



AIRCRAFT MECHANICS FRATERNAL ASSOCIATION

National Office: 14001 E. Iliff Avenue, Suite 217 • Aurora, CO 80014
Tel: 303.752.AMFA (2632) • Fax: 303.362.7736

June 16, 2008

Dear Mr. Bill Ayer:

The Aircraft Mechanics Fraternal Association (AMFA) would like to express our staunch opposition to the proposed outsourcing of any heavy maintenance to Mexicana MRO services, or any other third world MRO. This potential move is a shortsighted financial decision and blatantly ignores obvious safety concerns. While we continue to oppose any outsourcing of maintenance, and firmly believe that when properly managed, and taking all factors into consideration, our technicians are the best choice from both a safety and financial aspect. This move would take current outsourcing to a new low.

The FAA has openly admitted in recent US senate hearings that it lacks the resources to adequately oversee domestic maintenance facilities, let alone foreign facilities. As of June 2007, the FAA had just 86 inspectors assigned to oversee 698 foreign repair stations worldwide and just 5 inspectors assigned to oversee 20 repair stations in Mexico. While these foreign repair stations may be "FAA certified" this only means that the FAA has initially verified that they have the equipment, personnel, and inspection systems to ensure repairs are completed to FAA standards at the time of certification. Ultimately, repair facilities fall under the control of the foreign governmental authority, which lack the transparency of the FAA. This is particularly concerning considering Mexico's current political environment, which has been described as having a "pervasive atmosphere of corruption." This is hardly the environment where we can expect the objective evaluation of critical maintenance functions; in fact, we could only reasonably expect decisions based solely on a financial basis.

Additionally, the Transportation Security Administration (TSA) lacks the jurisdiction to conduct legislatively mandated audits of foreign repair stations. There is no requirement for licensing, duty time limits, background checks, or periodic drug and alcohol testing of employees who perform critical aircraft maintenance.

These are but a few of the many reasons why this move would be the equivalent of buying a signature and exporting blame for any future issues. In keeping with our organizations objectives to safeguard with ceaseless vigilance the safety of the air transportation industry in recognition of the high degree of public interest, confidence, and responsibility placed on our Association, and Alaska Airlines commitment to be number one in safety and compliance, we strongly urge you to reconsider any third world foreign outsourcing.

Sincerely,

Thomas Imlah
Region I Director

Timothy M Cullen
Local 14 Airline Representative

John Pollom
Local 14 Safety and Standards Chairman

Earl Clark
Local 32 Airline Representative

Fred Digne
Local 32 Safety and Standards Chairman

Cc: Fred Moore
AMFA NEC