

Phaneuf Associates Incorporated, doing business as PAI Consulting (PAI), was founded in 1978 to provide aviation consulting services to the Government and industry. Over the years, PAI has expanded its services to include regulatory consulting services, meeting support and facilitation, and editorial services, in many other areas. Our full-time staff includes individuals with specialized backgrounds in civil and military aviation, aviation maintenance, flight operations, economics, political science, and law. Our clients include many Federal and State agencies, foreign governments, major air carriers, cargo carriers, associations, corporate aviation departments, and repair stations. In addition to its continued support of the Federal Aviation Administration, PAI has expanded its regulatory work to include support to the U.S. Department of Agriculture, Farm Service Agency, Transportation Security Administration, National Aeronautics and Space Administration, Federal Motor Carrier Safety Administration, and Social Security Administration.

PAI offers the following services to Government and industry:

- Regulatory analysis, development, and evaluation
- Summary and analysis of comments and database development
- Economic and other executive order analyses
- Manual and procedures handbook preparation
- Special studies and projects
- Editing and production services
- Meeting support
- Program development and support
- Compliance reviews
- Training program development and instruction
- Support for petitions for exemption and rulemaking
- Flight operations evaluations
- Repair station support
- Civil aviation oversight

The subsequent pages include a detailed listing of PAI's capabilities, including the many areas in which PAI can support your agency.

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 have included—

- 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)
- 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)
- Hours of Service of Drivers (49 CFR Parts 379, 381, 385, 390, and 395)
- Maintenance recordkeeping (14 CFR Parts 91, 121, and 135)
- 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)
- 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 usually 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 different 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 the meeting. Logistical support before the meeting includes drafting the agenda and ground rules, registering attendees, compiling an attendee list, and producing name tags. It also involves arranging the meeting location, including seating and tables for panel members and attendees; electronic sound equipment; podiums and microphones; audio-visual 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' audio and visual 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 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.

PAI has and continues to provide 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.

#### **PROCEDURES HANDBOOK DEVELOPMENT**

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

The *Federal Aviation Administration Rulemaking Manual* includes the basic policies and processes for the development and issuance of rulemaking documents, instructions on how to follow the process, and tools with which to complete the process. The manual also includes tools to enable FAA employees to respond to current business processes and suggest ways with which 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 followed 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, maintenance, dispatch, customer service, and training departments.

### **MINIMUM EQUIPMENT LIST SERVICES**

PAI performs the following minimum equipment list services:

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

PAI tailor's 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.

### **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 and Voluntary Disclosure programs, and the safety management system.

## **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. Our team has worked on government and commercial contracts; therefore, their experience includes 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 has years of experience working with rulemaking documents, procedures manuals, proposals, evaluation reports, and marketing and presentation materials. In addition, the team is proficient in several word-processing, graphics, and presentation applications, including Microsoft Office (Word, PowerPoint, Excel, Access, Visio, Project), Mindjet MindManager, and Adobe PageMaker, Illustrator, and Photoshop on PC-based platforms as well as Macintosh.

PAI has significant in-house graphics and printing capabilities to effectively produce a range of quality products. Our state-of-the-art equipment allows us to scan graphics and text and print in black and white and color. Also, we have 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.

The 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.

## **TRAINING PROGRAM DEVELOPMENT AND INSTRUCTION**

For both government and industry, PAI has developed training programs and conducted instruction, for the instructors and the users. These training services include identifying 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 that program.

Most recently, PAI assisted the FAA with developing the Continuing Analysis and Surveillance System course for airworthiness inspectors. The course was designed to introduce a new approach to certification and surveillance procedures, as well as to clarify the intent of the regulatory requirements. PAI currently teaches that course to FAA inspectors on a monthly basis.

In addition, the PAI team has developed award winning video and other training materials for the Department of Transportation. Members of the PAI team collaborated on the Bribery Awareness video for the Department of Transportation Office of the Inspector General. That very successful video won both a Communicator award and a National Association of Government Communicators award. Those same team members worked together on the development of training 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 has taught courses on FAA repair station regulations, domestically and internationally.

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 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.

## **OPERATIONS AND MAINTENANCE EVALUATIONS**

PAI also performs in-depth air carrier and corporate flight department evaluations. Our evaluations provide a practical, 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 PAI helped the FAA create in 1989. The concept focuses on ensuring systems and procedures are in place to continuously comply with the 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. The corporate flight department evaluations also can include a review based on the International Standard for Business Aircraft Operations (IS-BAO) code of best practices.

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.

## **PROGRAM DEVELOPMENT AFFECTING REPAIR STATIONS**

PAI has assisted the FAA with issues affecting quality assurance, certification, and compliance. PAI worked on the following programs:

- 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 the training program requirements.

## **REPAIR STATION SUPPORT**

PAI assists repair stations in the United States and internationally in 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 most recently supported Aeromotores SRL in Buenos Aires, Argentina, in getting its Part 145 certification.

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

### **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 three reasons for noncompliance are lack of knowledge, lack of resources, and/or flawed priorities. PAI's compliance reviews will identify the reason for the noncompliance and offer suggestions and recommendations on how to meet the requirements in an efficient and effective way.

### **SPECIAL STUDIES AND PROJECTS**

PAI has experience completing studies or conducting reviews regarding the following:

- Systems efficiency reviews
- 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

## **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*.