



Negotiating the Barriers to PMA Usage

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MARPA



- Trade Association representing PMA parts manufacturers
 - Government affairs
 - US, EC, Canada, Singapore
 - Interested in working with other governments to support aviation safety
 - Promote safety
 - Share information throughout the industry

Regulatory Challenges



- In the US, the FAA has harmonized the production quality standards for PCs & PMAs
 - Final Rule published 16 October 2009
 - Single quality rule: 14 C.F.R. § 21.137
 - Airworthiness regulations have always been the same
- In Europe, there are few remaining regulatory challenges for PMA parts
- Most other nations appear to have a path for PMA approval

Know the Facts



- Where is the aircraft registered
 - Laws of the country of registry usually govern
- Where was the part produced
 - The US is not the only country issuing PMAs to manufacturers
- How does the part fit into the legal structure

Know the Law



- Bilateral agreements provide acceptance of FAA-PMA parts made in the United States
 - Forthcoming EASA-FAA bilateral will provide better guidelines for acceptance of PMA parts
 - Argentina Australia Austria Belgium Brazil Canada China Czech Republic Denmark Finland France Germany Indonesia Israel Italy Japan Korea Malaysia Mexico Netherlands New Zealand Norway Poland Romania Russia Singapore South Africa Spain Sweden Switzerland United Kingdom



Know the Law

- EASA Decision 2007/003/C (16 July 2007) approved three categories of FAA-PMA parts:
 - Non-critical parts
 - PMA by Licensing Agreement
 - Design approval from EASA (e.g. STC)

Critical: a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section of the PMA ICAs

PMA in Other Nations?



- In general, an Air Carrier can work with its NAA to amend its maintenance manual to permit the use of PMA parts
 - Based on an engineering finding that the PMA parts return the aircraft to a condition equivalent to type design
 - E.g. RAC 43.13(c) (Costa Rica)
- In some nations, the regulations permit the use of PMA parts based on (1) the airworthiness authorization (8130-3 tag), and (2) a finding that the PMA parts meet appropriate regulations
 - E.g. RAC 9.4.1.4. (Republic of Colombia)
- The engineering data to support such findings are often available directly from the PMA manufacturer



Leasing

- “Assessing the problems posed by leasing contracts”
- We need to stop looking at leasing companies as an impediment and start looking at them as business partners
- Contract language is not a brick wall – it is an agreement between commercial partners designed to protect both sides of the transaction

What Do Leasing Companies Want?



- The purpose of a leasing companies is to generate revenues from assets
 - They want to maintain asset value
 - The perception that PMA parts diminish asset value is rapidly diminishing in most other sectors of the aviation industry
 - PMA parts are approved to the same standards as TC/PC parts
 - The asset continues to perform as expected
 - They want to maintain (or increase) revenue streams
 - Can we find a way to use PMA to increase leasing company revenue streams?

Partnering with the Leasing Companies



- How can we work together?
 - Demonstrate that the asset does not lose value
 - Share the supporting engineering data
 - Identify the source of misplaced value perceptions
 - Show that PMAs should no longer limit future use
 - Entice leasing companies to share the savings
 - Recognize the ways for leasing companies to share in the PMA savings
 - Increase leasing company profits while reducing an air carrier's maintenance costs – it is a win-win scenario

Places to Find Answers!



- FAA
 - www.faa.gov
 - www.faa.gov/aircraft/air_cert/design_approvals/pma
- MARPA
 - www.pmamarpa.com
- MARPA Continued Operational Safety Program
 - pmamarpa.com/website/cos.html
- PMA Parts Blog
 - pmaparts.wordpress.com

Need More Information?



- We will hold our tenth annual membership meeting to share information about PMAs
 - New technologies
 - New FAA policies
 - New safety initiatives
 - New export strategies
- All are welcome!
 - October 27-29, 2010 in Las Vegas, USA
 - Information online: www.pmaparts.org



Thank You

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