



THE VIEW FROM WASHINGTON

BY RIC PERI

VICE PRESIDENT OF GOVERNMENT & INDUSTRY AFFAIRS FOR AEA

Baseball Spring Training is Similar to Regulatory Training

Last month, I participated in a training program at one of our AEA member companies, and on the flight home, I sat with one of their customers who had attended the meeting. It was interesting to hear an “outsider’s” perspective of the regulatory guidance I give.

His perspective is not a new or unique perspective, but rather one I hear regularly: “It sounds great, but I’m too busy making a living to know this ‘stuff’ as well as you.”

He is correct. My job is to know the regulations; your job is to install and maintain avionics, operate a successful business, answer your customers’ questions about the latest avionics technology and, in your spare time, know the regulations. This is one of the reasons you are a member of the Aircraft Electronics Association. I work for you, the membership, as a ready resource to the rules.

What about regulatory training? Well, it’s like baseball’s spring training. Sure, I’m here to consult for the membership, but through the pages of *Avionics News*, the AEA’s annual convention and trade show, and AEA regional meetings, we constantly are reviewing the regulations, guidance and policy. Am I a teacher? I’d rather consider myself a coach — perhaps the batting coach.

Every member gets the opportunity to

bat the regulatory pitches offered by his or her authority, customers and, occasionally, the original equipment manufacturers. My job, as the batting coach, is to teach you which ones to swing at and which ones are outside the strike zone.

The question is, do I train you to swing for the fence each and every time at bat,

ball player’s goal is to get a hit every time at bat. But how do you measure success?

In 2009 Alex Rodriguez of the New York Yankees had a home run ration of 3.04. He struck out three times for every home run, which still put him in the top 10 home run hitters of 2009. Ichiro Suzuki of the Seattle Mariners led the league with

Like baseball, there are two leagues in play: those who simply want to satisfy their inspector and those who want their inspector to be satisfied with their business. Which are you?

or do I teach you how to hit so, when the opportunity arises, you can simply get on base?

Giuseppe Paolo DiMaggio (Joe to those who didn’t followed baseball) has the best strikeout to home run ratio of any player in history: He hit 361 home runs while striking out only 369 times, for a lifetime 1.02 ratio. He struck out as often as he hit a home run.

Can you imagine standing up to the whims (oops, I mean “recommendations”) of your inspector and winning every other debate? This would be unheard of; however, satisfactorily resolving every debate should be the goal — just like every base-

225 hits and a batting average of .352. A-Rod’s batting average was .286. Both are fabulous statistics and both are exceptional ball players, but for the average player, which statistic is more achievable? I would offer the batting average. Regardless of whether you’re a fan of home runs or just base hits, both of these stars succeeded only once out of every three at bats. So, how do you measure success?

Like baseball, there are two leagues in play: those who simply want to satisfy their inspector and those who want their inspector to be satisfied with their business. Which are you?

For the shop owner who wants to

...If you have designed your business to be regulatory-compliant and your manuals to reflect your business, a challenge to the manual is a challenge to your business processes — certainly not something to be taken lightly.

satisfy his or her inspector, the game is played a bit differently. It is more like the minor leagues. Here are some of the ground rules. Most likely, you will see a constant turnover of inspectors. It seems as though we are the training ground for the big leagues.

So, if your focus is on satisfying your inspector, and your inspectors rotate out regularly, the “regulatory opinion” you are satisfying will rotate with them. As a result, you will be changing your manuals and processes constantly to satisfy the background, experience and personal preference of the new inspectors. This isn’t the inspector’s problem (or FAA headquarters); this is the game the shop owner chose.

On the other hand, if you chose the option that the regulations were designed around and you write your manuals to reflect your business practices, a challenge to your manual is a challenge to your business. AC 145-9 states, “Procedures described in the (repair station’s) manual(s) should ensure that the repair station could satisfactorily perform maintenance in accordance with its rating(s).”

If you chose to describe your business processes in your repair station manual and the manual is acceptable to the Administrator (indicated by previous ASI

reviews), any subsequent challenge isn’t a challenge to your manual; it’s a challenge to your business processes. Remember, AC 145-9 defines data as acceptable “when it meets the requirements of the applicable regulations.”

This is not to say every repair station’s operations are perfect. Nor is this arguing for changes not to be made to a repair station’s operations or the basic regulations. However, if you have designed your business to be regulatory-compliant and your manuals to reflect your business, a challenge to the manual is a challenge to your business processes — certainly not something to be taken lightly.

To add to the confusion, your inspector might have multiple charges he or she is required to oversee. Some repair stations have chosen the “make my inspector happy” direction, while others have chosen the “make my manuals reflect my business” mode. It is important to identify yourself and your philosophy to your new inspector so he or she doesn’t assume you are being difficult when compared to the overly cooperative shop down the taxiway. You simply have chosen a different regulatory path to the design, layout and procedures in your repair station manuals.

Just like the “boys of summer,” there is no right way to play the game — some

swing for the fence and some just get on base. How does this carry over into our daily lives? We won’t win every challenge. When challenged on regulatory issues, just get on the regulatory base once every three (.333) or four (.250) attempts. This should not be interpreted to mean “don’t follow the rules.” I still expect our membership to follow the rules, step up to the plate for every pitch and be familiar with the recommendations (Does it make regulatory sense?).

You’ve been coached and you know how to hit the fastballs, the curveballs and the knuckle balls. You know which pitches are outside the strike zone and when not to swing. Review the regulatory advice of your inspector and read the regulations, advisory material and guidance, then determine if the regulatory guidance is necessary, applicable and appropriate to your operation. Pick the right pitch and use your skills to connect and drive that one pitch out of the park.

Most importantly, don’t become discouraged if you are only successful once out of every four times at bat. In Major League Baseball in 2009, although there were six players with perfect at-bat records, the batting average for the league as a whole was only .250.

Play ball. □