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# PROFESSIONAL AVIATION SAFETY SPECIALISTS, AFL-CIO

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May 13, 2019

Ali Bahrami  
Associate Administrator for Aviation Safety  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Dear Associate Administrator Bahrami:

As you know, the Flight Standards Aircraft Evaluation Group (AEG) plays a critical role to ensure that pilot training, operational suitability, and aircraft maintenance instructions meet regulatory standards. More critically, the AEG provides real world review of these activities.

In recent years, these activities have been delegated to industry at a frantic, and accelerating, pace. Changes to guidance materials, most notably FAA Order 8100.15, are systematically removing the AEG from this direct and important role. A new iteration of this order is currently in the process of being implemented. This proposal incorporates sweeping changes that adversely affect the quality of these critical activities and the FAA's ability to oversee them properly.


These changes were developed without adequate consideration of AEG input and without the benefit of the normal review processes. The limited input provided by AEG employees was largely dismissed during negotiations between the Aircraft Certification Service (AIR) and industry stakeholders. Despite the significant impact on working conditions for Flight Standards personnel, there was no coordination between the FAA and the employees' union representative, the Professional Aviation Safety Specialists (PASS).

Recent tragic events have highlighted the insufficiency of the FAA's oversight of delegated aircraft certification activities. There are major gaps in the current delegation processes and oversight methods that have resulted in aircraft accidents and fatalities. PASS believes that these accidents are indicators of the risks that over delegation has introduced. These risks do not manifest themselves in the short term, and, for this reason, it is critical that the FAA reconsiders its delegation policy before implementation.

For the above-described reasons, PASS requests the delay of implementation of the proposed changes to Order 8100.15. It would be irresponsible to expand delegation authority when multiple investigations of the Boeing 737 Max are being conducted and a spotlight has been placed on the certification process. A proper review of Order 8100.15 after those investigations are complete—with full consideration of AEG and PASS input—is essential to ensure that we are not embedding risk into the system that will result in future aircraft accidents. In addition, under Article 23 of the PASS/Office of Aviation Safety collective bargaining agreement, PASS requests a representative selected by the union to coordinate the changes to the order and ensure proper implementation.

We look forward to working with you on this significant matter in order to ensure the safety of the flying public.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Perrone", written over a circular stamp or mark.

Mike Perrone  
National President