



2012 Gorham PMA Parts  
DER Repairs Conference  
Sarah MacLeod

March 22, 2012

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Association 703 739 9543 • [www.arsa.org](http://www.arsa.org)

Thursday, March 22, 2012

# About ARSA

ARSA has represented the aviation design, production and maintenance industries for over twenty-five years.

The Association is based upon regulatory compliance and has developed expertise in reading, applying, commenting on and improving aviation safety regulations.

The Association brings that expertise to the aviation industry through presentations such as these and on-line training classes.

# About the Speaker

Your speaker is the Association's Executive Director, Sarah MacLeod.

Sarah is an expert in application of aviation safety regulations; she help found the Association and is a practicing lawyer focused on national and international civil aviation regulations and the business relationships that must work within them.

# Legal Fine Print

Disclaimer: This material is provided for educational and informational purposes only. It does not constitute legal, consulting, tax or any other type of professional advice. Law, regulations, guidance and government policies change frequently. While ARSA updates this material, we do not guarantee its accuracy. In addition, the application of this material to a particular situation is always dependent on the facts and circumstances involved. The use of this material is therefore at your own risk.

**WARNING:** Reading and applying aviation safety regulations can be detrimental to your health, personal relationships, small animals and children. Permanent frustration will result, causing lapses in humor, sanity and hygiene.

# Drink Wine; Stop Whining

- A little bit of pontification
  - Alternative parts and materials can be used.
  - The aviation safety regulators *should not care* about—
    - Who owns data.
    - What stupid stuff industry put in contracts.
    - Business information collected, used or needed.

# Drink Wine; Stop Whining

- A little bit of pontification
  - Alternative parts and materials are popular because the original designer and/or manufacturer fails to deliver.
  - If not for the “original” designer and/or manufacturer, we would not be in this room.
  - If the “original” designer and/or manufacturer was perfect, we would not be in this room.

# What's New and Exciting?

- Jason, Michael, Pieter, Andy, David, Peter, Darren and Dominick will brief you in-depth on most of these things, but from ARSA's perspective:
  - The “new” PMA rule cannot and will not be enforced properly.
    - No **production** if you knew or should have known that the article would be installed on a civil aircraft.
    - If your part is listed in an IPC or is being used as an equivalent, you need to be under a production approval
    - Adds at least 20,000 manufacturers to those needing a production approval.

# What's New and Exciting?

- From ARSA's perspective—
  - The “new” PMA rule cannot and will not be enforced properly.
    - Commercial part definition is worthless.
    - Aviation safety inspectors still hate maintenance fabrication.
    - Industry still doesn't understand the ramifications of the “new” rule – Egyptian river is full of rafts.
  - It is the AGENCY's job to enforce parts 3 and 21, not airlines or maintenance providers.
  - Europe (EASA) isn't in any better shape, just a bit more pragmatic.



# What is ARSA Doing?

- Not making new friends that's for sure:
  - Comments on ICA policy—
    - Have not gone to the dark side, merely expressing normal idealism (and being mugged by reality!).
    - Worthless until ICA is actually defined.
    - Don't want an engineer, aviation safety inspector or any "representative" of the FAA looking at and/or trying to interpret contracts.
    - Hey you asked...Having the regulator in your pants will help Jason's career.

# What is ARSA Doing?

- Protesting vigorously issuance of PMAs on “materials”; provided the FAA with—
  - Clear definition of each type of “article,” i.e., products and parts as well as materials and processes.
  - Clear methodologies for “approving” each “type” of article, i.e., TC/PC, TSOA, PMA, as well as “processes” necessary to ensure production and maintenance is performed properly (can’t approve in a vacuum).

# What is ARSA Doing?

- Protesting vigorously issuance of PMAs on “materials”; provided the FAA with—
  - Request to withdraw the PMAs on sealants and never issue another such approval for “materials.”
  - Numerous requests to meet and discuss.
- Started online education for parts 3 and 21 for the maintenance providers and airlines making clear the industry’s responsibility versus the safety regulator’s role.

# ARSA's Wish List for the Decade

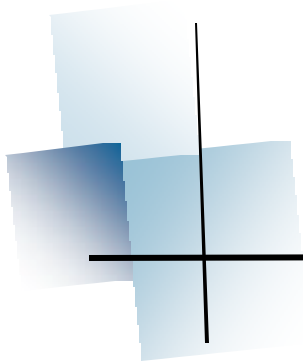
- Rewriting Advisory Circular 120-16 for air carrier maintenance programs—
  - How maintenance must be accomplished, i.e., compliance with section 43.13(c).
  - How maintenance programs are administered.
  - Recognition of contract maintenance by part 145 certificate holders.
  - Reduction or elimination of “audits” for auditing sake.

# ARSA's Wish List for the Decade

- Audits on a diet—
  - Clearly delineate regulator audits.
  - Clearly delineate business requirements.
  - Reduce “required” audits.
  - Recognition of audit standards for:
    - Commercial consumption
    - Regulatory consumption
- Create a part 183 designated organization to recommend part 145 certification and surveillance activities.

# ARSA's Wish List for the Decade

- Create numerous online training classes for industry and agencies.
  - The regulations governing aviation safety.
  - The business of aviation safety.
- Get Sarah out of the office and on the farm; let Crystal, Craig, Paul and the younger crowd with more energy deal with the vagaries of the agencies and the industry.



# Sarah MacLeod

## Executive Director

121 North Henry Street  
Tel. 703 739 9543  
Alexandria, VA 22314-2903

Fax 703 739 9488

[www.arsa.org](http://www.arsa.org)

[Sarah.MacLeod@arsa.org](mailto:Sarah.MacLeod@arsa.org)

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