

THE VIEW FROM WASHINGTON

VICE PRESIDENT OF GOVERNMENT & INDUSTRY AFFAIRS FOR AFA

Professionalism

The personal qualities that are characterized by conforming to the ethical standards of a profession.

irst used in 1856, the word professionalism currently is a buzz word thrown around to promote a bureaucrat's personal agenda. But, unlike some of the other words, this is not one to dismiss lightly. Recently, there were a few issues on professionalism that caused me to think about our industry.

First, on June 23, 2011, the National Transportation Safety Board published its "top 10 critical changes needed to reduce transportation accidents and save lives." Of the top 10 issues, six are related to aviation, and four of the six are directly, or indirectly, related to our segment of the general aviation industry.

The issues on the new most wanted list are:

- Promote pilot and air traffic controller professionalism.
- Address human fatigue.
- Improve general aviation safety.
- Require safety management systems.
- Improve runway safety.
- Require image and onboard data recorders.
- Promote teen driving safety.
- Improve motorcycle safety.
- Address alcohol-impaired driving.
- Improve bus occupant safety.

One of the early discussions I had after joining the AEA back in 2001, was that AEA membership is predicated on meeting a "quality" standard. A few of the members were, and still are, strong advocates that the benefit of AEA membership should come with a requirement for quality and professionalism. Whether by design or requirement, it has been my experience that the members who commit to the tools and services that AEA membership offers exhibit the best the industry has to offer. We don't need to mandate a quality standard. The membership exhibits professionalism and quality, as well as pride in AEA membership on its own.

What got me thinking about this grand concept of professionalism was a recent call from a member regarding questionable paperwork from a supplier. As the paperwork was described to me, the original shipment was received with Federal Aviation Administration Form 8130-3 that didn't match the invoice, shipping documents or equipment received.

When the supplier was contacted, a replacement form was provided, but again it did not match the shipment. Following this run-around by the supplier, the designated engineering representative whose signature appeared on the original form was contacted directly. He responded that he hadn't done any work for the supplier for more than three years.

My comment to the AEA member was simple: Report the apparent falsification to the FAA immediately. The frustration for me was the supplier was a former AEA member. In my view, there is no room for intentional falsification of records and forms.

Merriam-Webster defines professionalism as the "personal qualities that are characterized by conforming to the ethical standards of a profession." Then, it further defines ethics as "the discipline dealing with what is good and bad and with moral duty and obligation."

The AEA staff has offered thousands of training hours at its regular regional meetings and conventions and on the pages of Avionics News to assist the members in their constant drive for professionalism. The association provides the opportunity for training and education on the professional standards of aviation, as well as the moral standards of good business practices.

Let me add a note on the role of associations here. There is a small segment of the industry, clearly a minority position, that believes the maintenance industry, as a whole, is somehow less than "professional," and that they need to belong to one group or another to "make them professional." Well, to them I say, get out of the rarified air of your corporate office, or in this case, your corporate hangar, and breathe some fresh air. Associations are tools to enhance knowledge and education; tools that enhance professionalism and not create professionalism.

The NTSB has recommended as one of its top 10 initiatives that the FAA should "promote pilot and air traffic controller professionalism." Why did they not include mechanics and technicians? I suspect it is because our standards are better defined, with little room for deviation without resulting in a regulatory violation. The NTSB did include SMS, which injects a concept of professionalism in the management role of maintenance and operations, but that is an issue for another day.

What are the professional standards we meet in aviation maintenance? It is the Federal Aviation Regulations (Title 14 of the Code of Federal Regulations). The moral standards are those that drive businesses to be fair and honest.

Each year, I get the privilege of visiting with nearly half the AEA membership as they demonstrate one element of professionalism – the pursuit of their continued education and knowledge at AEA events, shop visits and other industry events.

But, getting back to the paperwork issue. The Federal Aviation Regulations takes falsification seriously. In fact, 14 CFR 43.12 makes it clear that "no person may make or cause to be made any fraudulent or intentionally false entry in any record or report that is required to be made, kept or used to show compliance with any requirement under this part."

The regulations continue with "the commission by any person of an act prohibited under this section is a basis for suspending or revoking the applicable airman, operator or production certificate, technical standard order authorization, FAA parts manufacturer approval, or product and process specification issued by the administrator and held by that person."

We have had a few instances where honest paperwork mistakes have been claimed by the FAA to be a "fraudulent or intentionally false entry," which, unfortunately, diminishes the importance of this standard. On the other hand, some FAA inspectors have claimed falsification to support their "witch hunt" against common industry practices, such as "rebuilding" antique aircraft, which, in my opinion, is simply wrong. But, in the case of the suspect FAA Form 8130-3, this paperwork indicates that signatures were photocopied, serial numbers were wrong, and the paperwork itself was a reproduction. I have little patience for intentional falsification. May the FAA and the courts have their way with this manufacturer.

facturer (it is not an AEA member company), its lack of professionalism places it at the bottom of the industry. In my experience, 90 percent of the industry exhibits the highest levels of professionalism. This case demonstrates the intent and purpose of the incoming inspection required by the repair station's quality control system.

When the FAA reviews the repair station manuals and audits the repair station quality control system, one of the elements it should inspect are the procedures the repair station uses to receive and document the airworthiness of received articles. The receiving inspection should include a review for the

Whether by design or requirement, it has been my experience that the members who commit to the tools and services that AEA membership offers exhibit the best the industry has to offer.

So, how did the issue arise? It was caught by an unregulated incoming inspection; simply good business practices. The AEAmember distributor utilizes a quality system, which includes an incoming inspection. Their incoming inspection resembles the regulatory incoming inspection required by Part 145. So, when the equipment was received from the manufacturer, the receiving inspector questioned the paperwork. Their procedure elevated the questionable paperwork to management for review and analysis, and they contacted the manufacturer and attempted to get the paperwork corrected. When the manufacturer continued to send suspect paperwork, the AEA was contacted. And, as reported earlier, after reviewing the steps the member has taken to correct the discrepancies, the lack of response from the manufacturer and the seriousness of the actions, the only option was to report the apparent falsification to the FAA for investigation and action.

While I am disappointed with the manu-

proper documentation, identification and traceability of articles. If the article received or its paperwork is questionable, then the repair station's suspected unapproved parts procedures should be followed. Remember, this is for "suspect" parts. Once the part and/ or paperwork has been reviewed and investigated by the quality staff, further action may, or may not, be required.

So, we have the FAA constantly reminding us to be professional and the NTSB including professionalism as one of its top 10 items. This is a reminder that not everyone in our industry exhibits the highest level of professionalism, and that our professional business practices can detect and resolve unexpected and unusual supplier defects. Perhaps this is a good month to remind ourselves of the high ethical standards we have chosen to follow in our businesses. It is an opportunity to review our procedures and remind our employees and co-workers of the standards we are committed to uphold. \square