

## 2011-07\_CRD to NPA\_reponse of SAMA

### SAMA Swiss Aircraft Maintenance Association

Thank you for commenting our CRD response, your time and your effort is truly appreciated.

We forward the following considerations

1. The proposal you make to rearrange the aircraft lists is definitely a good move. Please understand that we look at it with caution based on past experience with sometimes doubtful results of good initiatives. We are looking forward to the result.
2. We are aware that our stipulated para 1 to 6, as well as 9 to 10 are affecting Part 66 are out of the NPA's scope, however if things are wrong, they must be addressed regardless of limitations.
3. We are aware that PA-42 is listed in list 2. The proposal to cover all PA42 one TR remains nevertheless valid. The engineer has TPE331 experience and therefore two TR's just for the difference between the two engines is wasted time and effort.
4. The fact that it is outside the scope of the NPA does not solve the problem and based on member feedback it makes sense that our proposal is addressed at the appropriate place. The SME's need the capabilities, they need them at appropriate costs and they will be willing to demonstrate that the proposal is safe for the GA and Business Aviation sector and the SME's we are targeting.
5. Just coming back from a EAMTC meeting with a impressive participation justifies our approach and our opinion that GA und BUSINESS Aviation is more or less a non issue in the EASA world, on both the public air transport side as well as in the EASA world. We do fully understand that public air transport side has its own needs, its own problems and offers its own solutions. But solutions offered EAMTC which is mainly the public air transport side may create the impression that GA and BA is satisfied as well. This perception is false.
6. However we understand the different needs of this different sectors and their completely different organisational structures. Therefore we from GA and BA ask for a differentiated approach.

As a final note we appreciate the time, passion and effort Mr. JP Arnaud has been dedicated to make EASA's regulation more understandable for the industry, he is a real contributor. We wish him all the best in this new challenge in the so called super SMS effort. This could eventually become a path to another and more successful approach. An absolute necessity for success by introducing yet another tool, followed by yet other regulations and yet another hundreds of pages of organisational handbooks will be the concurrent drastic reduction and simplification of the present rulemaking for GA and BA. We may remind that EU wants to save 28 billions € annually by the targeted de-bureaucratisation process in its papers COM(2207) 869 "an agenda for sustainable future in general AND business aviation" and in comet 223 from the council of the European Union may 31. 2011. We may amend that it is not just that EU wants it, it needs to make this savings to keep Europe competitive.

Best regards

Franz Meier  
Director of SAMA