



THE VIEW FROM WASHINGTON

BY RIC PERI

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100 Months: A Look Back and Ahead

HAPPY 100th RIC PERI

— From Paula Derks, president of AEA

Ric Peri's "The View from Washington" this month highlights his 100th column since joining the Aircraft Electronics Association in March 2001, as its vice president of government and industry affairs. Since then, and with Ric's guidance, the AEA has grown our regulatory representation not only with the Federal Aviation Administration, but also well beyond the U.S. border.

Today, Ric leads our regulatory efforts with the invaluable assistance of our consultants in Canada, Europe and the South Pacific regions. He serves on working groups and rulemaking advisory committees in those regions and presents seminars throughout the world on understanding the regulations.

With the relationships built throughout the past several years in regional district offices as well as regulatory headquarters, the AEA continues to assist our members throughout the world with the issues they face when certifying and installing avionics systems.

Happy anniversary, Ric, and thanks for a job well done.

Yes, you have been reading "The View from Washington" for eight years and four months, making this my 100th column for *Avionics News* since joining the AEA as its vice president of government and industry affairs in April 2001.

They say times flies, and looking back over the past eight years, time has jetted by — but time also seems to have stood still.

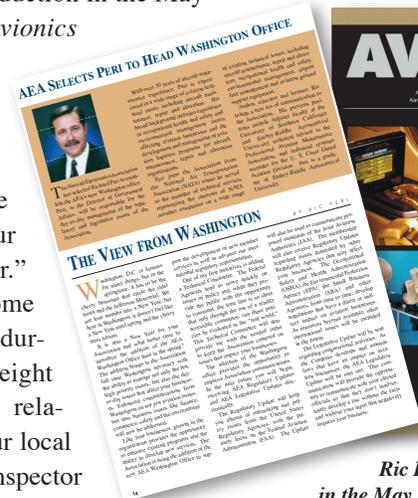
In preparing for this 100th column, it seemed like a good opportunity to look back over time and the 99 columns to see what we were dealing with back in 2001.

After my introduction in the May 2001 issue of *Avionics News* magazine, my column in June 2001 was an overview of working with the local FAA, our "business partner." We have had some ups and downs during the past eight years, but your relationship with your local aviation safety inspector

(ASI) still is critical for the success of your business, and more so for the small business relying on field approvals and the small shop where the owner wears multiple hats.

I think we have made great strides in our relationships, both here in Washington, D.C., and in the field. Where we have seen significant changes, however, has been our need to develop this relationship beyond our ASIs. Our relationships now must regularly include the local district office management and leadership team.

Today, AEA members know the regulations better. The Association



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provides training on the Federal Aviation Regulations during the AEA International Convention & Trade Show and AEA Regional Meetings as well as throughout the year and in *Avionics News*.

And the FAA has promoted the public's right to disagree with an ASI without fear of retribution. This doesn't mean blindly arguing for the sake of argument; that would be foolish. What it means is the AEA's membership knows the regulations as well as the ASIs who have oversight of their repair stations, and having an intellectual disagreement should not result in bruised egos or hard feelings.

The ASIs are trained in how to deal with conflict, and the shops should be more confident in presenting their cases. AEA members are comfortable enough today to raise issues through their ASI to the leadership at the district office, regional offices and, when necessary, FAA headquarters.

The July 2001 magazine column was about the globalization of aviation. In 2001, I was reporting the activities of the 18th annual JAA/FAA International Harmonization Conference. As you might remember, in 2003, the European Commission established the European Aviation Safety Agency (EASA) to develop, promote and regulate aviation throughout the European

Union with one set of European aviation regulations. As a result of this, the Joint Aviation Authorities began to wind down and transfer all rulemaking activities to EASA. Earlier this year, the JAA officially closed its doors with the transfer of operational requirements from JAA and the National Aviation Authorities to the European Commission and EASA.

In 2004, the JAA/FAA International Harmonization Conference changed its name to the Europe/U.S. International Aviation Safety Conference. The theme of this year's conference was: "Global Safety in Challenging Times: How Can We Better Achieve Harmonized Implementation?"

While the AEA participates in this conference every year, 2009 brought us a new opportunity participating on two of the panel discussions. The AEA moderated a panel discussion on airworthiness directives along with panel participants from the FAA, EASA, Boeing, Airbus, Embraer, and Austrian Airlines. This panel looked into the existing cooperative arrangements that have been developed and whether or not these arrangements properly address continued airworthiness throughout the lifecycle of aircraft types.

The second panel took a look at the regulations affecting the approval of changes and repairs to parts and ap-

pliances. The AEA joined the FAA, EASA, Transport Canada, Chromalloy Gas Turbine, and Lufthansa Technik AG on this panel.

The August 2001 magazine column discussed the Aviation Small Business forum and provided a review of the administrative costs to AEA membership created from the arbitrary and often capricious demands of the local ASI.

The burdens facing aviation small businesses created from personal demands of the local ASI and changes to the repair station manual, quality manual and training program cannot be minimized. We still are challenged by these "simple" changes and the accumulative effect of these demands. Despite explicit prohibitions against "wordsmithing," some ASIs still are acting like high school English teachers.

Recently, I dealt with an ASI in Houston, Texas, who took it upon himself to reject the FAA Administrator's repair station training program template. The ASI assumed the template was an AEA-derived template; however, the AEA simply digitized the template the FAA provided in Advisory Circular 145-10.

In defense of the ASI, the FAA's handling of the Repair Station Training

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Program has been anything but stellar. The literal mandate to the ASI is to “approve the program,” while the intended mandate is to “approve the manual” and audit the program. This was poorly communicated, and beyond all of our efforts to help FAA headquarters fix this conflict, the Agency continues to place its inspectors in a precarious situation.

The AEA has spent four years training repair stations to: 1) develop their manuals; (2) develop the program to go with the manuals; and (3) audit their activities to the onerous burden they committed to in their training programs. This cannot be taken lightly with just-in-time updates before an FAA audit; this program must be continuously maintained.

I began the September 2001 column with the following words: “The long-awaited Part 145 rule is now final and is a classic example of successful rulemaking.” Isn’t it ironic, eight years later in the June 2009 *Avionics News* “Regulatory Update,” I would report the last element of the 2001 rule was withdrawn?

When the repair station regulation was finalized in 2001, the FAA had to split the rule into pieces. The repair station training program and the issues the public raised during the original rulemaking couldn’t get resolved. The issues primarily stemmed from the requirement for a quality assurance program and a modern approach to repair station ratings.

The training program was delayed until the guidance and policies could be written, and the quality assurance program and ratings were sent back to the Aviation Rulemaking Advisory Committee to resolve.

The industry, including the AEA, participated in the ARAC and made recommendations to the FAA as to how

to fix the quality assurance and rating issues. However, when released for public comment, it became clear the ARAC didn’t get it any more correct than the FAA had. As a result, in May 2009, the original 2001 rulemaking finally was closed with the withdrawal of the last outstanding elements of the original repair station regulations.

Also in 2001, I was announcing the arrival of Nick Sabatini and Jim Ballowh to FAA headquarters, as well as the arrival of Dorenda Baker to the Small Airplane Directorate in Kansas City, Mo. At the beginning of 2009, I was reporting the retirement of Sabatini and the promotion of his replacement, Margaret (Peggy) Gilligan, to associate administrator for aviation safety; Jim’s pending retirement and his replacement, John Allen, as the director of Flight Standards Service; and the promotion of Baker to director of the Aircraft Certification Service in Washington, after John Hickey was named deputy associate administrator for aviation safety.

In the November 2001 issue of *Avionics News*, we relived the tragic events of Sept. 11, and issued a warning that “every special interest group with a grudge against general aviation will dust off their most recent proposals for safety and replace the word ‘safety’ with ‘security’ and feed on the public fear of this unknown threat called ‘general aviation.’”

It doesn’t take much effort to see the outrageous effects the past eight years have had on general aviation, from the Washington ADIZ to the Large Aircraft Security Program regulation, which would prohibit an aircraft owner from carrying his or her own golf clubs, skis and hunting weapons in their aircraft.

Currently, we are working with the Transportation Security Administration on its long-awaited repair station security program (another effort from special interest groups to restrict trade through fear-mongering, which would have a devastating effect on general aviation).

Last week, I spent a number of hours working on Capitol Hill helping some Congressional staffers to better understand the current aviation regulations so that the Bill being proposed by the Senate as part of the FAA Reauthorization might be technically correct and not add additional burden to aviation small businesses.

Many of the proposals offered by some of these “special interest groups” are already contained in Part 145, while their public interest is in airline safety (i.e. Part 121). Fortunately, we have been able to make a little progress in helping Congress to better understand the current regulatory structure.

We concluded 2001 with a “declining world economy, more layoffs and growing opportunities.” I wrote about commercial air travel “rapidly becoming the service-free utility” and the airlines’ efforts to “continue the reduction of services that they have determined unnecessary and costly.”

I find it interesting these reduced services now are considered the norm in commercial air travel. Earlier this week, I read an article in which the trade association representing the airlines justified the per-service charging for bags and blankets by comparing them to hotels that charge customers for raiding the mini-bar.

As in 2001, every time the airlines open their collective mouths to whine about the cost of providing the goods and services airlines are supposed to provide as a function of commercial air transportation, it creates an opportunity for us to promote the flexibility, security and convenience of general aviation flight.

It has been a great 100 months. Thank you all for your help and support. I’m looking forward to the next 100! □

If you have comments or questions about this article, send e-mails to avionicsnews@aea.net.