

June 10, 2009

The Honorable Janet Napolitano  
Secretary of Homeland Security  
Nebraska Avenue Center, NW  
Washington, D.C. 20528

Madam Secretary:

We are writing in regard to our concern over the Department of Homeland Security's (DHS) delayed implementation of a foreign repair station security rule and audit program first mandated in H.R. 2115, The Federal Aviation Administration Reauthorization Act of 2003.

Section 611 of the bill required the Administration to complete a security review and audit of foreign repair stations certificated under Part 145 of title 14 and to promulgate final regulations regarding the security of repair stations, domestic and foreign. After a delay in the rule of nearly four years, Congress again passed legislation regarding security in August of 2007 (H.R. 1, Section 1616) requiring a freeze on new foreign repair station certifications if regulations were not implemented within one year of enactment. As this deadline was not met, the repair and maintenance industry has spent the last ten months in the unenviable position of trying to weather the current economic downturn while experiencing an inability to address potentially profitable emerging markets.

Madam Secretary, our global industry fully supports the promulgation and implementation of the required repair station security regime and stands ready to assist DHS and the Transportation Security Administration in the rulemaking process.

As the ban on new repair station certification approaches its one year anniversary, we respectfully request your help in expediting the required rule at the soonest date practicable.

We thank you in advance for your attention to this issue and look forward to working with you in your new role at the Department.

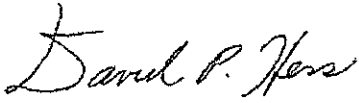
Sincerely,



Clayton M. Jones  
Chairman, President and CEO  
Rockwell Collins



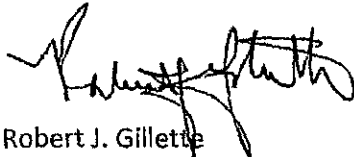
Joe Lombardo  
Executive Vice President - Aerospace  
General Dynamics



David P. Hess  
President  
Pratt & Whitney



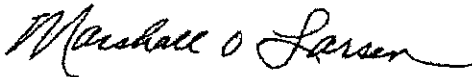
Armand F. Lauzon, Jr.  
President  
Chromalloy



Robert J. Gillette  
President and CEO  
Honeywell Aerospace



Scott E. Carson  
President and CEO  
Boeing Commercial Airplanes



Marshall O. Larsen  
Chairman, President and CEO  
Goodrich Corporation



David L. Joyce  
President and CEO  
GE Aviation

November 22, 2011

The Honorable Janet Napolitano  
Secretary  
U.S. Department of Homeland Security  
Washington, DC 20528

Dear Secretary Napolitano:

We the undersigned companies and associations are writing to express our concern with the lack of progress on the Transportation Security Administration's (TSA) rulemaking regarding repair station security.

This rulemaking is the direct result of congressional mandates contained within the 2003 *Vision 100 – Century of Aviation Reauthorization Act*, and the 2007 *Implementing the Recommendations of the 9/11 Commission Act*. The former act required TSA to issue "final regulations to ensure the security of foreign and domestic aircraft repair stations" within 240 days while the latter act specifically prohibits the FAA from certifying any new non-domestic repair stations after August of 2008 if the TSA had not yet promulgated the required regulations.

TSA first held a public meeting on this rulemaking in 2004 and issued a Notice of Proposed Rulemaking (NPRM) five years later in November of 2009. The aviation industry provided TSA with comprehensive comments on the nature and diversity of repair station operations and how to make this rule an effective, risk-based security regulation. The public comment period for this NPRM closed in February of 2010 and work on a final rule has been ongoing for the past 21 months.

The United States has long been the world leader in aviation and American aircraft and parts remain one of our key exports with aerospace contributing positively to our nation's balance of trade. The extensive delay in promulgation of a final rule regarding repair station security has a negative impact on our industry and the U.S. economy. American companies seeking to expand their markets overseas are hindered relative to foreign competitors due to the inability to get new repair stations certified.

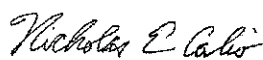
We respectfully request that your department work with TSA and others in the federal government to finalize the rulemaking by Dec. 31, 2011. The publication of a final rule will enhance security and also remove a regulatory roadblock that is currently damaging American companies. We urge your department to move quickly on this rule.



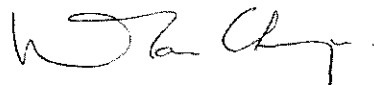
Sarah MacLeod  
Executive Director  
Aeronautical Repair Station Association



Craig Fuller  
President and CEO  
Aircraft Owners and Pilots Association



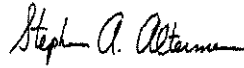
Nicholas E. Calio  
President and CEO  
Air Transport Association




W. Ian Cheyne  
Chief Technical & Regulatory Officer  
BAA Aviation, Engine Repair and Overhaul Group



Danny Maldonado  
Senior Vice President, Customer Support  
and Chief Services Officer  
Bell Helicopter



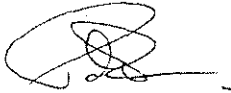
Stephen A. Alterman  
President  
Cargo Airline Association



David W. Brant  
Senior Vice President, Customer Service  
Cessna Aircraft Company



Peter Bunce  
President and CEO  
General Aviation Manufacturers Association



Paul McElhinney  
President and CEO, Services  
GE Aviation



Marshall O. Larsen  
Chairman, President and Chief Executive Officer  
Goodrich Corporation



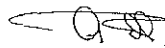
Mark Burns  
President, Product Support  
Gulfstream Aerospace Corporation



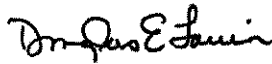
Bob Blouin  
Vice President, Government And Industry  
Relations  
Hawker Beechcraft Corporation



Matt Zuccaro  
President  
Helicopter Association International



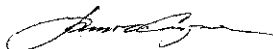
Adrian Paull  
Vice President, Customer & Product Support  
Honeywell Aerospace



Douglas E. Lavin  
Regional Vice President, North America  
International Air Transport Association



Dr. Hans Juergen Loss  
Vice President Quality Management  
Lufthansa Technik



James K. Coyne  
President and CEO  
National Air Transportation Association



Henry M. Ogrodzinski  
President and CEO  
National Association of State Aviation Officials



Edward Bolen  
President and CEO  
National Business Aviation Association



Greg Churchill  
Executive Vice President  
International & Service Solutions  
Rockwell Collins, Inc.