



PMA: Making the System Work

Regulatory Developments—PMA Parts
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Jason Dickstein
MARPA President



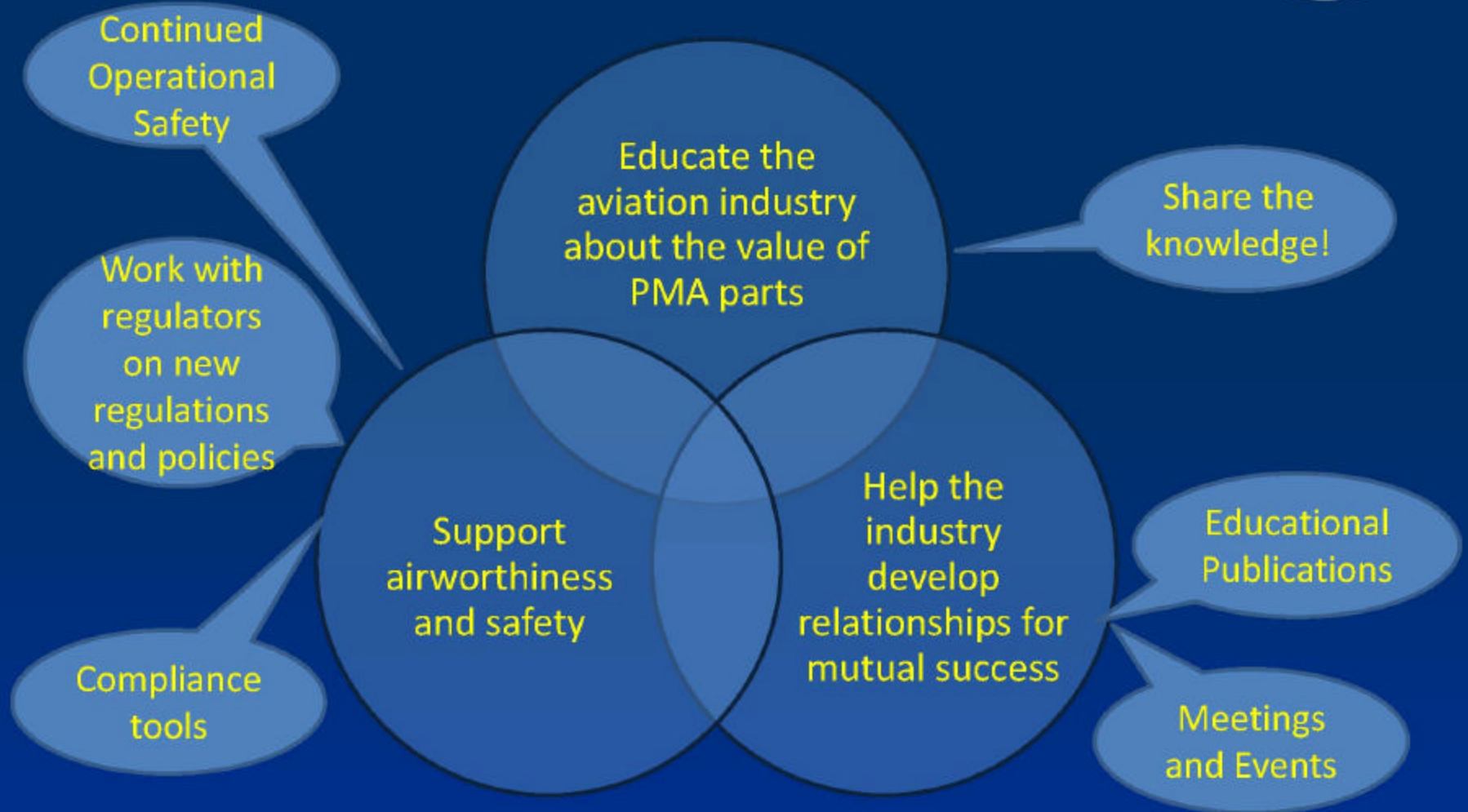
MARPA



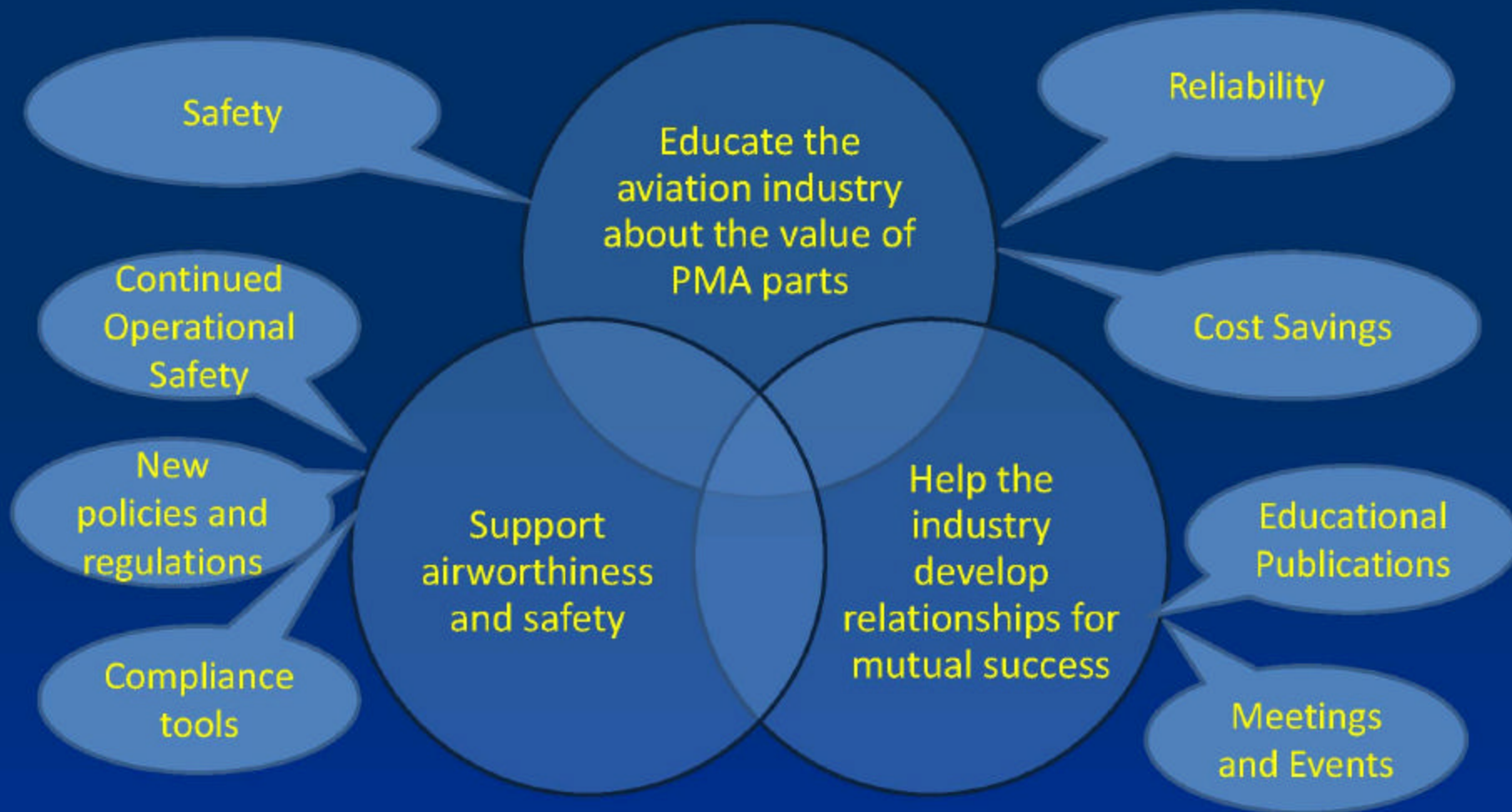
- Non-profit trade association representing the PMA community
- Formed in 1999
- We joined the PMA community in their quest to boldly bring reliability improvements, safety improvements, inventory availability and cost savings to the aviation industry



What MARPA Does for Manufacturers



What MARPA Does for Industry



There Isn't Enough Money



- You can't open a newspaper without seeing terms like these
 - Fiscal Cliff
 - Sequester
 - Balanced Budget
 - Mortgaging our Future
 - Furlough



Fewer FAA Resources



- One furlough day per week means
 - Less time to review packages
 - Less time to manage designees
 - Less time to understand our business models
 - Less time to understand new technologies



What Do We Need to Do



- Find a way to better leverage FAA engineering resources
 - Industry must step-up
 - Accept safety responsibility (already in the regulations)
 - Increase auditability of engineering systems
 - Better use predictive hazard –identification and risk-assessment models to ensure future safety
 - In return, FAA must change the way that it performs oversight
 - Increase audit-based oversight
 - Manage design approval using audit tools similar to those used for oversight of production approvals
 - Use certificated design organizations to issue approvals



How Do We Do This?



- Find ways to better apply safety management to front-end design activities
- Update U.S. design regulations to permit auditable design systems
 - Applicant uses a system like ODA to assure compliance
 - FAA certifies the design organization to issue its own design approvals
 - Europe already does this with DOA!
 - Canada's "Level of Involvement" paradigm is also consistent with this model



MARPA Projects: Targeting FAA Resources



- Streamlined application process for non-complex PMAs
 - MARPA 1100 standard
 - PMA applicant with experience
 - MOU with local office establishes ongoing protocols
 - Non-safety sensitive (NSS) parts get streamlined review
 - FAA Order 8110.119
 - Recognizes the MARPA Standard
 - Published in November
 - John Milewski should be addressing this later today



MARPA Projects: Instructions for Continued Airworthiness



- FAA policy on inappropriate DAH ICA licensing practices [*PS-AIR-21.50-01*]
 - ICA licensing agreements that undermine FAA approvals or FAA policies (e.g. anti-PMA prohibitions) or attempt to unfairly secure monopolistic market position are unacceptable
 - Published March 23, 2012
 - Ensures a level playing field where anticompetitive behavior could undermine safety



FAA ARC: Safety Management



- Recognize existing production SMS elements and update production regulations to add those few elements of SMS that are not already in the regulations
- But what about SMS for design functions?



FAA ARC: Design Organizations



- Right now, there is no need for an organization in order to apply for design approval
 - This inhibits FAA's ability to apply SMS requirements to TC/PMA/TSOA/STC
- Design Organizations
 - increase the safety management responsibilities of DAHs
 - increased ability to approve data or even issue approvals
 - This could REPLACE ODAs with a certificated function



Non-U.S. Models



- Europe has DOAs which can issue their own approvals and certificates
- Canada has a “level of involvement” paradigm in which the government decides how much time it needs to spend on a project to ensure it is done correctly



What Could the ARC Model Do?



- The ARC model would:
 - Reiterate that industry is responsible for safety, and that the FAA is responsible for oversight
 - Enhance continued operational safety
 - Require industry to develop the data that the FAA needs to streamline safety oversight
 - Free up FAA resources from ministerial tasks that can be better used for safety oversight
 - Accelerate issue of approvals and certificates



The ARC Functions Are Important



- The ARC could represent history's single most significant change to aviation manufacturing
 - The regulations MUST reflect the needs of small businesses and PMA manufacturers
- MARPA is proud to have a dozen member-representatives serving on the ARC and its Working Groups
 - This is the broadest MARPA involvement in a rulemaking project EVER



Some Ways to Get Involved



- MARPA has a slideshow of member success stories
 - Parts that increase safety
 - Parts that increase reliability
 - Parts that solve safety problems
- The MARPA Technical Committee is enhancing the slideshow
 - Any MARPA member is invited to submit slides highlighting the technical contributions they've made to the aviation industry



Working Together, Our Potential is Unlimited



- Join a Committee
 - Contact us at KATT@MARPA.AERO
- Stay Informed
 - Sign-up for the MARPA Blog: pmaparts.wordpress.com
- Understand Formal SMS and COS Programs
 - Guidance is available on MARPA's website
- Write about PMA and about MARPA
 - Share your success stories or even write for the blog
- Share your thoughts
 - We need to know what is important to you!



Thank You



Jason Dickstein

Modification And Replacement Parts Association

2233 Wisconsin Avenue, NW, ste 503

Washington, DC 20007

(202) 628-6777 Fax (202) 628-8948

jason@marpa.aero



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