

## Let Data Drive Foreign Repair Station Decision

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An unwavering commitment to safety is what drives aviation professionals at the National Transportation Safety Board and across the aviation community. The fact that our system today is incredibly safe does not lessen the imperative to make it even safer. As the debate regarding the oversight of FAA certificated foreign-based aviation repair stations moves ahead, it is imperative that decision-makers keep safety as the first priority and use the most accurate data available to guide their decision-making process.

The discussion over the use of foreign-based aviation repair stations by U.S. air carriers is often fueled by a number of flawed assumptions. Opponents are often quick to raise the safety flag, but never able to produce reliable data which show that work performed by these facilities is done to a lesser standard than that applied domestically. The idea that the U.S. traveler is somehow less safe because major air carriers now rely, at least in part, on maintenance and repair work completed at overseas locations is false. The simple fact is that over the past 20 years, the NTSB has not cited work done at a foreign repair station on a U.S. registered aircraft as the probable cause in any accident investigation.

Ten years ago in testimony before the U.S. Senate, the FAA called the oversight of and skill requirements for foreign repair stations “fundamentally the same” as those operating in the U.S.

Initially finalized in 1988, the regulations governing the certification and oversight of foreign repair stations were written to specifically ensure that the highest standards of safety were present. The FAA will not certify a foreign repair station today unless it meets the same standards that are applied to U.S.-based operations.

For example, foreign repair stations are considered for certification only if a U.S. carrier commits to using its services, and as part of that agreement the U.S. carrier guarantees that all work performed by the repair station follows the same approved procedures used domestically. If the carrier is satisfied and prepared to stand behind the repair station, the FAA conducts an in-depth certification inspection prior to allowing work to begin. Once certified, the station is subject to periodic and often unannounced site visits by FAA inspectors. In addition, the air carrier itself, through its own inspectors or designees, must maintain rigorous oversight of work done at overseas locations.

Our nation's aviation safety professionals make decisions driven by data – not just accident data, which becomes a smaller part of the picture as accidents continue to decrease, but also data from incidents, precursor events and sophisticated safety management systems that track and analyze trends and risks. This is part of the reason the U.S. has the safest commercial air system in the world. Safety professionals must focus most sharply on the data when they come under pressure driven by either inaccurate perceptions of safety issues, or economic or competitive interests. The remarkable safety record of U.S. air carriers is the direct result of the data-driven safety management systems in place, both domestically and overseas.

While the amount of maintenance work outsourced to foreign repair stations has risen over the past decade, the safety record of U.S. carriers has never been higher. This is a tribute in part to the oversight system in place and to the quality of work performed by foreign stations and monitored by foreign authorities, air carriers, and by the FAA.

The global safety system in place today can always be improved, and that is the goal of our continuously monitored data-driven process. There are steps that can be taken to strengthen the process, such as funding more FAA inspectors, so that more unannounced site visits can be conducted, especially based on a clear evaluation of risk. To truly advance safety globally we need to let the data drive the decision-making and resist near-sighted decisions that will, in the end, put the safest air traveler system in the world at risk.

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