of [a one-on-one meeting, messages conveyed via letters or E-mails are effective as well.](#)

## **April**

### **ARSA's 2007 Annual Repair Symposium Dates Announced**

ARSA is pleased to announce that the dates for next year's Symposium have been finalized.

The 2007 Symposium will be held on **Friday, March 16** and **Saturday, March 17**, 2007. ARSA's Legislative Day will take place on **Thursday, March 15**.

The new Thursday-Friday-Saturday schedule will allow for more valuable interaction between ARSA members and members of Congress and their staff persons, without affecting the quality of the Symposium.

Please mark your calendars now so that you can join us in 2007!

### **The Votes Are In: Legislative Day Is A Winner**

ARSA's 2006 Legislative Day has been deemed a success by those who attended and responded to our survey about their experiences. To wit: 80 percent of respondents rated Legislative Day "very good" or "excellent" and 70 percent of respondents rated the speakers as "very good" or "excellent".

While we are pleased that attendees found the event valuable, we're working to make the 2007 version even more beneficial.

For instance, moving the day back to Thursday (from Friday) will give us greater access to key lawmakers and their staffers, and the 2007 date is expected to fall during a time when Congress is in session.

### **Drug & Alcohol Rule Fight Needs Your Support!**

A total of 15 organizations, including 14 repair stations, have committed \$68,000 to the Legal Defense Fund set up to back the Association's efforts to fight the Federal Aviation Administration's expanded Drug & Alcohol (D&A) regulations. The ARSA legal team's efforts are far from complete, and your support is needed.

The Association is facing legal costs of up to \$350,000 as a result of its March 10th filing with the U.S. Court of Appeals for the District of Columbia Circuit seeking a review of the regulations, which extend drug and alcohol testing to subcontractors at any tier of the maintenance process.

For more information on contributing to the defense fund, call Karen at 703 739 9543 or E-mail her at [karen@arsa.org](mailto:karen@arsa.org). To read more about the new rule and what ARSA is doing about it, visit <http://www.arsa.org/da>

## Product Liability Insurance: AAIRRG Is For You

Formation of the Aviation Alliance Insurance Risk Retention Group (AAIRRG), the ARSA-led product liability insurance risk retention group, is in full swing. Association members will be getting information packets in the mail in the coming weeks explaining more about why AAIRRG is being formed—and how it will help you lower your insurance costs.

Want some information right now? See the AAIRRG Q&A on ARSA's Web site at <http://www.arsa.org/node/261> or call Paul Hawthorne at 703 739 9543.

## May

### Drug & Alcohol Rule Fight: Your Support Still Needed!

A total of 21 organizations have committed \$71,300 to the Legal Defense Fund set up to back the Association's efforts to fight the Federal Aviation Administration's expanded Drug & Alcohol (D&A) regulations. ARSA expresses its gratitude to the contributors. If your organization is not among them, please consider the stakes.

The Association is facing legal costs of up to \$350,000 as a result of its March 10 filing with the U.S. Court of Appeals for the District of Columbia Circuit seeking a review of the regulation, which extend drug and alcohol testing to subcontractors at any tier of the maintenance process. By any reasonable estimation, this rule—which does nothing to enhance safety—will cost industry millions of dollars. Our legal fight is on your behalf, and we need your support.

Meanwhile, the court has not set the case's schedule. Once a schedule is set, ARSA will have about 40 days to submit written arguments to the court. The FAA then has about a month to reply, and ARSA can make one final filing after FAA's reply.

The court will review the written arguments for about two months, and then hear oral arguments from both sides. As such, the court won't rule until late fall at the earliest.

ARSA's expenses in the case will come largely from paying for outside legal expertise to help prepare the written arguments, which are key to the case's outcome. Unlike jury trials, this process does not include witnesses—the only evidence is what's in the court docket, and the only new exhibits that will be introduced will be the written briefs.

For more information on contributing to the defense fund, call Karen at 703 739 9543 or e-mail her at [karen@arsa.org](mailto:karen@arsa.org). To read more about the new rule and what ARSA is doing about it, visit <http://www.arsa.org/da>.

If you can't contribute to the fund, please consider supporting ARSA in other ways. Have an advertising budget? Consider an ad in the hotline or on the ARSA Web site. Got jobs to advertise? Use ARSA's career center, [MROJobsOnline.com](http://MROJobsOnline.com).

Remember, every little bit helps us help you.

### AAIRRG Elects New President and New Board Member

The Aviation Alliance Risk Retention Group (AAIRRG) interim Board of Directors elected W. B. (Bill) Perdue to the office of president. Bill is president of Sonico Inc., an ARSA member since 1995 and an original supporter of the AAIRRG effort.

The board also elected Matthew Bickel, executive vice president with EB Airfoils LLC, to the board of directors. EB Airfoils has been a member of ARSA since 2001 and also joined the AAIRRG effort at its inception. Both Bill and Matt look forward to a long and rewarding relationship with the AAIRRG.

Meanwhile, AAIRRG's formation is progressing. A recently completed actuarial study was presented to the board and showed very promising results.

"The AAIRRG Board of Directors is excited with the positive results of the actuarial study and about submitting our formal license application in the near future," says Perdue. "With this completed study and the addition of new committed members, the project has gained great momentum. Those that invest now in AAIRRG are firms that understand the long-term financial benefits of early participation. It is an excellent example of American business men and women joining together for the common good of all!"

Currently, companies that commit to AAIRRG are eligible for preferred ownership options, which give them ownership stakes in the risk retention group. After the formal application process, preferred ownership options will not be available.

For more information about AAIRRG, please see our Web site: [http://www.arsa.org/taxonomy\\_menu/22](http://www.arsa.org/taxonomy_menu/22)

## ARSA PAC Fundraising Campaign Underway

The following ARSA members have contributed to ARSA PAC this year:

**Marshal Filler** – Obadal, Filler, MacLeod and Klein

**Gary Fortner** – Fortner Engineering and Manufacturing, Inc.

**Gary Jordan** – Jordan Propeller Service, Inc.

**Sarah MacLeod** – Obadal, Filler, MacLeod and Klein

**William Perdue** – SONICO, Inc.

**Jim Perdue** – SONICO, Inc.

**Bob Samson** – A.O.G. Reaction, Inc.

**Timothy Williams** – Aero Instruments and Avionics, Inc.

**Fred Zimbelman** – Soundair Repair Group, Inc.

So far, ARSA PAC has raised \$5,000; one-third of the \$15,000 goal set by ARSA's board. ARSA PAC accepts contributions only from executives and owners of ARSA member companies that have given ARSA PAC solicitation consent in accordance with the Federal Election Campaign Act.

To get a copy of the ARSA PAC solicitation consent form, please click on the following link:  
<http://www.arsa.org/files/SolicitationConsentForm.pdf>

If you're not sure whether your company has given solicitation consent, you can check by clicking this link:  
<http://www.arsa.org/node/158>

If you have questions about the PAC, please call ARSA Legislative staff at 703 739 9543 or send an e-mail to [legislativeteam@arsa.org](mailto:legislativeteam@arsa.org).

## ARSA Train To Gain Calendar

### Hazardous Materials Transportation Training.

Instructor: Jason Dickstein, Washington Aviation Group. Held in partnership with the Aircraft Electronics Association, the Aviation Suppliers Association and ARSA.

July 12-13, 2006—Las Vegas, Nev. [Four Seasons](#).

July 20-21, 2006—Miramar, Fla., [Hilton Garden Inn](#).

For information and registration, see <http://www.washingtonaviation.com/hazmat/>

### Human Factors Training

Instructor: Richard Komarniski, Grey Owl Consultants

July 27-28, 2006—Seattle, Wash.

October 12-13, 2006—Miami, Fla.

November 30-December 1, 2006—Los Angeles, Calif.

For information and registration, see <http://www.arsa.org/node/197>

## June

### ARSA Filing Underscores Rolls-Royce's Failure To Follow ICA Rules

ARSA remains convinced that Rolls-Royce's refusal to provide basic Model 250 engine series safety information to an FAA-certificated repair station as documented in a November 2005 complaint to the FAA is a violation of the Federal Aviation Regulations (FARs), despite the manufacturer's claims to the contrary.

In a June 19 FAA filing, ARSA clearly refutes claims made by Rolls-Royce that the Association's original complaint was baseless. Rolls-Royce argued in its Feb. 28, 2006 response to ARSA's Nov. 23, 2005 complaint that the engine models in question are not covered by rules requiring dissemination of Instructions for Continued Airworthiness (ICA).

"The certification bases of the engines at issue required the development and dissemination of maintenance information," the Association wrote in its June 19 submittal. "The regulations requiring design approval holders to

provide ICA are based on safety. Therefore, Rolls-Royce is required to provide these instructions under the CARs [Civil Air Regulations], 14 CFR §21.50(b), and Part 33. Because of Rolls-Royce's failure to adhere to its regulatory obligations, a formal complaint was filed with the FAA."

ARSA's November 2005 complaint documents Rolls-Royce's refusal to provide ICA to Helicopter Engine Repair Overhaul Services Inc. (H.E.R.O.S.), a certificated repair station located in Glendale, Calif. H.E.R.O.S. requires ICA from Rolls-Royce to perform maintenance on certain Model 250 parts.

Rolls-Royce claimed that the Series 250 engine's certification basis pre-dates the FARs and relies instead on the CARs. ARSA in its filing points out that section 13.32 of CAR Part 13 (Aircraft Engine Airworthiness) required type certificate holders to provide maintenance manuals "to persons engaged in the operation, maintenance, repair, or overhaul" of engines as early as 1941, or well before the Series 250's time.

In addition to this longstanding requirement that type certificate holders make maintenance information available, models added to type designs after January 28, 1981 must comply with the regulations in place at the time of application. Each of the six models discussed in ARSA's complaint were added to the Series 250 type certificate via amendment after that date.

The regulations applicable at the time the models were added included FAR Part 21.50(b), which requires type certificate holders to make ICA available to anyone—such as repair stations—required to comply with the instructions when performing maintenance on the articles.

ICA are the technical manuals necessary for performing maintenance. The FAA requires repair stations to have and use ICA.

The failure of some aircraft, engine and component manufacturers to make complete ICA available to qualified and certificated maintenance providers is an industry-wide, safety-related problem.

ARSA is committed to working with the FAA until the agency completes the safety chain by holding design approval holders responsible for their role in safe aviation maintenance.

Link to the filings related to the ARSA's complaint against Rolls-Royce here:

<http://www.arsa.org/node/286>

For more on the ICA issue and ARSA's efforts to correct the ICA problem, see:

[http://www.arsa.org/taxonomy\\_menu/10/22](http://www.arsa.org/taxonomy_menu/10/22)

## July

### **ARSA Requests Clarification of Human Factors Training Requirements**

ARSA has asked the FAA's Flight Standards Service to clarify inconsistencies in guidance on including human factors training in repair station training programs.

Language in Airworthiness Inspector's Handbook, Order 8300.10 and Advisory Circular (AC) 145-10 suggests that human factors training is mandatory; a note in the order states that exclusion of such training "would hinder the training program approval."

ARSA has asked the FAA for the regulatory basis in the Federal Aviation Regulations (FARs) for language requiring human factors training in the guidance.

If no regulatory basis exists, ARSA suggests that the guidance material be changed to reflect that human factors training, while beneficial to any maintenance organization, is not required under the Federal Aviation Regulations (FARs), and its absence will not prohibit approval of a training program tailored to meet the requirements of section 145.163, Training Requirements.

"This matter has come to our attention because members are being told by FAA aviation safety inspectors that the training manuals will not be approved without the human factors elements 'required' by the Handbook," ARSA noted.

The Association will keep its membership up to date on the FAA's response.

For more on repair station training program requirements, see *Legal Briefs* on page 2.

Read ARSA's request here:

<http://www.arsa.org/files/HFclarification72706.pdf>

## ARSA Seeks EASA Data Approval Interpretation

ARSA has requested an interpretation from the European Aviation Safety Agency (EASA) regarding repair data approvals obtained before the agency's September 28, 2003 start of operations.

Two issues are in question.

The first is whether a major repair design approved on a specific component by a European Union (EU) member state prior to EASA's start date must be reevaluated by EASA before the component may be installed on an EU-registered aircraft.

The second is if the identical repair can be performed on an article after September 28, 2003 based on the same data approved by a member state before that date without submitting the repair to EASA for evaluation.

ARSA's request stems from language in the European Commission (EC) regulation for transitioning between national aviation authorities (NAAs) and EASA.

"Read literally, this provision grandfathers only those design changes that were approved by an EU Member State if they were previously installed on an aircraft," ARSA noted in its July 18 letter to EASA Rulemaking Director Claude Probst.

"Installation of the same component on other aircraft of the same model on or after September 28, 2003 would not be automatically accepted," ARSA continued. "Neither would components that had been similarly repaired but were held in inventory, or components that are repaired in the future using the same approved data. This is despite the fact that an EU Member State's NAA had approved the repair design because it had been shown to comply with the pertinent airworthiness standards."

ARSA's position is that components repaired based on data approved by an EU member state before the agency's start date should be eligible for installation on an EU-registered aircraft.

"We believe components that are repaired based on data approved by an EU Member State before 28 September 2003 should be eligible for installation on an EU-registered aircraft. Safety is adequately assured by interpreting the grandfather provision to apply if the data was approved prior to 28 September 2003." (Emphasis in original.)

The Association will keep its members updated as more information becomes available.

Download ARSA's request letter here: [http://www.arsa.org/files/EASA\\_RepairData\\_Grandfather\\_071806.pdf](http://www.arsa.org/files/EASA_RepairData_Grandfather_071806.pdf)

## ARSA Requests 8130-3 Instruction Clarification From FAA

ARSA, prompted by a member inquiry, submitted a letter to the FAA requesting that all serial numbers or their equivalent be allowed to be entered in Block 11 of Form 8130-3.

The issue's root cause was an October 7, 2005 FAA Information Memorandum from the Production and Airworthiness Division (AIR-200) that said only serial numbers required by FAR part 45.14 were permitted in Block 11.

"We feel that any batch/serial number should be entered on Form 8130-3 regardless of whether it is required by Part 45," ARSA told the agency. "Indeed, to discourage the entry of serial numbers or other unique identifiers in a uniform manner on the 8130 is detrimental to one of the basic purposes of the form. Recording uniform information to ensure proper tracking of parts throughout their movement in the industry is one of the basic reasons the industry uses the form voluntarily."

ARSA will keep its members updated on the FAA's action.

View ARSA's 8130-3 Block 11 letter here: [http://www.arsa.org/files/8130-3\\_req\\_071806.pdf](http://www.arsa.org/files/8130-3_req_071806.pdf)

## August

### EASA Responds To ARSA Repair Data Grandfather Clarification Request

ARSA has received conformation from EASA that a major repair design approved on a specific component by an EU Member State prior to September 28, 2003 does not need reevaluation by EASA before the component is installed on an EU-registered aircraft.

In a Sept. 4 letter to ARSA, EASA Rulemaking Director Claude Probst summarized his agency's view as follows:

Repairs on components installed in an aircraft which was registered in the EU on 28-09-03 in accordance with applicable law, are grandfathered and can be repeated on other components to be installed in EU registered aircraft without further evaluation by the Agency.

Repair design incorporated in the parts and appliance approval of an EU Member State before 28-09-03 is grandfathered and can be repeated on other parts and appliances to be installed in EU registered aircraft without further evaluation by the Agency.

ARSA requested clarification on the issue in a July 18 letter to EASA.

Read EASA's reply here: [http://www.arsa.org/files/EASA\\_Reply\\_RepairData\\_Grandfather\\_090406.pdf](http://www.arsa.org/files/EASA_Reply_RepairData_Grandfather_090406.pdf)

## **ARSA Weighs In On Tax Row Over 'Integral Aircraft Equipment' Definition**

ARSA recently stepped up to help a member facing a challenge from its state department of taxation over whether some removable equipment, once installed, is integral to an aircraft's operation.

The member, an FAA-certificated repair station, specializes in repairing carts and unit load devices (ULDs). It considers its services eligible for its state's excise tax exemption on services provided by aircraft maintenance facilities.

State auditors disagree. According to the state's tax code, work on a component qualifies for the aircraft maintenance excise tax exemption only if the component is "integral to an aircraft's operation." The state claims that, since aircraft can fly without carts and ULDs, these parts aren't integral, and work on them is subject to the excise tax.

In a letter to the state's taxation department director, ARSA noted that, in regulatory terms, items such as galley carts and ULDs are often part of an aircraft's approved design and necessary for its safe operation.

If such items aren't maintained in accordance with manufacturers maintenance manuals—if work on a galley cart leaves it unable to be stowed correctly, for example—the FAA could consider the aircraft unairworthy.

For these reasons, ARSA underscored, ULDs and galley carts should, as a regulatory matter, be considered integral to an aircraft's operation.

At press time, the issue was still unresolved.

The stakes are high—for the repair station and its state. The member reports that at least one customer is prepared to move its work to facility in a state with more favorable tax laws.

Some states have carefully worded tax codes that define what types of maintenance are eligible for tax breaks. The member informed ARSA that several court rulings exist supporting the Association's view that ULDs and carts are components integral to an aircraft.

ARSA wants to hear what other members have experienced. What's the situation in your state, and have auditor interpretations been consistent?

Send your feedback to ARSA's Sean Broderick ([sean@arsa.org](mailto:sean@arsa.org)) or call him at 703 739 9543.

## **ARSA Supports AMTA's Effort To Honor Charles Taylor**



ARSA was honored to be part of a special night at the Steven F. Udvar-Hazy Center on Aug. 11, courtesy of the Aircraft Maintenance Technicians Association (AMTA).

ARSA joined some two dozen other aviation organizations and individuals in backing AMTA's effort to commission a bronze bust (*pictured*) of Charles E. Taylor, the legendary mechanic behind the Wright Brothers' historic aviation efforts.

Led by Director Ken MacTiernan, an American Airlines mechanic by day, AMTA raised money to have the bust made. The group then hosted a special after-hours ceremony to hand the statue over to the Hazy Center, the sprawling annex to the Smithsonian Institution's Air & Space Museum.

Visitors to the Hazy Center, located at Washington Dulles International Airport, can find Taylor's bust displayed—where else?—in the aircraft engines section.

AMTA was created to promote the aviation maintenance technician. Among AMTA's goals is bringing recognition to Taylor, who built and maintained the Wright Flyer's engine.

The group has helped lobby for a national Charles Taylor Day (some 43 states and territories have passed statutes setting aside May 24, Taylor's birthday, to mark the occasion) and will push to get Taylor on a U.S. postage stamp.

For more information on AMTA, see [www.amtausa.com](http://www.amtausa.com).

## **October**

### **ARSA Elects New Board Officers, Adds Two New Board Members**

ARSA on October 31 elected new officers for its board of directors. Ian Cheyne, vice president of Dallas Airmotive, was elected president of the ARSA board. Dave Latimer, TIMCO Aviation Services Inc., vice president of quality, was elected senior vice president, and Chris Erickson, compliance officer CRSO/accountable manager for Erickson Air-Crane, as treasurer.

ARSA also added two new members to its board: Dr. Hans-Jüergen Loss and Jim Perdue.

Dr. Loss is vice president, quality management for Lufthansa Technik AG, Hamburg, Germany. He has worked in various positions for Lufthansa Technik since 1985.

Mr. Perdue is vice president and manager of sales for Sonico, Inc. He has been with Sonico since 1989 and is involved in almost all aspects of Sonico's operations.

Continuing to serve on ARSA's board are Shane Cormier, chief operating officer for Team JAS; Gary Fortner, vice president of quality control for Fortner Engineering and Bruce Johnson, executive vice president of engineering for Chromalloy, and Gary Jordan, president and CEO, Jordan Propeller Service.

### **Timken-Bearing Inspection To Sponsor Human Factors Course**

ARSA is pleased to announce that Association member Timken-Bearing Inspection of Los Alamitos, Calif. will host and sponsor the upcoming ARSA/Grey Owl Human Factors Training course taking place November 30-December 1.

Human factors training programs are designed to help your organization comply with regulations and optimize the benefits of your safety management program.

Seats in the class are limited, so sign up today to ensure you get a spot.

## **November**

### **ARSA Submits Comments on AMOC Order**

ARSA recently provided comments on FAA Draft Order 8XXX.X, which addressed Alternative Means of Compliance (AMOC) with Airworthiness Directives (ADs).

The Order proposes to standardize the AMOC process and to provide guidance regarding AMOC approval and denial procedures.

In addition to providing editorial comments for better clarity and focus, ARSA suggested changes that would provide for a more efficient approval process, a better understanding of when such a request is necessary and identification of the FAA office authorized to issue AMOC approval.

ARSA provided the FAA with its comments on November 22, 2006. A copy of the Draft Order, along with comments, is available here:

[http://www.arsa.org/files/ARSA\\_AMOC\\_Draft\\_Order\\_Comments\\_11222006.doc](http://www.arsa.org/files/ARSA_AMOC_Draft_Order_Comments_11222006.doc)

## **December**

### **ARSA Files Drug & Alcohol Briefs**

ARSA and the other litigants in the Drug & Alcohol lawsuit against the FAA submitted their joint brief on December 13, 2006 to the U.S. Circuit Court of Appeals in Washington D.C. The brief emphasized the unnecessary and costly nature of the FAA's new testing rule. The litigants asked the Court to overturn the rule or to force the FAA to consider its effects on small businesses before enforcing the rule.

The FAA has until late January 2007 to file their brief, and the litigants will file a reply in February. The case is expected to be heard in late Spring 2007.

To view the brief, please visit: <http://www.arsa.org/node/378>