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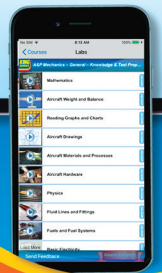


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ANNUAL ISSUE

2019 TECHNICAL SUPPORT DIRECTORY

14 COMPANY INDEX

16 TECHNICAL SUPPORT DIRECTORY

Aircraft Airframe & Accessories	16
Chemicals & Solvents.....	21
Consultants & Contract Service Providers	22
Education & Training	23
Engines	24
Information Technology (IT)	27
Inspection & Test Equipment.....	28
Maintenance Providers	30
Safety Equipment.....	39
Tools & Shop Equipment.....	42

FEATURES

FROM THE FAA

4 Follow Procedures

Training Launched:
Now Your Work Begins

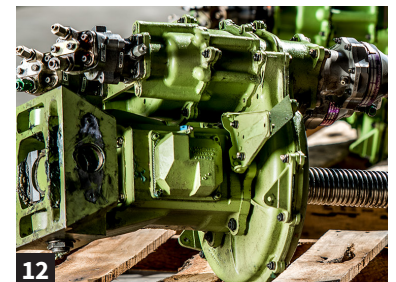
By Dr. Bill Johnson

SAFETY MATTERS

8 Five Steps to an Effective

Internal Voluntary
Reporting System

By Dr. Marc Szepean



TECH TIPS

12 How to Assess

Grease Color and Odor

By Gary Dudley

ONLINE EXCLUSIVE

Highlights from
2018 MRO Europe and
Heli Tech International
By Marino Boric

AVIATIONPROS.com

COLUMNS

ARSA INSIGHT

50 How to Win the Peace for
the Aviation Workforce

By Christian A. Klein

DEPARTMENTS

49 CLASSIFIED ADVERTISING

49 ADVERTISERS' INDEX

FOLLOW PROCEDURES TRAINING LAUNCHED: NOW YOUR WORK BEGINS

By Dr. Bill Johnson

FAA just posted the “The Buck Stops Here” web-based training on the human factors website. A website training system, alone, will hardly impact the No. 1 challenge in aviation maintenance: the design and adherence to technical procedures. The new training merely offers a vehicle to increase attention to procedural compliance. Now, you have another tool to address procedural noncompliance. Dr. Bill offers a few implementation ideas for your consideration.

BACKGROUND

For the past few years, the FAA Maintenance Human Factors research team, mostly at the FAA Oklahoma City

Civil Aerospace Medical Institute, has been revisiting the challenges associated procedural compliance in aircraft maintenance. It is not a new topic. It is a continuing challenge that affects every aspect of aviation. The issues/questions seem straightforward. Why is it so difficult to follow procedures? Why does procedural noncompliance remain as a significant contributing factor in most negative events in aviation maintenance? What actions can alleviate the challenge?

In the January/February 2018 issue of *Aircraft Maintenance Technology* Johnson described some of the empirical work that was the basis for the new web-based Follow Procedures training. The team conducted about 175 90-minute interviews with AMTs, supervisors, and those who wrote maintenance procedures. The interview topics were based on an extensive review of NTSB procedure-related accident reports and on hundreds of voluntary submissions from the NASA Aviation Safety Reporting System. The interviewers asked mechanics to tell stories about negative events where procedures were not followed.

A combination of the accident documents, the voluntary reports, and interview stories help define the training. The important finding was that procedural noncompliance was not from a lack of knowledge but



FIGURE 1. Attributes of Champion



DR. WILLIAM B. JOHNSON is the FAA Chief Scientific and Technical Advisor for Human Factors in Aircraft Maintenance Systems. His comments are based on nearly 50 years of combined experience as a pilot/mechanic, an airline engineering and MRO consultant, a professor, and an FAA scientific executive.

from an industry culture of completing perceived safe and quality work as quickly as possible. Thus, the research team surmised that the best way to address the procedural noncompliance was to address the culture. The rest of this article talks about the training and what individuals and organizations can do to address the challenge.

THE FOLLOW PROCEDURES TRAINING DESCRIBED

The 45-minute web-based training program, with all files, can be downloaded from the training section of www.humanfactorsinfo.com. The web-based training module also runs from the FFAST website (www.FAASafety.gov, free registration required). We recommend the FFAST site since it includes a post-training exam and it issues a completion certificate. Early users have already given the training good reviews.

The training is a multimedia mix with animations and short quizzes along the way. There is audio for

BEFORE the task
PROCEDURE FOLLOWING

Manager/Supervisor's Commitment Checklist:

- ☐ I will support organizational adherence to following procedures.
- ☐ I will ensure that current procedures are readily available.
- ☐ I acknowledge that it takes time to use procedures.
- ☐ We will take fast action to fix unsuitable procedures.
- ☐ I will minimize worker distractions.
- ☐ I will ensure required double inspection.
- ☐ I will minimize worker stress – both physical and psychological.
- ☐ I will nurture a culture of procedure following.

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AFTER the task
PROCEDURE FOLLOWING

Manager/Supervisor's Commitment Checklist:

- ☐ I supported organizational adherence to following procedures.
- ☐ I ensured that current procedures were available.
- ☐ I acknowledged that it takes time to use procedures.
- ☐ We took fast action to fix unsuitable procedures.
- ☐ I minimized worker distractions.
- ☐ I ensured required double inspection.
- ☐ I minimized worker stress – both physical and psychological.
- ☐ I nurtured a culture of procedure following.

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FIGURE 2.
Example
of before
and after
procedural
compliance
work cards
(manager
version).

selected portions of the training. To keep things moving at the user's pace, some of the materials require reading. Figure 1 shows a screen from the training that presents key attributes: Safety Champion. The training reinforces these champion attributes.

At the end of the training, learners are strongly encouraged to download and use the before and after checklists. There are different sets specifically designed for mechanics, managers, or procedure writers. Figure 2 shows the job cards for managers. The training ends by asking users to sign a "Safety Pledge," shown in Figure 3, to be a champion of an improved workplace culture of following procedures.

Again, the training is a start but it must be only one part of the campaign to change the culture of procedural compliance. What should you do now?

ACTIONS FOR GOVERNMENT, ORGANIZATIONS, AND INDIVIDUALS

FAA Action

Government research usually does an excellent job with research and develop-

ment. Government scientists/engineers/psychologists are great at collecting data. They usually validate the data by talking to workers/citizens, and then write detailed research technical reports. In many cases the research results in development of

guidance materials and/or software tools. The FAA Maintenance Human Factors website (https://www.faa.gov/about/initiatives/maintenance_hf) contains many such reports, advisory documents, software, media, and training support materials.

FFP SAFETY CHAMP

I, _____, pledge to champion an improved culture of procedure following at my workplace. I will not "pass the buck" on FFP to co-workers or other entities. I will keep FFP safety champion skills – such as accountability, communication, leadership, and problem solving – at the forefront of my daily attitude. Through my words and actions, I will demonstrate my dedication to detecting and addressing FFP risk. By honoring this pledge, I will be doing my part to eliminate FFP risk for good.

FIGURE 3. The procedural compliance safety pledge.

Government, because of funding design and the regulatory mission priority, often drops the ball when it comes to fielding and supporting the research projects. Commercially that includes marketing, sales, product support, and customer service. These activities are seldom the forte of government. The new web-based follow procedures training must be supported by government! This article and promotion by the FAA Safety Team, are example steps in product promotion and support direction.

The timing is right for customer support of the procedural compliance training initiative. FAA oversight, over the past few years, has changed from a policy of strict administrative enforcement to one of applying cooperative measures to achieve increased safety and regulatory compliance. When individuals or organizations must respond to an FAA discovery of procedural noncompliance, the new training initiative, with supporting activity, can be an ideal suggestion to address the issue. Propose to change the culture of procedural noncompliance with the FAA web-based training as a key component of the potential cultural change. Your FAA inspectors are likely to see the value and accept the training as a way to improve procedural compliance. FAA inspectors have “walked the walk” of being mechanics. They can offer other ways to help increase procedural compliance.

Organizational Action

Organizational action is critical when it comes to affecting culture change. Everyone must buy in to change. Top executives must demonstrate the commitment to procedural compliance in words and actions. And recognize that 100 percent compliance may take a bit more time. It is also likely to reduce delays from rework. It will reduce expensive errors and worker injury. Leaders must accept the tradeoffs. The executive must convince middle managers that increased procedural compliance is a renewed top priority. Selected organizational performance measures must be cognizant of all issues associated

with 100 percent procedural compliance. Higher compliance assurance must have similar value to high on-time departure and other reliability rates. Procedural compliance must be important on the list of key performance indicators. It can renew the commitment to the corporate fiduciary responsibility to flight safety of customers.

Strong words from the top can set the general tone, but actions from middle management have greater impact on the daily maintenance work. Continuing safety and low error rates must not be a justification for past procedural noncompliance (“past sins”). Workers must be encouraged, every day, that 100 percent procedural compli-

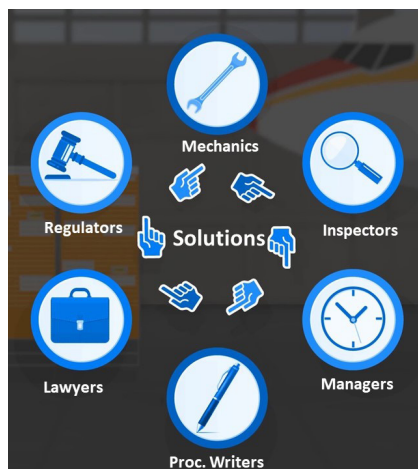


FIGURE 4. Who can champion procedural compliance.

ance is the goal. Procedures that are unnecessary, complicated, incorrect, incomplete, or unavailable must be documented and addressed, prior to continued work. This action will help correct or eliminate poor procedures, thus raising compliance.

What are immediate actions to accompany the training?

1. Written statement from top management that the organization is recommitting to 100 percent procedural compliance. Management recognizes that this is team effort.
2. Written statement of commitment from labor leaders, in support of management letter.
3. Written statement from Engineering Department committing to rapid

response to mechanic recommendations regarding problematic procedures and/or procedure use issues.

4. Statement from local FAA inspection team that they will assist/cooperate with renewed commitment to 100 percent procedural compliance.
5. Personal individual commitment from every person in the organization to champion the culture of 100 percent procedural adherence.
6. Use shift meetings to launch and reinforce the Follow Procedures training.
7. Consider paying an incentive to every worker that submits a training completion certificate from the FAA website.
8. Distribute the Before and After Procedure Following job cards (Available from training program or FAAST representative).

Individual Commitment and Action

Workers must commit to become champions of the procedural compliance culture. That means that workers must be not only introspective of their own behavior but also apply appropriate peer pressure. Remember that every time a procedure is not followed, and there is no immediate safety consequence, it is positive reinforcement to not follow the procedures. That must end!

Workers should engage with the Follow Procedures training in a serious way. Use the 45 minutes of training to question your own work behaviors and to recommit to 100 percent procedural compliance. Such behavior is beneficial to the aircraft, passengers, the organization, and to worker health and safety. Full procedural compliance will be achieved only when workers take individual personal and professional satisfaction with the knowledge that they followed procedures 100 percent.

THE BOTTOM LINE

The very start of the training uses the graphic in Figure 4. It explains that: “Everyone is part of the procedural compliance challenge. Therefore, everyone is part of the solution.”

Enough said. **AMT**

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FIVE STEPS TO AN EFFECTIVE INTERNAL VOLUNTARY REPORTING SYSTEM

By Dr. Marc Szezan

Industry-level reporting systems such as the U.S. Aviation Safety Reporting System (ASRS), the EASA Confidential Safety Reporting system, and the U.K. Confidential Human Factors Incident Reporting Programme for aviation (CHIRP) have become proven staples of aviation safety management. Aviation businesses — and companies in other safety-critical industries for that matter — should consider complementing these industry-level programs with their own company-internal voluntary reporting systems (VRS) as integral building blocks of their safety management programs.

There are two basic options for structuring a company-internal VRS: Anonymous or confidential reporting. Each of these approaches has advantages and disadvantages.

For example, confidential reporting allows for call-back and enables further investigation and clarification of reported information which is impossible in case of anonymous reporting. However, anonymous reporting can result in collection of data that reporting parties might otherwise be reluctant to report due to concerns regarding the reliability of confidential reporting systems.

In general, aviation businesses are well advised to consider configuring a company-internal VRS so that it allows both anonymous and confidential reporting. This article suggests five key steps for setting up, achieving credibility for, and maximizing the returns from an effective company-internal VRS.

1

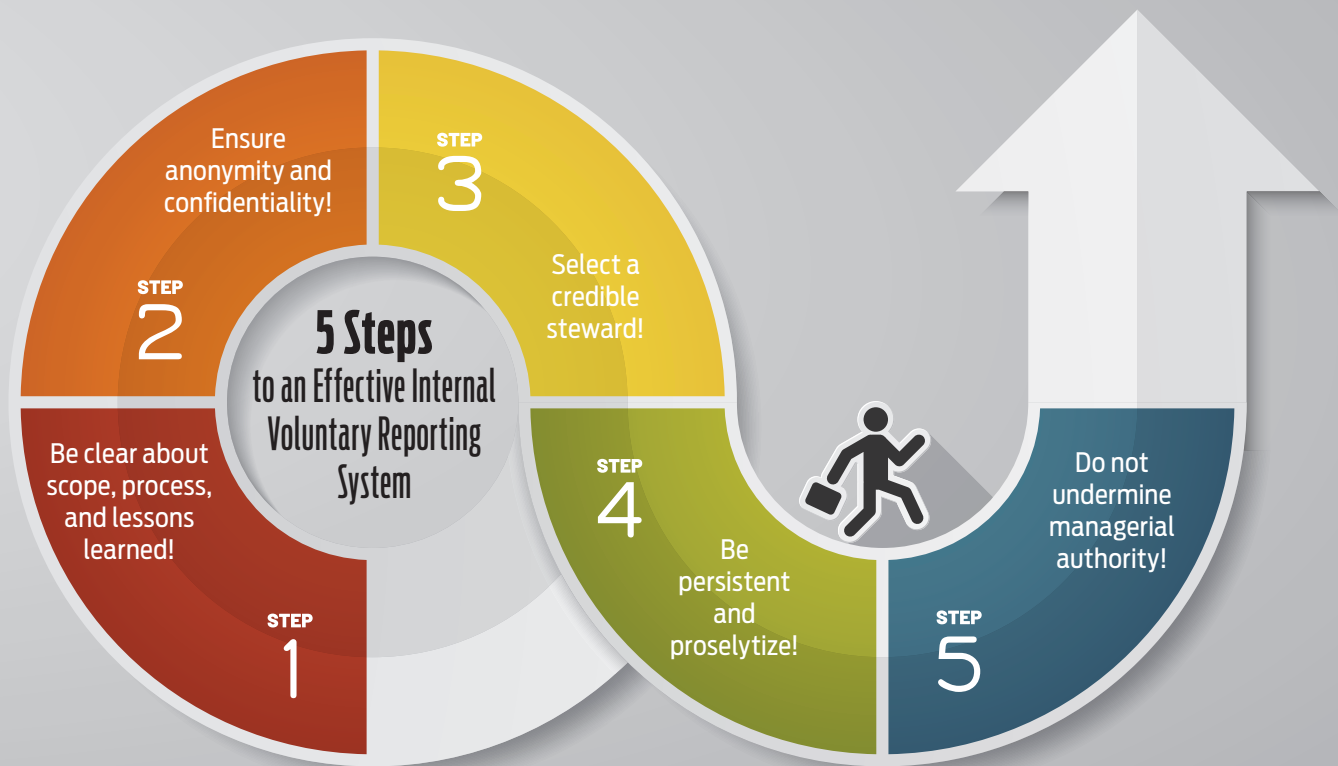
Be clear about scope, process, and lessons learned!

BE SPECIFIC ABOUT THE INTENDED SCOPE OF your VRS. Normally, it is easiest to set up a company-internal VRS that is exclusively focused on aviation safety issues, thereby mirroring the approach of national aviation safety reporting systems such as the ones mentioned above. In this case, other potential noncompliance issues related to — for example — labor, environmental protection, taxation, and anti-trust laws fall outside the scope of a safety-focused VRS and should be reported through other alternative whistle-blowing channels.

Put in place transparent standard operating procedures for handling reported issues. Keep in mind that

the value-added of a VRS tends to be highest in case of reporting that includes specific details sufficient for putting in place corrective and preventive measures. Mere “venting” or “complaining” might be cathartic but usually generates only limited organizational mileage. So encourage reporting and make it as easy as possible by including sufficient actionable technical and, if applicable, human factors-related details.

A VRS black hole approach is not advisable. Transparent and timely feedback regarding reported issues and related lessons learned tends to encourage future participation in VRS and enhances an organization’s safety culture at large. So commit to realistic and reliable response times for reported issues. Create company-internal transparency with regards to lessons learned developed from information reported via a VRS. Consider disseminating these to your entire workforce via regularly published company-internal versions of safety newsletters or bulletins such as ASRS’s CALLBACK or CHIRP’s Air Transport FEEDBACK.



2

Ensure anonymity and confidentiality!

ENSURING ANONYMITY FOR ANONYMOUS reporting should be a no-brainer. Surprisingly, some aviation businesses manage to get this wrong. For example, one particular company runs an otherwise world-class safety management system that features an internal VRS. However, it only provides one electronic channel — via the company’s intranet — for submitting “anonymous” reports. Submission is contingent upon an employee logging in via her/his company ID badge and individual access code. So much about “anonymity”! Make sure that your VRS allows submission of truly anonymous reporting via securely encrypted online

forms from any computer with internet access, email to a dedicated company email address, or even traditional snail-mail to a dedicated company post box address. You could also make use of good old letter boxes in which reports can be dropped off manually and which are placed in areas not subject to CCTV surveillance.

In the case of confidential reporting, the reporting person must have the assurance that reported information will be treated truly confidentially and, as core part of a nonpunitive culture, will not result in adverse consequences for the reporting person. Adverse consequences to be avoided can range from basic disciplinary measures like letters of reprimand to negative implications for the reporting person’s career development and also include legal issues such as loss of employment.

Remember the “single failure trap.” It only takes one single breach of anonymity or confidentiality to undermine efficacy of the entire VRS! So approach protection of anonymity and confidentiality with a zero-error, must-not-fail spirit.



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3

Select a credible steward!

THE IMPORTANCE OF SELECTING THE RIGHT LEADER who is well positioned to exercise credible stewardship of a VRS cannot be overstated, especially in case of a VRS that includes confidential reporting. Credible stewardship is contingent upon a leader's ability to protect the confidentiality of reporting parties and authority to wield sufficient organizational influence to translate reported information into tangible lessons learned.

Hence the ideal steward for a VRS is a proven and widely respected leader who is trusted by but not substantially dependent on — think of independence as a function of strength of personality, professional maturity, resume equity, professional network, and personal background — the CEO or any other member of the senior management team.

In the end, a reporting person needs to have the confidence that whoever has ownership for a company-internal VRS is both willing and able to maintain confidentiality even in the face of potential pressure to reveal the identity of the reporting person and to say No! to the CEO or any other senior leader. Similarly, credibility of the VRS throughout the organization at large is contingent upon reported information being utilized in the interest of maximizing safety and not being misused for internal turf-battles or worse. The last person an aviation business should put in charge of a company-internal VRS is a crony or lackey of the CEO or of any other member of the senior management team.

4

Be persistent and proselytize!

AVIATION BUSINESSES THAT NEWLY LAUNCH A VRS often face two major challenges: First, there can be misunderstandings regarding the intended scope. A favorite example is an aviation service provider that proudly set up what was supposed to be a safety-focused anonymous reporting system. The inaugural submission, however, turned out to be a complaint about the pricing and quantity of meals in the staff dining hall. Second, there can be skepticism regarding the protection of anonymity or confidentiality and the degree to which an aviation business is committed to learning and enacting change based on VRS submissions.

Resolving the former usually entails patience and, at times, a healthy sense of humor. Addressing the latter is likely to require considerable persistence and consistent messaging on the part of the senior management team. So give serious thought to the best ways of championing a company-internal VRS. Make VRS submissions a key part of the standard agenda of senior management team meetings and all-hands-on-deck events to signal importance and commitment. Use every other appropriate opportunity like meetings with smaller employee groups to showcase lessons learned derived from your VRS. And do not forget the aforementioned “single failure trap”!

5

Do not undermine managerial authority!

A COMPANY-INTERNAL VRS CAN BE A POWERFUL addition to the managerial toolbox for any aviation business. However, overreliance on a VRS can have the pernicious effect of undermining the authority of a company's management team. A VRS is most effective as a complement to regular lines of reporting but should not be used as a substitute thereof.

Beware of the dangers of inadvertently creating a denunciation culture by allowing a VRS to crowd out regular lines of reporting. A VRS is supposed to be an additional informational resource but not a tool for policing lower level leaders. Assuming the absence of criminal, unethical, or deliberately negligent conduct, leaders whose areas of responsibility are affected by a VRS submission should not be penalized.

Also, make clear that a company-internal VRS is not meant as a substitute for national reporting systems such as ASRS or CHIRP and that employees are at liberty to avail of these national reporting systems.

A company-internal VRS can be an important building block of the safety management system of any aviation or other safety-critical business. In addition, in cultural environments characterized by strong bias against publicly speaking up or questioning authority figures such as a line superior, let alone members of the senior management team, a company-internal VRS can be a natural channel for securing employees' insights that, due to cultural norms, might otherwise not be accessible. The five steps outlined above can be a good starting point for setting up, achieving credibility for, and maximizing the returns from an effective company-internal VRS. **AMT**



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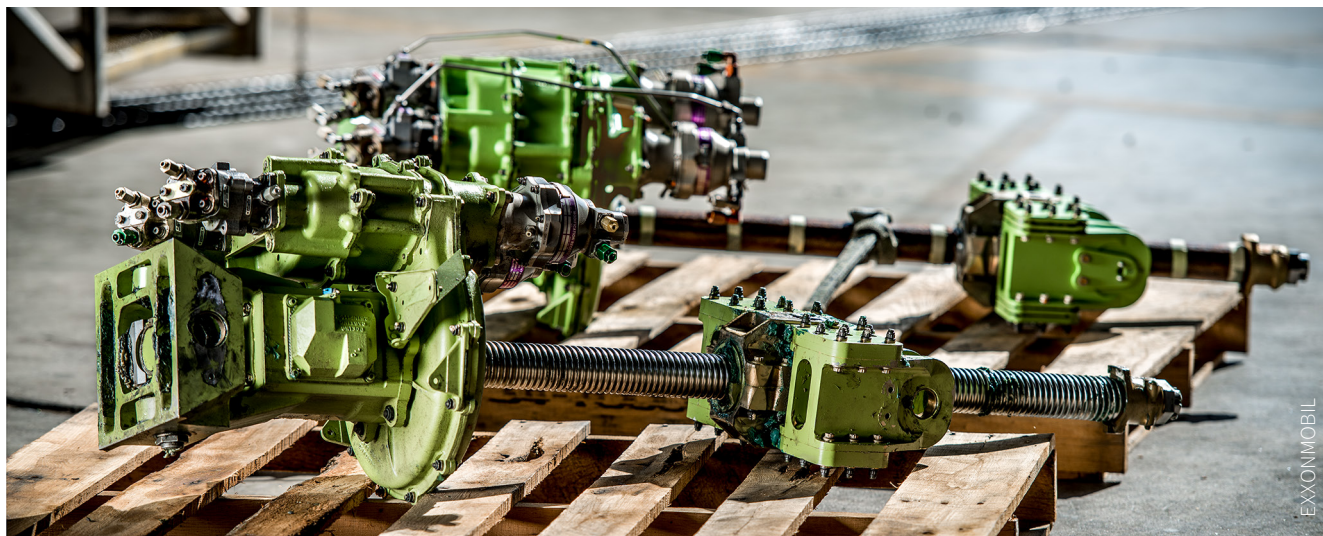
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HOW TO ASSESS GREASE COLOR AND ODOR



Gary Dudley, Ph.D., Global Grease Product Technical Advisor for ExxonMobil Research & Engineering Lubricants Technology, tackles questions on evaluating grease color and odor and how this may or may not indicate the status of grease condition

By Gary Dudley

To better understand the aviation industry's key concerns and pain points related to grease, ExxonMobil asked MRO Americas attendees to submit their grease-related questions directly to the ExxonMobil team. Having collected more than 40 questions on grease, including color, formulation, compatibility, storage, and handling, ExxonMobil has offered to share the answers in a three-part article series.

In the final part of the grease series, Gary Dudley tackles questions on evaluating grease color and odor and how this may or may not indicate the status of grease condition.

Q. What causes grease to produce an odor? Does grease odor impact performance?

While many base oils and additives used in greases have a defined odor when fresh, odors can also be the result of in-service degradation of the grease. However, ExxonMobil aviation greases formulated from 100 percent polyalphaolefin (PAO) base oil, such as Mobilgrease 33, will minimize these objectionable odors. Greases containing an ester base stock may be susceptible to hydrolysis and could generate an odor as they degrade in-service.

In general, grease odor does not impact grease performance.

Q. Can you alter grease to make it smell better?

No. Once tested and approved, grease formulations cannot be changed without undergoing a full recertification process.

Q. What could impact a change in the original grease color?

Many factors can cause a color change, but this alone should not be used as the only basis for judging the quality of the grease in use. It's important to note that many greases in the industry are dyed a specific color and that exposure to light can cause a change in the dye color that has no impact on the grease performance.

Additionally, environmental ingress and contamination could also cause grease color to change. We recommend consulting your lubricant supplier when an unexpected color change occurs.

Q. What happens when you find black grease and now green grease during an inspection?

Two of the most common examples seen are:

- Insufficient grease purging: Grease

purging can still leave some residual grease in the component. Instead, it's generally recommended that the part be removed and cleaned to ensure full removal of the prior grease.

- Incomplete mixing: This could be the result of improper grease distribution throughout the component, leading to what appears to be two different colors as the grease ages or becomes contaminated.

The darker grease color changes in-service can be a result of operating temperatures well above a grease's temperature rating, or a result of contamination (e.g., dust from carbon brake that causes wheel bearing grease to appear dark).

In some airframe applications, a black grease may signify hydrolysis of an ester-based grease, identified with some BMS3-33 and MIL-PRF-23827 approved greases.

Q. What causes a grease to change colors? Can discoloration affect the grease?

Changes in grease color can be the result of a number of factors, some of them more negative than others. For instance, the change can merely be caused by a change in the chemical dye used in the grease.

However, if the color change is caused

by high temperatures, contamination, or reactions with other substances, the color change may indicate a change in grease performance. Some of these effects include:

- Chemical change in the grease's base oils or additives, such as hydrolysis, which may reduce the load-carrying capability or structural stability of the grease.
- Presence of particle contamination that can cause premature wear of bearings or affect grease quality.
- Reaction with unknown material resulting in a change in color.

Q. What does the color of grease mean? Why does aviation have red, green, blue, tan colored greases?

The color of fresh grease is simply a function of dyes added to the formulation, which is often required by aviation industry organizations such as SAE International Aerospace or by an OEM QPL-specific directive. Other greases may be free of dyes.

Different grease colors sometimes help to avoid accidentally mixing greases; however, greases with the same color are not always compatible and may not consist of the same technology. Learn more on aviation grease color here. **AMT**



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2019 COMPANY INDEX

A

AAR Corp. 16, 24, 30, 42
 Abaris Training 23
 Advantage Aerospace LLC 16
 Aero Dynamix Inc. 16, 42
 Aero Jet Wash/Giti Tech Group 43
 Aero Norway AS 24, 30
 Aerospace Maintenance
 Solutions LLC 30
 Aerospace Turbine Rotables Inc. 31
 Aircraft Specialties Inc. 16, 31
 Aircraft Window Repairs 16, 23, 31
 AJW Group 30
 Alberth Aviation 16, 40, 43
 Alpine Aerotech LP 31
 Apex Aviation 31
 Applied Composites Engineering 16, 32
 A.S.E. Inc. 39, 42
 ATP/Casebank 27
 Av-DEC 21
 Aviall 16, 21, 24, 28, 43
 Aviation Businesses for Sale 22
 Aviation Component Solutions 16, 24
 Aviation Fabricators (AvFab) 16, 32
 Aviation Maintenance Professionals 32
 Aviation Technical Services 32
 Avion Express 16
 Avtron Aerospace/Testek 29

B

B/E Aerospace 16
 Banyan Air Service 17, 32
 Barfield Inc. 29, 32, 43
 BDN Aerospace Marketing 22
 BendixKing by Honeywell 17
 Beta Professional Hand Tools 43
 BriskHeat Corp. 17, 21, 43
 British International Ind. 17, 24, 32
 Business Aircraft Consumables 21, 40, 43

C

CAMP Systems International Inc. 28
 CAV Ice Protection 44
 CD Aviation Services 22, 28
 Centrex Construction Inc. 22, 44
 Certified Aviation Services LLC 32
 Clear 4 Take Off 32
 Component Control MRO & Logistics
 Software 28
 Consolidated Aircraft Supply Co. 17, 32
 Constant Aviation 33

Cornwall Quality Tools 44
 Corridor Aviation Service Software/
 Continuum Applied Technology 28

D

Dalton Enterprises 21
 Designovations Inc. 40
 DFW Instrument/Red Aviation 17, 29
 Duncan Aviation 33

E

ECT Inc. 22, 44
 Elliott Aviation 18, 34
 Engine Assurance Program 25, 34
 Evolution Aerospace Inc. 18

F

FACC AG 34
 Factory Supply Inc. 40, 45
 First Aviation Services Inc. 34
 Flightdocs Inc. 28
 FluidTran Inc. 45
 Flying Colours Corp. 34

G

Gage Bilt Inc. 45
 GLOBALJet Services 23
 GlobalParts 18
 Gogo Business Aviation 18
 Gradient Lens 29
 Greenwich AeroGroup Inc. 18, 34

H

HarcoSemco 18, 34
 Harlan Global Mfg. 45
 Hartzell Engine Technologies LLC 18, 25
 HBD/Thermoid Inc. 18, 45
 Hobart Institute of Welding
 Technology 24
 Honeywell Aerospace 18, 25, 28

I

International Governor Services LLC 34
 iSIGNS Inc. 40

J

Jackson Aircraft Weighing Systems 45
 JB Roche (Mfg.) Ltd. 45
 J.W. Winco 18
 Jet Aviation 34, 35, 36

JETechnology Solutions Inc. 40, 45
 Jet Fleet Management LLC 45
 JFM Engineering 30, 46
 JME Technologies 30

K

King Schools 24
 Klassic Tool Crib 46
 Kusssmaul Electronics 46

L

Lee Aerospace Inc. 18, 36
 Liftsafe Fall Protection Inc. 40, 46
 LockNClimb 41, 46
 Lufthansa Technik 18, 22, 36
 Lycoming Engines 25

M

MSB Aerospace LLC 19
 MSG Production AS 36, 46
 MTU Maintenance Group 26, 36
 Mankiewicz Coatings 22
 Mantec Services Inc. 41
 Microcranes Inc. 41, 46
 Midwest Tungsten Service 46
 Millennium Intl. 36
 Miraj Corp. 26
 MORE Company Inc. 25

N

NDT Consulting Group Inc. 24, 30
 Nordic Aerowash Equipment AB 46

O

Oasis Scientific Inc. 30, 46
 Olympus Corp. of the Americas 30
 Ontic 19, 26
 Optima Aero 36

P

Pan American Tool Corp. 46
 PCE Instruments/PCE Americas 30, 46
 Pentagon 2000 Software Inc. 28
 Pentastar Aviation LLC 36
 Performance Aircraft Services Inc. 22, 37
 Phillips 66 Lubricants 22
 Piedmont Propulsion Systems LLC 37
 Preferred Airparts LLC 19, 22
 Pro Star Aviation 37
 Professional Aircraft Accessories 37

Professional Aviation Associates.....19
 ProTech Technologies Inc.....41
 PROTO Industrial Tools47

R

Rhotheta Intl. Inc.19

S

S.A.F.E. Structure Designs LLC..... 42, 47
 Santa Fe Aerospace 24, 30, 38, 47
 S.E.A.L. Aviation.....30
 Sherwin-Williams Aerospace
 Coatings 22
 Snap-on Industrial..... 30, 47
 Southwind Aviation38
 Spartan College of Aeronautics and
 Technology24
 Speech Me 24, 28
 Stahlville Tools LLC.....47
 StandardAero38
 Start Pac/Rotorcraft Enterprises LLC.... 48
 STS Aviation Group37
 Summit Aviation38
 Super Brush LLC.....48

T

Tanis Aircraft Products26
 Taughannock Aviation Corp.....38, 48
 Tdata Inc.24, 28
 Tempest.....20, 27
 Tempest Aero Group.....27
 Things for Aircraft Support Inc.48
 thINK Communications23
 Titan Tool Supply30
 Total Control Systems20, 48
 Traxxall Technologies.....28
 Tri-Star Technologies.....49
 TurbineAero.....38
 Turbine Services and Solutions39

U

USA Borescopes.....30
 U.S. Manufacturing & Design Inc.39, 49

V

Vallair39
 Varco Pruden Buildings49
 Vantage Specialty Chemicals Inc.....22

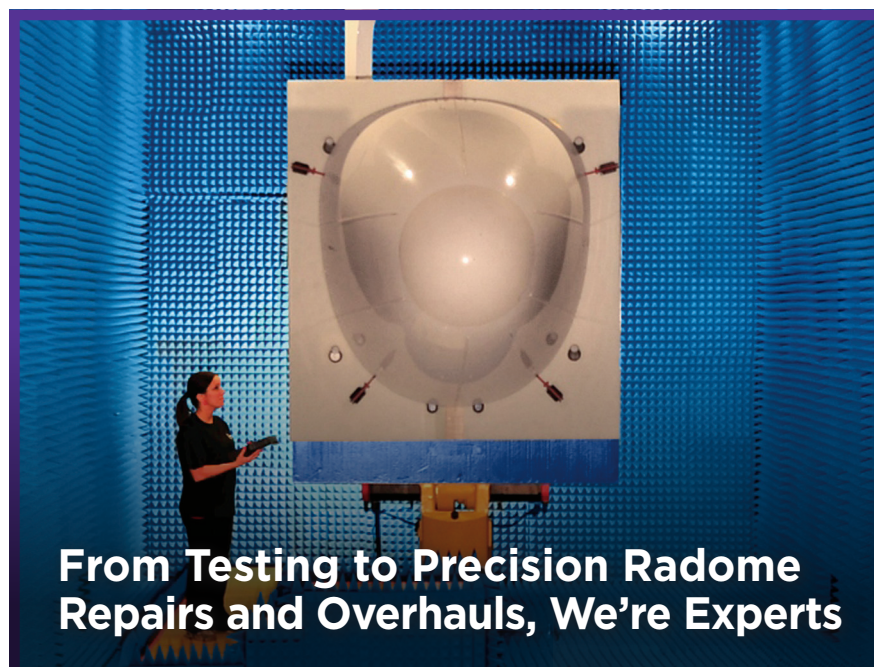
W

WAAG42, 49

Western Aircraft20, 39
 Western Filtration Technologies.....20, 49
 West Star Aviation.....39
 Wilco Inc.20
 World Aero.....39

Z

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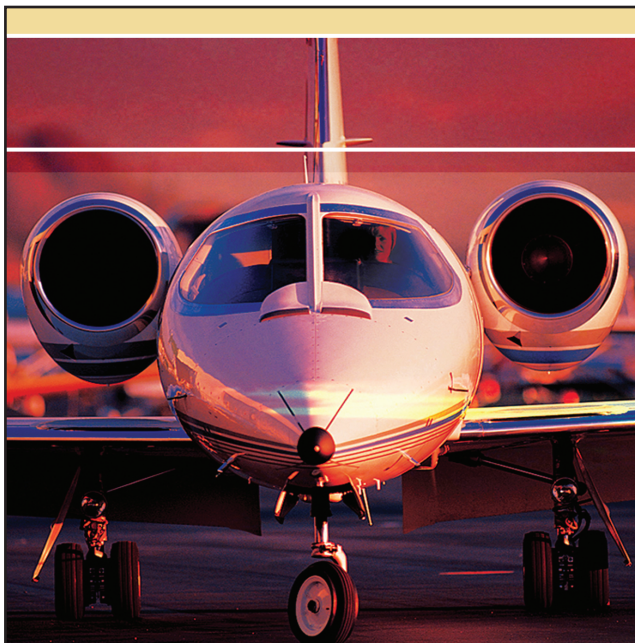
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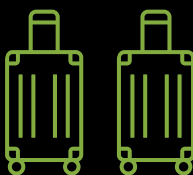
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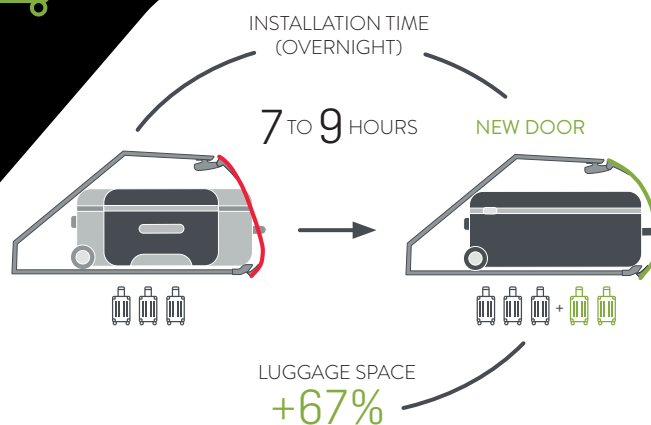
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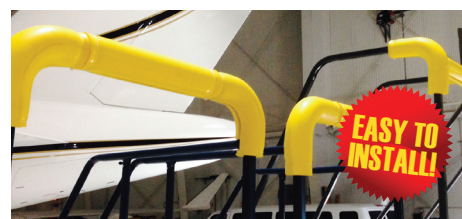


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ADVERTISERS' INDEX

ADVERTISER	PAGE #
AAR Corp	7
Alberth Aviation	46
Applied Composites Engineering	15
AvFab	25
B/E Aerospace	26
Barfield	27
CD Aviation Services	48
Consolidated Aircraft Supply Co., Inc.	19
Elliott Aviation	51
FACC Aftermarket Services	20
Global Parts Aero Structures	29
Gradient Lens Corporation	31
Harlan	40
Jackson Aircraft Weighing Systems	42
JETechnology Solutions Inc.	44
King Schools	2
Lee Aerospace	23
Lycoming	52
Mantec Services Inc.	48
Millennium International Avionics	21
Miraj Corporation	43
Pentagon 2000	38-39, 48
Preferred Airparts	47
Professional Aviation Associates	33
S.E.A.L. Aviation	37
Stahlwille Tools	35
StandardAero	11
Start Pac	13
Tanis Aircraft Products	45
Taughannock Aviation	42
Tdata	47
Titan Tool Supply	44
Tri-Star Technologies	17
USA Borescopes	43
VP Buildings	41

HOW TO WIN THE PEACE FOR THE AVIATION WORKFORCE

ARSA, ITS MEMBERS, AND ALLIES SUCCESSFULLY LOBBIED for an “historic victory” through this year’s FAA reauthorization process. That victory included the authorization of a five-year pilot program that will provide annual grants of up to \$500,000 to businesses or unions, schools, and governmental entities that partner to pursue creative ways to recruit and retain new aviation maintenance technicians.

Getting the program authorized was a major achievement, but the policy work is far from complete. The Department of Transportation must now initiate it and Congress must appropriate the money necessary to provide the grants, which could be available by the end of 2019 if industry moves quickly to encourage action.

The association is already continuing its leadership of aviation-industry stakeholders to keep the process moving. To support the effort, maintenance professionals should act now in order to keep DOT and Congress on track and be ready to take advantage of grant money once it’s available.

WHAT HAPPENED IN FAA REAUTHORIZATION?

Recognizing a problem — a shortage of technical professionals — aviation industry leaders and a bipartisan group of lawmakers decided to act. Legislation to create an aviation maintenance workforce grant program was introduced in the Senate (S. 2506) on March 7, 2018 by Senators Jim Inhofe (R-OK), Richard Blumenthal (D-CT), Jerry Moran (R-KS), and Maria Cantwell (R-WA) and in the House (H.R. 5701) on May 8, 2018 by Representatives Sam Graves (R-MO), Dan Lipinski (D-IL), Markwayne Mullin (R-OK), and Brenda Lawrence (D-MI).

The effort was endorsed by more than 30 leading industry organizations representing all segments of the industry, including maintainers, airlines, general aviation, manufacturers, and labor, as well as by the National League of Cities. Lobbyists for ARSA and allied organizations held dozens of meetings on Capitol Hill to build support for the workforce bill, which was ultimately rolled into a larger FAA reauthorization package signed by President Trump in October.

WHAT ARE THE DETAILS OF THE AVIATION MAINTENANCE WORKFORCE GRANT PROGRAM

Sec. 625 of the 2018 FAA reauthorization law (Public Law No: 115-254) creates the new DOT-administered grant program, which is designed to support a wide variety of aviation maintenance workforce development recruitment and training activities. Grants may be used to:

- Establish new educational programs that teach technical skills used in aviation maintenance, including purchasing equipment, or to improve existing such programs;

- Establish scholarships or apprenticeships for individuals pursuing employment in the aviation maintenance industry;
- Support outreach about careers in the aviation maintenance industry to primary, secondary, and post-secondary school students; or to communities underrepresented in the industry;
- Support educational opportunities related to aviation maintenance in economically disadvantaged geographic areas;
- Support transition to careers in aviation maintenance, including for members of the Armed Forces; or
- Otherwise enhance aviation maintenance technical education or the aviation maintenance industry workforce.

The program is authorized at \$5 million for five years starting in 2019 and can provide grants of up to \$500,000. The goal is to incentivize collaboration between key stakeholders and grant applications must be jointly submitted by business or union, school, and state or local governmental entity.

WHAT CAN YOU DO TO HELP?

The money isn’t ready to start flowing yet, so it’s incumbent on the industry to help move things forward and prepare to take advantage once all the pieces are in place.

1. Begin having conversations with other community stakeholders to lay the foundation for a joint application, thinking creatively about ways to use the federal money.
2. Contact the members of Congress who supported the program to thank them and urge them to work with DOT to initiate the program and with their colleagues in Congress to appropriate the necessary funds.

For resources to help — ARSA has done the legwork already — visit arsa.org/grant-program for updates and access to the association’s Workforce Legislative Action Center. Be sure to bookmark this page, as it will be used to share current information and provide further instructions for industry action as this grassroots advocacy effort develops.

As we wrap up the most successful year of U.S. legislative advocacy in the maintenance community’s history, it’s time to start looking and acting ahead. The industry saw through a long-term advocacy effort and helped pass a proactive FAA bill and must make good on building and utilizing the resources we fought so hard to earn.

Or, as I’ve become fond of saying: We won the war, now we’ve got to win the peace. **AMT**



CHRISTIAN A. KLEIN is the managing member of Obadal, Filler, MacLeod & Klein, P.L.C. overseeing the firm’s policy advocacy practice. He represents trade associations as a registered federal lobbyist and provides strategic communications and legal counsel services to clients. He is executive vice president of the Aeronautical Repair Station Association and a member of the University of Virginia’s adjunct faculty.

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