

162216

Docket No.

FAA-02-11301-7

Karen L Leamon
03/29/02 06:06 PM

To: Barbara Slavik/AWA/FAA@FAA
cc:
Subject: Alcohol/Drug NPRM

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James Ronan
03/21/02 02:51 PM

To: Karen L Leamon/AWA/FAA, Arnold Schwartz/AWA/FAA
cc:
Subject: Alcohol/Drug NPRM

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----- Forwarded by Jim A Wittnebel/CedarRapids/RockwellCollins on 03/21/2002 01:08 PM -----

Jim A Wittnebel
03/21/2002 11:38 AM

To: Jamesronan@faa.gov, Elizabeth M Ray/CedarRapids/RockwellCollins@RockwellCollins
cc: Mark T Harris/CedarRapids/RockwellCollins@RockwellCollins

Subject: Alcohol/Drug NPRM

Reference the recent FAA Alcohol and Antidrug Prevention Program NPRM and phone conversation with Mr. James Ronan

I would like to submit a concern to the draft proposal as follows:

One of the proposed subject changes is to require employers to utilize subcontractors, that perform safety-sensitive functions, who are covered by an alcohol and antidrug misuse prevention program for the

entire period

they perform safety sensitive work (reference proposed changes on NPRM p. 3

& 4). My concern is the interpretation of safety sensitive work with a

contractor? For example, if an avionics FAR 145 certified repair

station sends out a subassembly (e.g. circuit board) from a top level

avionics unit to a subcontractor (i.e. company that is non certified) for

repair. That subassembly is repaired by the subcontractor (i.e. company)

and returned to the FAR 145 repair station. The FAR 145 repair station

inspects the subcontracted repair work and assembles the repaired

subassembly into the top level avionics unit and performs satisfactory

airworthiness return to service processes. In this case, would the FAR 145

repair station need to assure that the contractor (who repaired the

assembly) have an drug/alcohol plan in place? Further to this, is if in

the above example, the subcontractor was a vendor that soldered longer

leads on to a piece part (e.g. capacitor). The piece part would go into a

safety sensitive higher level assembly that can only be tested/certified at

a higher Level. Would this vendor need a plan?

I believe that the definition of safety sensitive isn't defined far enough

and will result in a wide range of interpretations that will place undue

burden on the industry. I would appreciate any comments in return.

Thank you,

Jim Wittnebel, Manager
Maintenance Operations
Collins Aviation Services