

The MARPA Supplement

Volume 3, Issue 9

August 28, 2009

Quick Notes:

- Please make your hotel reservations for the MARPA conference today so you do not get closed out of the hotel.
- We will publish a list of the early registrants for the 2009 Conference on our website by Sept 7.
- See MARPA's Blog at <http://pmaparts.wordpress.com> for expanded versions of Supplement articles and additional features.
- Please file comments on both the SMS ANRPM and the Draft 21.93 AC and share them with MARPA.



MARPA has lined up several FAA speakers to address the 2009 MARPA Conference.

Day one of the conference will feature Dave Hempe discussing demonstrations of compliance. The final speaker on day one be Barbara Capron, giving a long-awaited overview of the new Part 21.

FAA Speakers Announced

The Deputy Associate Administrator, John Hickey, will be giving the second day keynote address at the conference.

Day two will also feature FAA discussions of:

- ◇ FAA's engine vibration guidance,
- ◇ FAA's PMA Template Advisory Circular,

- ◇ FAA RAFT report implementation,
- ◇ Fuel tank system component replacements and critical design configuration control limitations (CDCCLs)

Register for the conference today to get a front row seat for this valuable new guidance from the FAA!

What Does Safety Management Systems (SMS) Entail?

With all of the industry buzz lately about Safety Management Systems (SMS), companies have found themselves asking what exactly SMS entails.

An SMS is the formal process of using System

in the present to address future safety needs.

The SMS approach can be used throughout the aviation industry to meet System Safety standards set by the International Civil Aviation Organization

available to the NAAs).

SMS may not be as foreign a concept as it may initially sound. Many MARPA member companies have implemented Continued Operational Safety (COS) programs. COS programs permit safety data collection and risk-based analysis of that data and are viewed as providing the necessary infrastructure to support an SMS program.

For more about SMS, see other articles in this month's supplement, or visit the MARPA blog.

Mark your calendar! The 2009 MARPA Conference is scheduled for Sept. 29th-Oct. 1st. Find out more information online at <http://www.pmamarpa.com!>

Safety practices in an organization's everyday activities to control risk. Essentially, SMS is like a quality assurance system that uses risk-based analysis to look forward and predict future needs. This allows a company using SMS to commit resources

(ICAO). ICAO has asked states to implement both SMS programs and State Safety Programs (State Safety Programs are risk-based analysis programs for national aviation authorities to use to better manage safety with the often-limited resources

MARPA

2233 Wisconsin Ave., NW
Suite 503
Washington, DC 20007
Tel: (202) 628-6777
Fax: (202) 628-8948
Jason@WashingtonAviation.Com

President

Jason Dickstein

Meetings and Membership

Manager

Katt Stanley

Board of Directors

Nate Dalton
John Hunter
Bruce Johnson
Dennis Piotrowski
Rod Sands
Kent Whitmer

Don't forget to visit the MARPA
blog at [http://
pmaparts.wordpress.com](http://pmaparts.wordpress.com)

SMS: Time to Add Your Two Cents!

The FAA has put out a call for comments on the Safety Management Systems (SMS) rulemaking. This request was issued in the form of an Advance Notice of Proposed Rulemaking (ANPRM) published in the Federal Register. As mentioned in last month's issue of the MARPA supplement, MARPA has been working on the SMS project, and is represented on the SMS Aviation Rulemaking Committee (ARC).

The International Civil Aviation Organization (ICAO) has published significant guidance on implementing SMS programs; so much guidance, though, that it must be reduced significantly to a level that will permit the publication of implementing regulations. In order to help the FAA make sense of what is necessary— and what is not necessary— within a SMS pro-

gram, the FAA has issued the ANPRM asking for the industry's opinions about some of the core elements of SMS.

A primary focus of this ANPRM is on collecting data about existing SMS programs, but it would also be important for companies to share information about non-SMS programs that meet the same objectives as SMS programs. **MARPA member companies' data and information about their implementation of Continued Operation Safety (COS) programs is an example of data that would be very useful to the FAA.**

MARPA member companies should forward copies of their comments to MARPA headquarters so that we can be sure your comments and concerns are also addressed in MARPA's own comments.

Have You Booked Your Room for the 2009 MARPA Conference?

With the MARPA conference less than a month away on September 29 – October 1, have you made your hotel reservations at the Renaissance Las Vegas?

You can make your hotel reservations online, by following the "Hotel Reservations" under the "Conference" section on the MARPA webpage (pmamarpa.com) or by calling the Renaissance at 800-750-0980. If making reservations by phone, make sure to mention the MARPA conference to ensure that you receive the special MARPA discount rate.

Be sure to reserve today while rooms are still available!

Major/Minor AC: PMAers need to Comment!

The FAA has offered for public comment a new mechanism for distinguishing major changes to type design from minor changes.

The idea of an effective tool for distinguishing major / minor changes to type design is a good idea; but there are problems with the initial FAA draft.

An important problem with the proposal is that it appears to impose a new burden to perform an analysis and affirmatively determine that a minor change to type design is, in fact,

minor. The existing language of 21.93 does NOT impose a burden to identify whether a proposed change is a major or minor change to type design. Instead, it provides guidance to make such a distinction, and imposes no specific recordkeeping burden.

This is a potential problem for the PMA community because obviously minor PMAs will now need to be analyzed before installation using system effects analysis, despite the fact that the PMA part may be obviously minor in its affect

on "the weight, balance, structural strength, reliability, operational characteristics, or other characteristics affecting the airworthiness of" a product (the regulatory definition of minor). This appears to be wasteful of resources in cases where a change is obviously minor, and it could have a chilling effect on the purchase of PMA parts.

MARPA members should review this draft and file comments. Find more details/instructions on our blog!

«Line 1»
 «Line 2»
 «Line 3»
 «Line 4» «Line 5»

Got something to say? You can read and comment on articles on the MARPA Web Log (Blog) online at pmaparts.wordpress.com or through our homepage (www.pmamarpa.com). Sign up for updates via email or RSS feed!