



Phaneuf Associates Incorporated, doing business as PAI Consulting (PAI), a 100-percent woman-owned small business, was founded in 1978 to provide aviation consulting services to government and industry. PAI offers a broad range of services in regulatory affairs, aviation consulting, flight operations, international and domestic meeting support, and government services—always maintaining quality results with exceptional client service.

PAI is a small business with the experience, ability, and resources of a large company. Our staff includes individuals with specialized backgrounds in civil and military aviation (including fixed-wing aircraft and rotorcraft), flight operations, aviation maintenance, management, economics, political science, and law.

PAI offers the following services to government and industry:

- Regulatory analysis, development, and evaluation
- Economic and other executive order analyses
- Summary and analysis of public comments
- Meeting and event planning and facilitation
- Special studies and projects
- Technical writing, editing, and production services
- Program development and support
- Manual and procedures handbook preparation
- Training program development and instruction
- Operational safety and maintenance evaluations
- IS–BAO certification audits
- Safety Management Systems (SMS) training and implementation
- Compliance reviews
- Minimum equipment list (MEL) services
- Support for petitions for exemption and rulemaking (waivers)
- Repair station support
- Civil aviation oversight

The following pages include a detailed listing of PAI’s capabilities, including the many areas in which PAI can support your agency. For a complete overview of our staff and current and previous clients, please visit our Web site at <http://www.PAIconsulting.com>.

PAI is on the GSA MOBIS Schedule.

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REGULATORY ANALYSIS, DEVELOPMENT, AND EVALUATION

PAI has drafted numerous regulatory documents in accordance with plain language standards and performance-based regulations guides, including the *United States Government Printing Office Style Manual* and the *Federal Register Document Drafting Handbook*. These regulatory documents include—

- Advance notices of proposed rulemaking,
- Notices of proposed rulemaking,
- Supplemental notices of proposed rulemaking,
- Final rules,
- Withdrawals,
- Rulemaking support papers,
- Guidance material, and
- Internal agency orders.

In addition to preparing the regulatory document for publication in the Federal Register, PAI has the experience and expertise to draft rule language and prepare all required regulatory analyses, including the Executive Order 12866 regulatory evaluation, regulatory flexibility analysis, unfunded mandates analysis, international trade impact analysis, paperwork burden analysis, and National Environmental Policy Act analysis.

PAI has drafted regulatory documents related to—

- Air cargo security (49 CFR Parts 1540, 1542, 1544, 1546, and 1548)
- Aircraft certification (14 CFR Parts 23 and 25, and SFAR 41)
- Airspace classification (14 CFR Parts 71 and 93)
- Automatic Dependent Surveillance–Broadcast (ADS–B) (14 CFR Part 91)
- Bilateral agreements and aircraft maintenance implementation procedures (14 CFR Part 145)
- Biometric identifiers (49 CFR Part 383)
- Certification of aircraft and airmen for the operation of light-sport aircraft (14 CFR Parts 1, 21, 43, 45, 61, 65, and 91)
- Cockpit voice recorder and digital flight data recorder requirements (14 CFR Parts 23, 25, 27, 29, 91, 121, 125, 129, and 135)
- Commercial drivers license permits (49 CFR Part 383)
- Commercial space transportation reusable launch vehicle and reentry licensing (14 CFR Parts 400, 401, 404, 405, 406, 413, 415, 431, 433, and 435)
- Crew scheduling and training (14 CFR Parts 121 and 135)
- Extended range operations (14 CFR Parts 1, 25, 33, 121, and 135)
- Flight attendant duty time and requirements (14 CFR Part 121)

- Hours of service of drivers (49 CFR Parts 379, 381, 385, 390, and 395)
- Maintenance recordkeeping (14 CFR Parts 91, 121, and 135)
- Minimum standards for birth certificates (project abandoned; CFR never assigned)
- National Environmental Policy Act (14 CFR Part 1216)
- Operating rules (14 CFR Part 91)
- Parachute operations (14 CFR Part 105)
- Pilot and mechanic certification (14 CFR Parts 61 and 65)
- Railroad grade crossing (49 CFR Part 392)
- Repair station certification (14 CFR Part 145)
- Requirement for a continuing analysis and surveillance system (14 CFR Parts 121 and 135)
- Service difficulty reporting (14 CFR Part 121)
- Title VI, Financial Assistance (49 CFR Part 303)

SUMMARY AND ANALYSIS OF COMMENTS

PAI has developed electronic databases for summarizing comments on advance notices of proposed rulemaking, notices of proposed rulemaking, supplemental notices of proposed rulemaking, interim final rules, regulatory reviews, exemptions, and other regulatory notices.

Each of PAI's databases facilitates trend analysis and retrieval of industry and commenter concerns, and functions as an efficient and reliable means of summarizing comments. PAI has used such databases for rulemaking projects, receiving as many as 30,000 comments and less than 100 comments. Each database is tailored to the particular project and includes fields such as commenter name, commenter affiliation, a summary of the comment, and commenter recommendations related to individual issues or specific section numbers. These databases allow PAI to sort the collected data and form numerous reports, including graphs and charts according to each requesting agency's needs.

PAI then analyzes the public comments and organizes them in a manner that allows the agency to easily address and respond to the comments in the final rule. In addition, based on agency guidance, PAI has drafted the agency response to the comments for publication in the final rule.

MEETING AND EVENT PLANNING AND FACILITATION

PAI has provided complete planning services and meeting support for a number of large-scale public hearings and meetings, as well as meetings held under the Federal Advisory Committee Act and as part of the regulatory process. As a result, our team is well versed in the detailed planning that successful meetings require.

PAI can provide extensive logistical support before, during, and after a meeting. Logistical support before a meeting includes drafting the agenda and ground rules, registering attendees, compiling an attendee list, and producing name tags. It also involves arranging a meeting location, including seating and tables for panel members and attendees; electronic sound equipment; podiums and microphones; audiovisual equipment to include projectors, screens, and television monitors; court reporter services; speaker timers; security services; and an operator for sound and audiovisual equipment.

During the meeting, PAI can provide meeting support that includes checking in attendees, organizing and assisting with presenters' audiovisual presentations, and moderation and/or facilitation.

Following the meeting, PAI can provide an official meeting transcript or a record of meeting to the government agency for submission to the public docket.

PAI also has extensive experience in planning and facilitating Federal Aviation Administration (FAA) Rulemaking Management Council and Rulemaking Steering Committee meetings. Support for these meetings includes preparing the agenda and other meeting materials; researching and retrieving information from the FAA intranet to update and compile meeting reports; preparing a meeting folder for each council and committee member; and delivering the materials to the FAA in draft form for review and in final form for each meeting. Following each meeting, PAI drafts an official record of meeting and a list of attendees.

PAI provides similar services for several aviation rulemaking committees formed to respond to specific issues. PAI attends each meeting, records and generates a final record of meeting, supports the drafting of any reports produced by the committee, and performs general meeting support services such as organizing the meeting location and disseminating information to committee members.

SPECIAL STUDIES AND PROJECTS

PAI has extensive experience conducting special studies and projects for government and industry. Our subject matter experts can lead and/or assist teams with completing their analyses. PAI has completed or supported studies and reviews in the following areas:

- Systems efficiency
- Presidential regulatory reviews
- Corporate cost-benefit analyses
- Flight attendant certification
- Flight attendant flight and duty time
- Pilot flight time limitation and rest requirements
- Air carrier parts inventory
- Aircraft transfers
- Line maintenance procedures
- Wrong runway departures
- Runway incursions

TECHNICAL WRITING SERVICES

PAI's team has countless years of experience drafting rulemaking documents, procedures manuals, evaluation reports, study reports and recommendations, rulemaking committee and task force reports, proposals, and marketing and presentation materials. We can supply a team of diverse and skilled personnel to deliver accurate, clear, and consistent technical copy that follows government and industry standard practices and style guides, from concept through completion.

EDITING AND PRODUCTION SERVICES

Our team has extensive experience with the publications process, from writing to editing and from layout and design to printing and distribution. PAI has supported government and commercial contracts, working with the *United States Government Printing Office Style Manual*, the *Federal Register Document Drafting Handbook*, the *Chicago Manual of Style*, client editorial styles, and in-house styles. Our editing process includes the following steps:

- Proofreading documents to ensure the accuracy of formats, proper semantic usage, spelling, and punctuation.
- Editing (copy editing and substantive) documents to include checking and correcting the content of all documents to ensure consistency, accuracy, and coherency; style; grammar; parallel structure; and cross-referencing.

- Ensuring documents are written in plain language or revising documents to conform to plain language, including the use of question-and-answer format, active voice, short sentences, lists and tables when possible, and descriptive topic headings.
- Designing, producing, and reproducing forms, charts, tables, and other graphic presentations required for clarification or explanation within documents.
- Formatting documents according to the appropriate and requested style guides.

PAI's team is proficient in several word processing, graphics, and presentation applications on both PC and Macintosh platforms. These include Microsoft Office (Word, PowerPoint, Excel, Access, Visio, and Project), Mindjet MindManager, and Adobe (PageMaker, InDesign, Illustrator, and Photoshop).

PAI has noteworthy in-house graphics and printing capabilities to effectively produce a wide range of quality products. Also, PAI has access to and experience working with printers who produce large quantity, high-end quality, color and black and white documents, brochures, programs, signs, or similar products.

PAI team members routinely use the *United States Government Printing Office Style Manual*; *Federal Register Document Drafting Handbook*; *FAA Plain English Guide*; *FAA Performance-Based Regulations Guide*; *FAA Order 1320.1, FAA Directives Management*; and *FAA Order 1320.46, Advisory Circular System*. In addition, PAI is prepared to respond to the requirements of Section 508 of the Rehabilitation Act.

PROGRAM DEVELOPMENT AND SUPPORT

In 1998, the FAA Office of Rulemaking began reengineering its rulemaking process—from how it initiated a project, through the process of drafting and finalizing a project, to publication and issuance. PAI was involved in this reengineering process from the beginning.

In addition, PAI has participated in developing several other FAA programs, including the Flight Standards Program Plan for the Aging Airplane Program; a Flight Standards program plan for international agreements that affects the certification of foreign repair stations and simulator approvals; the Suspected Unapproved Parts Program Plan; the Internal Evaluation Program; and SMS.

PROCEDURES HANDBOOK DEVELOPMENT

PAI has helped the FAA draft three internal process manuals: the *FAA Rulemaking Manual*, the *Aviation Rulemaking Advisory Committee Operating Procedures* manual, and the *FAA Exemption Procedures Manual*.

The *FAA Rulemaking Manual* includes the basic policies and processes for developing and issuing rulemaking documents, instructions on how to follow the process, and guidance on the tools used to complete the process. The manual also includes tools to enable FAA employees to respond to current business processes and suggests ways to improve such processes. This task included research and analysis of processes used, investigation and analysis of proposed processes, and compilation of the appropriate and most efficient process steps to draft and produce a manual that is informative and user-friendly.

The *Aviation Rulemaking Advisory Committee Operating Procedures* manual provides Aviation Rulemaking Advisory Committee (ARAC) members and FAA personnel with information to help them understand and participate effectively in the ARAC process. The manual describes how ARAC is organized and each group's responsibilities within the process. In addition to updating the procedures from the previous version of the manual, PAI helped the FAA draft this version according to plain language standards.

PAI documented the FAA's exemption process in the *FAA Exemption Procedures Manual*. To accomplish this task, PAI reviewed the revised procedures for processing exemptions, interviewed FAA personnel involved in the exemption process, and outlined the steps for processing a petition for exemption. In developing these steps, PAI evaluated the revised procedures and noted gaps in the new procedures based on our experience supporting the FAA's Office of Rulemaking with processing petitions for exemption. PAI's evaluation assisted the FAA in further refining the revised processing procedures.

MANUAL PREPARATION

PAI has assisted Part 121-certificated air carriers, companies seeking Part 121 air carrier certification, Part 145 repair stations, and corporate flight departments with the preparation of manuals needed to conduct airline, repair station, and corporate flight department operations. PAI has prepared manuals used by company personnel to support flight operations, maintenance, dispatch, customer service, and training departments.

TRAINING PROGRAM DEVELOPMENT AND INSTRUCTION

For both government and industry, PAI has developed and conducted training programs for both instructors and participants. These training services include identification of training requirements, instruction design, training recordkeeping, and program evaluation.

For the FAA, PAI developed and conducted the program implementation training for the FAA's Office of Aviation System Standards Internal Evaluation Program. In addition, PAI completed a multimedia refresher training course for the program.

PAI also assisted the FAA with developing the Continuing Analysis and Surveillance System (CASS) course for airworthiness inspectors. The course was designed to introduce a new approach to certification and surveillance procedures, and to clarify the intent of the regulatory requirements. PAI currently teaches that course to FAA inspectors on a monthly basis. PAI also has taught courses on FAA repair station regulations, both domestically and internationally.

In addition, the PAI team has developed award-winning videos and other training materials for the U.S. Department of Transportation (DOT). Members of the PAI team collaborated on the Bribery Awareness video for the DOT Office of the Inspector General, which won both a Communicator award and a National Association of Government Communicators award. Those same team members worked together on the development of training material regarding suspected unapproved parts, including a 20-minute video, *Suspected Unapproved Parts, What Can You Do?* That video was widely distributed and used for public and industry briefings and suspected unapproved parts education for aviation industry personnel. PAI also is supporting the DOT Office of the Secretary in developing its training program for the Air Carrier Access Act.

PAI can design and create several types of multimedia products using an approved script. PAI may use videography, storyboarding, two-dimensional characters, graphics, and interfaces to develop training programs to meet our clients' needs. PAI can create characters using pencil sketches, digitizing, special effects, animation drawings, cleaning up, and ink and painting. PAI creates graphic elements and text using computerized tools such as Macromedia Flash, Macromedia Fireworks, Macromedia Director, and Adobe Photoshop. In addition, PAI can incorporate audio files into any presentations, including lip sync and text.

As part of each project, PAI analyzes and tests the presentation, and debugs the final product as part of our quality control process. The final delivery of the project includes filing all media elements, delivering the presentation as an executable file on a master CD, and creating and delivering a user manual and troubleshooting guide.

OPERATIONAL SAFETY AND MAINTENANCE EVALUATIONS

PAI performs in-depth air carrier and corporate flight department evaluations. Each evaluation provides a practical and independent assessment of operations, including flight operations, maintenance, dispatch, and customer services.

Our evaluations are based on the systems evaluation concept, which is similar to the FAA's internal evaluation program that PAI helped the FAA create in 1989. The concept focuses on ensuring systems and procedures are in place to continuously comply with regulations and company requirements. Our evaluations help companies verify compliance with all regulatory requirements and assess their practices in relation to the best in the industry. We provide specific recommendations for improving processes and correcting deficiencies.

We also have performed evaluations for and of government agencies. These evaluations include a safety audit of the Air Marine Interdiction Division of the U.S. Customs Service and a baseline audit of the FAA's Office of Aviation System Standards. Subsequent to the baseline audit, PAI created an internal evaluation program for the Office of Aviation System Standards, including guidance material and a training program to support the program.

In addition, PAI participated in the FAA's national safety inspection evaluation of 9 of the 10 major air carriers' maintenance management systems, which included evaluating each air carrier's continuing analysis and surveillance system, internal evaluation program, reliability program, and safety program.

IS–BAO CERTIFICATION AUDITS

PAI has auditors certified by the International Business Aviation Council to conduct International Standard for Business Aircraft Operations (IS–BAO) certification audits. IS–BAO is a code of best practices designed to help aviation departments worldwide voluntarily achieve a high level of safety and professionalism. Integral to IS–BAO is a safety management system. PAI can conduct a standalone IS–BAO certification audit or combine it with a corporate flight department operational safety evaluation. PAI also can assist a corporate flight department with implementing IS–BAO practices.

SAFETY MANAGEMENT SYSTEMS (SMS) TRAINING AND IMPLEMENTATION

SMS is a systematic, comprehensive, and proactive approach to managing safety. The International Civil Aviation Organization (ICAO) requires operators, maintenance providers, air traffic providers, and airport operators to implement an SMS accepted by the State. The FAA has endorsed the ICAO SMS standard and is working on implementation.

PAI offers customized SMS training and a 2-day comprehensive course based on MITRE Aviation Institute course materials, ICAO Standards and Recommended Practices (SARPS), and the FAA SMS model.

PAI also can provide assistance in implementing SMS in the following areas:

- Planning
- Gap analysis
- Hazard identification
- Risk analysis
- Risk assessment
- Risk mitigation
- Manual drafting

COMPLIANCE REVIEWS

The PAI team has experience performing quality assurance compliance reviews in a number of areas, including security, operational control, insurance, employee misconduct, ethics, and management practices. The primary reasons for noncompliance are lack of knowledge, lack of resources, and/or flawed priorities.

It is more efficient and cost-effective to identify potential problem areas and implement corrective action *before* issues become violations. Our team consists of subject matter experts who can provide an independent review and opinion of your operations to ensure you are in compliance with your own procedures, as well as any federal or state regulations. An independent review will show you exactly where your company stands and provide recommendations to correct potential problem areas.

MINIMUM EQUIPMENT LIST (MEL) SERVICES

PAI performs the following MEL services:

- Creates new MELs.
- Tracks master MEL revisions and updates company MELs accordingly.
- Revises existing MELs based on aircraft equipment changes.

PAI tailors the MEL to each company's expectations and requirements. We offer a unique electronic color-coded format that meets all FAA requirements and the guidelines in Advisory Circular 91-67, Minimum Equipment Requirements for General Aviation Operations Under FAR Part 91.

SUPPORT FOR PETITIONS FOR EXEMPTION AND RULEMAKING (WAIVERS)

PAI supports the FAA's Office of Rulemaking in drafting responses to petitions for exemption from 14 CFR and petitions for rulemaking to revise 14 CFR. This support includes—

- Coordinating with the office of primary interest in drafting the appropriate response documents, such as grants and denials of exemption, summary grants and denials of exemption, and letter grants of exemption and/or amendment.
- Summarizing comments to the docket on petitions for exemption.
- Conducting a review of the response document for technical content.
- Editing the response document for proper grammar, punctuation, and format, and for compliance with the principles of plain language and the *United States Government Printing Office Style Manual*.

REPAIR STATION SUPPORT

PAI's experience supporting the FAA with issues affecting repair stations puts us in a unique position to assist your organization with its repair station support needs. PAI assisted the FAA with developing the following:

- A complete revision to Part 145.
- Regulatory amendments affecting service difficulty reports and maintenance recordkeeping requirements.
- Guidance materials for voluntary disclosure of regulatory violations by Part 145 repair stations.
- An advisory circular to provide repair stations with ways to develop and implement internal evaluation programs.
- Certification and surveillance standards and procedures under international bilateral maintenance agreements that satisfy FAA and European Aviation Safety Agency requirements.
- Development of an advisory circular discussing training program requirements.

PAI assists repair stations in the United States and internationally with obtaining or maintaining Part 145 certification. This includes facilities and records evaluations; development of repair station manuals, quality control manuals, and training program manuals; and providing training on regulations. International clients include Japan Airlines, Mitsubishi Heavy Industries, and Ishikawajima-Harima Heavy Industries Co., Ltd. PAI also supported Aeromotores SRL in Buenos Aires, Argentina, with obtaining its Part 145 certification.

PAI assisted AAR Aircraft Services, Inc., with drafting its repair station manual, quality control manual, and letter of compliance for Part 145 repair station certification. PAI also assisted AAR with developing its Indianapolis Repair Station Training Program and the associated training program manual. In addition, PAI helped AAR develop quality monitoring programs and related documents for the repair station.

CIVIL AVIATION OVERSIGHT

PAI assisted the civil aviation authority of the Republic of Venezuela in establishing appropriate regulations, standards, and surveillance procedures. Our team provided on-the-job training to Venezuelan inspectors and helped develop the surveillance and enforcement procedures and recordkeeping systems needed to meet ICAO Standards and Recommended Practices. A team of eight full-time technical staff was on site in Caracas. In support of this program, we developed a program plan, inspector guidance, and policy documents in English and Spanish. This program included a re-certification process, whereby all international air carriers were required to demonstrate that they meet the requirements for initial certification using the ICAO standards and basic certification process.

In addition, PAI performed an independent systems-oriented evaluation of Transportes Aéreos Ejecutivos S.A. de C.V. (TAESA), a Mexican air carrier, for the Dirección General de Aeronáutica Civil of Mexico (DGAC). PAI evaluated flight operations, maintenance, cabin safety, and training. The objective of the evaluation was to help the DGAC reach a determination based on worldwide industry standards regarding TAESA's resumption of operations.

PAI also conducted a mid-term evaluation of the Inter-American Development Bank Multilateral Investment Fund project for regional technical cooperation to strengthen the regulatory and institutional air transport safety framework in Central America, Belize, the Dominican Republic, Haiti, and Panama. PAI evaluated the project's activities, goals, and assumptions, and analyzed how the project could be modified to maximize the probability of achieving its goals.