AVIATION MAINTENANCE REPAIR & OVERHAUL BUSINESS ASSOCIATION, INC

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ADVOCATE OF THE AVIATION MRO INDUSTRY

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Trade Training—Industry Skill Fund

The Federal Budget has introduced a major change in financing skill training of the Australian workforce. It is across the board and changes the concepts for a school leaver looking for a trade.

The deregulation of higher education, to take place from 1 January 2016, is listed as one of three features of Budget 2014. The budget overhauls Federal course funding contributions toward students enrolling in higher education courses at TAFE Institutes and non-university institutions.

What any school leaver must now accept is that they will be paying for their skilling and qualifications and will have access to HECS type system.

The government will provide student loans of $20,000 over 4 years so they can obtain qualifications. These loans are in stages, $8000 yr 1, $6000 yr 2, $4000 yr 3 and $2000 yr 4.

Employers support this approach as it helps lock students into completing the course. Their point is that a lot of students under the current system do not complete their first elected training course.

The funding model provides the most money in the first couple of years but decreases as the apprentice earns more.

In addition to the student trade support loan scheme, the budget included a new $476 million *Industry Skills Fund* that will streamline training and better position Australian industry to succeed in a rapidly changing global economy.

In general aviation, trade skilling has traditionally been obtained under apprenticeships or traineeships. This will continue under this system including the traditional "block release" of the apprentice/trainee.

These loans will ease the financial burden and help increase apprenticeship completion rates.

Like HELP loans for tertiary students, the loans will be repayable once apprentices are earning a sustainable income.

The *Industry Skills Fund* will assist small and medium sized businesses to successfully diversify and improve competiveness in a global market.

"*Registered Training Organisations will deliver to businesses high-quality accredited and targeted training.*

This fund will help make Australian industry more flexible so it can seize emerging opportunities like new markets in Asia from Free Trade Agreements."

The fund will be delivered through the new streamlined Single Business Service initiative to make it easier for businesses to deal with Government.

Removal of the administration fee on VET FEE-HELP loans is a huge step forward in terms of equity for VET students. This change recognises that higher education is not for everyone and for those students who want to undertake a VET Diploma or Advanced Diploma they will no longer be discriminated against with prohibitive and unjustified additional administrative charges.

The *Industry Skill Fund* is described as targeting: health and biomedical products; mining, oil and gas equipment technology and services; and advanced manufacturing, including defence and **aerospace**.

Businesses will be required to make co-contributions towards the cost of training on a sliding scale depending on the size of the enterprise. Details not yet disclosed.

The Australian Skills Quality Authority should not be forced to operate on a full cost recovery basis—there does not seem to be an ongoing commitment from the government to fund ASQA in the budget statements.

The Industry Skills Fund budget.

Budget papers	2014-15	2015-16	2016-17	2017-18
Industry Skill Council	24,208M	131,404M	151,390M	157,715M

Changing Practices

Like all budgets, it is about a rearrangement of priority of funding. This budget was about reducing spending and in trade training, the apprentice/trainee will be provided with a loan that will be paid to the training provider. The loan will be repaid when the AME is earning above $54K.

Of course, this has not affected the implementation of the "mechatronics" training pathway for general aviation.

Training for jobs and productivity is important and there is some doubt that competency based training provides a person with the capabilities for the associated tasks.

Though the budget will have an effect on the skill training providers, the real changes will be what is included in the ASRR report due out this month.

The real concern will be how industry, trainers and students accept and adapt to this major change. **Will it bring more aircraft maintenance engineers to the industry**?

This growth is also dependent on growth in the aviation MRO local industry that is totally dependent in the revival of the non airline operators, both private and commercial.

More operators — more MRO jobs.

Design & Manufacturing

Obviously CASA takes no notice of the government's direction to reduce red tape.

Let's start with delegation/authorisation of qualified and experienced industry engineers. CASA & its predecessors have been delegating/authorising these persons for many years. The Australian system had its benefits over the FAA or TCA systems that are also based on economic needs. Delegation/authorisation enables a broader range of functions and increased number of qualified certification personnel available to the industry.

This spread of qualified personnel enables operators and maintenance personnel better access to certification functions that enables project approvals to be expedited.

If you are an industry delegate or authorised person for the following regulations, then you now have to notify CASA when you intend to use your approval:

- CAR 2A, CAR 29A, CAR 37,
- CAR 42M, CAR 42R, CAR 42ZC(6),
- CAR 42ZC(7), CAR 42ZS, CAR 43,
- CAR 262AP(5), CAR 42 AP(6),
- CASR 21.176, CASR 21.195A,
- CASR 21.200, CASR 21.324,
- CASR 139.200, CASR 139.320.

This process is not used in any other aviation delegated system. Job status, 'In Progress', 'Pending', 'Cancelled' and 'Completed'.

Is it an attempt to economically manage delegates?

Design delegations/authorisations.

A review of the draft AC 21-J demonstrates CASA thinking. Many professional engineers must be wondering what their academic qualification actually means.

An approved design organisation (ADO) must also be approved to provide advice.

Every ADO will have an Accountable Manager and a Head of Design, approved by CASA, who could be the same person. The ADO will also have the following:

1. Person responsible for independent monitoring.
   - Tertiary qualifications & lead auditor qualifications.
   - Provides quality assurance not certification
   - Additional person
2. Office of airworthiness manager
   - Tertiary qualification applicable to ADO approval
3. Individuals authorised to carry out design activity
   - Initially limited to technical data
   - ADO can authorise to do design activity
   - ADO can authorise to approve damage (PUS)
   - ADO can authorise to approve major damage
4. Independent Checking

Must be carried out by a person with same qualifications as a person that performed the design activity. It cannot be the Head of Design who signs the final approval, certificate, or advice. If there are multiple levels of the design activity then there will be added checking at each level.

The additional cost associated with what were basically "field approvals" are no more. No longer can a delegate or authorised person approve the design of a repair or modification as has been done in the past.

How many more aircraft will be designed in Australia with this system? Refer Australian Designs as an example.

Maybe there will be more ultralights designs

If we had a healthy GA industry we would have more maintenance personnel engaged in rebuilds and refurbishing. If this was the case, the need for many specific repairs and modifications would be required.

In the States it is not uncommon for an older aircraft to be de-riveted completely, then rebuilt like new using their minor/major approval processes. In the past, many of our 'old' planes have had similar or partial rebuilds by our very talented LAMEs. Will this continue if costs associated with Subpart 21J stifles approvals?

EASA Changes Direction for GA

During the Aero Friedrichshafen event (April 9th-12th) EASA made an announcement which came as a surprise to many people – even to those members of the GA Safety Standards Consultation Committee Sub Group. No one – not even NAAs had any prior knowledge of the EASA announcement.

Simpler, lighter, and better rules for General Aviation.

The Agency is committed to changing the way it regulates GA and this new approach comes from the Executive Director (Patrick Ky).

The presenters said transposing CAT (Commercial Air Transport) rules for GA was wrong and the aim now is to make the rules risk based and proportionate which is in line with the requirements established in the GA road map.

Furthermore, EASA wishes to simplify the operations and administration procedures.

Although it was originally decided not to have a specific GA department, EASA is now in the planning for a GA department, the aim of which is to establish a focal point inside EASA for GA, which has **accountability for the future health of GA across Europe.**

The time frame for this work is 2014 to 2017. **So why did we follow EASA**?

Regulatory Structures GA

Most governments are against imposing additional requirements on the public and individual participants but few achieve such an outcome.

Over the last decade we have seen a change from outcome based requirements to prescriptive regulations that also shifts the burden of proof from government to industry.

Standards are confusing to say the least.

Increasing unnecessary paperwork is killing the basic foundations of aviation, general aviation.

Splitting the maintenance capability between AOC pax operations and others was and is a backward step.

Nothing is being proposed to reduce the regulatory burden on the non airline and airline sectors. Changes introduced since 1991 has seen private VH registered aviation continue to decrease.

The regulatory changes has seen many shift to non VH registered aircraft where there is less regulatory burden.

Same aircraft, two different standards applied.

Is the safety of aviation affected by the type of person that wants to become a pilot, engineer, etc. or is it affected by the skills of these people.

New Zealand has a "fit & proper" person criteria that an aviation participant must meet prior to obtaining a government issued licence, certificate or approval. Why? Because under the NZ Aviation Act, the CAA(NZ) is also responsible for security matters.

So what is the best structure for GA?

Pilot licensing should be no different to the principles used in North America where there is a thriving non type certificated aircraft industry.

The legislation should be minimal and requiring CASA to promulgate minimum safety standards that this sector would need to comply with. This sector is all about individual standards not organisations.

Getting the structure right is important.

> "*The regulator may not have the skills or knowledge necessary to design and implement an alternative policy instrument. For example, in some technical areas regulators and policy makers may be influenced by the desire to specify highly technical standards, where they have very specific knowledge*."

Before regulatory change happened in aviation post the Authority's HO move to Melbourne, Australia had the right structure but requirements had two flaws.

1. Orders were not changing quick enough to keep up with changes needed by industry—basically waited for ICAO standards to change.
2. Many requirements did not have a "head of power" in the legislation.

The new CASA CEO will need to design a much better structure than the current system. Of course, his/her direction will be driven by the ASRR recommendations.

Small Aircraft Innovation

Modified Diamond— Fly by wire small aircraft This is introducing large aircraft technology into small aircraft.

The current tests and experimentation has been carried out in Europe by University of Stuttgart. Though it has only been installed in an experimental aircraft by Diamond, how much longer before any size issue is overcome and it becomes part of the TC.

The link to the test flight above is worth watching. History: *Gary Krier made the first flight of the F-8 Digital Fly-By-Wire aircraft. It used the Apollo 15 command module computer for control. It had a total memory of 38K, of which 36K was read only*.

We have recently witnessed the Cirrus Aircraft Parachute system being activated in New South Wales recently. When this was first advocated, many were also sceptical of its value. There are now a couple of other small manufacturers that are building these parachutes into their aircraft.

Czech Sport Aircraft is pleased to announce that the PS-28 Cruiser has won the prestigious Aerokurier Innovation Award 2014 in the category of Aircraft Of The Future. The award was presented to Czech Sport Aircraft this afternoon on the company's exhibition stand at Aero Friedrichshafen 2014. The readers of Aerokurier have recognised the PS-28 Cruiser as the most innovative aircraft of the future within its respective category.

Diamond is also involved with electrical powered aircraft. The experimental airplane is powered by a hybrid system comprising an integrated drive system from Siemens and a generator fed by a small rotary engine. Siemens, Diamond Aircraft and EADS present the second generation of the serial hybrid electric aircraft. A new technological concept has enabled both fuel consumption and emissions to be cut by around 25 percent. View Flight

LSA aircraft now have full glass cockpits. As an example, these are options that can be fitted to the CTLSi. Advanced panels with the Garmin G3X and new Area GNS 550 and GNS 750 are also featured on the new CTLSi. All of these exciting new panels give LSA pilots large glass panel displays with capabilities only found in the big jets just a few years ago. Flight Designs

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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Light Sport Aircraft

The US EAA has the following on its website. Web Link

The world of light-sport aircraft is achievable, affordable, and fun. Whether you're a new pilot who wants to learn in as little as half the time, or an experienced pilot looking for fewer hassles, the sport pilot certificate is your ticket to fly.

The FAA has defined light-sport aircraft as simple-to-operate, easy-to-fly aircraft that, since initial certification, has continued to meet the following performance definition:

In addition to fixed-wing airplanes as pictured, light-sport aircraft also include powered parachutes, weight-shift control aircraft, balloons, airships, gliders and gyroplanes.

Any aircraft that meets the definition of a light-sport aircraft as called out in FAR Part 1.1 is eligible to be operated by a sport pilot. These aircraft can be certificated in any category, such as standard, experimental amateur-built, experimental exhibition, experimental light sport aircraft (E-LSA), or special light sport aircraft (S-LSA).

Although FAR Part 43 specifically states that it does not apply to experimental airworthiness certificates, the operating limitations on your homebuilt will include the following (or something similar): No person shall operate this aircraft unless within the preceding 12 calendar months it has had a condition inspection performed iaw the scope and detail of appendix D to Part 43, or other FAA-approved programs, and found to be in a condition for safe flight.

EAA further explains who can perform a Condition Inspection by explaining that the inspection can be performed by any licensed A&P mechanic, an FAA-Approved Repair Station, or by the builder obtains a "Repairman's Certificate" from the FAA. They note, however, that unlike an annual for a type certificated aircraft, the A&P mechanic does not have to have his/her "Inspection Authorisation."

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."*