



## MODIFICATION AND REPLACEMENT PARTS ASSOCIATION

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### **Anti-PMA Rhetoric is Wrong; PMA Parts are Valid, Says FAA**

The FAA has issued a special bulletin reminding the industry that PMA parts are perfectly valid for use, and that competitors' rhetoric questioning FAA-approved PMA parts is contrary to FAA technical findings.

The FAA announcement came in the form of a Special Airworthiness Information Bulletin, or SAIB. The FAA uses SAIBs as a mechanism for communicating safety information that is valuable, but that falls short of the requirement for issuing an Airworthiness Directive. SAIBs are meant to alert, educate, and make recommendations to the aviation community. Normally, SAIBs are issued about specific technical concerns that the FAA has identified.

It is highly unusual for the FAA to answer an industry marketing campaign with a SAIB, but that is what we seem to have here in the August 8th SAIB addressing PMA parts. Various manufacturers have made a variety of commercial statements designed to undermine public confidence on PMA parts. The FAA specifically notes that "some engine manufacturers responded to the FAA's approval of PMA and STC for parts involving their type design engine models by telling customers that support of their products could be limited if such parts are installed." The FAA explains that some manufacturers "have included language in the FAA-approved airworthiness limitation section (ALS) of their engine instructions for continued airworthiness (ICA) stating that the ICA was developed only for use with their parts."

By issuing this SAIB, the FAA has said "enough is enough." The SAIB makes it clear that when the FAA approves a PMA part, they expect that the industry will treat that approval with the respect that a decision of the FAA deserves, and that furthermore such parts are entitled to the full recognition of the FAA's approval, and it is not up to the engine manufacturer to say that installation of a PMA part is wrong or invalid.

Jason Dickstein, President of the Modification and Replacement Parts Association (MARPA), asserts that "The FAA's issue of this SAIB sends a strong message to competing manufacturers and consumers of aircraft parts, reiterating that PMA parts meet FAA approval standards." Dickstein also notes that "With the current state of air carrier instability, more airlines are looking for safe and cost effective parts to help offset increasing fuel prices. PMA parts meet those needs."

The FAA draws four important conclusions in the SAIB:

#### **PMA Parts are Valid Replacement Parts**

FAA-approved TC/PC holder, PMA, and STC parts are interchangeable within the certificated product since they are approved only after a full demonstration of compliance to the applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR). A PMA or STC part, when FAA-approved for installation on a certificated product, is a valid replacement part to the TC/PC holder part according to 14 CFR.

#### **Installation of PMA Parts Does Not Change the Life Limits for the Other Parts In the Assembly**

Unless stated otherwise as a limitation to an STC, the FAA has determined and the applicant has shown that FAA-approved life limits established for the TC/PC holder parts remain unchanged for those TC/PC holder parts when PMA or STC parts are installed elsewhere within the product. For example, the life limit for a TC/PC holder disk is unchanged and remains in effect when PMA blades are installed in that disk.

#### **A PMA Holder Has Shown that the ICAs are still Valid OR Has Provided a Supplemental ICA for any Differences**

The FAA approves the content of an ALS and ICA based upon its review of the substantiating data provided by an applicant. Applicants for PMA or STC parts are required to assess the ICA requirements. A PMA or STC applicant either shows and states that the product's ICA are still valid with their part installed or provides a supplemental ICA for any differences.

#### **PMA Holders Remain Responsible for Continued Operational Safety**

TC/PC holders, PMA holders, and STC holders are responsible for the Continued Operational Safety (COS) support in accordance with the applicable standards for their parts and products which they have designed and produced.

MARPA has been supporting the PMA community's COS Obligations by publishing recommended guidance to help companies develop their own COS programs. At this year's [2008 MARPA Annual Conference](#) (held October 14-16 in Las Vegas), the Association will feature a COS workshop to assist companies in developing FAA-compliant COS programs.

The full text of the FAA's [Special Airworthiness Information Bulletin](#) is available for review.

MARPA, is a non-profit association of aviation industry modification and replacement PMA parts manufacturers, and other individuals and entities associated with that industry. The Association promotes its members' business efforts by promoting uniform standards of excellence in the members' efforts to secure FAA design and production approvals for parts while representing the industry on regulatory issues. MARPA speaks with a single, powerful voice to the entire worldwide aviation community thereby elevating the acceptance and prestige of each of its members.

MARPA is based in Washington, DC, providing association members with a voice in the nation's Capital. The Association represents its members before aviation policy makers to prevent unnecessary or unfair regulatory burden while working with the FAA to improve the aviation industry's already-impressive safety record.

The only major trade group exclusively representing the PMA industry, MARPA represents a diverse group of interests dedicated to excellence in producing aircraft parts. MARPA supports its members' business efforts by promoting superior production standards for PMA parts.

The MARPA President is Washington, DC lawyer **Jason Dickstein**. Jason became the President of the Modification and Replacement Parts Association (MARPA) in the summer of 2007.

As a lawyer in the Washington, D.C. area, Jason has counseled and represented aircraft parts distributors, aeronautical repair stations, air carriers, and aircraft parts manufacturers (PMA/TSOA). He has advised and represents clients on matters concerning regulatory compliance and quality assurance. He has also represented a variety of aviation companies in enforcement actions brought by the Federal Aviation Administration.

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If you'd like more information about this topic, or to schedule an interview with Jason Dickstein, please call Brandy DeAngelo at 202.628.6777 or email [brandy@washingtonaviation.com](mailto:brandy@washingtonaviation.com)