



THE VIEW FROM WASHINGTON

BY RIC PERI

VICE PRESIDENT OF GOVERNMENT & INDUSTRY AFFAIRS FOR AEA

Perfect Timing To Do the Things You Keep Putting Off

So, the economy is tough, work is slow and winter is right around the corner — perfect timing. Perfect timing to do what you told me two years ago you didn't have time to do: paperwork, audits, clean-up and organizing.

I've heard it so many times: "I'm too busy making a living to take the time to do the paperwork, audits, clean-up and organizing that my inspector wants me to do."

Well, now is the perfect time to take care of these long put-off tasks. Consider this your friendly push to get these tasks accomplished.

I think it was my grandmother who first told me about "first impressions." I'm sure you take into consideration the first impression you give your customers or perspective customers.

But what about the first impression you give your FAA inspector? Are your facilities clean, neat and well-organized? Are your training records complete and thorough? Are your records well-managed and easily accessible?

It's always interesting when AEA members call me in because of a dispute between themselves and their "new" inspector. The classic scenario is one in which a shop's inspector has been its inspector for years, then retires. It usually takes months to replace the inspector, so there is not a

hand-to-hand pass down from old to new. The new inspector knows nothing about the facility, nothing about the operator and nothing about the local industry. All the new inspector possesses is his own background and experience.

What is the first thing the inspector sees when he walks up to your facility? Weeds, an overgrown parking lot, a shack in need of paint, papers and trash strewn around? Or does he see a professional building with fresh paint and clear signage?

When the inspector enters your facility, are you giving him a good feeling of organization? Is all of the paperwork neat and organized? Or do you need to shuffle through the mess on your desk to find work orders, parts lists and receipts?

When the inspector looks into your shop, does he see components scattered about or are they neatly organized in clearly labeled cabinets, shelves and containers?

I have a little sympathy for inspectors on this topic. During my tours of many shops, the owners will mention their component storage and their FAA inspectors' comments regarding the storage.

It is good for you to know your labeling method, but is it also clear and understandable to your employees and the FAA?

WHAT ABOUT OPS SPECS?

During past couple of years, there have been pockets of FAA inspectors who have been completely wrong. The inspectors anticipated a change to Part 145, and they "coerced" their charges to "update" their ratings and capability lists prior to finalization of the proposed rule change. Well, it didn't happen.

The FAA withdrew the proposed ratings change. The inspectors were wrong for making the shops comply with a proposed rule.

If your shop does have a limited rating, you must either have your limitations on your operations specifications or your capability list. I personally prefer the capability list — you can control it; whereas, your inspector controls the ops specs:

- 14 CFR 145.215(a)—A certificated repair station with a limited rating may perform maintenance, preventive maintenance or alterations on an article if the article is listed on a current capability list acceptable to the FAA or on the repair station's operations specifications.

What is the FAA looking for in an audit of your capability list? According to FAA Order 8900.1, the FAA is looking to find that each item on the capability list has documentation showing a self-evaluation was performed to determine the necessary hous-

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ing, facilities, tools, test equipment, materials, technical data, processes and trained personnel were available to accomplish the work.

If a repair station uses a capability list, the FAA is instructed to verify the repair station follows the procedures in its repair station manual/quality-control manual for conducting self-evaluations and revising the list in accordance with §145.215(c).

Another area somewhat linked to the capability list is the repairman's certificate. In auditing repair stations, I have found many senior technicians, managers and owners have not kept their repairman's certificates current to the repair station's capabilities.

The FAA instructs its inspectors to verify whether or not each person authorized to approve an article for return-to-service under the repair station certificate and ops specs is certificated under Part 65.

Repair station personnel employed as repairmen with job functions including return-to-service, final inspection or maintenance release of an aviation article, must have the appropriate rating on their repairman's certificates.

A repair station often will grow its capabilities, but the authority of the technicians goes unchecked for years. If work is a bit slow, it is a great time to review each repairman's certificate and match it to the repair station's capabilities and the authorities granted to the individual in the repair station roster, especially with the growth of new technologies.

AN ALL TOO COMMON SCENARIO

In most cases, when a repair station is fined for violation of Part 145 regulations,

the error usually was committed only once, then repeated for years afterward.

Often, a repair station is asked to repair something new — something not on its capability list. The repair station acquires the required manuals; the technicians obtain the necessary training; and the repair station performs its self-evaluation and changes its capability list. However, they fail to update the repairman's certificate.

The second time this part is received for repair, it seems like a normal procedure and the staff doesn't even think about the shop's capabilities because they have worked on this product before — it's routine now and the error is perpetuated.

Unfortunately, while he was technically qualified, the repairman with return-to-service authority in the repair station manual was not administratively qualified; therefore, every part returned to service is invalid.

During your annual FAA audit, if your FAA inspector discovers the repairman's certificate was never updated to reflect the training and expertise in the new technology, the inspector has no choice but to initiate a letter of investigation and the recall of every part returned to service.

This little bit of administrative oversight will cost the repair station hundreds of thousands of dollars in fines from the FAA, as well as the tens of thousands of dollars in making good with customers.

WHAT ABOUT THE EMPLOYEE TRAINING PROGRAM?

Perhaps it has been a few years since your employee training program has been approved, and now your FAA inspector

plans to review the training program for compliance.

The inspector will verify the repair station is operating in accordance with its current program. You should be able to show compliance with each step you committed to in your repair station training program — you should have a paper trail and record for each item.

Now is a good time for training in general. Take an hour each week to review the training products the AEA offers to its members on the association's website at www.aea.net.

It is also a good time to get caught up on safety and environmental training. The regulations require training your employees in regards to industrial safety hazards in the workplace and your mitigation strategies. Have you provided personal protective equipment? Each item has a certain level of required training. Do you manage waste oils and solvents? This also requires training.

In general, if business is slow, it is a good time to take an hour each day to audit, upgrade and manage your housing, facilities, tools, test equipment, materials, technical data, processes and personnel training.

These are the items you review when you perform a self-audit to amend your capability list, and generally they are the same items the FAA looks at when performing a formal audit.

Now is just a really good time to make a great first impression. □

If you have comments or questions about this article, send e-mails to avionicsnews@aea.net.