

AMROBA[®]inc

ADVOCATE OF THE AVIATION MRO INDUSTRY

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2015—3 Proposals

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On behalf of our members, AMROBA had a meeting in January with CASA to highlight the damage that their regulatory development is doing to this industry, especially GA. Some assert that the damage is permanent and we will never recover.

Our job, like always, is to provide CASA with sensible solutions that are achievable and will enable GA to safely grow.

Until the independent flight instructor is resurrected we will not see growth in GA pilot numbers in rural Australia — the heartland of GA. This is the main reason for a pilot shortage.

Our research in developing these proposals clearly identified regulatory change has had nothing but negative impacts on the employment levels in GA.

What we have identified is that pre 1991, our GA system was healthy and closely aligned with the FAA approach but with some additional requirements that added value to the system.

The research also identified that, especially in GA, the AMO/LAME had to contend to below standard CASA advisory material and regulatory requirements that totally conflicted with CASA CAAPs.

It is wrong for CASA to reproach industry for low practices when the regulatory requirements do not provide the same clarity as the FAA, TCA & EASA systems.

Proposal 1, available on the AMROBA website under Association News, [AME Licencing](#) ; addresses restrictive unique laws that do not provide the flexibility that past regulations and EASR regulations includes. There was very little difference between EASR Part 66 and what our original requirements specified. We would also like to see the extension of the CASA AME Basics to be permanent just like EASA NAAs.

Proposal 2, available on the AMROBA website under Association News, [Ageing Aircraft](#) ; clearly identifies that past regulatory changes lowered the regulatory standards by deleting inspecting aircraft, or part of an aircraft, as airworthy. For a regulator, CASA no longer thinks like a regulator. They think more like an airline maintainer or operator. A good regulator will look for causal reasons why they have any concern with ageing aircraft and amend the regulatory requirements to lower those risks.

Proposal 3, available on the AMROBA website under Association News, [Cessna SIDs](#) ; makes comparisons with the FAA, TCA and EASA and their treatment for FAR Part 91 operators of Cessna aircraft. It provides changes that will enable GA Cessna aircraft to be maintained the same as under the FARs.

The CASA Maintenance Schedule is a broad generic inspection schedule that, if followed iaw CAR 42V/2A, is as complete an inspection as the manufacturer's maintenance schedule.

The reason GA can exist the same here as in the USA. The maintenance records for non airline passenger flights must be kept to a minimum so that administrative costs are kept to a minimum.

To achieve this, a generic annual inspection requirement is needed, such as the FAA Annual Inspection.

The CASA Maintenance Schedule has an advantage over the equivalent FAR Annual Inspection as it includes some basic maintenance tasks.

The most important requirement is CAR Schedule 6, CASA System of Maintenance Certification. This requirement was developed by experience and includes coordination requirements not used in other countries.

AMROBA supports there is a need for some collaborative review of Schedule 6.

We say collaborative review because nobody trusts CASA to review any regulatory requirements.

The proof is in the problems with just about all regulatory changes implemented over the last two decades.

When will the ASRR recommendation be implemented to fix the mess these current regulations are in? No other NAA can understand them.

CASA needs another *Review of Resources* — based on the declining size of the industry, CASA numbers should also be reduced.

Manufacturing Should Create Jobs

Back in 1998, CASR Parts 21-35 were introduced under great fanfare with a promise of fully adopting the FAA approach, i.e. use of industry delegates for data/design approval and, once CASA received the industry delegate (authorised person) approved documentation, CASA would issue the document (TC, ASTC, APMA, ATSO). The promised reduction in paperwork and red tape lasted as long as two CEOs in CASA and then a return to pre 1988 red tape continues to grow. In fact, it is now worse than what the Department provided pre 1988. Manufacturing has not grown, **it is declining**.

So what benefits has any regulatory change had in the aviation manufacturing sectors. Two decades of government promising change to end up with a more bureaucratic system than what was in place pre 1998 and also pre 1988 when the CAA was formed. Why??

The purpose of regulatory change in the past was to empower industry to certify all the data and processes so government would not be liable for what industry approved. If the industry was responsible for designing and making the aircraft or product, then government would only have to approve the final document. CASA should not be responsible for any manufactured aircraft and products, it is the designers' and manufacturers' responsibility.

CASA's return to micro management is adding costs to the process of manufacturer that is not applied in the US by the FAA.

CASA has demonstrated their lack of business management when dealing with these businesses. Instead of working with industry to encourage safe streamlining of manufacturing processes, CASA is living in an era that prevents modern manufacturing and business controls from being adopted.

This is a completely different approach to how the FAA works with their manufacturing industry. CASA must reduce the red tape so Australian businesses can be globally and domestically productive.

The FAA places great faith in "designees" providing the face to face work flow.

A return to adopting FAR Part 183 might just create an environment where increased employment may happen.

Just about every manufacturer that you contact complain of the attitude of CASA engineering staff and those that audit manufacturers.

Our impression is that CASA must be trying to stop manufacture by adding administrative requirements not in the FAA system or individuals like invent delays so business cannot meet customer demands.

*APMA: Is a **combined design and production approval for modification and replacement articles**. It allows a manufacturer to produce and sell these articles for installation on type certificated products.*

A New Outlook on AME Training

At the Geelong Airshow, I had the opportunity of meeting with the Embry Riddle delegation who provide 'BSc in Aviation Maintenance' that, in countries where they provide this training, also enables the person to hold an AME licence. Why would we be interested? Many young people may want to work in aviation but also want a degree, maybe that will be the norm in the future, so they can also change their career. It is happening overseas.

In the larger airline industry in the USA more than 60% of the A&P mechanics also hold a degree and this trend continues to increase.

[Embry Riddle University](#) is interested in bringing their training system to Australia in conjunction with an Australian university. AMROBA supports.

An interesting part of the discussion is that their course is based on the ICAO AME training manual underpinning the licences in whichever country they participate. This could, in Australia provide B1 and/or B2 licences based on a proven international training program. It maybe the only way that the Australian LAME may once again get international acceptance.

What they also explained that A&P training can provide credits towards a degree. They asked what would be the problems in setting up such a system of training in Australia with a B1 & B2 outcome. We will discuss further.

Interestingly, when we discussed practical skills, they explained it is done in house or with employers to complete the ICAO AME training manual practical skills.

Their interpretation of the [ICAO AME training manual](#) was enlightening and demonstrates that Australia's competency based training, as applied today, has a lot to be desired when compared to world standards associated with this kind of training.

Any Sign of Red Tape Reduction

This question was asked recently by some of our members because they feel that CASA is creating more red tape in spite of the government direction. The process involved in obtaining approval from CASA for maintenance or manufacturing is quite complicated. The conundrum is, the assessment is not much different than other NAAs.

CASA Form 019, when compared to the one page application forms of other NAAs, creates red tape that can be lessened by CASA doing a documented assessment. Does CASA need to duplicate what other government departments and agencies control?

For example, FAA Order 8900.1 Volume 6 Chapter 9 is very specific what has to be assessed and included in the FAA computer database.

The application must include:

- 1) *Repair Station Manual, 2) *Quality Control Manual,
- 3) *Listing of articles to be maintained, 4) *Organizational Chart, 5) *Housing and Facilities, 6) *Contract Maintenance Functions, 7) *Training Program, and 8) a *Letter of Compliance.

[Quality Control System Assessment](#); or [Tooling and Equipment](#); or

[Facilities](#) all individual assessment for compliance.

Each inspection includes a FAA computer input—PTRS.

E.g. [Section 9. Inspect a Part 145 Repair Station's Parts and Materials Program \(CHG 205 - 5/2/12\) PTRS Activity 3601/5601](#)

This system requires the FAA Inspector to do the assessment, enter all the assessment details in their computer system before issuing an approval.

However, the American system also has many small maintenance organisations that start as FBOs, without any FAA approval, and then upgrade to FAA approval as a FAR Part 145 organisation. Natural growth.

The US FBO system can be easily adopted in Australia with a CASR Part 145 approval based on compliance with CASA promulgated clear and concise aviation safety standard. A return to past safe practices.

A CASR Part 145 AMO with no approved company manual, just a requirement to comply with CASA promulgated standards will encourage GA aircraft AMOs.

It would also require adoption of the principles of "direct supervision" for small AMOs.

CAO 104.1 defined "**direct supervision**" as *meaning that the supervisor observes and checks the work being performed to ensure that it is being performed properly.*

This did not apply to component maintenance or manufacturing that always required 'quality control' to be documented.

General Aviation @ Avalon Airshow

Talking to members of the New Zealand vintage contingent at the Avalon Airshow clearly identified why the NZ GA is succeeding whilst Australian GA is struggling. Replicas like the Sopwith Triplane, Nieuport 11 Bebe, Fokker Dr-1 and others put on a great display. These replica aircraft are manufactured in New Zealand.

Their flying WWI replicas were testimony to a successful aviation infrastructure. Their support staff were actually supportive of the CAA(NZ).

When experimental was introduced, it was expected that this sort of growth would happen in Australia.

In amongst the high tech military and large aircraft that predominate the Airshow, there were many small aircraft that proves we still have some entrepreneurs willing to invest in GA and aerial-work aircraft operations.

Some of the exhibitions were aircraft from the past, including some old aircraft that have more TLC than the owner's motor vehicle. Many of these aircraft were completely rebuilt.



Besides aerobatic displays of large and small aircraft of all types were many companies, some are our members, who placed their capabilities on display at stalls. Some of these have identified new markets where they may be competitive.

This Airshow is a very important cog in aviation advancement in Australia. It is the only time that aviation comes to the fore and the normal media provides some coverage of what is happening. We need more manufacturers in Australia.

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: amroba.org.au/become_a_member, or print the membership form amroba.org.au/print_a_form

Fees are stated on the application forms — BSB preferred method.

Stimulating Apprentices

When the regulatory development was under Keith and Toller's oversight, the maintenance regulations included those under training (apprentices or trainees), aircraft maintenance engineers and their regulatory responsibility. The proposed LAME in those regulations would have met their ICAO privileges with broader scope than today's B1 & 2 LAME.

The CASR Part 42, 66 & 147 has virtually destroyed the trade skilling capability of RTOs in Australia. They are not compatible with the Australian training system, have no acceptability within the training system and definitely not compatible with world standards.

The problem confronting the industry is to negotiate with the Department of Education to resurrect proper trade training that meets the international standards as is available in just about every other mature aviation country.

We do not believe that CASA controlled competency based training has met the needs of this country.

CASA dominated AME licencing training has virtually destroyed AME trade training and apprenticeships, but our early discussions with government on a new approach to trade training is providing some promise for the future.

Based on these early discussions, AMROBA encourages its members to consider employing an apprentice or two—the industry needs a younger profile.

We heard at the Airshow that only 8 apprentices completed their AME courses last year—the industry is unsustainable if employers do not invest in apprentices.

Our aim is for the regulations to recognise apprentices, trainees, AMEs and LAMEs. The LAME is and always has been, the quality control in general aviation.

Every apprentice, AME and LAME should read and understand the AME/AMT Creed printed below.

CASA has a lot to learn as a regulator, and they are not the 'quality control' of the aviation MRO industry, that is a responsibility AMOs and LAMEs have been proud to accept for decades.

What a mess the current system is. Whichever way you look at it, there are issues and problems existing, mostly created by CASA.



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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."