



A Report From the TWU

Aircraft Maintenance In America: Who Is Fixing My Plane?



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A Letter from Donald M. Videtich International Representative, Transport Workers Union, AFL-CIO

There is no question airlines have been struggling financially over the last ten years. Many over the years have blamed organized labor for being inflexible and unwilling to lower costs. Unfortunately, in a knee jerk response in an attempt to lower costs, many airlines have outsourced thousands of high skilled jobs to aircraft maintenance repair companies that are not tightly regulated or inspected by the Federal Aviation Administration (FAA) as those maintenance divisions run by the air carriers themselves.

For example, in 1999 American, United, Northwest, US Airways, Delta, TWA, and Continental all performed the overwhelming majority of their aircraft maintenance work in-house. Regional airlines also kept a large portion of their work internal and within the United States. However, beginning in the late 1990s and particularly after 9/11, the in-house standard changed. The percentage of work outsourced in terms of maintenance dollars, has risen from an average of 26% in 1999 to over 40% in 2009, a figure which remains under 50% primarily because of the work still performed in house by American Airlines mechanics. Of the top six network carriers over \$4 billion worth of work, approximately 30% is sent outside the United States. A significant amount of wide body aircraft are currently being sent to China, Singapore, India, and Central America where the FAA lacks the resources to adequately oversee the repair work. The Office of the Inspector General (OIG) has audited the FAA's capacity to oversee more than 1,000 licensed repair facilities in the world and the results are disturbing. In the latest OIG report¹, out of eight major airline FAA inspection offices in the US, four accomplished less than 50% of their assigned inspection duties. Overseas the issue of oversight gets even worse. There are approximately 100 FAA inspectors for roughly 700 aircraft repair stations outside the US, while in the U.S.; there are approximately 4,000 FAA inspectors for 4,200 aircraft repair stations.

Each year the problem of inadequate oversight, strained government resources, and lack of consistent application of standards may put passengers at risk. At American Airlines, the TWU is resisting the industry wide outsourcing trend. Other companies have outsourced, while some airlines along with their Unions representing the workers were unwilling to look for solutions to preserve these jobs. The TWU Membership has worked to find unique ways to lower the costs of keeping work in-house while maintaining high quality workmanship. At the same time, the AFL-CIO Transportation Trades Department continues to pursue legislation to hold all aircraft repair stations and airlines to a uniform standard at the federal level. The standard of safety must be equal for all operators, regardless if they are Union or not, and regardless of where they are located.

This report seeks to enlighten each person who flies as to whether he or she can be sure the aircraft carrying them is being maintained to the highest standards. Can you safely say the aircraft you're flying on is maintained by people who have undergone thorough security background checks, drug screening, training, and can understand the maintenance manuals they are using? If you fly American Airlines you can rest assured, TWU represented aviation maintenance professionals are hard at work maintaining your aircraft to the highest standards.

¹ OIG AV-2011-026



Aircraft Maintenance In America's Airline Industry Today- The commercial aviation business is not a friendly place if you are looking for a calm and comfortable environment to work. Airlines are subject to extremes in energy costs, political upheaval, security risks, complex regulations, and changes in the world's economies. While many other industries deal with the same issues, airlines routinely operate on thin profit margins and are quickly impacted by any change in any of the aforementioned factors. The past decade has been exceedingly stressful on all the above fronts; as a result many skilled jobs within the U.S. airline industry have been lost and air safety is now being compromised.



In order to understand the problems, we need to explain how carriers are structured. Airlines can be separated into large divisions within the company, for example; Operations, Marketing, and Aircraft Maintenance to name a few. In this report, the focus will be on Aircraft Maintenance and how this segment of the industry has been affected by financially strapped airlines. Many airlines have responded to the need to cut costs by cutting wages, reducing benefits, eliminating pensions along with outsourcing in-house aircraft repair, resulting in massive job losses. Outsourcing aircraft repair has to be the biggest concern to the traveling public because the FAA lacks the resources, or a well structured oversight system to adequately ensure aircraft maintenance is done properly. Labor Unions are not the only organizations raising concerns about this fact -- the U.S. Office of the Inspector General (OIG) has repeatedly raised this issue² during the last decade. Unfortunately, to date, a majority of the serious safety issues raised by the OIG have not been addressed; several critical safety issues raised are seven years old.

On another serious note, what is the standard for personnel working on aircraft when the aircraft repair is outsourced to a repair station? U.S. employees working for airline carriers are required to participate in random drug testing and security background checks. However, this is not the case at all maintenance repair facilities. Once the work is sent outside the U.S., the problems of employee oversight issues become enormous. The FAA does have the ability to perform inspections overseas; however, the number of FAA Inspectors is woefully insufficient. Many facilities outside the U.S. performing aircraft repair on U.S. aircraft, or aircraft components, have not been inspected in five years or more. To make matters worse, drug testing is not a requirement in foreign countries and background checks are not generally performed overseas.

This report seeks to inform people about the need to take a very hard look at the system in place for ensuring the safest possible transportation system for all whom fly. Transport Workers Union Members are some of the most experienced, well-trained professionals in the aviation world. Organized labor did not create the aviation maintenance rules and regulations, but we have worked to make sure these rules are clear, are applied reasonably, and uniformly.



² July 8, 2003 AV-2003-047; September 30, 2008 AV-2008-090; December 16, 2010 AV-2011-026



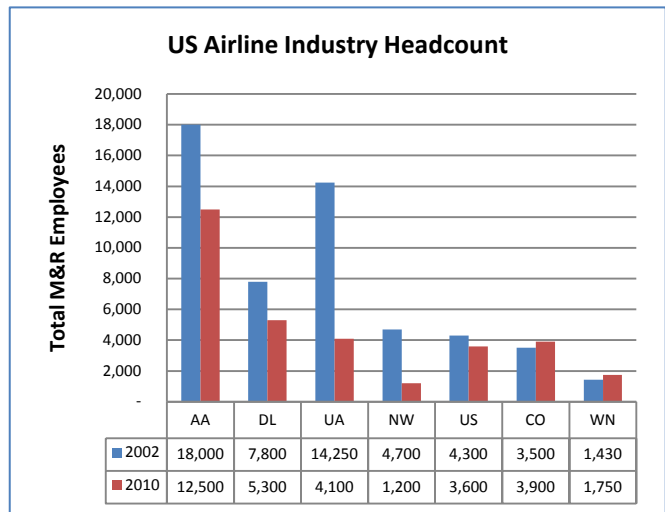
You should read this report with an open mind and we urge everyone to consider the serious ramifications of continued complacency and inconsistency.

Who Is Maintaining the U.S. Airline Fleet? During the average day, there are approximately 5,000 aircraft flying within the borders of the United States. Aircraft are flying at speeds of around 500 miles per hour and up to altitudes of over 40,000 feet. Today’s aircraft can carry up to 500 passengers and are an assembly of thousands of parts, complex electronics, and a variety of advanced materials. Ever



wonder who keeps these complicated and unforgiving technological marvels performing? Most passengers don’t and, to be honest, that’s what a well running aircraft maintenance department wants. Aircraft maintenance employees want you to enjoy your flight and to only be thinking about what is awaiting you at your destination. But, we must ask whether or not every aircraft maintenance organization runs in this way?

Prior to 2001, the majority of U.S. airlines performed their routine aircraft line maintenance and aircraft overhaul in-house. Airlines wanted control over aircraft maintenance of their fleets; this allowed airlines to optimize their maintenance programs and maintain top notch quality. The term “gold plate” was used in the industry for their aircraft since in-house employees took “pride of ownership.” Training was conducted consistently and often, the vast majority of aircraft maintenance technicians were FAA licensed, drug tested, and FAA inspectors would show up frequently to ensure proper compliance with safety regulations. This all radically changed with the wave of bankruptcies that occurred early on in the first half of the last decade. United, Delta, and US Airways, to name a few, gutted labor agreements, pay and benefits were slashed. Most airlines sent a major portion and in some cases all -- of airframe overhaul to outside providers of maintenance.



Northwest Airlines – before it went out of existence after being merged into Delta-- went further by outsourcing all aircraft maintenance except for two stations, Detroit and Minneapolis. Practically overnight the U.S. Airlines eliminated approximately 25,000 aircraft maintenance technicians and support staff positions. So who is doing the work now?

Initially airframe overhaul work was sent to facilities within North America. However, much of it has now been sent overseas. If you fly on a wide body aircraft operated by United, Delta, US Airways, or Continental, it’s most likely overhauled in China, Singapore, or Hong Kong. If you fly on a narrow body aircraft, it’s most likely been overhauled in the U.S., El Salvador, Costa Rica, or Mexico. At these facilities



outside of the U.S., the ratio of FAA licensed to unlicensed mechanics is mind boggling³. For instance AMECO overhauls 747, 767, and 777 aircraft for United Airlines in Beijing China with a staff of over 2,500 unlicensed mechanics supervised by only 5 licensed mechanics. **That's a ratio of 500 to 1!** Another example is at Aeromexico Maintenance in Mexico City and Guadalajara, Delta Airlines has its fleet of over 100 MD80s and MD90s overhauled where just over 550 unlicensed mechanics are overseen by just under 50 licensed mechanics-- **a ratio of 10 to 1.** There is a language barrier problem in these operations. Large numbers of employees at these foreign facilities do not speak English. This wouldn't be a problem except the international language of aviation is English. Many of these foreign facilities do not translate the maintenance manuals and paperwork into the workers' native language, but instead require one of the FAA licensed mechanics to translate. You could imagine how hard it would be at a facility like AMECO where one mechanic is responsible for 500 unlicensed mechanics.

There is one way to ensure your aircraft has been maintained in the U.S. by trained, qualified, background checked, drug tested, experienced professional FAA licensed mechanics. At American Airlines, TWU Members have worked hard to ensure every plane is maintained to the highest possible standards set by the FAA. In many cases, AA goes above and beyond to ensure every aircraft is safe and reliable. At American Airlines overhaul bases in Tulsa, OK and Fort Worth, TX there are over 5,000 FAA licensed mechanics. These facilities also employ over 1,500 unlicensed mechanics, many of whom have specialized skills related to machining, welding, manufacturing and aircraft appearance responsibilities. Even though many of these unlicensed mechanics are highly skilled, the bottom line is for each unlicensed mechanic there are more than **3 licensed mechanics.**

The Transport Workers Union and American Airlines have collaborated to find innovative ways to control and lower cost, obtain high quality, and keep highly skilled jobs in America. Many U.S. airlines have not worked with their Unions and, in response; many of those Unions have chosen to take a different path and risked bankruptcy court rulings that were destructive. For example, management and mechanics at United and Northwest decided to fight any type of change and ended up with catastrophic sacrifices. At United, airframe overhaul was substantially outsourced resulting in a reduction of more than 50% in the mechanic and related workforce. The end result at Northwest was even worse. The Union representing aircraft mechanics at Northwest concurred with the Company's request for self-help during the industry downturn in 2005. The Company had carefully prepared for an aircraft mechanic job action and unfortunately continued to operate during the strike. In the end, 6,000 aircraft mechanics lost their jobs and all aircraft maintenance work was outsourced except for two stations – Detroit and Minneapolis – with less than 1,000 aircraft mechanics left at the time of the merger with Delta. Overall, the aircraft mechanic and related workforce at Northwest was reduced from close to 10,000 in 2001 to less than a thousand when the carrier was merged into Delta eight years later. At Southwest, the most profitable airline of major passenger carriers, the outsourcing problem persists. Work restricted under an earlier agreement negotiated by a predecessor Union to only North American facilities is now being sent to Aeroman in El Salvador. Aircraft Mechanic positions at Southwest are now capped at 2.75 per aircraft, without regard to whether the work can be completed more effectively by in-house aircraft mechanics. US Airways have retained a limited amount of overhaul work in-house, but aircraft mechanics did not bode well either, experiencing major job, wage, and benefit losses.

³ FAA Repair Station Database



The mass outsourcing of aircraft overhaul maintenance and the resulting closure of a majority of domestic aircraft maintenance facilities operated by U.S carriers has impacted all mechanic and related personnel. Highly skilled facility and automotive technicians, along with their experienced and capable support personnel, have been furloughed numbering into the thousands. Properties they maintained have been shuttered or sold. Most air carriers have now completely discarded this crucial function to limit their maintenance operations to the bare minimum.



Many observers have argued Unions are the cause of all the job, wage, and benefit losses at airlines mentioned. That would not be a true statement. Non-Union Delta airlines made the same choice to outsource aircraft maintenance work by substantially shedding airframe overhaul repair. The driving factor in the decision to outsource was obviously the reduced exposure to U.S. safety regulations and access to lower cost labor.

In The United States Who Is Working On My Aircraft? That is a really good question since it is not only who, but exactly how skilled, experienced, security background checked, and drug tested the person is? Do they understand the maintenance manuals they are using? How often are the FAA regulators checking to see if the rules are being followed? There is a system of trust, integrity, and compliance monitoring that has been built here in the United States. It didn't happen overnight; in fact, it was through government oversight, close interaction with manufacturers, and the work of well-educated Union represented aircraft mechanics working to improve the safety systems in place to advance safe aircraft passenger travel. So if the majority of U.S. airlines outsource their aircraft maintenance, who is doing the work?

Most would think that if the work was outsourced to aircraft maintenance repair facilities in the U.S. These aircraft maintenance repair facilities would be held to the same standard as the in-house airline aircraft maintenance repair facilities. Regrettably, that isn't the case. The major airframe maintenance repair outsourcers – AAR, TIMCO, Aviation Technical Services (ATS), and PEMCO – all operate in the U.S. None of these operators has to conduct background checks on their overhaul mechanics. The issue surrounding the gap in aircraft security at these repair stations has been under discussion since 2004, but as the following points show, the issue is still unresolved.

- *TIMCO – maintenance contractor for United, Delta, and US Airways – was found to have multiple employees working on critical aviation maintenance structures that had falsified immigration documents. The employees were caught in 2005 during a federal investigation.*⁴
- *On November 18, 2009 the Transportation Security Administration (TSA) issued a Notice of Proposed Rule Making (NPRM) to address the significant gaps on security that exist at repair stations. Currently those employees that do not have access to the airfield operations area do*

⁴ OIG DOT website <http://www.oig.dot.gov/library-item/3382>



*not have to undergo security background checks; however, they are allowed to work on safety sensitive structure, engines, and components.*⁵

At in-house aircraft maintenance repair stations at U.S. airlines, the requirements for security background checks are the same for all aircraft maintenance workers. United, American, Continental, US Airways, Southwest, and Delta all have their repair station employees undergo background checks. However, at the low cost outsourcers, the checks generally stop. Since outsourcers are not required by law to conduct security background checks, they by and large are not done and the low cost repair stations like it this way. In a January 5, 2011 letter from the Aeronautical Repair Station Association,⁶ the stated position is; people who work on airframes, engines, and components do not pose any significant risk and the system in place is fine. In fact, the letter even goes on to state drug testing policies in place in the U.S. are unenforceable overseas so, therefore, should not be applied at all to foreign repair stations. Consider the following incidents and think about whether or not the current policy is effective.



- *In 2003 at a Singapore major maintenance facility, it was discovered that an Al Qaeda member was found to have been working on aircraft for Northwest. This security gap was reported in an US Inspector General Report in 2003⁷ as a serious concern in that neither the FAA or TSA has jurisdiction over these employees under current regulations.*
- *In January 2011, FAA has proposed a \$1.025M fine of ST Aero for hiring 90 repair station employees at its San Antonio, TX facility without performing the required drug tests. This facility performed overhaul work on Delta 757s during the period in question.*

What about the skills and ability of the repair station mechanics? Mechanics were laid off from the United, Northwest, US Airways, and

Mechanic Headcount	2000	2009	Percent Change
All Passenger Airlines	64,248	42,774	-33%
Network (7 Airlines)	55,715	31,448	-44%
Low-Cost (7 Airlines)	3,630	3,300	-9%
Total Fleet Count	3,732	3,507	-6%

Delta overhaul facilities were highly trained, experienced, and almost all licensed by the FAA. Airlines routinely hired mechanics that gained experience in the military, general aviation, and regional airlines.

The work they performed has not been moved to facilities with equal skill and capabilities. Overhaul work for United, US Airways, and Delta is now done in countries like China, El Salvador, Singapore, and Mexico, to name a few, and the standard of work being performed by these facilities is often not of acceptable quality. For example, read the following issues that have come up in recent years:

- *US Airways mechanics found incidents of door components installed backwards and crossed wires for critical engine instrumentation. All this work was conducted at Aeroman in El Salvador.*

⁵ NPRM 49 CFR, Subchapter C, Part 1554 http://www.tsa.gov/research/laws/regs/editorial_1878.shtm

⁶ ARSA letter RE: DOT-OST-2010-0074 dated January 5, 2011 <http://www.arsa.org/files/ARSA-DOT-OST-2010-0074-Comments-20110105.pdf>

⁷ OIG AV 2003 047



During a NPR interview Aeroman mechanics stated that many did not speak English even though the manuals are not in Spanish.⁸

- *The OIG stated in their 2003 report that of the repair stations visited, 38 percent did not maintain training files for supervisory personnel that were overseeing the work performed.*
- *Aeroman mechanics say managers kept pressuring them to fix the planes faster. For instance, if there's rust on a metal beam, but it's just a little over tolerance, "the supervisor says, 'Oh, just leave it like that,' " the mechanic says, through an interpreter." 'There's no need to repair it.'⁹*
- *The 2003 OIG report AV-2003-047 detailed an incident (airline de-identified) of an aircraft operated by a US carrier that had been delivered as airworthy yet had over 6,000 discrepancies. The defects such as cracks and severe corrosion were so bad that the air carrier submitted six service difficulty reports.*

While some labor Unions seem to have given up on the fight¹⁰, the TWU (AA Mechanics Union) continues to push for uniform standards for all aircraft maintenance facilities. The TWU continues to lobby for stricter standards for all FAA licensed repair stations.¹¹ The issue is not protectionism, but safety, and the need for a single standard of safety.

Airline	Airframe Ovh'l	Engines Ovh'l	Components Ovh'l
American	Tulsa, OK & Ft Worth, TX	Tulsa, OK & Ft Worth, TX	Tulsa, OK & Ft Worth, TX
Airtran	Outsourced Domestic	Outsourced Domestic	Israel & Outsourced Domestic
Alaska	Canada & Outsourced Domestic	Outsourced Domestic	Outsourced Domestic
Continental	Hong Kong & Outsourced Domestic	Spain & Outsourced Domestic	France & Outsourced Domestic
Delta	Hong Kong, China, Mexico & Outsourced Domestic	Atlanta, GA	Hong Kong, China, Mexico & Outsourced Domestic
jetBlue	El Salvador	Germany	Germany & Outsourced Domestic
Northwest	Singapore, China, Hong Kong & Outsourced Domestic	Singapore & Outsourced Domestic	Singapore, China, Hong Kong, & Outsourced Domestic
Southwest	El Salvador & Outsourced Domestic	Outsourced Domestic	Outsourced Domestic
United	China & Outsourced Domestic	San Francisco, CA	Hong Kong, South Korea & Outsourced Domestic
US Airways	El Salvador & Outsourced Domestic	Outsourced Domestic	El Salvador & Outsourced Domestic

Where U.S. Air Carriers have their aircraft maintenance work accomplished

⁸ NPR October 2009 <http://www.npr.org/templates/story/story.php?storyId=113877784>

⁹ NPR October 2009

¹⁰ Southwest Airlines/AMFA CBA 2009 ¹⁰ TWU Representative R. Gless February 11, 2009 testimony on FAA Reauthorization Bill



Isn't The FAA Ensuring the Regulations Are Followed? The FAA's responsibility is to ensure the regulations are followed by the airlines. The FAA has a staff of 4,000 to oversee 4,200 repair stations within the U.S., but overseas there is only a staff of 100 to ensure compliance at 700 foreign repair stations. So while in the U.S. you can expect a close 1 to 1 ratio of repair stations to FAA Inspectors,

"There are three major concerns that we have with regard to repair work performed at foreign aircraft repair stations. First, we have long held that our belief is that the same standards should be applied to repair work being performed on U.S. bound aircraft regardless if the work is done in the U.S. or abroad. Second, the loss of thousands of American jobs to outsourced foreign repair mechanics further weakens our U.S. economic security. And finally, we have a concern regarding security breaches within and around the perimeters of facilities which can lead to sabotage.

Robert Gless – TWU International testimony to
Subcommittee on Transportation Security and Infrastructure
Protection of the Committee on Homeland Security

overseas the ratio is 7 to 1. Considering travel time due to the locations of most of these facilities, difficult access, the barriers for effective oversight are painfully obvious. The issue becomes even more of a concern when factoring in the ratio of FAA licensed mechanics to non-licensed mechanics in locations like China where there are 500 non-licensed mechanics to every one licensed mechanic. So what is the FAA doing to address this problem?

The issue of oversight is a complicated one. The FAA's role has been evolving along with the technology of aviation maintenance since the

agency came in to being in 1958. The Airline Deregulation Act of 1978 changed the industry dramatically when new airlines entering the market brought in a new dynamic of competition. The purpose of deregulation was to allow greater access to air travel for more people. While air travel has grown along with the population, how has safety been affected in regards to incidents and accidents?

At the same time air travel was becoming more common place, aviation technology improved. The aircraft became safer, but they also became more complex to maintain. Composite materials, advanced avionics, and new maintenance information technology are now the rule instead of the exception. There has also been a shift in how aviation maintenance is being monitored for compliance with the safety regulations. In 1998, the FAA implemented the Air Transportation Oversight System (ATOS) in response to the newer generation of aircraft and information systems available and the belief that the airlines, manufacturers, and regulators had a better understanding of the technology in use. Aircraft did not need as much scheduled maintenance as in the past and by analyzing the data, issues could be resolved quickly and safely. ATOS is a good concept, if executed as envisioned, but the environment changed dramatically in 2002.

% of Maint. Outsourced	2001	2009
American Airlines/TAESL	15%	12%
Continental	40%	45%
Delta	24%	31%
Northwest	28%	61%
United	18%	41%
US Airways	29%	60%

In 2002, airlines started to lose the ability to borrow money to stem their losses. Operating costs easily outpaced revenue and bankruptcy was the option most airlines took. The FAA stepped up their oversight of airlines based on the concern that safety should not be compromised to lower costs. The ATOS system in place was still evolving and the major financial crisis at nearly all the airlines was unprecedented. The FAA did not have the resources to meet the demand for increased inspections that were needed as the problems got worse. United, US Airways, and Delta dropped most, and, in some cases, all airframe overhaul at Northwest they went even further by outsourcing all airframe and engine



overhaul along with line maintenance at all but two cities. Outsourcers of aircraft maintenance promised airlines they could handle the new influx of work. The FAA had implemented ATOS on airlines that performed most of their maintenance in-house, but this changed overnight. Safety oversight was now severely strained and the financially strapped airlines decided costs needed to be lowered further. Maintenance on nearly all wide body aircraft and some narrow body aircraft was moved to foreign repair stations. The FAA did not have the inspection staff in place to cover this occurrence and airlines and the FAA did not move to adapt ATOS to properly oversee the change in work responsibility. The OIG had already signaled concerns about oversight and now the issues were magnified many fold.

- *The NTSB¹² in 1997 recommended to the FAA that it 1) ensure that passenger aircraft maintenance receives the same level of FAA oversight, regardless of whether it was performed in-house or by repair stations 2) review the workload of inspectors assigned oversight responsibility for repair stations to ensure those inspectors have sufficient time and resources to perform surveillance.*
- *In the 2003 OIG report AV-2003-047, it was noted that the FAA inspected one major US airline 400 times at its in-house facilities, yet only inspected its outsourced facilities 7 times in 2002. Only 7 inspections when the airline was outsourcing 44% of its total maintenance costs!*
- *Also in the OIG report AV-2003-047, the report stated that "...the FAA has no mechanism in place to obtain information on how much work is outsourced, domestically or overseas. FAA inspectors believe it is not part of their oversight responsibility to track this information."*
- *FAA inspector staffing and budget problems are hampering the oversight process. At five of the nine major air carriers reviewed, the OIG was told they could not perform their tasks due to the constraints of the current budget. One inspector was so constrained the office was only able to inspect 16% of one carrier's substantial maintenance providers.¹³*
- *The OIG reported again in 2010 that the FAA was not able to get their required inspections accomplished. During the period of FY2005 and FY2009, inspectors at 8 major US carriers did not complete 340 inspections of which 180 were high-criticality. The Southwest Airlines inspection office missed the most inspections (57) during the required time intervals. Between 2006 and 2007 the FAA did not inspect Southwest's AD Management Program for almost 18 months.¹⁴*
- *The FAA is not following its own risk assessment guidance. During the merger of Northwest and Delta the FAA rated neither of those airlines as a higher risk even though the FAA lists "Merger or Takeover" as an area of increased risk and stepped up inspections were required.¹⁵*
- *During the period of FY2002 to FY2009 the US Airways inspection office completed slightly less than 25% of its inspection workload. US Airways outsourced 60% of their total maintenance spend in FY2009.*

One can easily tell the problems and issues are well documented; however, the FAA has not caught up to the changing airline environment. There are insufficient inspectors for foreign repair stations and there is no way they can adequately and uniformly ensure the same level of compliance at all repair stations foreign and domestic. The FAA clearly has work to do to ensure airline passengers can be

¹² AV-2003-047 page (x)

¹³ OIG AV-2008-090 September 30, 2008

¹⁴ OIG AV-2008-057 June 30, 2008

¹⁵ OIG AV-2011-026 December 16, 2010



assured their aircraft has been maintained to the same standard of quality and compliance. Under the current system of controls and oversight, unless a passenger is flying on American Airlines, the chances are the aircraft they're on was maintained by a repair station which may or may not have been inspected within the last five years.

Is There A Solution? How Can The Public Be Reassured Their Aircraft Is As Safe As Possible?

Under the current regulatory system there are no assurances. There is hope, the TWU, the AFL-CIO Transportation Trades Department and its affiliates have been working together to get the aviation safety system working right. The U.S. has a long history of being the safest, most advanced air transportation system in the world and airline labor wants to keep it this way. The TWU through the Transportation Trades Department has advocated for stricter legislation for drug testing, uniform standards of repair station licensing, and security background checks for anyone who work's on an aircraft, engines, and components regardless of whether or not the employee is on or off the airport area of operations. While many lobbyists for independent repair stations and Corporation's would say Unions want to protect their member's jobs at the expense of affordable air travel, consistent uniform safety standards are the best possible protection for the traveling public. The following reforms are necessary to achieve this standard;

- Require that all maintenance on all U.S. aircraft used in service be maintained in FAA-certified repair facilities.
- Require, as a condition of FAA certification, all repair stations meet the same standards. This would include, but not be limited to, drug and alcohol testing and Part 65 aircraft mechanic certification, background checks etc.
- Reconfigure FAA inspection and oversight to place the greatest scrutiny on those repair stations whose audits determine to pose the greatest risk to safety and security.
- Require, as a condition of FAA-certification, all repair stations be subject to unannounced FAA inspections. The FAA shall be prohibited from certifying any repair station in any countries that prohibit unannounced inspections and shall immediately revoke any existing certifications in these countries.

While these points are merely a short list, there are legislative actions already moving forward at this time. The FAA Reauthorization Bill has been discussed and reworked but has yet to be voted on by both houses of Congress. The TSA has also issued a Notice of Proposed Rule Making on repair station security that needs to move forward so passengers can be assured the work done on the aircraft was done by people who have been thoroughly screened. The traveling public has a right to demand safe air travel and the government's role must be to ensure that safety is not compromised.

Leveling the Playing Field - A TWU Priority- The TWU understands the obstacles labor faced during the past decade. There have been pay concessions, loss of pensions, huge job loss at a majority of the air carriers and significantly more expensive health care. As the largest single organized aircraft maintenance labor group in the U.S., the TWU looks to show Unions are not the problem, but part of the solution to what ails the airline industry. By working to enhance productivity and improve quality, the



TWU has shown there is potential for U.S. labor to compete and win in the current financial environment.

We are now working to set a clear direction with goals and campaigns developed by the AFL-CIO Transportation Trades Department. In addition, we are working with our new labor Coalitions, the (IBT) International Brotherhood of Teamsters and (CAPA) Coalition of Airline Pilots along with the (APA) Allied Pilots Association and (APFA) Association of Professional Flight Attendants at American, to persuade Congress, the FAA, and the Department of Transportation to preclude substandard aircraft maintenance by requiring the proper oversight by the FAA and other greatly needed safety and security measures. All this to ensure the U.S. remains the leader in safe air travel. Educating the flying public, legislators and the media is paramount due to the fact we are facing corporations which have large, well-funded lobbying groups who will fight any legislation that would require proper effective oversight. We can only overcome this handicap by each and every one of us becoming more personally involved in securing the proper safety standards for the future.

On Capitol Hill, concerned legislators have been working to correct the problems with the current Federal Aviation Regulations. The FAA Air Transportation and Safety Improvement Act (S223) passed the Senate in February 2011, but with several anti-worker amendments. The new bill has been weakened significantly however. Foreign repair station inspections have been reduced to “risk-based” versus required and the U.S. Secretary of State and Secretary of Transportation only “request” not require drug and alcohol standards for foreign repair stations that work on the U.S. commercial fleet. To make matters worse countries that sign bi-lateral agreements with the U.S. will be able to conduct their own inspections on behalf of the FAA. While many established regulatory agencies in Europe, Japan, and Australia to name a few, are equivalent to the FAA, many countries are not. The risk-based system is flawed as noted in the OIG 2008 and 2010 reports¹⁶ and until the system is corrected, the FAA should be conducting the inspections. The House is moving forward with their version of the bill (HR658) which is more anti-worker than the Senate bill and seeks to liberalize inspections, drug testing, and background checks even further. There is even an amendment to the bill seeks to repeal the changes by the National Mediation Board (NMB) that make Union organizing election rules more reasonable. The bill should focus on improving aviation safety and security not partisan politics or business lobbyists who want



"We just want a level playing field where we know they have the same oversight, they're dealing with the same things we're dealing with, and they're required to meet the same requirements that we are."

Don Videtich – TWU

¹⁶ OIG AV-2008-057 June 30, 2008 and OIG AV-2011-026 December 16, 2010



profits with no consideration to for the private citizen's well-being.

Enough is enough! The public, as well as all aviation professionals should be extremely concerned. The government must determine an acceptable set of standards to ensure the traveling public's safety. If drug and alcohol testing, security background checks, and frequent compliance inspections by the FAA is not important enough to do abroad, then why do it at home in the U.S. to airline owned aircraft maintenance repair facilities? The answer is simple, any reasonable person wants a drug free, fully screened, and closely monitored aircraft mechanic responsible for working on their aircraft as it flies at 30,000 feet at over 500 MPH. Every American should be appalled at the compromises being made, while other federal watchdog agencies like the Inspector General and NTSB have pointed out for over ten years specific issues must be addressed. What can you do? Contact your Representatives and Senators today and let them know your safety and security is important and to pass the bills S223 and HR658 without the new amendments. The current bill with amendments weakens the FAA's ability to ensure acceptable standards of safety and security. Act now!

At the bargaining table, the TWU is working hard to ensure the Membership we represent reaps the benefits of their hard work, financial sacrifices, and increased productivity. This goal will be achieved through a unified effort of all TWU brothers and sisters. At AA these contract negotiations are our number one priority, no matter how frustrated we are with the process dictated by the Railway Labor Act and the extended time we have been in mediation/negotiations. We must remember at this critical time to respect one another's opinion. At the same time-make sure the inevitable and necessary debate among ourselves is based on accurate information and fact rather than innuendo, and motivated by a true desire to move the Membership forward.

In closing, no matter how daunting the task before us may seem, no matter how this industry may have betrayed our thoughts and dreams of how we envisioned our careers, no matter how many times we hear from people that have not been in the arena and claim to have all the answers, it is best to reflect back to some of the best advice provided by the founder of our Union:

"...whatever the problem, your efforts will be crowned with success only if your Union is sound and united. It takes planning, patience, vigilance and determination to win any struggle, regardless of the arena. Above all else, the Membership must wholeheartedly believe in its organization and the role it can play in building a better world."

"We have learned that a labor Union is not a gambling table; it is not a bingo game where you hit the jackpot once in a lifetime. Membership in a Union is a way of life. Dues payment is not enough. You must attend meetings, prepare yourself for leadership...you must invest part of yourself." Michael J. Quill

In Unity