

INTERNATIONAL FEDERATION OF PROFESSIONAL & TECHNICAL ENGINEERS AFL-CIO & CLC

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April 29, 2008

Dear Senator,

As President of the International Federation of Professional and Technical Engineers (IFPTE), I am writing regarding today's consideration of HR 2881, the *Federal Aviation Administration Authorization Act of 2007*. IFPTE applauds the Senate Leadership for bringing this much needed legislation to the floor.

Among IFPTE's membership are hundreds of United Airlines engineers, technologists and specialists represented by IFPTE Local 20 and employed at the San Francisco International Airport and the Indianapolis Engineering Maintenance Center. IFPTE Local 150 also represents aviation workers employed by Northwest Airlines, a company that has recently announced its intention to merge with Delta Airlines. IFPTE is pleased that there may be legislative language included in the underlying manager's amendment, and/or to be offered to the bill as separate amendments, to address some of the concerns facing the union's membership.

IFPTE remains concerned that there are now over 700 foreign repair stations performing critically important maintenance work to US commercial aircraft with little to no oversight by the Federal Aviation Administration (FAA). Some of these repair stations are certified by the FAA, but most are not audited or inspected regularly and do not have to abide by the same FAA requirements as their US counterparts. The FAA and Transportation Security Administration (TSA), despite some attempts by Congress in the past to mandate regular audits and inspections, are still ignoring this glaring safety hazard to the flying public. To make matters worse, American commercial air carriers are also, and in increasing numbers, turning to non-certified foreign repair stations for major repairs. This is inexcusable.

Fortunately, Senator Claire McCaskill (D, MO) is expected to offer an amendment to HR 2881 that aims to reverse this trend. Sen. McCaskill's amendment goes a long way toward putting the flying public's mind at ease when it comes to this race to the bottom mentality by many of our domestic airlines. Among the possible items to be included in the McCaskill amendment that IFPTE supports are:

- The FAA must submit a plan to Congress within six months after passage of the legislation that requires domestic air carriers to provide an itemized accounting of all non-certified foreign facilities that are performing covered maintenance on their commercial aircraft;
- Require drug and alcohol testing for workers at foreign stations working on US aircraft, as is the case for domestic stations;
- Require that within three years after passage of the legislation the FAA must have in place regulations mandating that workers employed by FAA certified US carriers, workers at FAA certified foreign repair stations, or workers that are directly supervised by an FAA certified repair facility are the only

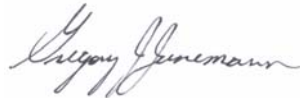
qualified personnel permitted to perform covered maintenance to commercial domestic aircraft;

- Mandates that the FAA ensure foreign repair station compliance with TSA security rules before re-certifying a repair facility;
- Requires annual reports by the Department of Transportation Inspector General (IG) to ensure compliance with the regulations outlined in this law;
- Requires that foreign certified maintenance facilities be inspected by the FAA twice a year, with one of those inspections being unannounced;
- Prevents the costs of this important oversight function from being imposed on US taxpayers by mandating the FAA to create a fee schedule for foreign repair station certifications to fully offset the costs of the program, including related inspections; all travel expenses, benefits and salaries of inspectors; and any increased costs as a result of implementing this legislation.

Lastly, IFPTE is also strongly supportive of efforts to include language that would mandate that those airlines involved in mergers abide by the Allegheny-Mohawk labor standards, requiring for the protection of employees and their jobs before approval of mergers.

We at IFPTE ask for your support of these important provisions. Should you have any questions, please feel free to contact me, or IFPTE Legislative Director Matt Biggs at (202) 239-4880.

Sincerely,



Gregory J. Junemann,
President