



THE VIEW FROM WASHINGTON



BY RIC PERI

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What First Impression is Your Inspector Getting From You?

I am having my morning coffee at a Hilton hotel in Edinburgh, Scotland, watching the breakfast chef scurry around cleaning, wiping and arranging the breakfast buffet table. I hadn't noticed it yesterday, but when I walked into the restaurant today, I found the total package to be quite appealing — starting with the spotless floor as I approached the host stand and the neatness of the tables we passed on the way to our assigned seating. Then, there was the friendliness of the breakfast chef and the arrangement of his buffet. I hadn't consciously noticed the table yesterday, I simply felt very comfortable sampling the options that were presented.

This morning, I sat a few rows back from the buffet and centered so I could watch this technician perform his tasks. When the chef finished a task, he immediately cleaned up around his work center. Then, when there was a lull in the Saturday morning onslaught of rugby guests, he busied himself making sure the presentations all were clear and clean, the serving utensils all arranged facing the same direction (sorry, lefties, they all were pointing to the right),

and relentlessly wiping down the customers' view of his work center. He did all this to make the best first impression possible and, I suspect, to conform to Great Britain's food safety standards.

For the regulator who walks into this restaurant, the first impression of this chef's shop is one of clear, well-managed and well-controlled food presentations from a master technician.

Now, I'll ask the question you

I remember a few years ago when a long-time "local" inspector transferred to another district and left the local office without a GA avionics inspector. After a couple of months, the "new guy" showed up. Within a few months, AEA members were up in arms over the unreasonable treatment from this new ASI toward the GA avionics industry.

These AEA members got together and conducted a local meeting to discuss the FAA's treatment. During this

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knew was coming: What is the first impression the regulator gets when he walks through your shop's doors?

Allow me to add one more caveat: What is the first impression of the FAA ASI who knows nothing about you or your business? This is where the challenge lies. Whenever I receive calls from members, it usually is when their long-time inspector retires and they get a "new guy" who wants wholesale changes.

meeting, we talked about how the bar had been raised and how this new ASI was over the top. The recommendation was to get together with the FAA district office and meet with the office manager and the inspector.

I attended this meeting and found it to be very interesting. The root cause: perceptions and first impressions. I found both sides had valid concerns.

The shops saw a paradigm shift from their original long-time local

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mechanic turned FAA ASI. The local ASI had grown up with most of these shops and personally knew the managers and technicians. He knew their quality of work and had a deep personal knowledge of their operations, limitations and strengths. Using this personal knowledge, he could allow more generic descriptions of repair station processes in their repair station manuals. In addition, the ASI was well versed in the latest GA avionics technologies and installation processes, so he could field-approve alterations without volumes of repetitive installation manuals being submitted for each installation package. Plus, the local ASI knew the value and accessibility of installation manuals on the AEA’s website, which saved the shop and the inspector hours of time and tons of paper.

Without any overlap when the long-time local inspector transferred and the new inspector reported for duty, there was no passing down of local knowledge; so, the only thing the new inspector could rely on was his first impression of the shops during his first shop visits.

And his first impression wasn’t stellar.

He visited a couple of shops and found a great deal of deviation. I’m hesitant to call them “violations” because they typically were truly small issues — but they were deviations from the technical reading of the regulations. There was no question about the technical quality of the products, but there were sloppy administrative processes.

The alteration packages were slight, and they were missing what the inspector considered critical information. When I looked at the installation packages, considering the inspector didn’t have any background knowledge of the shops or the quality and completeness of their work, in my view, the shops were asking the inspector to “sign a blank check.”

So, what is your new inspector’s first impression of you?

When he first meets you, do you show him not only technical competence, but also regulatory comfort? I can’t remember ever talking to an AEA member who didn’t radiate technical competence. And I’ve never reviewed an FAA-issued Letter of Investigation that cited technical incompetence; rather, some deviation from the regulations or paperwork is cited.

The first impression an inspector needs is a balance between technical competence and regulatory comfort.

Never say to an inspector, “I just don’t have time to keep up with the regulations.” This is a surefire way for the inspector to focus more on your shop.

I remember growing up in my dad’s garage with him constantly telling me, “There is a place for everything and everything should be in its place.” So, what does the inspector see when he walks through your front doors? Does everything have a place and is everything in its place? Do you know where everything is?

I have the privilege of visiting AEA member shops around the world. Some shops use the latest in customer service waiting rooms: Well lit and laid out, spotlessly clean and organized, with the latest copies of trade magazines and, of course, extra copies of the AEA’s *Pilot’s Guide to Avionics* and *Avionics News* available in the lobby. (You do order extra copies of the *Pilot’s Guide to Avionics* for your customers and your pilot’s/customer lounge, don’t you?)

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On the other end of the spectrum, I visit shops that rely on long-time customer relationships and word-of-mouth business growth. There are pieces and parts on every shelf on every wall, and there is no rhyme or reason to the few new components they offer for sale. Although originally designed with small reception areas, some of these shops have expanded to the point that when you walk through the door, it immediately feels like there is no reception area.

While you might know where every piece and part is, where the new stock is, where the replacement parts are, how you segregate completed repairs from pending work, it isn't obvious to the novice inspector who just walked into your world. A world in which he or she is tasked to ensure your operation is in regulatory compliance, the paperwork is properly filed, and the products you produce are technically valid.

And what about that first alteration package?

As many of you know, my least favorite words are: "My inspector says..." When you file for a first field approval with your new inspector and she rejects your first draft, do you answer with: "According to 14 CFR Part 43, Appendix B, and FAA Advisory Circular 43.9-1F, 'Instructions for Completion of FAA Form 337,' it says..." Or do you answer with, "Well, my last inspector required..."

The first option — 14 CFR Part 43, Appendix B, and FAA Advisory Circular 43.9-1F, "Instructions for Completion of FAA Form 337" — tells your inspector you are comfort-

able with the regulations, you are less likely to get your inspector in trouble with sloppy paperwork and you inspector probably doesn't need to micro-manage you administratively.

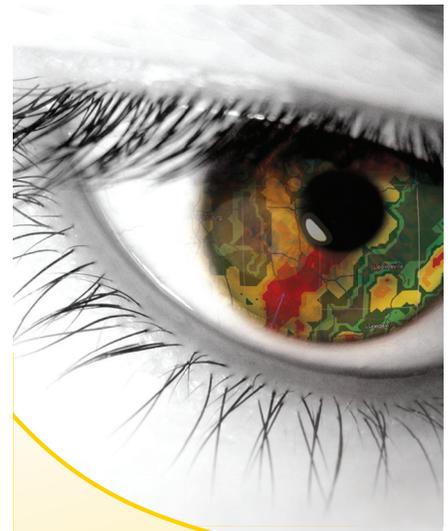
On the other hand, if you answer with: "My last inspector required....," your new inspector knows you don't know what is required, and if they don't micro-manage you administratively, they likely will have problems in the future. It might not be true, but this is your inspector's first impression, and now you will spend the next few months or years proving this impression wrong.

So, what is the first impression you leave with the new inspector? Is it one of confidence and security, or is it one of technical competence with little regulatory background?

This isn't a one-sided issue. What is the industry's first impression of the new inspector? In the case of the problem with the local inspector a few years ago, the new inspector had terrible "bedside manners." He was easily frustrated, and the more the shops challenged him, the more defensive he became.

While the industry works on communicating better and making sure its first impression is one of confidence and competence, I challenge the agency and its employees to make a first impression of confidence, competence and compassion. We are in this together and, on the whole, our greatest deficit is poor communication, which starts with that first initial impression. □

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