

Basel, 19. June 2011

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Commission européenne

Mr. Eckard Seebohm

Head of Air Safety DG-MOVE

Office DM24 5/139

B-1049 Bruxelles

**By e mail**

**Safety Regulation of General Aviation**

Your letter 5. Mai 2011

Your Reference: MOVE E3/PG-RZ/Is (D2011) 491056

Dear Mr. Seebohm,

Thank you very much for your letter regarding our concerns in regards to General Aviation Maintenance regulation.

We appreciate the reference to the regulations in your letter from 5. Mai. Indeed from opinion 1/2011 may result relief for maintenance of aircraft up to 2000 kg.

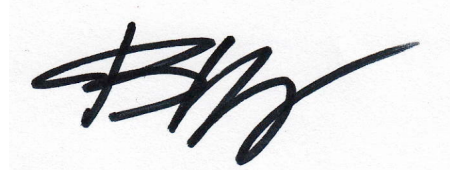
However we can't see relief for the important sector of maintenance in General Aviation above 2'000 kg. Maintenance in this sector is often provided by medium sized maintenance organisations with staff numbers of more than one to less than one hundred employees. The current regulations visibly tailored for major organisations don't take into account that overview of small to medium sized organisations is less complex and hence the required safety level can be achieved successfully and efficiently with less complex structures and processes.

We don't see any such differentiation in the quoted regulations and therefore ask for further discussion of the issue with you. This in conjunction with other European Organisations involved in Maintenance in GA. It is our common goal to create a sustainable future in GA and business aviation, as stipulated in the respective communication of the commission from January 11, 2008. We are of the opinion the provisions given in this paper especially those under article " **3.3 one size does not fit all**"- **the importance of proportionate regulation**" are not progressing for the benefit of GA and Business Aviation.

As a provisional date for a first meeting in this respect we propose September 14, 2011 preferably in the morning but will make ourselves ready for other dates suitable to you.

Sincerely,

Franz Meier



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