MARPA and You

Working Together to Make PMA Successful

MARPA

- Trade Association representing PMA parts manufacturers
- Established 1999
  - To give the PMA industry a voice in Washington
    - Promote regulations that ensure safe practices
    - Protect the PMA industry
  - To educate our customers about PMA's safety record
  - To promote the value posed by PMA
  - To circulate industry best practices

MARPA's Role

- Coach
  - We promote best practices
  - We work with industry committees to help establish uniform industry lobbying positions
- Cheerleader

  - We work with the customer base to promote PMA
  - Safety, reliability, availability & economic benefits
- Referee

  - We work directly with government regulators to help ensure that regulations are fair to the PMA industry

10+ Years Ago

- Air carriers asked
  - What are these PMA parts?
  - Are they safe?
- TC holders called PMAs “bogus parts”
- Some non-U.S. Governments were not sure what to do with PMA parts
- The U.S. Government was taking steps to educate our trading partners about PMA
- MARPA was formed in 1999

Today

- Air carriers are asking
  - How can I convince my leasing companies to partner on use of PMA parts
- TC holders are active participants in the PMA market
  - Licensed PMAs
  - Partnering with PMA holders
  - Acquisition of PMA holders
  - Acquisition of their own PMAs
- Non-U.S. Governments are comfortable with PMA parts
  - 2007 EASA Directive
  - EASA-FAA BASA recognizes PMA parts (May 1, 2011)
  - China and Australia are issuing their own PMAs
- The U.S. Government has issued Reports and Bulletins supporting PMA parts
- MARPA continues to work with industry and governments

Look at the Comparison!

Past

- Air carriers asked about PMAs
- TC holders called PMAs "bogus parts"
- Non-U.S. Government uncertainty

Today

- Air carriers are asking
  - How can I convince my leasing companies to partner on use of PMA parts
- TC holders embracing PMA as a way of doing business
- Non-U.S. Governments comfortable with PMA parts
  - Accepting PMA parts under bilateral agreements and local legislation
  - Issuing their own PMAs
  - Contemplating additional PMA structure

How Did We Accomplish the Change?

- As an industry, PMA manufacturers have been successful in protecting safety while also providing value to our customers
  - We have demonstrated our commitment to safety through our safety record
  - We have demonstrated our commitment to safety through our industry activities

COS – an Example of the PMA Industry's Commitment

- The MARPA Continued Operational Safety (COS) Program (published in 2007)
  - Problem Prevention
    - Initial data gathering
    - Prediction of future issues
  - Parts Monitoring
    - Field data collection and monitoring
  - Problem Response
    - Closed-loop response to all issues
    - Industry communication concerning issues

What Has Adoption of COS Done for Us?

- Demonstrated our safety commitment to the customers
- Demonstrated our safety commitment to the FAA
- Demonstrated our safety commitment to non-U.S. governments
- This has made it easy for MARPA to promote the industry

Major Regulatory Milestones

- 2007 EASA Decision 2007/003/C
  - Codified EASA position accepting PMAs
- 2007 MARPA publishes its COS Program
- 2008 FAA Order 8110.42C
  - Recognizes the importance of COS

More Regulatory Achievements

- 2008 SAIB NE-08-40
  - Affirmed that PMA parts are interchangeable with TC/PC parts, and that FAA approved limits and instructions continue to apply to them
- 2009 RAFT Report
  - Recognized that PMA parts are safe and that FAA oversight is adequate
- 2009 Part 21
  - Codified Order 8110.42 by unifying the quality system regulations that apply to PMA and PC holders

The Next Challenges

- Part 21 implementation
- Safety Management Systems
- Streamlined PMA Application Processes
- Educating the Leasing Community about PMA Value

Part 21 Implementation

- Only 47% of PAHs had started the process of getting quality manuals approved
  - Submit your quality manuals to the FAA by April 16 if you have not already done so!
- Supplier control
  - 21.137 requires supplier control
    - NOT just confirmation of quality of materials
  - Recent FAA guidance on nickel parts requires unusually high levels of supplier control

ICAO's Vision of SMS

1 Safety Policy and Objectives

- 1.1 – Management Commitment and Responsibility
- 1.2 – Safety Accountabilities of Managers
- 1.3 – Appointment of Key Safety Personnel
- 1.4 – Coordination of Emergency Response Planning
- 1.5 – Documentation, Including SMS Implementation Plan

2 Safety Risk Management

- 2.1 – Hazard Identification Processes
- 2.2 – Risk Assessment and Mitigation Processes

3 Safety Assurance

- 3.1 – Safety Performance Monitoring and Measurement
- 3.2 – The Management of Change
- 3.3 – Continuous Improvement of the SMS

4 Safety Promotion

- 4.1 – Training and Education
- 4.2 – Safety Communication

Safety Management Systems

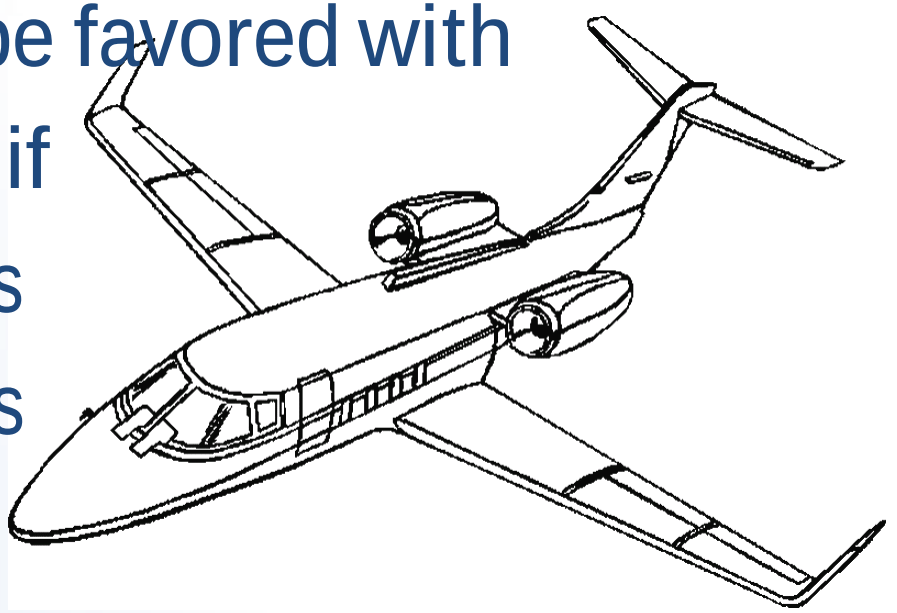
- SMS is an effective method for managing safety
- ICAO has asked governments to mandate SMS as a means of managing safety
- Challenge:
  - How does the government promote the beneficial aspects of SMS without inhibiting future innovation in systems management

MARPA and SMS

- MARPA was a member of the FAA's first SMS Aviation Rulemaking Committee (ARC)
  - We expect a new ARC either late in 2011 or else in 2012
  - We developed Design & Manufacturing Industry comments (with AIA and GAMA) and two sets of MARPA comments in response to the air carrier SMS rule, because it will serve as the foundation for a manufacturer's SMS rule
- MARPA is working with the FAA to develop performance oriented-standards instead of process-oriented standards
  - The provide industry with more discretion to develop and optimize processes that work, *and that can be improved*

Streamlined PMA

- MARPA has developed a template for non-critical aircraft parts PMA applications
- FAA is developing guidance to permit certain non-critical parts to be favored with expedited treatment if the application meets certain FAA standards



Leasing

- This summer, MARPA will begin working on the development of a White Paper on PMA and Leasing

- Anyone who would like to participate is welcome to join the development team

Get Involved

- MARPA is made up of the PMA community
- You are the heart and soul of MARPA
- MARPA Committees
  - Board of Directors
  - Continued Operational Safety
  - Technical
  - Marketing

Thank You

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