

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

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Ageing Aircraft Elected Maintenance

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One of the big differences between the maintenance requirements of the FARs and our regulatory requirements is the reliance that our regulatory system places on 'aircraft registered operators' to have effective and efficient maintenance schedules or systems.

The FARs specify the minimum maintenance requirements thus relieving registered owners from determining the minimum maintenance requirements and standards to be applied.

The CARs are very ambiguous when specifying what is an effective and efficient maintenance schedule or system. The onus is placed on aircraft registered operators to make that determination.

Basically, the FARs are safety related whereas, under our system, the requirements are more about assigning responsibility which requires considerable more red tape when compared to the FAR system.

The number of aircraft that record "nil hours" each year continues to increase.

Many blame the amount of red tape for the increasing numbers of aircraft that no longer fly.

Maybe, another reason is that many older aircraft, as they age, become increasingly costly to maintain in an airworthy condition.

On the other hand, the number of aircraft being placed on CASA's aircraft register continue to increase. Extracting the number of aircraft that fly nil-hours shows the increase is not as great as the figures suggest.

How many of these ageing aircraft that are not flying each year are "airworthy"?

How many of the nil-hour aircraft should be removed from the CASA aircraft register because they are no longer being flown.

How safe are these ageing aircraft?

Should these aircraft, if they have not flown for a few years, remain on the register?

If over 20% of the aircraft on the CASA register fly nil-hours/annum, then the real number of aircraft is actually 80% of the number registered. If the current number of the aircraft on CASA's register is around 15,000 then there is only 12,000 active aircraft.

Is it a natural trend for these aircraft to stop being used as new aircraft are placed on the register?

If these nil-hour aircraft were removed from the register, what would be the age of the aircraft fleet in each certification category?

Though the 20% plus figure is based on BLTRE survey figures from 2010, many of our members suggest that the recent increase in parked aircraft would see a figure closer to 30%. Active aircraft could be as low as 10,500 VH registered aircraft.

The single most confusing requirement that the registered operator must determine is keeping an effective and efficient maintenance schedule/program.

The recent CAO stating that CMRs are mandatory clarifies some of the contentious issues when "electing" the right maintenance schedules/systems.

What confuses many is that older aircraft maintenance manuals mix mandatory and recommended maintenance. Only the mandatory must be done BUT many of the "recommended" requirements need careful consideration as they could increase the reliability and life of the aircraft.

This is where the FAR requirements are a safety step above current requirements for the non-airline segments. Future maintenance requirements must be FAR based.

ICAO Renewal C of A

With over 20% of VH registered aircraft flying hours/annum, maybe it is time to annually validate the Certificate of Airworthiness (C of A)

Many have asked why they are no longer flown. Some may be going through extensive maintenance but a large number are not flown, nor are they maintained.

- ◆ Are we basing costs on an aircraft higher than 15,000?
- ◆ If we only have 10,500/12,000 aircraft flying then costs could change.

If the C of A was validated each year then maybe aircraft that are not being flown for a few years should have their registration cancelled.

That way, the CASA register would receive the validation and tell the real facts relating to the number of VH operating aircraft

Basically, the annual airworthiness review CASA has introduced in CASR Part 42 is a method of validation based on the renewal system that ICAO clarifies in its Airworthiness Manual.

Though we don't support all the details proposed by ICAO, the following excerpt is from the ICAO manual; continuing validation was once used in Australia when we had the 3 year annual—the MRO sent a card to CASA that basically met the following. **ICAO provides the following guidance for a renewal of a C of A. (Example only)**

The process the renewal of C of A consists of the following steps:

1. Application form:

-incomplete forms (including supporting documents) should be rejected;

2. Air operator to submit compliance checklist and ensure the aircraft has complied with the type certification, airworthiness and national requirements. Compliance checklist, which should include:

- a) current aircraft and engines/propellers hours/cycles;*
- b) maintenance checks, if required;*
- c) ageing aircraft programme, if applicable;*
- d) all modifications and repairs;*
- e) ALI list;*
- f) aircraft damage chart;*
- g) AD compliance; and*
- h) maintenance record;*

3. Aircraft inspection, if necessary:

-sampling inspection to verify Item 2;

4. Aircraft radio station approval, if applicable;

5. Review flight test reports (if applicable), maintenance records and aircraft log books:

-ensure all deficiencies and deviations are appropriately addressed and corrected in an acceptable manner;

6. Issue C of A; and

7. File completed application, all documents and copy of C of A.

National Aviation Authorities Mission/Vision Statements

CASA

To enhance and promote aviation safety through effective safety regulation and by encouraging industry to deliver high standards of safety.

FAA

Our continuing mission is to provide the safest, most efficient aerospace system in the world.

Transport Canada

To develop and administer policies and regulations for the safest civil aviation system for Canada and Canadians, using a systems approach to managing risks.

Singapore

Grow a safe, vibrant air hub and civil aviation system, making a key contribution to Singapore's success.

India

Endeavour to promote safe and efficient Air Transportation through regulation and proactive safety oversight system.

Indonesia

To accomplishment of reliable, competitive and having value added air transportations.

ICAO

To provide advice and assistance to Contracting States in the development and implementation of projects across the full spectrum of air transport aimed at improving the security, efficiency, regularity and operational safety of national and international civil aviation with a view to achieving standardization, as specified in ICAO's Standards and Recommended Practices (SARPs).

Coalition Policy v White Paper

Compare the White Paper to the Coalition Aviation Plan ; it consists of 12 major points as follows:

1. Abolish the carbon tax

This states the obvious—should see lowering of costs in the industry.

2. Establish Formal Industry Consultation with the Minister.

This will implement a conduit for industry to raise real issues with the Minister so they can be addressed to the benefits of industry.

3. Ensure Best Practice in Aviation Safety is Maintained.

The Coalition will establish an “external” review of aviation safety and regulation. No more internal reviews and recommendations.

4. Reform the Structure of CASA

Reform is supported so CASA can function like their counterparts such as the FAA.

Clarifying CASA’s strategic directions

Retain CASA Board—improve industry representation

Industry Complaints Commissioner to make regular reports to Parliament.

5. Focus on Better Utilisation of Airspace

Not only does this cover the utilisation of some military airspace for civil use but it also, at long last, recognise new technology quieter aircraft access to Sydney/Adelaide airports.

6. Support Regional Aviation

Re-introduce En Route Rebate Scheme and recognises that regional aviation connects communities.

7. Recognise the Importance of Airports

Airports must be dedicated to providing aviation services & developments must not compromise current or future airport operations.

8. Encourage Aviation Manufacturing

Linking aviation manufacturing with future free trade agreements—at last.

9. Revitalise the General Aviation Action Agenda

The GAAA was designed to promote growth and prioritise areas of reform.

10. Promote Aviation Liberalisation

Recognises the need for global agreements to ensure capacity to meet demands.

11. Enhance Industry Training & Development

Recognises the on-going viability of aviation is only possible if skilled and trained staff are available.

12. Ensure Aviation Security is Risk-Based.

Accepts that “one-size” does not match all. Dedicated to remove red tape. Maybe they will accept CASA licences as security cards.

Annual General Meeting—12th October

We will need members input to what approach AMROBA takes over the next couple of years, especially with a new government likely.

To achieve this, the AGM will be split into 2 meetings. The first will be at:

Venue: Palmer Coolum Resort
(formerly Hyatt Regency Coolum)
Coolum, Queensland
12 October, 2013

This is the Saturday after the Regional Aviation Association of Australia Convention. Some members have indicated they will be attending the Convention so the meeting on the Saturday at Coolum will enable some members to attend the RAAA Convention and stay on for our AGM

This will enable members to discuss the future direction of AMROBA.

<http://www.raaa.com.au/convention.html>

The second meeting will be in Parafield on the 30th October. Time we met the needs of our southern members.

Please email AMROBA if attending either meeting and the numbers attending: amroba@amroba.org.au

We need to know numbers for catering.

Our meetings will help set the future of aviation in Australia. The LNP aviation policy states: “The Coalition will establish a formal “*Aviation Industry Consultative Council*” that will meet regularly with the Minister.”

This was one of AMROBA’s submissions to the Coalition and we expect that we will be represented on that Council.

All members of The Australian Aviation Association Forum have been suggesting this as well as reforming the structure of the Civil Aviation Safety Authority. Must happen.

* Become a Member *

The adage "there is strength in numbers" is absolutely true when it comes to influencing government regulations and policy. No one company, no matter how big or successful, can keep up on all the regulatory issues directly impacting businesses.

AMROBA is dedicated to serving the businesses that are responsible for the in-service continuing airworthiness of aircraft and aeronautical products, including the manufacture of replacement parts for in-service aircraft. This segment of the industry has never had a dedicated advocate until now.

AMROBA membership form is available from the AMROBA website: <http://amroba.org.au/become-a-member/>

print the membership form <http://amroba.org.au/index.php/download/file/view/15/>



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LNP Review

This needs special attention simply because of the dot points that the LNP listed in their policy paper.

The review will include an investigation of:

- *The structures and processes of all agencies involved in aviation safety;*
- *The relationship and interaction of those agencies with each other, as well as with the Department of Infrastructure and Transport;*
- *The outcomes and direction of the regulatory review process being undertaken by the Civil Aviation Safety Authority;*
- *The state of our aviation safety regulations when benchmarked against comparable overseas jurisdictions; and*
- *Any other relevant matters.*

One only hopes that any investigations, reviews, etc are not used to prolong the reduction in excessive red tape that the current legislation is imposing. Transferring all ICAO SARPs to CASA promulgated "Civil Aviation Safety Standards" will move criminal provision to administrative provisions. Same as FAA & CAA (Aus) in the past.

The policy also states:

The [Minister] strategic direction will reinforce safety as CASA's primary responsibility, but will also set out:

- *The leadership role of the board in determining the strategic direction of CASA;*
- *A renewed focus on meaningful industry consultation and engagement when regulatory reforms are being developed and implemented as required by Section 16 of the Civil Aviation Act, 1988;*
- *An emphasis on consistency of processes and outcomes when interpreting often complex and prescriptive regulations; and*
- *A desire for a timely and streamlined review process to reinforce consistent outcomes and incorporate industry feedback into future decision-making processes.*

LNP Vision: *Our vision for aviation in Australia is to help the industry grow in an environment that is safe, competitive and productive.*

AMROBA members should support this vision — it supports a future.

The Aircraft Maintenance Engineers/Technician Creed

Worth Remembering

"UPON MY HONOR I swear that I shall hold in sacred trust the rights and privileges conferred upon me as a qualified aircraft maintenance engineer/technician. Knowing full well that the safety and lives of others are dependent upon my skill and judgment, I shall never knowingly subject others to risks which I would not be willing to assume for myself, or for those dear to me.

IN DISCHARGING this trust, I pledge myself never to undertake work or approve work which I feel to be beyond the limits of my knowledge nor shall I allow any non qualified superior to persuade me to approve aircraft or equipment as airworthy against my better judgment, nor shall I permit my judgment to be influenced by money or other personal gain, nor shall I pass as airworthy aircraft or equipment about which I am in doubt either as a result of direct inspection or uncertainty regarding the ability of others who have worked on it to accomplish their work satisfactorily.

I REALIZE *the grave responsibility which is mine as a qualified aircraft maintenance engineer/technician, to exercise my judgment on the airworthiness of aircraft and equipment. I, therefore, pledge unyielding adherence to these precepts for the advancement of aviation and for the dignity of my vocation."*