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NEWSLETTER

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1. No minimum standards means restrictive entry requirements.

For aviation to grow, costs must be contained. This means, unnecessary costs associated with regulatory standards, red tape, etc., that do not value-add to safety, must be removed. What is important for safe continuing airworthiness and maintenance is highly skilled maintainers, knowledgeable LAMEs certifying aircraft as airworthy post maintenance and coordinating maintenance so the aircraft can be returned to service as safe to fly. No current regulatory requirements state the aircraft has to be inspected as released in an airworthy condition.

Minimum Standards – Reduces Costs not Safety.

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Prescriptive regulatory requirement must give way to more flexibility to achieve the same outcome. Performance based requirements.

2. Overcoming concerns with declining skills – 2017 & on.

Ever since the EASR Parts 66/147/Subpart M were partially adopted into CASR Parts 42/66/147, the aviation MRO industry reportedly has seen a decline in skills. AMROBA research has identified that this decline actually started a decade or so before then. Also, this trend is not unique to this industry so proposed fixes need to identify career paths to attract, train and keep important skills within the aviation industry. The foundation of AME training depends on CASA promulgating ICAO international AME training standards applicable to AMEs and LAMEs as they did in the past.

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Rebuilding the apprentice system to meet future needs is possible. Adopt trade skills training & additional LAME knowledge by following ICAO standards.

3. Certifying as “airworthy” is the highest safety standard.

To maintain the validity of an aircraft’s certificate of airworthiness, all maintenance and servicing must leave the aircraft in compliance with its design standards, including any modification or repair. This requires on-going inspections that verifies the aircraft or component, continues to conform to its airworthiness requirements. Currently not a regulatory requirement.

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Airworthy means the aircraft/component conforms to its design standards and is in a serviceable (safe) condition for flight.

4. Unless it value adds, why are we doing it?

If Government’s red tape reduction procedures were properly applied in this industry, the regulatory system would be more cost effective. Training is imposing massive costs when compared to the multiple pathways in both the EASA & FAA systems. Even ICAO standards are more cost effective. Transition and re-validation of the LAME is costly for a non-employee.

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There are a lot of CASA “requirements” spread throughout standards, AMCs, GMs, CAAPs, ACs that do not value add to safety.

1. No minimum standards means restrictive entry requirements.

For aviation to grow, costs must be contained. This means, unnecessary costs associated with regulatory standards, red tape, etc., that do not value-add to safety, must be repealed. What is important for safe continuing airworthiness and maintenance is highly skilled maintainers, knowledgeable LAMEs certifying aircraft as airworthy post maintenance and coordinating maintenance so the aircraft can be returned to service as safe to fly. No current regulatory requirements state the aircraft has to be inspected as released in an airworthy condition.

Minimum Standards – Reduces Costs not Safety

Suitable Aircraft: General aviation suffers from viable modern looking aircraft that provides appeal for new private purchase. The light sport aircraft was supposed to provide such an aircraft but, for its size and purpose, became too expensive. The marine industry is more successful as new modern looking boats are replacing older aged boats. Look at the old tired looking aircraft fleet that are the entry product to flight training. New modern aircraft are slowly replacing older aircraft. The future will have glass cockpits and digitalised technology to attract young prospective pilots.

General Aviation: Includes over 362,000 general aviation aircraft worldwide, ranging from two-seat training aircraft and utility helicopters to intercontinental business jets flying today, of which over 199,000 aircraft are based in the United States and over 103,000 aircraft are based in Europe. Aircraft can fly to more than 5,000 U.S. public airports, while scheduled airlines serve less than 500 airports. The European general aviation fleet can access over 4,200 airports. Australia can access around 465 airports. <http://chartsbin.com/view/1395>.

Pilots: **Costs** are the main reason prospective applicants do not continue. In the US they have both approved flying training schools and independent instructors, many working out of aero clubs, or operating from an RTO that is not approved by the FAA. Enables flexibility and variable pathways for prospective new pilots. So the cheapest way, in the USA, to gain a pilot licence is to use the services of an independent flight instructor. New GA pilots are needed to provide growth in the use of aircraft for other than commercial business but additional red tape has priced private aviation out of reach.

AMEs: Industry wide trained tradespersons have not been the outcome of Education Department's approved training organisations. This is because CASA has not promulgated the international AME training standards set by ICAO for the last couple of decades. What the industry needs are trade qualifications that are transportable across the various maintenance sectors. The only way that this can be achieved is a return to the ICAO AME training standards so trade qualifications are globally recognised as they did in the past.

LAMEs: A review is about to start that will bring back the appropriate training, to ICAO training standards, so that the LAME understands the responsibility of coordinating inspections, maintenance, to sign the maintenance release and the most important responsibility of certifying the aircraft, or parts of the aircraft, as airworthy. This requires all LAMEs to understand the design standards and other requirements so that they can certify the aircraft, or parts (systems) of the aircraft as airworthy.

Unlike EASA & FAA, the only method in Australia to obtain licences & ratings is by an approved training organisation. This approach is highly restrictive and costly. The flexibility of the EASR Part 66/147 system, similar to FAA approach, needs to be adopted. EASR Part 66 includes provisions for group ratings.

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2. Overcoming concerns with declining skills – 2017 & on.

Ever since the EASR Parts 66/147/Subpart M were partially adopted into CASR Parts 42/66/147, the aviation MRO industry reportedly has seen a decline in skills. AMROBA research has identified that this decline actually started a decade or so before then. Also, this trend is not unique to this industry so proposed fixes need to identify career paths to attract, train and keep important skills within the aviation industry. The foundation of AME training depends on CASA promulgating ICAO international training standards applicable to AMEs and LAMEs as they did in the past.

The EASA LAME system is an examination system the same as CAR31 Basics. Resurrecting a LAME examination system run by CASA or a contractor(s) that has the 75% pass mark will remove the pressure that CASA applied to the AME system.

Undoing the damage that CASA did in the last decade will take time but the current management in CASA has been positive and have agreed to this review.

A return to trade training and a separate licencing examination system correctly implemented can be made to work as long as the following is implemented.

The broad based avionics and mechanical AME employable across the industry sectors is the core to resurrecting a career positive system. With the proper AME skills, a person may gain employment across the industry. AMROBA's proposal is for a highly skilled AME that can work in avionics/mechanical or a composite of the two streams.

To obtain the licencing knowledge and skills above the trade training, an AME should be able to self-study, or do an on-line course, or a fulltime course. The LAME skills are about supervision, airworthiness requirements, management, and to certify as airworthy, these are all added to the AME trade skills.

The "group" rating system that has been created will work under the proposed licencing system if the different licences are based on aircraft design standards.

The need for the "Elementary" rating should be based on a similar process of to the FAA repairman system where the AMO makes a request for an employee to hold the "elementary" rating based on the AMO assessing the competencies of the employee. This can be limited to an apprentice half way through training or an adult employee from an allied trade.

What has to be carefully handled is the transition of current LAMEs trained under the CASR 66 system to the future system. Some have not attained the practical skills, some have not attained the knowledge so we need to replace that with experience plus employer assessment when they have the knowledge/practical skills to transition.

The last thing we need is the debacle of the introduction of CASR Part 66 and the exclusion fiasco.

The first thing CASA can do is repeal the introduction of the 5700Kg/9 seat and adopt next year's CASR Part 23 19 seats/5818Kgs limitation. This resurrects "group" ratings up to 19 seats and type ratings above and other transport aeroplanes. The same applies for helicopters, type ratings for CASR Part 29 and "group" ratings for Part 27.

The B2 group and type ratings will basically return to a workable system.

The group rating system was introduced to enable a broadly trained AME to gain experience to obtain a licence. The next system must return to a similar system with CASA promulgating the avionic and mechanical qualifications required to underpin the LAME system. The LAME additional skills can be tested by examination.

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3. CASA needs industry expertise as they rebuild.

To maintain the validity of an aircraft's certificate of airworthiness, all maintenance and servicing must leave the aircraft in compliance with its design standards, including any modification or repair. This requires on-going inspections that verifies the aircraft or component, continues to conform to its airworthiness requirements. Currently not a regulatory requirement.

CASA has demonstrated their naivety of "regulatory" requirements over the last decade. The airworthiness, certification, design, manufacturing, maintenance and technical training has not met international harmonisation.

Though GA does not have the administrative processes like the airlines, it does need to have a high commitment to safety by those that operate in a "direct supervision" system.

It is hard for "new" regulators that have no senior staff with corporate memory of CASA's predecessors' nurturing implementation of GA processes to improve safety. What worked and what failed must be passed on or the same mistakes will be made.

AMROBA has committed to assisting CASA to recovering some of the policies that worked for GA and were the basis for safe operations.

Understanding the difference between the need for a regulation or a standard is not well understood but the current acting management seems to be willing to learn.

For example, at a recent Engineering Seminar sponsored by CASA, held in Brisbane, the Lufthansa presentation questioned why CASA had additional design requirements to EASA or FAA. Another case of over-regulation and over prescriptive standards.

CASA MUST HARMONISE AND NOT APPLY UNIQUE REQUIREMENTS.

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4. Unless it value adds, then why are we doing it?

If Government's red tape reduction procedures were properly applied in this industry, the regulatory system would be more cost effective. Training is imposing massive costs when compared to the multiple pathways in both the EASA & FAA systems. Even ICAO standards are more cost effective. Transition and re-validation of the LAME is costly for a non-employee.

Minimum requirements that harmonise with international requirements so that there is no unique requirement that affects costs and administrative requirement.

Most GA small businesses operate under a transformational leadership style that depends on high levels of communication from management to meet goals. The C/E motivate employees and enhance productivity and efficiency through communication and high visibility. This style of leadership requires the involvement of management to meet goals. C/Es focus on the big picture within an organisation and delegate smaller tasks to the team to accomplish goals.

Implementing regulations that enable businesses to operate to modern business practices and technology. If it adds costs, it must value add to safety. No evidence that it value adds to safety then it should not be implemented.

CASA supports this approach, DAS Skidmore has documented the policy for development of requirements. We are supportive and we expect his staff to follow the policy.

Directly supervised small businesses don't need documented procedures if the requirements are well documented by the regulator.

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