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FAR TERMINOLOGY

General aviation owners/operators and maintainers will need to come to terms with new meaning to words so a safe transition can be made to the FARs for GA/AWK. The US GA includes privately owned and operated transport category aircraft as well as normal category aircraft, ex-military aircraft and personnel involved with the maintenance of these aircraft. Adopting FARs means adopting FAR definitions and meanings and complying with the FAR meanings.

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Acceptable & Approved Data – FAR Concept.

These words seem to be self-explanatory but they have caused many disagreements between regulators, manufacturers, designers, and maintenance personnel over the years where confusion whether approved data should have been used or acceptable data is the centre of the discussion. There is still a grey area to be determined.

Adoption of FARs for GA/AWK re-introduces the use of "acceptable" data to maintain aircraft, which is a return to pre-1988 Australian regulatory standards. This will require training and discipline so maintenance is not performed using "acceptable" data instead of "approved" data. To understand the difference, a clear understanding of FAR Part 43 Appendix A, (a) *Major alterations* & (b) *Major repairs* will be required by the LAME and/or AMO. Minor *alterations* (modifications) and *repairs* can be carried in accordance with "*acceptable*" data and previously "*approved*" data.

Both "acceptable/approved" means the appropriate data is used for maintenance.

It has been 28 years since LAME's were regulatory permitted to determine what/which "acceptable" data that they themselves must conclude as applicable to the maintenance being performed. What is 'acceptable' to the Administrator/FAA does not mean the data has been reviewed by the Administrator/FAA to determine that it is acceptable data. That is the LAME/Organisations determination.

> ***FAR Part 1 Approved*** *means: "Approved, unless used with reference to another person, means approved by the FAA or any person to whom the FAA has delegated its authority in the matter concerned, or approved under the provisions of a bilateral agreement between the United States and a foreign country or jurisdiction."*

Comprehensive, clear and concise – no further explanation required.

> ***FAA AC 43-210 adds****: For the FAA aviation safety inspector (ASI), "**approved**" or "**approved by**" means the item (e.g., data; methods, techniques, and practices; manual contents; tools; materials; equipment) is required to be and has been reviewed and formally approved by the FAA (or appropriate Civil Aviation Authority (CAA)). (includes NAA delegates/authorised persons).*

Adds to the clarity – addresses bilateral agreements and/or technical agreements.

> ***FAA AC 43-210. Repair and Alteration Classification****. Only those persons with **§ 43.7 authorization** may approve an aircraft, airframe, engine, propeller, appliance, or component part for return to service after the performance of a repair or alteration. You must perform major repairs and major alterations using technical data approved by the Administrator/FAA. You may perform minor repairs and alterations using technical data acceptable to the Administrator/FAA.*

Identifies who (FAR 43.7) has responsibility to determine the correct data to be used.

Acceptable Data

This is where it has the possibility that mistakes can be made. The FAA has confirmed that *acceptable* data does not mean all the data has been reviewed and formally found acceptable to the Administrator/FAA.

It means the LAME, or maintenance organisation, have determined the data meets regulatory standards. FAA AC 43-210 clarifies this area of debate, or does it?

> **2.2.2.2.1. Acceptable data** means data acceptable to the FAA. The terms "acceptable to the *Administrator*" and "*acceptable to the FAA*" appear numerous times in the maintenance regulations. They refer to any item addressed in the regulation (e.g., data; methods, techniques, and practices; manual contents; tools; materials; equipment; etc.) that must meet regulatory standards. If the regulation requires only that an item must be "*acceptable to*," ***it does not necessarily follow that the FAA requires the item to have specific FAA review and acceptance before it may be used***. A **person** making a determination of whether an item is "**acceptable to**" the agency must ensure the item addresses specific applicable section(s) of the regulations. The LAME has to determine whether the FAA would accept or not the data when performing aircraft maintenance. Onus is on the LAME/AMO.

The item states "addresses specific applicable section(s) of the regulations"? It also enables a third party's, not the manufacturers', data to be "acceptable" as well as a MRO professional engineer developed data to be determined as applicable.

> **2.2.2.2.2.** Items required by regulation to be "**acceptable to**" the FAA or to the Administrator (unless otherwise required by regulation to be approved) do not necessarily require FAA review and acceptance prior to a person using the item. A person using an item that must be acceptable to the FAA **should be able to demonstrate that the item meets all applicable regulatory requirements**. If, however, upon subsequent review of the item, the FAA believes the item is not acceptable, the agency [LAME/AMO] has the burden of demonstrating its unacceptability in any related enforcement matter. In any event, if an ASI finds an item unacceptable to the FAA, the ASI must immediately inform the maintenance provider/certificate holder, in writing, of the potential noncompliance and request compliance.

The person must make the right determination or the FAA ASI will take "enforcement" action. Nothing different.

> **FAA Advisory Circular (AC) 43-18** describes **acceptable** data as data acceptable to the FAA that can be used for maintenance, minor repair, or minor alteration that complies with applicable airworthiness regulations. Acceptable data can be provided by a type certificate (TC)/supplemental type certificate (STC) holder or third-party operator or MRO qualified engineer.

Use manufacturers data, third party operators or MRO employed/contracted qualified engineer. Much broader than current requirements.

This AC provides some clarity by enabling all manufacturers' data to be used, this includes manufacturer's "No Technical Objections" that the AMO has determined meets regulatory requirements. This is a return to practices pre-1988.

> **FAA AC 120-77** defines **approved** data as: "Technical and/or substantiating data that has been approved by the FAA" or by an FAA delegate such as a FAA -designated engineering representative (DER) or FAA authorized representative (AR).

Approved has clarity.

> **FAA AC 43-210A. 3.2.2.1** *Minor Repair or Minor Alteration*. If you are properly authorised, you may perform a minor repair/alteration using acceptable data, and without approved data. You may document the alteration or repair in the product's logbook per § 43.9 indicating return to-service.

Properly authorised is specified in FAR 43.7. Who may perform and certify.

Minor assessment process

"The FAA expects appropriately approved airline, maintenance, and MRO personnel to assess whether a repair is major or minor, and to use an assessment process preapproved by their national aviation authority. This assessment is based on the scope and complexity of the repair and the experience and capability of the operator.

The responsibility for determining whether a repair is major or minor rests with operators, repair stations, and holders of an inspection or maintenance authorisation."

The FAA and EASA have similar definitions for what constitutes major and minor repairs, the requirement for acceptable or approved data is quite different.

However, EASA has a very different approach to major or minor.

EASA regulations (Commission Regulation European Community [EC] 2042/2003 Annex I Part M) require "approved" data for both minor and major classifications of airplane repairs. This policy is in contrast to the FAA system that requires "approved" data for major repairs only and "acceptable" data for minor repairs.

CASA's decision to adopt the FAR system for GA/AWK implements a system that Australia basically used pre-1988. Transitioning means adopting FAR Part 43 Inspection Authorisation and associated skill training.

Skilling is the key to any successful transition. Many experienced non-airline LAMEs have this knowledge/skill today – they have to be grandfathered to make the system work.

Addendum: Oddly, the same FAR Part 43 Appendix A lists (c) Preventive Maintenance – Pilot maintenance

> *"Preventive maintenance is limited to the following work, provided it does not involve complex assembly operations:"*

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Major V Minor Defined – FAR Concept

*There has been much debate over the grey area where major and minor are defined within industry. The LAME has to make this determination when deciding whether a repair or alteration (modification) is treated as minor or major. To understand, terms such as "**might appreciably affect**" means.*

CASA is proposing to **re-instate** the capability of the LAME/organisation to determine what is a minor repair or alteration (modification) and what is the data to be used to perform that minor repair or modification. This requires additional knowledge and experience.

The background to what is provided below comes from records of the FAA Part 43 working group that reviewed and made small changes to FAR Part 43 and associated provisions to provide clarity to its terminology two decades back.

Let's start with FAR Definitions:

> ***Major alteration*** *means an alteration not listed in the aircraft, aircraft engine, or propeller specifications—*
> *(1) That **might appreciably affect** weight, balance, structural strength, performance, powerplant operation, flight characteristics, or other qualities affecting airworthiness; or*
> *(2) That is **not done according to** accepted practices or cannot be done by elementary operations.*
> ***Major repair*** *means a repair:*
> *(1) That, **if improperly done**, might appreciably affect weight, balance, structural strength, performance, powerplant operation, flight characteristics, or other qualities affecting airworthiness; or*
> *(2) That is **not done according to** accepted practices or **cannot be done** by elementary operations.*
> ***Minor alteration*** *means an alteration other than a major alteration.*
> ***Minor repair*** *means a repair other than a major repair.*

So, to understand what is **minor** repairs and alterations (modifications) one must fully understand what is "**major**" and the **highlighted** text of the FAR meanings.

Some of the phrases used in FARs need to be understood so determinations can be made.

The term "**might appreciably affect**" is the most debated phrase but it has a purpose that the regulatory drafters and reviewers have continued to support. The following research gives some of that background why it has been retained over many decades.

Before 1942, there was no difference because the regulation referred to CAM 18, the fore runner to AC 43-13-1 and -2, that basically stated if altered beyond the data contained in CAM 18.

> *"The Appendix A of Part 43 referred to above was added as part of the FAA's 1960's recodification of all of the regulations it had inherited from its predecessor agencies. The material included in Appendix A had previously appeared in Civil Aeronautics Manual (CAM) 18 material."*

This confirms that the standards and practices of the FARs have a long safe history.

The FAA review committee went into great deal discussing "**appreciably affect**" and the reason why this phrase was used. Their discussion provides the reasons why this should continue and why we should adopt and understand.

> *"Without the word "**appreciably**" any change in a type design, however small, that could affect the weight, balance, structural strength, performance, powerplant operation, flight characteristics, or other qualities affecting airworthiness would be considered a major repair or major alteration. This would mean that virtually all repairs or alterations to an aircraft would be major and would trigger the requirements discussed above. The modifier "**appreciably**" is thus intended to establish a level of significance to avoid this result."*

Obviously, the word "appreciable" was inserted after much thought and reasoning. The introduction of the LAME with an *Inspection Authorisation* was commenced to replace "authorised by the Administrator" used in pre-FAR days.

> *"Too literal an interpretation would lead one to conclude that any effect on airworthiness is measurable and therefore would lead to the classification of major. Furthermore, such a reading would lead one to conclude that the term "**appreciably**" adds nothing to the definition and could be removed without affecting the meaning of the definition. However, such a conclusion undermines the logical intent of the drafters, as well as the common usage of word "**appreciable**."*

Re-affirms the purpose of "**appreciably**" and on-going support for the principle.

> *"However, considering the impact and the complexity of the subject matter this result is not a defect, but a necessity. The definitions must rely on advisory material to explain the intricacies of the issues involved. The definitions require at some level a judgment call to be made. To try and rewrite the definitions to avoid any judgment decisions would be both imprudent and ineffective."*

Simple text in regulation but detailed advisory material to implement. Refer FAA AC 43-210A. This AC has flowcharts to assist with decision making.

> *"The Major/Minor Working Group, like the JAA Working Group, concluded that it is necessary to use subjective terms in the definitions. It is therefore important to provide advisory material to aid people in the major/minor determination. Put simply a major repair or major alteration is one that **has an appreciable effect** on certain characteristics affecting airworthiness. These characteristics are weight, balance, structural strength, performance, operational characteristics and other characteristics affecting airworthiness."*

As the AC flowchart demonstrates, the LAME will make a determination that it is not major by using the AC flowchart and determining the data to be used.

> *"Some alterations or repairs will have no effect on these characteristics, while other alterations or repairs will have some effect, but not an appreciable effect. There are three degrees of "effect" to be considered: no effect, some effect, and appreciable effect. If a determination is made that a repair or alteration has either no effect or some effect, then it is classified as a minor repair or a minor alteration. If the determination is that the repair or alteration has an appreciable effect then it is either a major repair or major alteration."*

Making the determination before the maintenance is to be performed is explained above but the FAA research also reviewed the outcome post the work being performed.

For instance, the 70-year-old phrase "***if improperly done***" appears in the definition of "**major repair**", but not in the definition of" **major alteration**." However, the word '**repair'** is defined in the definition of 'maintenance'.

*"From its use throughout the regulations it is clear that the word "**repair**" is used in its normal dictionary meaning which is "To restore to sound condition after damage or injury;"*

"It is clear from the history of the Federal Aviation Regulations that the word "repair" has been used to mean fixing or restoring something on an aircraft, that was damaged, in order that the aircraft continues to meet its certification basis. This use of the word "repair" is consistent with its dictionary definition. If a repair was considered minor no technical data was needed to accomplish the repair (Bulletin No. 7-H), although the fact of the repair and the signature of the licensed mechanic who approved the repair had to be noted in the aircraft log."

Under current CA(S)Rs, repair does not have the clarity of the FARs that place higher emphasis on performing repairs. More aligned with ICAO Annex 8 requirements.

"A certificated aircraft which is slightly damaged, but not damaged to such an extent as to come within the meaning of major damage, shall not be flown until it has been fully repaired and such repairs approved by a licensed mechanic. The repair and approval must be noted in the airplane log, together with the signature of the mechanic involved."

Re-affirms the LAME Annex 1 privilege to certify as airworthy, post completion of a repair or modification. A traditional ICAO LAME privilege previously held by Australian LAMEs pre-1988.

*"The **person responsible** for the proposed repair work must look at the damaged aircraft and determine how the airworthiness of the aircraft would be affected if the repair work were not properly done. This determination must be made before the repair work is performed because of the requirements that apply if the proposed repair is considered major. A great deal of confusion has occurred by people interpreting the definition to require mechanics to look backwards to determine whether a completed repair task was properly done."*

This is also supported in FARs 121.369(b)(2) and 135.427(b)(2), as follows:

*"A designation of the items of maintenance and alteration that must be inspected (**required inspections**), including at least those that could result in a failure, malfunction, or defect endangering the safe operation of the aircraft, if not performed properly or if improper parts or materials are used."*

Who may make determinations and return to service.

*"**FAA AC 43-210. Repair and Alteration Classification**. Only those persons with **§ 43.7 authorization** may approve an aircraft, airframe, engine, propeller, appliance, or component part for return to service after the performance of a repair or alteration. You must perform major repairs and major alterations using technical data approved by the Administrator. You may perform minor repairs and alterations using technical data **acceptable** to the Administrator."*

Operators under FAA jurisdiction are responsible for ensuring that repairs are accomplished according to all applicable regulations under U.S. CFR Part 43.

The responsibility for determining whether a repair is major or minor rests with operators, repair stations, and holders of an inspection or maintenance authorization.

In the U.S., all operators have authority to use *acceptable* repair data for minor repairs without additional FAA approval.

If the operator's qualified personnel determine the damage necessitates a major repair, then FAA approval of the repair data is required. Operators have many ways to obtain FAA approved repair data:

- Accomplish the repair per the manufacturers structural repair manual (SRM) because all repairs are FAA approved.
- Apply to the FAA directly.
- Use a DER, who has a "special delegation" from the FAA, to approve data for major repairs using an FAA form 8110-3. (CASR Part 21M)
- Where a FAA authorization has been delegated to an authorised design organisation an AR may approve the engineering repair data on a FAA form 8100-9. (CASR Part 21j/CAR30 ADO)

Regulations similar to EASA's (Part 21 Subpart J Design Organisations) are being adopted by global national aviation authorities outside the EU, including Australia and India.

By understanding applicable regulations, using manufacturers' SRMs, and following established procedures, operators and AMOs can receive the information they need efficiently, reducing aircraft downtime. The value of structural repairs contained in the manufacturers' SRM is that they are available for immediate use by the operator and are approved by CASA.

Many aircraft used in GA/AWK sectors don't have manufacturer's SRMs and rely on availability of CASA approved Design Engineers and Organisations

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Rebuilt V Overhaul Terminology

FAR terminology has caused much debate in countries where the FARs have been adopted because these terms do not match the legislative language of a country. In addition, the FARs have abrogated their responsibility of government from approving maintenance organisations to 'rebuild engines' to the manufacturers' new specifications. Maintenance organisations have been approved by CASA or its predecessors to overcome this issue.

Adoption of FAR Part 43 means regulations compatible with US manufacturers' documentation and data. FAR terminology needs to be understood.

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—*

(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.*

(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 FAA also places all responsibility on the owner.

> *"Most owners look for an engine maintenance organisation with the right approval to do the work. An FAA certificated powerplant mechanic can overhaul a complete engine and legally approve it for return to service. In fact, there are a number of engine overhaul shops in America that aren't FAA approved repair stations but rather operate with certificated mechanics.*
>
> *In the case of shops not operating as a repair station, often the only time the FAA gets involved with an individual mechanic is by specific complaint or an aircraft accident! In the case of problems with an overhaul, the FAA cannot proceed against the company, only the individual.*
>
> *Beware, the company may attempt to lay the blame at the feet of the mechanic who signed off the overhaul. It will cite FAR 43.7 laying the responsibility on the individual because the company is NOT certificated."*

Do we need to include the FAR "rebuilt" provisions?

CASA approved component overhaul maintenance organisations know the difference between 'repair' and 'overhaul' in accordance with Australian legislative language.

However, under the FARs there is a real difference between 'rebuilt' and 'overhaul' specified in FAR 43.2 for aircraft engines. "**Rebuilt**" under FARs is **restricted** to the **engine manufacturer or its agent**.

In the FAR system, their regulations have devolved to the engine manufacturers the right to approve agents (maintenance organisations) to carry out an engine "rebuilt". The FAA does not approve AMOs to rebuild engines (Zero Time) only to overhaul. This also means that an independent LAME can overhaul engines as long as he/she complies with FAR Part 43. Current Australian regulations were amended to prevent this after some fatal engine failures many years ago. Do we want that without adopting the FBO standards and US control processes? Compliance with FAR Part 43 by an individual or organisation is the same.

So why doesn't the FAA approve AMOs to rebuild an engine?

FAR Part 43 includes a provision that permits manufacturers to perform maintenance. FAR Part 91 then includes a provision that permits manufacturers, or a manufacturer's approved "agent" to "rebuilt" engines. So, if a CASA approved engine overhaul maintenance organisation wanted to state the engine was "rebuilt", i.e. an engine set to zero time, then they would need the US engine manufacturer to approve them as an agent. Is this what we want in Australia?

FAR 91.421 - Rebuilt engine maintenance records

(a) The owner or operator may use a new maintenance record, without previous operating history, for an aircraft ***engine rebuilt by the manufacturer or by an agency approved by the manufacturer.***

(b) Each manufacturer or agency that ***grants zero time to an engine rebuilt*** *by it shall enter in the new record—*

(1) A signed statement of the date the engine was rebuilt;

(2) Each change made as required by airworthiness directives; and

(3) Each change made in compliance with manufacturer's service bulletins, if the entry is specifically requested in that bulletin.

(c) For the purposes of this section, a ***rebuilt engine is a used engine that has been completely disassembled, inspected, repaired as necessary, reassembled, tested, and approved in the same manner and to the same tolerances and limits as a new engine with either new or used parts. However, all parts used in it must conform to the production drawing tolerances and limits for new parts or be of approved oversized or undersized dimensions for a new engine****.*

This is further explained in FAA AC 43-11. Adopting the FARs could place a lot of doubt on the safety and reliability of engines. Is CASA proposing to abrogate its sovereign right to approve engine maintenance organisations? CASA hasn't determined.

Complying to FAR Part 43.13(a) & (b) is the real basis of implementing safety.

Adoption of FAR91.421 would deny Australian operators' access to an Australian engine overhaul organisation that could "rebuild" an engine with zero-time new records. American manufacturers have tried to stop Australian AMOs in the past, will it happen again?

AC 43-11 Section 4. *ENGINE OVERHAUL TERMINOLOGY*.

a. Engine Overhaul Facilities.

(1) Engine overhaul facilities include following:

- The manufacturer, or a manufacturer's approved agency
- Large and small Federal Aviation Administration (FAA)-certificated repair stations (FAR Part 145)
- Engine shops that perform custom overhauls (Air Carrier, Part 43 FBO/SASO)
- Individual certificated powerplant mechanics (Part 43 LAME)

(2) These facilities offer various services. Regardless of the type or size of the facility, **all are required to comply with §§ 43.13(a) and 43.13(b).** In this regard, it is the responsibility of the owner to assure that proper entries are made in the engine records in accordance with §§ 91.405 and 91.417. Engine overhaul facilities are required by § 43.9 to make appropriate entries in the engine records of maintenance that was performed on the engine. The owner should ensure that the engine overhaul facility references the tolerances used (new or serviceable) to accomplish the engine overhaul.

(43.13 Performance rules (general).

(a) Each person performing maintenance, alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance ***shall use*** *the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques, and practices acceptable to the Administrator, except as noted in § 43.16 [AWLs].*

He shall use the tools, equipment, and test apparatus necessary to assure completion of the work in accordance with accepted industry practices. If special equipment or test apparatus is recommended by the manufacturer involved, he must use that equipment or apparatus or its equivalent acceptable to the Administrator.

(b) Each person maintaining or altering, or performing preventive maintenance, ***shall do that work*** *in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least* ***equal to its original or properly altered condition*** *(with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).)*

b. Overhaul. In the general aviation industry, the term "engine overhaul" has two identifications that make a distinction between the degrees of work on an engine:

(1) **Major Overhaul**. A major overhaul consists of the complete disassembly of an engine. The overhaul facility inspects the engine, repairs it as necessary, reassembles, tests, and approves it for return to service within the fits and limits specified by the manufacturer's overhaul data. This could be to new fits and limits or serviceable limits. The engine owner should clearly understand what fits and limits should be used when the engine is presented for overhaul. The owner should also be aware of any replaced parts, regardless of condition, as a result of a manufacturer's overhaul data, SB, or an Airworthiness Directive (AD).

(2) **Top Overhaul**. Top overhaul consists of repair to parts outside of the crankcase, and can be accomplished without completely disassembling the entire engine. It can include the removal of cylinders, inspection and repair to cylinders, inspection and repair to cylinder walls, pistons, valve-operation mechanisms, valve guides, valve seats, and the replacement of piston and piston rings. All manufacturers do not recommend a top overhaul. Some manufacturers indicate that a powerplant requiring work to this extent should receive a complete overhaul.

d. Rebuilt.

(1) A rebuilt engine as defined in § 91.421, "is a used engine that has been completely disassembled, inspected, repaired as necessary, reassembled, tested, and approved in the same manner and to the same tolerances and limits as a new

engine with either new or used parts. However, all parts used must conform to the production drawing tolerances and limits for new parts or be of approved oversized or undersized dimensions for a new engine."

(2) The definition of the term "rebuilt" in § 91.421 allows the owner or operator to use a new maintenance record without previous operating history for an aircraft engine rebuilt by the manufacturer or an agency approved by the manufacturer.

e. Remanufacture.

(1) The general term remanufacture has no specific meaning in the regulations. A new engine is a product that is manufactured from raw materials. These raw materials are made into parts and accessories that conform to specifications for issuance of an engine's TC. The term "remanufactured" infers that it would be necessary to return the part to its basic raw material and manufacture it again. "Remanufactured" as used by most engine manufacturers and overhaul facilities, means that an engine has been overhauled to meet the standards required to grant the engine zero time in accordance with § 91.421.

(2) Not all engine overhaul facilities which advertise "Remanufactured Engines" overhaul engines to new dimensions. Some of these facilities do overhaul to new dimensions, but may not be authorized to zero time the engine records. As outlined in § 91.421, only the manufacturer or an agency approved by the manufacturer can grant zero time to an engine.

Maybe the best approach for CASA, when adopting the FARs, is not to adopt FAR ***91.421 - Rebuilt engine maintenance records*** and associated rules/advisories.

Summary

When all's said and done, Australian aviation insurance brokers will determine what will, or won't be, supported post any regulatory change. It is therefore imperative that CASA includes insurance brokers as part of their consultation processes. Insurance brokers have a direct impact on industry survival.

The FARs have a 70-year history and traditions underpinning the practical application of the FARs in GA/AWK where a lot of dependence is placed on the LAME with an Inspection Authorisation.

This FAR system is not new to Australia as this was regulatory supported pre-1988. The continual change in direction by different CAA/CASA Executives since 1988 has cost this industry dearly with less participators and less GA aircraft flying hours.

A return to basing Australia aviation regulations on the FARs will provide an environment where there is a possibility for growth as long as the GA/AWK FAR operational requirements are also adopted.

AMROBA is open to working with government/CASA and providing assistance to our members to transition to the USA GA/AWK practices without unique CASA practices being added that happens post every past regulatory change since 1988.

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