



GAMA 13-20

May 10, 2013

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## Comments of GAMA on Transatlantic Trade and Investment Partnership

Dear Sirs and Madam:

I am pleased to submit this statement on behalf of General Aviation Manufacturers Association (GAMA) in response to the United States Trade Representative's request for comments concerning the proposed Transatlantic Trade and Investment Agreement with the European Union. GAMA is an international trade association representing over 80 of the world's leading manufacturers of general aviation airplanes and rotorcraft, engines, avionics, components and related services. GAMA's members also operate repair stations, fixed based operations, pilot and maintenance training facilities and they manage fleets of aircraft. With a global membership, including numerous members domiciled in the US and EU, GAMA views the aviation sector as heavily regulated in both the U.S. and Europe but due to a U.S./E.U. Bilateral Aviation Safety Agreement, we have a successful model to ensure the safety and efficiency of aviation product trade.

GAMA and its members work actively with the regulators in Europe and the US (EASA & FAA) to assure commonality in aviation requirements and recently we have been working to maximize this commonality through the use of internationally acceptable consensus standards. GAMA believes that the use of internationally coordinated and accepted standards is the key to assuring the best methods are widely available and accepted. This approach allows industry predictable paths to bringing technology to market and the assurance that those products can be widely accepted around the globe.

GAMA is closely involved with the development of standards from a number of organizations including ASTM, RTCA, EUROCAE and SAE. An example of GAMA's involvement includes ASTM International's globally recognized standards developed in accordance with World Trade Organization (WTO) principles and allows individuals and governments to participate directly as equals, in a consensus based manner. As active members of ASTM Committees F44 on General Aviation Aircraft, F37 on Light Sport Aircraft, and F39 on Aircraft Systems we aim to create globally-accepted, consensus standards that establish a common means of regulatory compliance for the design, manufacture and operation of general and light sport aircraft anywhere in the world.

Committee F44 General Aviation Aircraft has members from around the world, including Austria, Brazil, Canada, China, Czech Republic, Egypt, France, Germany, Italy, Slovenia, Switzerland, United Kingdom and New Zealand. Stakeholder groups represented include manufacturers, suppliers, trade associations, user groups and government agencies. Regulators include representatives from government agencies from the United States' Federal Aviation Administration, Canada's Transport Canada Civil Aviation Authority, and the EU's European Aviation Safety Agency (EASA) just to name a few. We held our last meeting in Friedrichshafen, Germany, in conjunction with AERO, the global trade show for general aviation as a way to ensure global stakeholder participation in the technical

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committee process. The work conducted by our global industry through ASTM is open to all stakeholders and is a model for transatlantic cooperation.

Another unique example of beneficial industry standards involves RTCA and EUROCAE which are standards organizations based in the U.S. and Europe respectively. These organizations develop concurrent and very similar standards on each side of the Atlantic for use by each country. GAMA is heavily engaged in RTCA and these standards are utilized in the standardization of critical aviation equipment which is necessary for the continued safety of the global air transportation network. RTCA and EUROCAE coordinate standards together through common meetings and teleconferencing on a continual basis.

Finally SAE is a standards organization that develops standards for much of the world's aviation equipment including mechanical and electronic devices. SAE works with global experts to develop the necessary technical standards for parts that are included in aviation products worldwide. GAMA companies participate in SAE activities on a global scale to assure commonality and the development of the best approaches to safety and efficiency.

The aviation industry has consistently followed the practice of selecting standards to be used on the basis of merit, regardless of where or from which particular organization they are created. Common standards between the U.S. and Europe are a key to maximizing safety and efficiency in the aviation industry. GAMA is pleased to have this opportunity to provide these comments to USTR on the proposed Transatlantic Trade and Investment Agreement with the European Union.

Respectfully,

A handwritten signature in black ink, appearing to read 'Gregory J. Bowles', with a long horizontal flourish extending to the right.

Gregory J. Bowles  
Director, Engineering & Manufacturing  
General Aviation Manufacturers Association