

# The MARPA Supplement

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## Quick Notes:

- The 2009 MARPA Conference will take place Sept. 30-Oct. 1 in Las Vegas! Sponsorship opportunities are going fast!
- Gorham's PMA- DER Conference will be in San Diego. Mar. 26-27.
- See the MARPA Blog at [pma-parts.wordpress.com](http://pma-parts.wordpress.com) for expanded versions of supplement articles as well as discussions of:
  - ◇ Developments in Safety Management Systems
  - ◇ Search for a FAA Administrator



## RAFT Report Published; Report Supports PMA

The FAA has published the Repair, Alteration and Fabrication Team (RAFT) Report. The Report was commissioned to investigate claims that things like PMA parts and DER repairs are inferior to OEM products and repairs. The FAA pointed out that many of these allegations are rooted in the OEM claims made against their competitors.

Generally, the FAA found no systemic problems among aftermarket solutions developed in compliance with the existing FAA regulations. PMAs and

DER repairs do not raise any special safety issues. Instead, the FAA stated that

*"A major driver of the debate between TC/PC holders and non-TC/PC holders over the integrity of repairs and replacement parts is the economic business competition between them."*

The FAA implies throughout the Report that OEM complaints about PMA parts are disingenuous. As an example, the Report cites the fact that OEMs may be hypocritical in the

standards that they apply to PMA parts:

*"The AVS RAF Team was aware that some TC/PC holders have purchased companies that are repair stations and/or held PMA and STC approvals. Following such acquisitions those PMAs, major repairs, and STCs at those facilities they now owned were suddenly OK."*

The full report is available on MARPA's website under the Government Affairs tab.

## 2009 Conference: Early Registration Benefits

For 2009, MARPA is offering special Conference registration discounts for MARPA members who are able to renew their membership early and also plan to send a delegate to the Conference.

Specifically, if you renew your 2009-10 MARPA membership before April 30, 2009, and you register your company's first attendee at the same time, then

you will receive a \$100 discount on registration.

This \$100 registration discount is **in addition to** the early-bird registration discount and the member discount.

MARPA is already in the process of lining up the speakers—we've already spoken to a few new faces addressing some topics that we haven't addressed in the past, like advances

in machining technology and the latest trends in reverse engineering. We also plan to have economic updates (very necessary in the current economic climate) as well as discussion about the latest FAA policies affecting PMA manufacturing.

This is a conference that cannot be missed by anyone serious about PMA. Discount details can be found on the website.

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# FAA Safety Management Systems Initiatives

The FAA has kicked off new efforts to develop and implement Safety Management Systems (SMS).

The U.S. government has been working for several years on SMS, which is a system in which companies identify risks, quantify the likelihood of the risks, and then use this data to correct (or at least prevent) the risks.

SMS came from a proposal issued by the International Civil Aviation Organization (ICAO). The ICAO proposal lays out the fundamentals of SMS, including the recommendation that SMS should include four primary elements: a SMS policy (that provides the structure underlying the SMS program), Safety Risk Management (identifying hazards and assessing risk), Safety Assurance (developing responses to hazards in proportion to the risks posed), and Safety Promotion (promoting a culture that encourages the sort of data reporting and data collection that will be necessary in order to develop data that will support Safety Risk Management)

After several false starts on SMS, the FAA has decided to seek a wider variety of ideas about how to implement SMS.

MARPA is participating on the FAA's Aviation Rulemaking Committee (ARC) for SMS. Jason Dickstein and Steve Szpunar are representing MARPA's interests on the Committee.

The FAA is also providing briefings to the industry on its plans with respect to SMS. Mark Fulmer of the Engine and Propeller Directorate spent a day with MARPA members on February

26<sup>th</sup>, discussing the FAA's SMS vision. This meeting was like most of the meetings we have with the FAA—an open and positive exchange of ideas.

FAA realizes that some of their regulations are out of date and that there are gaps in the regulations; however some FAA employees have discussed trying to include additional issues in an SMS rule as a mechanism for filling those gaps. Thus, there are discussions concerning the addition of supplier control (and extension of your SMS to the supplier), and control of outsourced maintenance.

So while SMS *could* be a simple issue of predicting your hazards, assessing them and addressing them, instead many government authorities are looking to SMS to “fill the gaps” and correct issues that do not have any relationship to SMS as the system has been described by ICAO.

Because the process of using SMS to address unrelated safety issues is both highly tempting and rather likely to make SMS impossible to implement across a broad spectrum, the ARC has expressed the need to identify what they feel lies at the Core of SMS (and to distinguish the core of SMS from the extras that might be desirable but are not necessary to implement a SMS program).

Recognizing their natural tendency to add copious additional detail, the government has chosen to enlist the aid of industry in order to parse through this issue and find a SMS solution that increases safety across the board while also remaining implementable.

## Who Can Support this Configuration?

A number of people have shared with us different incorrect statements made by large manufacturers to the disadvantage of the PMA community. These anecdotes ultimately lead MARPA to the complaint letter we filed with CFM last year.

I was in attendance at a meeting this week when another inaccurate statement was presented.

The OEM in question presented a slide featuring a cut-away view of an engine, and positing that OEM parts, two different sets of PMAs parts, and a change to type design pursuant to an STC could all be found in the one engine. The caption at the bottom professed that “No one has the data to support this configuration.”

But when I asked about the practice of configuration control exercised generally by air carriers, he admitted that he meant manufacturers. Air carriers in the audience confirmed that they review all PMAs and STCs before implementation for configuration control purposes. They also noted that they have approached PMA companies for engineering support and found the PMA companies to be highly responsive and supportive.

**Mark your calendar! The 2009 MARPA Conference is scheduled for Sept. 29th-Oct. 1st. Find out more information online at <http://www.PMAMARPA.com>!**

Got something to say? You can read and comment on articles on the MARPA Web Log (Blog) online at [pmaparts.wordpress.com](http://pmaparts.wordpress.com) or through our homepage ([www.pmamarpa.com](http://www.pmamarpa.com)). Sign up for updates via email or RSS feed!