



## MODIFICATION AND REPLACEMENT PARTS ASSOCIATION

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Dear Mr. Cavuto;

On December 19, 2007, you interviewed Mary Schiavo, a private sector attorney (and former DOT Inspector General) about engine failures in 737 aircraft. During that interview, she stated *"If you go through a number of overhauls, a lot of work on the planes, you get aftermarket parts, you get parts that have been worked on, you increase the risk and the danger."*

Ms. Schiavo's suggestion, that aftermarket parts increase risk and the danger to aircraft, is false. The airworthiness regulations implemented by the Federal Aviation Administration prevent her statement from being true, and the real-world evidence belies her statement as well.<sup>1</sup>

The FAA's approval and oversight of the aviation aftermarket community makes it different from many other aftermarket communities. While other industries can reasonably claim that the aftermarket fails to meet the quality standards of the original equipment, the aviation industry's PMA community enjoys an extremely high safety history because of the FAA's rigid regulatory control.<sup>2</sup>

By airing erroneous information about the aviation aftermarket, like the unsupported fabrication that aftermarket parts increase the risk and danger to aircraft, Fox News does a disservice to one of the safest industries in the United States.<sup>3</sup>

Our Trade Association's Board features some of the leading experts on aviation safety. We would appreciate an opportunity to rebut Ms. Schiavo's comments in a forum comparable to the one in which her comments were made.

Very Truly Yours,

Jason Dickstein  
President  
Modification And Replacement Parts Association

## ENDNOTES

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<sup>1</sup> In practice, there have been only a small handful of aircraft aftermarket part failures. These small number of failures have been well-documented. The two well-known failures in the history of PMA parts were related to (1) a failure in the original equipment that also existed in the aftermarket parts due to design similarities – it was found that there had been a significant number of original equipment failures that had never been announced to the public before the PMA part failed, and (2) an unanticipated and poorly communicated change in the design of an original equipment product (which induces dissimilarities that made the competing aftermarket parts unacceptable for use).

<sup>2</sup> US regulations require that aftermarket aircraft parts be produced under FAA design-and-quality-assurance approvals, called Parts Manufacturer Approvals (PMAs). 14 C.F.R. § 21.303. The FAA applied rigorous requirements to such applications to make sure that these aftermarket parts will meet or exceed the standards that applied to the original aircraft. See FAA Order 8110.42B. Where safety standards have increased over time, design changes will only be approved when they meet the new safety standards, so aftermarket parts that represent design changes must meet the most up-to-date safety standards even if the original equipment did not meet those standards. 14 C.F.R. § 21.101(a).

<sup>3</sup> For many years, large manufacturers have cast aspersions on the PMA community for competitive reasons; they found that the real-world data did not support their safety claims and in recent years, some of those same large manufacturers have recognized the value that PMA parts bring to the community and have begun to join the PMA community.