



THE VIEW FROM WASHINGTON



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Are You Taking Advantage of the AEA's Training?

Recently, I finished a two-day regulatory course on developing and drafting rules. I know what you're thinking: Ric leads such an exciting life, right? Two days of dissecting rule-making, from the basic issue of identifying a problem to justifying the dozen or so laws, regulations and policies the agency must resolve as a basis for rulemaking, then measuring the effectiveness of the final answer, the proposal. Exciting, right?

Perhaps not, but this two-day course is representative of what I regularly do as part of my job. Why would I take two days out of my business schedule to review something as mundane (and painful) as Rulemaking 101? Because, like you, I can benefit from refresher training, too.

In fact, I routinely attend more than 100 hours of training throughout the year. I attend a dozen or so FAA IA seminars, usually as a speaker, and I'll sit through as much of the other training as possible. I attend countless meetings and conferences where the regulations, guidance and policies are being reviewed, updated or simply written. I also attend our own AEA-hosted functions: regional meetings, annual convention and, if schedules permit, the on-site training courses offered at AEA headquarters in Lee's Summit, Mo.

On a near-daily basis, I read, review and debate the regulations, guidance and policy affecting avionics manufacturing and certification, repair stations and technicians. On a monthly basis, I try to attend

In fact, all of this is continuation training. All of this meets at least some of the training requirements of 14 CFR 145.163. What you probably haven't done is written a plan to include these processes.



some form of business training to better understand the implications of change on the business aspect of aviation.

I hope all of this sounds familiar. I'm sure you do at least some of this yourself. However, you might never have linked the "what you do to stay competitive" actions with "FAA-required recurrent training."

Let me clarify the difference between "nice-to-have training" and "what the FAA actually mandates." The FAA mandates training for A&P mechanics and repairmen. The FAA requires initial training for each and refresher training for repairmen. However, best practices, as well as practical experience, would dictate both

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an A&P and a repairman not only need refresher training, but also refresher training.

The challenge we face is the “brand” the FAA puts on training. Depending on who is providing oversight of the repair station, the FAA may or may not recognize the training the mechanics and repairmen receive. Everything the AEA does contains training: this magazine, the annual convention and trade show, the regional meetings around the globe, and our online training. Everything we do falls into the category of “continuation training.”

Some training does need to be specific. For example, I am required to attend FAA FAAS-Team refresher training every year to maintain my appointment as a FAAS-Team representative. As such, this training is specific, not unlike the specific training the FAA offers annually for DERs. On the other hand, mechanics and repairmen need both specific and general training.

A technician should have specific training on new technology before working on the new technology. According to the FAA, however, an “acceptable means of compliance” for this requirement can take the form of formal training, computer-based training, self-study or nearly anything in between. A technician also needs specific training on new test equipment, changes to the organizational processes (manuals), and changes in the regulations, guidance and policy affecting a new piece of equipment.

Where do you learn about changes to regulations, guidance and policy? Easy

enough: right here in the pages of *Avionics News*, as well as the hundreds of hours of formal training the AEA offers each year at regional meetings and its annual convention and trade show.

One of my priorities at the AEA is to be your eyes and ears for regulatory changes. Why would 1,300 member companies of the AEA collectively spend no less than 1,300 staff hours daily reading the Federal Register and the FAA's webpage for changes when I can do it once for all of you? I spend an hour each day saving each of you independently an hour. And when a change does take place, it gets published in the “Regulatory Update” section of this magazine and, if it is a high-priority issue, it also is e-mailed to you as a Regulatory Update and listed on the homepage of www.aea.net.

In addition, we host Regulatory Rise and Shine sessions (yes, they really are that early) during our regional meetings and annual convention. During these sessions, we review all of the regulatory, policy and guidance changes that have taken place in the past year affecting the repair stations and their technicians.

We also host regulatory sessions on hot topics affecting a wide range of AEA member shops. In the past, we have offered training sessions on EASA regulations for U.S.-based EASA 145 repair stations; extensive workshops on alterations; the full spectrum of Part 145 regulations; and training sessions on Canadian regulations for U.S. repair stations.

This year, we will begin a series on the implementation of safety management systems for Canadian shops, as well as the process of implementing quality management systems for U.S.-based repair stations.

A number of years ago, the FAA proposed new repair station ratings and a quality assurance system. Well, the FAA is on track to reintroduce these two topics in a notice of proposed rulemaking later this year. Regardless of the FAA's rulemaking efforts, we have enough experience with the ICAO SMS proposal to see a clear link between quality management systems and safety management systems. In fact, a fully functioning QMS addresses about 80 percent of the technical requirements of SMS.

Beginning this year, the AEA will be conducting training on upgrading the basic quality control system required of 14 CFR Part 145 to a fully functioning quality management system, partly because it is the right thing to do from a business and safety perspective, and partly because it will ease the transition to an SMS program.

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Training is a valuable part of your membership, and it is one of the many areas you should take advantage of every year. I look forward to seeing you at the AEA Regional Meetings starting next month. □