

HOW DO YOU MEASURE ‘SUCCESS’.

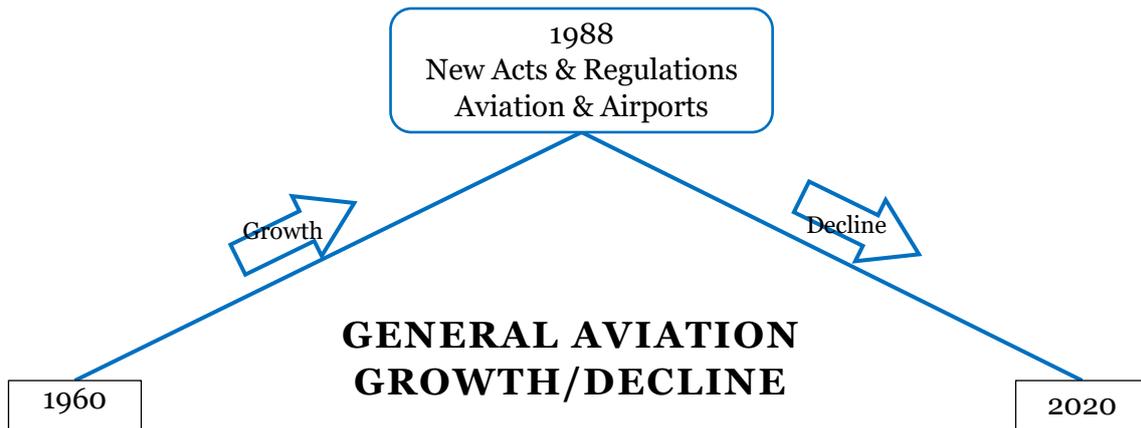
Is success based on participation, profit, incidents or accident numbers?

The true measurement of success is growth in business activity. Without growth, there is no success. The real question has to be what changed in 1988 when the Civil Aviation Regulations were created that sent GA into a downward spiral. Why?

Obviously there was major regulatory change for many activities in General Aviation. Access to airports and the government’s retention of airports for aviation is crucial.

‘Participation’ has declined drastically, especially with the regulatory removal of small flying training and small directly supervised maintenance organisations. The industry is fully aware of these facts. CASA databases do not identify active aircraft, LAMEs, etc.

The US has Independent Flight Instructors and FAR Part 61 flying schools that we desperately need to rejuvenate GA. We had a similar system with a light approval process.



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1. General Aviation Flight Training Success?

The changes in regulations in 1988 to create the CARs and CAOs brought about the decline in General Aviation. If this happened in a private business, the management would take action as soon as they realised their mistake to reverse the decline. Australia must reverse this action taken to 1988 and change the Act & Regulations to adopt the FARs. Our previous system provided ample pilots and maintenance personnel with career paths. One man directly supervised flying training schools were the basis of flying training in Australia, so why cut them out.

In the last 30 years, all the hard work and benefits that the previous Department(s) had implemented over the previous 30 years to grow aviation in Australia, especially in GA, have been removed from the regulatory system. Airports are no longer there for aviation but are being treated like local government commercial real estate. Look at the secondary airports in all States – on-going non-aviation development restricting aviation.

That is not success.

The loss of hundreds of basically independent flying training schools throughout rural Australia post 1988 started a rapid decline. These training schools provided around 70% of the pilots, the same as Independent Flight Instructor/Part 61 flying schools currently do in the USA. What was the reason to remove this regulatory provision?

The only assumption that can be made, is government/agency was captured by another sector to remove competition. Anti-competitive legislation.

Pilot Shortage

By the mid-1980s, we had a shortage of pilots and still government and its agencies took no action to resurrect a competitive system that had success or took action to adopt the FAR Part 61 system. Why does the government and CASA continue to refuse to take corrective action to re-implement or adopt a competitive safe system that will increase participation by providing a proven cost-effective pilot training system?

Worse still, government and CAA/CASA now enables different standards to apply to non VH registered aircraft than what they apply to similar aircraft VH registered aircraft, pilot and maintenance personnel. If these standards are safe then why does government and CASA not apply them to VH registration? Once again, anti-competitive regulations.

Government regulations obviously apply anti-competitive and economic restrictions. Why?

The core of aviation is continuing to encourage pilot participation to fly many hours that supports all other aspects of aviation from private to commercial operations. Growth can be measured by the number of flying hours that are being flown per sector – low hours should alert the government regulators to review and find out why.

Creation of Regulatory Silos since 1988

Since the creation of CAA/CASA, there has been a trend to create silos in the regulatory system that have applied anticompetitive and economic restrictions between similar sectors or, eliminated a sector that once existed to the benefit of another sector.

e.g. Australia had over 1500 “controlled” “FAR Part 61 type of flight training schools” pre 1988 that were not recognised under new regulations and most did not upgrade to the more costly administrative CASR approved flying schools post 1988. Competition eliminated. Costs added is why they don’t exist in rural Australia.

Australia also had over 800 rural, directly supervised, maintenance organisations that did not upgrade to the higher administrative CASA approved maintenance organisations.

Aviation sectors that exist in USA FAR based General Aviation regulations similarly existed in Australia but were left out of CAA regulatory reform in 1988.

In addition, airports have continued to increase fees for private and small business that has added to the costs of aviation. There are no responsibilities for airport operators to foster aviation on their airports as the USA airport legislation provides.

This has to be included in airport legislative reform if government intends to keep airports as airports. Aviation tenants at most airports have lost faith in the political support for aviation.

There are no political champions of aviation in government ministerial positions.

Civil Aviation Register (which aircraft are active?)

One way to measure success in aviation is for CASA to resurrect the requirement for LAME’s to complete an annual (major) inspection notification form that is posted to CASA so CASA’s database can record which aircraft had completed annuals or SoM MR Inspections. (modern technology, this could be done on-line)

This would enable CASA to know which aircraft were not flying/being maintained.

Simple process that would confirm which GA aircraft were operating.

What percentage of aircraft on the register are actually operating?

Wherever you look, there are aircraft sitting idle. Some look like they have been idle for a number of years. We need a method that annually or biennially provides confirmation that each aircraft is still flying. Many AMOs tell us that there are aircraft on the CASA register that don’t actually fly. How many?

With modern technology, this should be able to be achieved, see previous item.

Motor vehicles have annual registration, why not a simple **no cost** re-registration on-line process stating current aircraft hours?

It is time that we have some authenticity in the system.

Flying Training Changes needed to be Successful

To remove the monopoly of the CASR Part 141 pilot training schools, government must revert to pre 1988 regulations and orders that applied to rural flight training schools or adopt the FAR Part 61 Independent Flight Instructor and the ability to open Part 61 training schools without CASA approvals.

Learn from the past and implement the highly successful FAR Part 61 Flying Schools and Independent Flight Instructors to provide a cost effective safe training alternative.

Safety Responsibility

Safety responsibility is built into the Airport Regulations in the FARs. It is the responsibility of the airport operator/owner to ensure businesses that they authorise to open on their airports meet certain standards promulgated by the FAA. They have to verify they are a registered business, they have insurance set by the airport, employ a FAA authorised person, LAME or Pilot, and comply with the FARs.

There is no such provisions in Australian aviation or airport regulations. Only adopting Part of the FARs will not provide the same safety standards

Adoption and harmonisation with ICAO Standards & Recommended Standards should be based on adoption of the competitive and safe aviation system used by the USA.

FARs enable economic decisions to be mostly made by industry GA participants.

It has to be full FAR adoption, as regulatory changes implemented since 1988 have done nothing to change participation or the viability of GA, even small commercial GA sectors that are viable would be safer and more profitable with the FAR style regulations.

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2. GA Maintenance Success

Australia's once viable general aviation maintenance industry, modelled on the one man directly supervised maintenance organisation that only had to comply with the rules, was actually taken out of the regulations when the CAA was created in 1988. So why doesn't the government and CASA re-regulate so small businesses can participate in general aviation. The alternative is to adopt the FARs and their non-approved Fixed Based Operator maintenance organisation. The FAR airport operators responsibilities to authorise businesses on airports apply safety standards. Australia should resurrect its previous directly supervised maintenance organisations.

Today many GA approved maintenance organisations are feeling the pinch with COVID-19. Sadly, prior to the coronavirus, many had reduced staff to support the operators that have been feeling the pressures to survive.

The application of CAR30 started the decline

When CAR 30 was made in 1980, many small one man organisations suddenly realised the loss of 1200 plus flying training schools, mainly in rural Australia, and the number of Aero Clubs that folded, meant many small GA directly supervised maintenance organisations suddenly lost many customers. From a growing industry in 1988, the decline was fairly rapid. These additional costs closed many doors.

CAR 30 was then fairly stable until the EASA AME licencing system was implemented, against the majority in GA. This licence system is still not the best model for GA.

CAR 30 was able to support all levels of aviation from airlines to GA. Why do people think that CAR30 is deficient when compared with the CASR Part 145. Deficient because it has less administrative costs but still released safe aircraft and components?

An unsuitable AME Licensing System

Pre adoption of the EASR Part 66 licence system, planned regulatory changes over the years was transitioning towards an avionic and mechanical licence system with broader cross trade responsibility between avionic and mechanical. This matched Australia's needs as did the previous CAR 31 licence system.

With CASA now moving towards the FARs, then they should adopt the FAR licence system as it is the right system to support the FAR Parts now being adopted for General Aviation.

The most ridiculous reason is the airlines need for a line LAME that could have been provided under CAR 31 with far less problems.

In addition, the trade training system is not yet changed to match the EASR standards.

After years of confusion in GA because of an inappropriate LAME system, CASA is now reverting to adopt the FAR system previous CASA management and industry supported.

Stop now: adopts the FAR, resurrect CAR 31 group licencing system and trade training skills that worked. Part 66 must adopt CAR31 group ratings. They work.

Safety not improving.

Safety has to be foremost in making decisions to change regulatory requirements to GA but no changes that have been made since 1988 have improved safety. The only outcome has been less and less private aviators and small businesses as cost escalate.

The VH accident rate in Australia is pretty stagnant which identifies no improvement when compared to the declining GA and lowering flight hours in GA.

The Civil Aviation Act Change is Pivotal

The Civil Aviation Act was made in 1988 and the decline in general aviation started almost immediately after implementation because the previous legislative system, based on a slightly more controlled FAA General Aviation system, was [purposely] omitted from the Act and Regulations. Though government verbally makes CASA responsible to administer specific Annexes to the Convention, the Act directs to do otherwise.

When will the Act be changed to require safe and viable growth of aviation?

The Future is Positive

Some of the employees in CASA know what has to be change but the will of the management to reverse previous bad regulatory decisions seems to be lacking.

However, a number of politicians are starting to realise that the bureaucrats simply are not decision makers that could provide a cost-effective, low red tape levels, safe and job creating regulatory environment.

Removal of protected regulatory silos by providing the same standards to all aviation in Australia. Aviation Regulations should not support silos and anti-competitive regulations. Model the regulations on the USA competitive FARs. They are safe.

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