

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

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This government was elected, from our aviation participants perspective in particular, to make radical changes to lower regulatory costs, reduce red and green tape and support aviation, especially rural aviation. These are their key points.

To support the growth of our aviation industry, the Coalition will:

- *abolish the carbon tax and its insidious impact on aviation fuels and aviation businesses;*
- *establish a formal Aviation Industry Consultative Council to meet regularly with the Minister;*
- *establish a high level external review of aviation safety and regulation in Australia; [happening]*
- *ensure that the Australian Transport Safety Bureau is adequately resourced;*
- *reform the structure of the Civil Aviation Safety Authority;*
- *focus on the better utilisation of Australian air-space;*
- *support regional aviation by introducing a new and better targeted En Route Rebate Scheme;*
- *recognise the importance of Australian airports to the economy;*
- *revitalise the General Aviation Action Agenda;*
- *continue to promote aviation liberalisation;*
- *enhance aviation skills, training and development; and*
- *ensure that aviation security measures are risk based.*

The Coalition will ensure Australia has a safer and more competitive aviation sector.

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

Everything in the Government Policy is consistent with the hopes of the aviation industry.

Back in September last year, this government election policy also included a pledge to reduce the ever increasing government red tape so businesses can get back to doing business.

More than 6 (six) months since the election and we wonder when will CASA get the message?

At the last CASA SCC Operations sub-committee, we were promised a lot more regulatory packages that are so big, they will be submitted to parliament in 2 separate bundles.

Under this government and their policies, they should and must be totally rejected.

The Government's Guide to Good Regulation states:

1. What is the problem you are trying to solve?

The RIS requires you to explain the problem — and your objective — simply and clearly.

A crisply defined problem offers scope for innovative, non-regulatory thinking.

The problem is that CASA's leadership is hell-bent on creating Parliamentary Regulations which are excessively prescriptive to support a safe and potentially growing aviation industry. Where is the non-regulatory thinking?

In the late 1980s, the government started the process to amend regulations to reduce regulatory burden on the aviation industry — the only area that has been successful is CASA issuing Type Acceptance Certificates based on aircraft Type Certificates from recognised countries.

Certification teams no longer go overseas to type certificate aircraft from recognised countries.

CASA administrative processes are growing immensely and impose more costs than equivalent NAAs.

Since the start of the 1990s, the growth in government burden, aviation incurred, has drastically reduced rural communities aviation service providers.

In the last decade there has been no "**innovative, non-regulatory thinking**" from CASA.

The whole regulatory approach is contradictory if the Australian government wants an aviation industry to grow, especially in rural Australia.

With our climatic conditions and geographic size, the aviation industry should be continually growing and ought to be utilised more than it was in the 60s and 70s.

The ASRR Report must recommend radical change for aviation, outside major airlines, to grow. It will need a radically different CASA culture and structure for the aviation industry to trust and respect.

Most mature aviation regulators have a better relationship with their industry that enables both the regulator and the regulated to work together to improve safety.

Safety needs a combined approach that fosters safe growth and a 'just culture' by all in this industry.

Cessna SIDs — CASA Mandatory

The most recent decision of CASA to mandate the Cessna SIDs demonstrates how different the Australian GA maintenance system is to the FAA system. Pre 1991, Australia had a system close to the FAA airworthiness and maintenance system, including design and manufacturing.

Since then, regulatory changes made have reduced the aspirations of some sectors that continue to decline.

In 1991, the 3 year 'major' inspection was removed and the "annual" inspection was introduced.

So what is an "annual inspection"? CASA has not promulgated any standards except CAAP 42B.1.

CASA personnel that were responsible for introducing the "annual inspection" believed they copied the FAA system because they were under the impression that the FAA annual inspection had the same "scope and detail" as the 100 hourly. The difference is that the A&P mechanic can do the 100 hourly BUT cannot do the "annual inspection" unless the A&P holds an "Inspection Authorisation" (IA).

FAR Part 43 separates 'inspection' and 'maintenance' for a very good reason. If you are a Part 91 operator then the "annual inspection" of the entire aircraft and systems is carried out by an A&P mechanic with an IA who will provide the owner with a 'list of discrepancies' discovered during the inspection. Usually the discrepancies are listed as 'must-do', 'recommended' or 'others that need monitoring'.

The owner can then technically use any A&P mechanic to carry out the maintenance to clear the list of compulsory/recommended discrepancies as well as having a list of items to monitor. The IA signs the 'annual inspection' but the A&P can perform the 100 hourly inspection and clear the defects.

The A&P/IA role is [conformity] detailed inspection of the entire aircraft to verify meeting design standards.

The FAA states: "The IA **inspects** the airworthiness condition of an aircraft following either a major repair or alteration action or the performance of an annual or progressive inspection."

Because the A&P/IA "annual inspection" is like the inspection aspects of the (3) three major inspection pre 1991, the manufacturers' data that seems to be mandatory are not mandatory unless the FAA mandates by an AD. The IA will take into account manufacturer data, FAA Alerts/Bulletins, etc when inspecting.

FARs state: (c) *Annual and 100-hour inspections.*

- (1) Each person performing an annual or 100-hour inspection shall use a checklist while performing the inspection. The checklist may be of the person's own design, one provided by the manufacturer of the equipment being inspected or one obtained from another source. This checklist must include the scope and detail of the items contained in appendix D to this part and paragraph (b) of this section.

No inspection performed under paragraph (b) of this section may be substituted for any inspection required by this paragraph unless it is performed by a **person authorized to perform annual inspections and is entered as an "annual" inspection** in the required maintenance records.

Because of the depth of the IA annual inspection, the Part 91 operator is not compelled to perform many "manufacturers' mandatory" maintenance requirements like the SIDs **but** the IA has to take into account the airworthiness & maintenance data (e.g. SIDs) issued by the manufacturer when inspecting.

CASA could address their "ageing aircraft" concerns simply by promulgating "standards" to be used when performing a CASA "annual inspection". It is the "annual inspection standard" that is flawed.

It is time that CASA developed and promulgated much needed standards associated with their annual inspection that meets the same standards as the FAA.

Cessna SIDs — Corrosion Levels

(1) Level 1 Corrosion.

- (a) Corrosion damage occurring between successive inspection tasks, that is local and can be reworked or blended out with the allowable limit.
- (b) Local corrosion damage that exceeds the allowable limit but can be attributed to an event not typical of the operator's usage or other airplanes in the same fleet (e.g., mercury spill).
- (c) Operator experience has demonstrated only light corrosion between each successive corrosion task inspection; the latest corrosion inspection task results in rework or blend out that exceeds the allowable limit.

(2) Level 2 Corrosion. (Reportable to manufacturer/CASA?)

- (a) Level 2 corrosion occurs between two successive corrosion inspection tasks that requires a single rework or blend-out that exceeds the allowable limit. A finding of Level 2 corrosion requires repair, reinforcement or complete or partial replacement of the applicable structure.

(3) Level 3 Corrosion. (Reportable to manufacturer/CASA)

- (a) Level 3 corrosion occurs during the first or subsequent accomplishments of a corrosion inspection task **that the operator determines** to be an urgent airworthiness concern.

This is a new maintenance concept for small aircraft, other manufacturers will follow with this approach.

Small Aircraft LAME

CASA informs us that they have almost completed the NPRM for the Small Aircraft AME licence and new ratings so that the B licence can be issued 'limited' to ratings similar to the old licence. As usual, even though the working group met with CASA only twice, we really cannot put our hand on our hearts and say what CASA will include in the NPRM.

We asked for a basic AME licence with added ratings so the licence could be issued **limited to** properly designated ratings similar to what we originally had. No exclusions.

We also asked for an "**elementary maintenance**" rating so an apprentice/AME could perform "**elementary maintenance**" and certify completion in their own right. This was asked for by many GA maintenance organisations both members and non-members of AMROBA. Elementary maintenance is used in the Canadian system and is more than pilot maintenance. We don't want the Cat A approach used in the airline system because the AQF training standards used is lower than the (L)AME competency standards levels. E.g. AQF L2 instead of AQF L3. It means an AQF L2 needs to do the same training but to the AQF L3 standard so they can get a 'B' AME licence. All training needs to be at AQF L3 standards as a minimum.

This means it won't be a dedicated training program as it should be obtainable after achieving competencies addressing elementary subjects part way through the 'mechatronic' training program.

CASA consultation does not go to the level that the industry members of the working committee has pre promulgation review. The working committee will see the NPRM is after the promulgate the NPRM.

The training college representative on the working group agreed that the course could be structured so the appropriate skills can be achieved.

Transport Canada [Standard 625, Elementary Maintenance](#) covers many tasks that we see an AME should be able to carry out. We have not advocated the Canadian process but it is applicable to our current maintenance release in the CARs.

TCA states: "*The following list is exhaustive; if a task is not listed, it is not elementary work. Elementary work is a form of maintenance that is not subject to a maintenance release.*"

- In other words, make a clearing endorsement on the non-airline maintenance release.

Most see this meeting what is basically industry practice except for issuing an official approval to the individual.

A return to a "basic" B1 licence that can add ratings will once again provide the industry with a viable general aviation AME licence system. What we must also lobby for is a return to self study and practical experience to obtain additional ratings until full B1 licence.

Only time will tell what is in the proposed NPRM.

Explaining CAR 42—'Inappropriate'!!!

If this regulatory provision is read carefully, then any aircraft that has had a modification carried out that includes on-going maintenance will need to have an approved system of maintenance. If a manufacturer has issued supplemental maintenance requirements then this would also require an approved system of maintenance. If already on a system of maintenance then the system would need amending, etc. etc.

For instance, if the registered operator had elected the CAR Schedule 5 as the appropriate maintenance schedules because the manufacturer's schedule were inappropriate and the aircraft had a modification that added on-going maintenance, then the elected schedule, whether the manufacturer's or CAR Schedule 5, technically become inappropriate.

An approved system of maintenance can be implemented by an approved LBS that list either CAR Schedule 5 or manufacturer's maintenance schedules plus additional maintenance schedules from the manufacturer, component manufacturer, modification data, etc.

CASA mandating the SIDs demonstrates that this regulatory requirement has not been applied properly or enforced.

42 Defective or inappropriate maintenance schedule

If the **maintenance schedule for a class B aircraft** is defective or **no longer appropriate**, the holder of the certificate of registration for the aircraft, **within 7 days after becoming aware** of the defect, or **that the schedule is inappropriate**, must report the situation to CASA and take one of the following actions to ensure that the aircraft has a maintenance schedule that is appropriate and not defective:

- if the aircraft's maintenance schedule is the **manufacturer's maintenance schedule**:
 - elect to use the CASA maintenance schedule as the aircraft's maintenance schedule; or
 - under regulation 42J, request CASA or an authorised person to approve a system of maintenance for the aircraft;**
- if the aircraft's maintenance schedule is the **CASA maintenance schedule**:
 - elect to use the manufacturer's maintenance schedule as the maintenance schedule for the aircraft; or
 - under regulation 42J, request CASA or an authorised person to approve a system of maintenance for the aircraft;**
- if the aircraft's maintenance schedule is an **approved system of maintenance**:
 - under regulation 42P, request CASA to approve a proposed change to the system;** or
 - elect to use the manufacturer's maintenance schedule as the maintenance schedule for the aircraft; or
 - elect to use the CASA maintenance schedule as the maintenance schedule for the aircraft.

If either elected schedule is inappropriate by themselves, then a SoM is the only regulatory alternative.

Air Transport System Growth

* 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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The first stage: The government's decision to build a second Sydney airport will at last remove a major restriction to the Australian air transport system. We all know that Sydney is a bottleneck at peak hours and has restricted growth simply because it does not have any vacant landing/takeoff slots available during peak periods. This restriction has caused continual delays to the network for many years.

Similarly, the rail and marine systems are restricted by the availability of railway stations and wharves — aviation need runways.

There are only a few ways that pax numbers can be increased during peak periods. They are:

- Increasing the number of slots per hour (safety restricted);
- Increasing the size of aircraft used (also restricted);
- Increasing the number of runways (the only real answer)

Sydney's centre of population is well west of Sydney CBD, so additional runways west of Sydney makes more sense. (2-3M pop. west of Sydney)

Increasing pax movements through Sydney will lead to increases in pax movements to inter and intrastate destinations. This benefits all Australia.

This decision also confirms that this government's aviation policy is being implemented as documented.

Will it be built in the next decade? — probably not. The law gives first right to Sydney Airport to build the airport and they have 12 months to make a decision. We know Sydney Airport operators do not support the need for a second airport. Add some ALP MPs in west Sydney who are anti and you can only concur that this political issue will be canned by a future Labour government. Aviation infrastructure still does not have the full political support we need.

The second stage: It has been reported that there is about 2000 airstrips around Australia of which approximately 250 airports have had public transport services and many others have had charter air services.

Many Australian airports do not have the population or business to support medium to large transport aircraft and, in the past, this was recognised by the Authority exempting these rural air service providers from airline requirements on condition that the highest level of safety was provided relevant to the smaller aircraft used. These type of services are more on-demand than regular air transport.

This government is committed to supporting growth in rural aviation and it must therefore support the removal of "red tape" and unnecessary regulatory provisions that has over-regulated this kind of air services. Will the Government reduce costs to these operators? Only if the ASRR provides the catalyst for change.

This next stage will make or break many aviation participants that have stayed true to aviation and it will be during this period that the direction implemented by this government should take effect, for the better we hope.

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."