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NEWSLETTER

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Proposed General Meeting of members, **March 16/17 at Tamworth NSW** to discuss the future of aviation as it affects our members. Program to cover Friday/Saturday being developed so all issues can be discussed on Friday. Saturday could open meeting to other associations' executive, media and politicians. Should we also invite CASA to attend at some stage? [Read more](#)

1. Need to provide 'regulatory inspections standards'.

Many aircraft manufacturers provide definitions of the various levels of aircraft inspections standards. However, most countries have minimum regulatory inspection standards promulgated in regulations to address the older aircraft that do not specify the inspection standards.

FAR 43.15 requires the inspection to determine the aircraft, or part of the aircraft meets all applicable airworthiness requirements and, if the aircraft is under a system of maintenance, to do in accordance with the procedures and system specified in the SoM.

Modern aircraft (e.g. MSG) systems include inspection standards that ensure the aircraft is inspected to determine the aircraft meets all applicable airworthiness requirements.

Current maintenance personnel are used to terms like routine and detailed inspections and many manufacturers provide a definition of the difference. This too is based on more FAR Part 43 minimum standards. [Read More](#)

2. FAA Reauthorisation Bills.

CASA does not have the same political scrutiny that the FAA is put under by their parliament transport committees. The USA Parliament has House Committees review the FAA performance and technical issues confronting the industry just about every two years before presenting a Bill that reauthorises the FAA for a further period.

The contents of these Reauthorization Bills make interesting reading. For instance, the 2013 Reauthorisation Bill amended their Act re CDPOs.

(a) In General.--Section 44704(e) is amended to read as follows:

“(e) Design and Production Organization Certificates.--“(1) <<NOTE: Effective date.>> Issuance.--Beginning January 1, 2013, the Administrator may issue a certificate to a design organization, production organization, or design and production organization to authorize the organization to certify compliance of aircraft, aircraft engines, propellers, and appliances with the requirements and minimum standards prescribed under section 44701(a). An organization holding a certificate issued under this subsection shall be known as a certified design and production organization (in this subsection referred to as a ‘CDPO’).

Remember, it was the 2016 reauthorisation bill that eliminated the current 3rd class medical requirement within 180 days of enactment. It would allow any pilot with a valid driver's license to carry up to five passengers in aircraft weighing up to 6000 pounds, on flights below 14,000' MSL and at speeds below 250 knots. [Read more](#)

3. Maintenance records - deferred defects.

When the registered operator or the RO's pilot delivers the aircraft to a maintenance organisation there is usually a discussion that is had with the RO or the pilot on what maintenance is to be carried out. This complies with the regulations as the customer has to authorise the maintenance organisation to perform maintenance and what maintenance is to be carried out.

How often during those conversations does the RO or pilot raise issues that have not been documented in the maintenance records but will require servicing or maintenance?

However, as a maintenance organisation are we doing the right thing by writing up these defects that the pilot had not listed on the maintenance release or an approved alternative maintenance release and/or log book system? These are not defects identified during maintenance.

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1. Need to provide 'regulatory inspections standards'.

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FAR 43.15 requires the inspection to determine the aircraft, or part of the aircraft meets all applicable airworthiness requirements and, if the aircraft is under a system of maintenance, to do in accordance with the procedures and system specified in the SoM.

Current GA maintenance personnel are used to terms like “routine” and “detailed” inspections and many manufacturers provide definitions. Routine means opening access panels as necessary whereas detailed means further disassembly so the structure can be inspected.

A review of a US manufacturer’s progressive inspection documents the difference between the routine and the detailed inspection. However, USA manufacturers all base their inspection standards on the FAR Part 43 minimum standards for inspections.

§43.15 Additional performance rules for inspections.

(a) *General. Each person performing an inspection required by part 91, 125, or 135 of this chapter, shall—*

- (1) *Perform the inspection so as **to determine** whether the aircraft, or portion(s) thereof under inspection, **meets all applicable airworthiness requirements**; and*
- (2) *If the inspection is one provided for in part 125, 135, or § 91.409(e) of this chapter, perform the inspection in accordance with the instructions and procedures set forth in the inspection program for the aircraft being inspected.*

In other words, an inspection that determines the aircraft continues to meet the type design and continuing airworthiness requirements applicable to the aircraft or part thereof.

Are our maintenance personnel knowledgeable about “applicable airworthiness requirements”; i.e. the aircraft/component design standards?

So what are applicable airworthiness requirements?

- a. The design standards for the aircraft and/or product.
- b. Any additional standards specified in Airworthiness Limitations.
- c. Any requirement specified in Airworthiness Directives.
- d. Any specific configuration standards.
- e. Any requirement association with modifications and repairs.

§ 43.2 Records of overhaul and rebuilding.

(a) *No person may describe in any required maintenance entry or form an aircraft, airframe, aircraft engine, propeller, appliance, or component part as being **overhauled** unless—*

[Routine Inspection IRAN]

- (1) *Using methods, techniques, and practices acceptable to the Administrator, **it has been disassembled, cleaned, inspected, repaired as necessary, and reassembled**; and*
- (2) *It has been **tested in accordance with** approved standards and technical data, or in accordance with current standards and technical data acceptable to the Administrator, **which have been developed and documented by the holder of the type certificate, supplemental type certificate, or a material, part, process, or appliance approval under part 21 of this chapter.***

[Detailed Inspection Remanufacture]

(b) *No person may describe in any required maintenance entry or form an aircraft, airframe, aircraft engine, propeller, appliance, or component part as being **rebuilt** unless **it has been disassembled, cleaned, inspected, repaired as necessary, reassembled, and tested to the same tolerances and limits as a new item**, using either new parts or used parts that either conform to new part tolerances and limits or to approved oversized or undersized dimensions.*

The difference between ‘overhaul’ and ‘rebuilt’ is the data used during maintenance.

Overhaul uses the in-service tolerances promulgated by the manufacturer during the maintenance and testing of aircraft/article whilst **rebuilt** is to new tolerance and limits. In many cases, the new tolerances and limits are only documented on design manufacturing/assembly data. We do not do “rebuilt”.

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Remember, it was the 2016 reauthorisation bill that eliminated the current 3rd class medical requirement within 180 days of enactment. It would allow any pilot with a valid driver’s license to carry up to five passengers in aircraft weighing up to 6000 pounds, on flights below 14,000’ MSL and at speeds below 250 knots. A pilot may not operate a flight under this exemption for compensation or hire. The FAA also would be required to implement procedures to streamline the process for obtaining an Authorization for Special Issuance of a Medical Certificate and similar consultations would be required. We have adopted a similar provision.

In 2016, a Bill made, amongst many other changes, the following:

SEC. 311. AIRCRAFT CERTIFICATION PERFORMANCE OBJECTIVES AND METRICS.

5 (a) IN GENERAL.—Not later than 120 days after the date on which the Safety Oversight and Certification Advisory Committee is established under section 302, the Administrator of the FAA shall establish performance objectives and apply and track metrics for the FAA and the aviation industry relating to aircraft certification in accordance with this section.

The FAA Administrator shall establish performance objectives for the FAA and the aviation industry to ensure that, with respect to aircraft certification, progress is made toward, at a minimum—

- (1) eliminating certification delays and improving cycle times;*
- (2) increasing accountability for both FAA and industry entities;*
- (3) achieving full utilization of FAA delegation and designation authorities;*
- (4) fully implementing risk management principles and a systems safety approach;*
- (5) reducing duplication of effort;*
- (6) increasing transparency;*
- (7) establishing and providing training, including recurrent training, in auditing and a systems safety approach to certification oversight;*
- (8) improving the process for approving or accepting the certification actions of bilateral partners;*
- (9) maintaining and improving safety; and*
- (10) maintaining the leadership of the United States in international aviation and aerospace.*

“(B) delegate fully to the ODA holder each of the functions to be performed as specified in the procedures manual, unless the Administrator determines, after the date of the delegation and as a result of an inspection or other investigation, that the public interest and safety of air commerce requires a limitation with respect to 1 or more of the functions; and

“(C) conduct regular oversight activities by inspecting the ODA holder and taking action based on validated inspection findings.”

Note that these are all parliamentary directions to the FAA stating what and how they manage their business. CASA has never been under such scrutiny.

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3. *Maintenance records - deferred defects*

When the registered operator or the RO's pilot delivers the aircraft to a maintenance organisation there is usually a discussion that is had with the RO or the pilot on what maintenance is to be carried out. This complies with the regulations as the customer has to authorise the maintenance organisation to perform maintenance and what maintenance is to be carried out.

How often during those conversations does the RO or pilot raise issues that have not been documented in the maintenance records but will require servicing or maintenance?

However, as a maintenance organisation are we doing the right thing by writing up these defects that the pilot had not listed on the maintenance release or an approved alternative maintenance release and/or log book system? These are not defects identified during maintenance.

For instance, many instruments can be intermittent and work perfectly well most of the time or sometimes the pilot is just querying whether there is a defect. e.g. discoloured light lens, signs of wear on rub strips, looseness or tightness of attachments fittings. Maybe the pilot, once he/she confirms with the LAME there is a defect, enter it into the maintenance records.

Just how does the pilot know how to defer such defects or possible defects?

Most aircraft are designed and certified with a significant amount of equipment redundancy, such that the airworthiness requirements are satisfied by a substantial margin. In addition, aircraft are generally fitted with equipment that is not required for safe operation under all operating conditions, e.g. instrument lighting in day VMC. Other equipment, such as entertainment systems or galley equipment, may be installed for passenger convenience. If this non-safety related equipment does not affect the airworthiness or operation of the aircraft when inoperative, it need not be listed in the MMEL/MEL or be given a rectification interval. However, if the non-safety related equipment has another function related to safety (such as use of the entertainment system for passenger briefings) then this item must be included in the MMEL/MEL with an appropriate rectification interval.

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Proposed General Meeting – Tamworth NSW

Many issues are confronting the on-going viability of general aviation and more may be introduced.

We need members and associates to meet and professionally discuss our future.

- Regulatory Reform & Red Tape Reduction associated with harmonisation.
- Replace Regulatory Development with Regulatory Economic Reform?
- Is CASA the problem or is it the Act that directs their modus operandi?
- Do we adopt a modified version of the USA FBO system for GA?
- Where are the future AME/LAMEs coming from? Will they have the expertise for the future?
- How do we attain higher utilisation of VH registered aircraft?
- Reducing costs to maintain a viable safe aviation industry.
- Encouraging the use of aircraft as a normal form of transport.

Location: Tamworth because the DPM resides in Tamworth. Most agree we need to invite the DPM to attend. It was also suggested to enable GA members and friends to privately fly in, stay a night and return home the next day.

If Tamworth is seen as difficult to get to, where else should it be held to improve attendances?

Duration: Two days has been suggested so that day one could identify all the issues, identify what action should be taken and by whom. Day two could include other GA associations' executive representatives to discuss proposed actions.

Invitees: Many suggest that CASA senior management should be invited to pm day one to be part of the discussion. Others clearly reject this approach. Voice your opinion.

Should aviation media be invited and at what time? All through the meeting as we have done in the past?

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