



# THE VIEW FROM WASHINGTON

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## From Oshkosh to London and Points in Between

**T**his year's EAA AirVenture in Oshkosh, Wis., was a remarkably busy time. The crowds were solid and aircraft met or exceeded nearly everyone's expectations. While there were no "home-run" announcements this year, there were plenty of companies — both old, established bell weathers and new start-ups — introducing new products or enhancements to their current product lines.

Another remarkable part of Oshkosh 2008 was KidVenture, which is the EAA's outreach program to introduce kids and young adults to aviation. This is no slouch operation. With more than 24,000 kids passing through the tents, hangars and buildings at Pioneer Airport — the antique field on EAA property — this is a serious outreach program.

Last year, the FAA expanded the traditional operations-based KidVenture to include an introduction to basic aircraft maintenance issues. Various stations were set up for basic maintenance tasks, such as safety wire, torque and general hardware, as well as specialized stations for engines, avionics, electrical and instruments.

The AEA assisted the FAA this year in staffing the instrument station on Friday during AirVenture — thanks to AEA board member Al Ingle of Capital Avionics for his four hours of support. Next year, the AEA hopes to staff the entire electrical, avionics and instrument stations for the entire five days KidVenture is operating. With 24,000 prospective avionics technicians passing through the doors, how can we not?

### Heading Home with Stops at AEA Member Shops

The return from Oshkosh to my home in Baltimore, Md., was again via my BMW R 1150 RT motorcycle with a number of AEA member visits during the trip. While visiting with members, a number of issues were raised, such as applicability of STCs; installation of AirGizmo's mounting system for portable GPSs; youth outreach; and the limitations of local FAA approvals.

### Applicability of STCs

The applicability of STCs is an issue continuing to pop up from time to time. In this case, a customer had a discrepancy with an installed electronic engine monitor, and he wanted to upgrade rather than simply replace the defective monitor. A non-avionics A&P technician upgraded the system as the customer requested without reading the fine print in the STC and type certificate data sheet (TCDS).

It was an AEA member who discovered the error and notified the customer. I hope the AEA member filed a report with the local FAA office. If A&P mechanics are performing avionics work they shouldn't be doing, it is up to the avionics industry to bring it to the attention of the FAA. Whether or not they act on the information, it still should be reported.

In the case of the STC, it specifically stated this system could not be used to replace "required" equipment in this particular model of aircraft, and the TCDS specifically called out this instrument as a required piece of equipment.

There is more to acceptability of alterations and equipment installations than form and fit. The equipment must function properly when installed; the equipment already in the aircraft must continue to function properly; and the equipment must meet its intended function.

In this case, the equipment functioned properly and didn't negatively impact the installed equipment. However, because it was not approved as a replacement for a required instrument, it did not meet its "intended" function and should not have been installed.

### Mounting System Installation

Another issue raised on my return trip was of the installation of the AirGizmo mounting system. The AirGizmo system is forward-fit and approved as part of the type certificate of the American Champion Aircraft.

In talking with the folks at AirGizmo, there are a number of initial approvals in the pipeline, which should be finalized in the next few months. The bottom line: The equipment has been demonstrated to conform to Part 23.

For installers, evaluate the installation and determine why the installation is a major alteration. If you cannot justify by regulation why the installation is a major alteration, it must be minor. Remember, as an AEA member, if you need to review evaluating an alteration, you received the training CD titled "Architecture of an Alteration." This training CD covers the evaluation of an alteration and the

determination of major or minor from a regulatory perspective.

## Youth Outreach

Among one of the more pressing issues raised during my visits with members was youth outreach. Following my participation in this year's EAA Kid-Venture in Oshkosh, these were timely discussions.

During EAA AirVenture, Marshall Puckett, an AEA member, raised the issue of youth outreach with myself and other members of the AEA staff, and he offered a number of valuable suggestions.

One of the stops on my trip back home was with AEA board member Rick Ochs of Spirit Avionics. We talked about his youth outreach activities with the state of Ohio's Youth Aviation Adventure program ([www.youthaviationadventure.org](http://www.youthaviationadventure.org)).

This discussion brought to mind Stark Avionics' John Stark's youth outreach program. Stark participates in a home-school co-op of sorts, where all of the home schools in his region come together once a week and meet for sports, art and science. Stark developed and teaches a science class on avionics and electricity.

Another champion of youth outreach is Don Dominguez of San Luis Avionics. His Youth in Aviation program was featured in the August issue of *Avionics News*.

In addition to these programs, the AEA works year-round on its successful Educational Foundation, having provided more than \$1 million in scholarships to students.

These programs made me wonder how many other AEA members and their employees participate in youth outreach educational programs. I participate with the FAA on youth outreach for the aviation maintenance trades, and I would like to put together a report on AEA members' activities for the FAA.

If you or your employees are engaged in a youth outreach and/or educational program, send an e-mail to me at [\[aea.net\]\(mailto:ricp@aea.net\) and let me know the particulars.](mailto:ricp@</a></p></div><div data-bbox=)

If you are involved in these types of extracurricular activities, have you submitted for the FAA's Avionics Technician of the Year honor? These above-and-beyond activities separate the "average" technician from the best. I'd like to see every avionics technician who gives back to the industry and their communities apply for recognition from the FAA, the industry and their peers.

## FAA Approvals

One of the last issues raised during my trip regarded FAA resources. The long and the short of it is, local FAA resources are stretched to the max and they often are not technically qualified to approve alteration data for much of the newer technology.

However, just because the local FAA office is not comfortable with helping you with a field approval, it does not mean the project rose to the level of an STC. Remember, 14 CFR 21.113 specifies when an STC is required — that is, when the applicant is proposing a major change in type design.

Only about the top 5 percent of major alterations rise to the level of a major-type design change. If your local FAA office cannot perform the field approval for any reason, look to a DER before getting bogged down in the "coordination" between the local Flight Standards Office and the regional Aircraft Certification Office. Some work very well and have quick turnarounds. Others are overworked and understaffed, and they can take months to accomplish a project. A DER often is a quicker and cheaper alternative.

## A Detour to Europe

Now, to continue eastbound to Europe. In August, the AEA hosted a meeting in London regarding B-2 licensing. The AEA has been working closely with EASA for a number of years regarding engineer licensing and the challenges raised by AEA member companies.

Following the last SSCC meeting in June, I met with EASA representatives

about an alternative plan for type training B-2 engineers. EASA regulations call out more than 100 required general aviation aircraft type ratings for which there are seven approved aircraft type-training courses available.

Thanks to Franz Redak, the AEA's European regulatory consultant, and his work in developing the Part 147-approved training organization report for the AEA, it has the only complete source of European-wide training resources, which shows EASA the true deficit in GA training. Even EASA admitted this is a problem.

There is an often-overlooked regulatory reference to an alternative means of type qualifying an engineer through the resources of a Part 145. EASA concurs that the alternative is viable but has not been utilized.

We are working with the U.K. Civil Aviation Authority and local AEA members to work out the details and processes for this alternative and, hopefully, we will be able to report our success at the AEA Europe Meeting in May 2009.

Another issue raised in London was the U.S. FAA certification of European repair stations. There are some distinct differences between EASA Part 145 and FAA Part 145.

Your membership in the AEA allows you access to advice and consultation on U.S. regulations and European regulations. A shop in London took advantage of this and scheduled a consultation meeting with me during my visit to London, and we reviewed its FAA Part 145 ratings and qualifications. The shop was not taking full advantage of all of the benefits of its FAA certificate.

While Washington is abuzz with the presidential election season and most regulatory issues have ground to a stop, we still are working field issues and bettering our systems during the Washington recess. □

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*If you have comments or questions about this article, send e-mails to [avionicsnews@aea.net](mailto:avionicsnews@aea.net).*