



THE VIEW FROM WASHINGTON

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Branding

Looking beyond 'logos' to find critical elements

Recently, I participated in an FAA Repair Station Training Program providing an update on recent changes to the regulations, a discussion of common errors in repair station audits, and a review of a few of the basic regulations. Originally, I was asked to include human factors in my presentation; however, as the schedule came together, the FAA offered a dedicated human factors presentation.

I found the exchange between myself and the FSDO representative scheduling the program very telling. Although an overview of changes to regulations, a discussion of common errors and a review of basic regulations all are listed as elements of the recommended human factors portion of the Repair Station Training Program, because it wasn't branded as human factors training, it wasn't considered human factors training.

It reminded me of a recent shopping trip with my teenage son for a pair of jeans. I was looking for durable, reasonably priced denim pants, but he was looking for the latest brand. As a result, the jeans I recommended simply weren't jeans until we found a pair with the appropriate logo.

Sometimes, it seems as though the regulatory authorities are more concerned about promoting their brand than the elements of the product they are trying to im-

plement. Some of the common brands we are dealing with today are SMS, FRMS, QMS, human factors, and the list goes on.

I remember a few years ago, when we were working on the "Quality Assurance and Ratings" piece of the rewrite to the repair station regulations, the FAA representative insisted the repair station must have a quality assurance system. He had the brand in his mind, and no matter how much discussion we had about "what" he was looking for, unless we labeled the change a "quality management system," he simply couldn't accept the proposed compromises.

After a few weeks of discussions, we listed all the elements of a traditional quality management system, then we performed a gap analysis between the existing requirements of 14 CFR Part 145 and the elements of a QMS. The result was the addition of only two or three additional elements to the existing Part 145 requirements and Part 145 would be a QMS.

It took months of work, but finally, we were able to show the FAA representative he succeeded by upgrading Part 145 to achieve his goal without his preconceived ideas of the QMS brand.

Getting back to the branding of human factors training, the FAA states in Advisory Circular 145-10, "Training in maintenance human factors is an essential part

of an FAA-approved training program." It continues to recommend that "a human factors training program should be related to maintenance practices where possible."

The AC further discusses some of the elements that should be included in human factors training, such as including an introduction to human factors, a discussion of accident statistics, organizational safety culture, and the types of errors in maintenance tasks before they get to human performance, limitations and reliability.

In the April 2007 edition of *Avionics News*, Dr. Bill Johnson wrote that for "more than a decade, the term PEAR has been used as a memory jogger, or mnemonic, to characterize human factors in aviation maintenance." Johnson explained each letter of PEAR, with "R" representing the "resources" necessary to safely and efficiently perform the requisite maintenance task. Johnson defined resources as "anything a technician (or anyone else) needs to get the job done."

When looking at the triggers for training under Part 145 — changes in the repair station's scope, equipment, error mitigation, regulations or personnel — all of them provide a need for recurrent training. Aren't these resources a technician needs to get the job done correctly? Isn't a review of the paperwork requirements part

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of doing the job correctly? If this is true, when we teach elements that meet the definition of at least one of the characteristics of human factors in maintenance, why is the training not considered human factors training? Is it simply because the training isn't branded as human factors training?

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If you have had the opportunity to hear FAA Administrator Randy Babbitt speak about safety management systems and how SMS will enhance safety, you might have walked away ready to embrace the concept; however, he speaks about specific elements of SMS, such as data collection and risk mitigation based on the data. To him, the brand means better data and responding to the data.

Recently, the FAA announced its adoption of SMS in air traffic management as a tool to make strategic decisions about NextGen. These two SMS-branded products are different.

To clarify our position, the AEA is not against many of the elements offered in the various SMS-branded products. SMS offers a good method of compliance for the strategic decisions already required under the Part 145 regulations. The con-

cept of capturing incident data that would impact the safety of the aviation system as a whole is a logical next step in improving our nearly perfect safety record. It is the branded product of SMS that concerns us.

The SMS brand is attached to at least a dozen different products in aviation alone. If you talk with any two regulators, you will hear at least three different (often broad-based) descriptions of what SMS includes. Add these to the various SMS products the FAA offers and the industry SMS products currently offered by national and international associations. They all are different.

There is not one concise definition of SMS. ICAO is the closest; however, its recommendations are so broad-based, the implementation has been across the entire spectrum.

In review of the comments of the advanced notice of proposed rulemaking, it was clear those who supported or saw benefit in SMS were talking about their brands of SMS, not necessarily the FAA's brand.

Another "branded" product beginning to circulate throughout the industry is fatigue risk management systems; yes, yet another "system."

Fatigue and the effects of fatigue are elements of human factors, and flight operations folks have had fatigue manage-

ment regulations in place for more than 50 years, but none of this has prevented fatigue from being a causal factor in accidents. Therefore, the regulators have devised this new branded system to fix the problem.

The interesting fact of the fatigue debate is that the regulators have never bothered to ask, "Why was the employee tired?" In most cases, it wasn't driven by the employer insisting on overtime, but rather choices made by the employees — something that might not be an option under fatigue risk management systems.

Each of these branded systems cost money. The AEA continuously asks the regulators to simply incorporate the necessary elements of human factors, safety management systems and fatigue risk management systems into the existing regulations rather than adding more programs. You only can layer so many programs on the backs of small businesses before their back buckles.

As we move forward, we must find a way to adopt the critical elements of these branded programs so they are durable and reasonably priced without focusing on the logo attached to them. □

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