

AMROBA

ADVOCATE OF THE AVIATION MRO INDUSTRY

Newsletter Date 11/11/03

Volume 1, Issue 2.

TRANSITIONING TO THE PROPOSED NEW MAINTENANCE REGULATIONS

Inside this issue:

Competency Training	2
Is CASA coping?	2
DOT&RS/CASA	3
CASA Scorecard	4
Part 145 Manual	5
Certification	6
Devovement	6

Stop Press

Industry Survey

- The University of Western Sydney is carrying out research into the preparedness of the MRO industry for the maintenance suite of regulations.
- Copies of the survey are available from AMROBA.
- Whether you are a member of AMROBA or not, we urge you to complete the survey and return, post free, to the UWS to assist us to plan the change.

The introduction of a new regulatory structure in Australia was suppose to enable current members of this industry to have access to global trading.

Transitioning from one regulatory structure to another was not suppose to affect current approved MRO entities.

Transitioning can be done many ways ranging from complete re-certification of each participant to automatic transition done under transitional and saving regulations.

As this change was an initiative of government, industry quite rightly expects that the regulatory transitional process is the only acceptable process that can be used.

The MRO industry had a very good safety record and the thrust of the regulatory change was not to correct any safety issues.

However, the experience that this industry has had to endure, when dealing

with CASA, with the introduction of Part 21, quite rightly makes us nervous.

CASR Part 21 was introduced without appropriate saving or transitional provision for all the approvals issued during the last 100 years of aviation.

CASA has at long last proposed to introduce saving provisions after AMROBA has made many submissions to CASA and lobbied both CASA and DOT&RS.

Part 21 introduced sunset clauses for industry that virtually ignored 100 years of safe aviation in this country.

It did not have any transitional regulations so that organisations would stay in business nor did the administrative approach taken by CASA assist industry.

CASA's approach was that all approvals delivered by CASA and its predecessors and industry authorised persons no longer were good enough to sup-

port parts manufacturing.

CASA wanted justification for approvals made in the past. Even CASA approvals would not have the justification that was being asked for and CASA never identified that unsafe parts were being manufactured.

There is not, and never was a safety issue. CASA created a paperwork nightmare instead of producing saving regulations that enabled industry to continue in business.

Therefore, it is imperative that saving and transitional regulations completely enable current organisations and personnel holding CASA authorisations, to transition into the new maintenance system without any cost to industry.

CASA must automatically re-issue Parts 144, 145 & 147 certificates and ratings to organisations with the broadest scope of approval as can be given otherwise industry cannot develop.

AMROBA MEMBERSHIP UPDATE

AMROBA continues to grow and participate in appropriate committees.

Membership growth over the last 9 months has been steady but recently it has started to slow down (XMAS?).

AMROBA's long term survival depends on the MRO

industry support. A minimum of 300 members are required to be financially viable but 500 to 1000 members is our aim.

We are now registered as a non-profit organisation. Development of rules, industry based segmental management representa-

tion, website, etc are now complete so membership becomes the next project.

If you are not a member access our website for details of AMROBA and membership application.

Complete an application and join now.

COMPETENCY BASED TRAINING WHAT THE FUTURE HOLDS

Australia's decade old competency-based training system is simply the basis of obtaining qualifications under the national vocational educational training system (NVET).

Competency includes knowledge and practical experience which differs from the old system of only obtaining knowledge under the NVET system.

Currently, CAR 30 requires qualified persons to be employed and that simply means qualifications under the Australian NVET system or similar.

CASA currently specifies qualifications (not NVET qualifications) for the LAME and some AAs

(CASA's out-of-date and nationally out-of-step examination system).

Under the proposed maintenance rules proper recognition is given to the NVET qualifications even for the LAME.

Because formal training is required, persons signing for maintenance tasks will need to hold NVET qualifications. Of course, saving provisions must save all current personnel working in this industry that are signing for maintenance tasks.

CASA will licence those maintenance personnel that hold specified NVET qualifications and issue ratings for others.

What we are looking at is reducing the number of transactions with CASA.

AMROBA proposes that additional NVET qualifications are not really ratings. Basically, the specified NVET qualification to hold a general AME licence should be the only transaction with CASA unless an additional specific aircraft rating is being added to the AME licence.

All other NVET qualifications (e.g. pressurisation, navigation, wooden structures, etc) are actually additional competencies that an approved training organisation issues under the NVET system. A reduction in CASA transactions.

IS CASA COPING?

Whilst industry is supposed to be the beneficiary of the regulatory change process what about CASA? All the current indications seen by industry seem to indicate that CASA is not coping as well as it could.

It is obvious that the silo structures within CASA is preventing policy, procedures and processes from being standardised.

For example, industry works with CASA's Standards Division to develop rules and then all the other Divisions come up with their own interpretations of these rules.

CASA's current silo structure (segments) are based on legislative responsibilities and **not** on operational segments of the industry. (Compliance, Regulatory Services, Standards, etc. are Section 9 of the Civil Aviation Act)

This means that industry has to communicate with too many silos within

CASA instead of the local CASA office. This differs from all other businesses.

Industry is the victim of internal differences and inefficient management within CASA.

CASA must be structured to the segments of industry not the Act. All such segments being responsible for Section 9 of the Act. It is obvious that CASA, as a whole, is not internally coping with change as skilfully as industry, including the additional empowerment of the industry.

Some CASA staff obviously just do not agree with, nor do they understand devolvement.

Advice to CASA:

Large organisational-change programs are notoriously difficult to run: they involve changing the way people not only behave at work but also think about work. Sometimes, however, changing indi-

vidual mind-sets is the sole way to improve a company's performance.

First, they must **see** the point of the change **and agree** with it, at least enough to give it a try. Then the surrounding structures — **reward and recognition** systems, for example — must be in tune with the **new behaviour**. People must also see colleagues they admire modelling it and **need to have the skills to do what is required of them**.

Common faults:

Applying any one of these insights on its own doesn't have much impact. But managers now find that applying all four together greatly improves their chances of bringing about lasting changes in the mind-sets and behaviour of people in their organisations—and thus of achieving sustained improvements in business performance.

**CASA's silos
(segments) are based
on legislative
responsibilities and
not on operational
segments of the
industry**

WORKING WITH GOVERNMENT MINISTERS/DOT&RS/CASA

One of the benefits of having an association to represent the MRO industry is that it gives a focal point for politicians, government departments and agencies to contact.

It also gives the media a point to contact.

The benefit of having such a focal point is that your views are sought so it is important that your views are sent to the management committee so that they can formulate policy.

The management committee provides the directions for the Executive Director to use in the various meetings that he at-

tends on behalf of the members.

AMROBA is developing a good relationship with its contacts and its views are sought quite regularly.

AMROBA now has regular meetings, some one-on-one, with various managers in CASA and DOT&RS.

AMROBA has also met with the Minister's office and the Shadow Minister for transport.

We keep in regular contact with as many people in power as we can so that your business interests are made known to the those that may influence your business future.

During the formulation year of AMROBA we have had to set up a political contact base.

We intend to develop educational packages for politicians so that we can gain political support for our long term future.

Without political support this industry will not obtain the changes that are needed so businesses can safely operate in a level playing field both domestically and internationally.

One thing can be sure, the MRO INDUSTRY is in desperate need of political and government support.

CASA's Scorecard

CASA still has a response problem. They just do not understand performance.

If private businesses operated like CASA then they would be out of business.

The problem is, the lack of performance within CASA affects your business.

Where other government bodies are following the Prime Minister's direction to reduce "red-tape" for

small business, CASA increases the paperwork.

Take a comparison with filling out an application form for a certificate of approval under the FAA system and CASA.

The FAA states on their form that it should not take any more than 15 minutes.

Have you made a submission lately for a regulatory service to CASA. Since

the inception of RSD (new empire) costs have more than doubled for MRO regulatory services.

The FAA accepts certifications from applicants as being honest. They then carry out a site visit to verify what was applied for.

Come on CASA, improve your performance—accept industry standards of performance.

**Come on CASA,
improve your
performance**

AMROBA's DRAFT Part 145 Organisation Manual

AMROBA is in phase of developing a Part 145 manual, acceptable to CASA, for use by its members at a small cost.

It is based on the format that ARSA uses in the US to meet FAR Part 145.

There will still be some personalisation required to make the manual compatible with your particular

organisation.

This is the same approach as used in the US with the latest amendment to FAR Part 145. Naturally, AMROBA's manual will be drafted to match the CASR Part 145.

In addition, a number of members of AMROBA will be able to provide advice to organisations to assist with personalising the

AMROBA manual.

We intend to make it available to members on a CD.

Non members will be able to purchase the manual at a much higher price.

This will make it much easier for industry to comply with Part 145 over the next few years.

The final AMROBA manual will be acceptable to CASA.

**AVIATION
MAINTENANCE REPAIR
& OVERHAUL BUSINESS
ASSOCIATION, inc**

Postal Address:

**PO Box CP 443
Condell Park
NSW 2200**

Phone: 61 (0)2 9759 2715

Fax: 61 (0)2 9759 2715

Email:

amroba@amroba.org.au

inquiries@amroba.org.au

Website:

www.amroba.org.au



MAINTENANCE CERTIFICATION

Signing for the completion of maintenance and stages of maintenance has become one of the mysteries of aviation records.

This seems to be one of CASA's major traumas and one that creates more questions than answers.

So what is maintenance certification? Take away the legislation and all certification means is a method of confirming that the work has been completed.

Unlike the new CASR Part 43 that requires all maintenance tasks to be signed for, Schedule 6 only requires the completion of maintenance, or completion of a stage of maintenance or an independent inspection to be certified.

So the current regulatory standard is only a minimum standard, whilst the normal industry practice, above the regulatory standard, is to sign for all maintenance.

So what is meant by the term "completion of maintenance or stage of maintenance"?

This depends on what is to be certified and where.

For example, if an 100 hourly inspection was performed on a VFR aircraft by a LAME then there would only be one certification for the inspection.

Where more than one person is involved it means that provision must be made to certify by each certifying person.

Each certifying person has to sign for the completion of the maintenance that each person performs or supervises. This actually is a stage of maintenance that is being performed.

What else is a stage of maintenance? Basically, wherever an individual certification is made it can be a stage of maintenance.

Removal of a flight control for rectification and balancing, if carried out by more than one person, requires separate certifications for the rectification, balancing, installation and functional test. No certification is required for removal.

The more people that are involved in the maintenance of an aircraft or product the more stages of maintenance are generated.

ADs are normally classified as a stage of maintenance where more than one person is involved with the certification of an aircraft or product.

Basically, all organisations should be providing worksheets so that they know which employee carried out what maintenance.

This way, you will not only comply with current legislation but be well prepared for CASR Part 145.

Coordination is provided across trades and within trades. If coordination is required a final certification is also required.

The reason for coordination within categories is to ensure that a category specialist reviews and ensures all relevant maintenance has been carried out. A final certification simply states what type of maintenance has been carried out, not an abbreviated list of the work that has been certified as completed.

AMROBA is developing a regulatory compliance cross-over chart so industry can clearly see where CAR certification requirements fit in the CASRs.

DEVOLVEMENT – TRUE OR FALSE

One of the cornerstones of the regulatory development is devolvement and empowerment of the aviation industry. Macro management versus micro management.

What we will continue to lobby for is clarity in legislation so that the industry knows which regulatory power is being devolved and not to rely on a system of hidden delegations.

This is a return to the system of the past that the "authorised persons" replaced.

ICAO standards and recommended practices, the basis for regulatory systems worldwide, enables a State to make laws that will empower industry to carry out just about all functions except the power to issue certificates and licences that need international recognition.

Just about every other function can be devolved to industry.

The maintenance suite of rules were based on further devolvement but there are more functions that can be devolved.

AMROBA will continue to lobby for further devolvement. Let us know of any function that you think industry can do better and cheaper than CASA