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Title	Non-binding guidance on TBO limits
NPA Number	NPA 2011-15

Aero-Club of Switzerland (meier@aeroclub.ch) has placed **11** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
50	EXECUTIVE SUMMARY	2	The Aero-Club of Switzerland with its now 23'000 + members supports the initiative of the Agency in favour of the sports and recreational aviation community. Always bearing in mind that for our members a consequently applied "on condition" maintenance represents the most cost-effective solution we recognise that such a one will not yet find political acceptance. We therefore support fully the Agency's proposals for the time being. In the long run we favour the "on condition" maintenance for all aircraft up to a CMTOM < 2'730 kg operated by clubs or private individuals, also for training flights.	
51	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	IV. Content of the draft Decision 8. Description of today's scenario: That's exactly what we are suffering from: The competent authorities are following different approaches in respect of TBO's, we are miles away from the level playing field asked for by the politicians, the idea many times not followed by the competent authorities of the home countries of the politicians. To correct this we fully support the Agency's idea of strict application of common rules.	
52	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	9. Proposed approach for this NPA: 9.1, bullet 7: The Aero-Club of Switzerland asks for two extensions of 30 instead of 20 % each. Rationale: Before every take-off the engines are carefully checked, eventual malfunctions will be recognised as such, no disproportionate risk exists. We therefore ask for this higher percentage for all non-powered aircraft and non-complex motor-powered aircraft with a CMTOM of < 2'730 kg used by private individuals and by clubs, also for training flights.	
53	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	9. Proposed approach for this NPA: 9.2 bullet 1: We do not think that this provision is useful. Rationale: Aircraft/parts/appliances arrive with TC or STC, so experience made in the past is known to the whole community. The restriction you ask for is not adding to safety, only to costs.	

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			<p>9.2 bullet 2: We favour a more positive approach: "A request for the two 30 % TBO extensions submitted by organisations/individuals familiar with the individual aircraft and it's equipment should as a standard solution be answered positively by the competent authority."</p> <p>Rationale: This proposal enables all organisations/individuals concerned with the operation of the individual aircraft, and the competent authorities, to gain experience. Based on this, evidence based maintenance measures could finally be set up.</p>	
54	A. Explanatory Note - V. Regulatory Impact Assessment	7 - 8	<p>V. Regulatory Impact Assessment</p> <p>10. Purpose and intended effect: Looking what happened to the intended effect with regards to Generic Maintenance Programmes we favour the most strict common rules possible to enforce common TBO rules.</p> <p>Rationale: Basic Regulation 216/2008 writes of "avoidance of duplications at European and national levels". Looking at aircraft maintenance we are miles away from this objective. We invite therefor the Agency to present stricter rules in order to obtain a really level playing field.</p>	
55	A. Explanatory Note - V. Regulatory Impact Assessment	7 - 8	<p>V. Regulatory Impact Assessment</p> <p>12. Sectors concerned: Does the Agency dispose of amounts in Euro indicating a trend with regards to the maintenance cost of today and the one's of the future after the proposed TBO extensions becoming "soft law"?</p> <p>Rationale: We are very much interested to learn about the effects of the TBO extension on the one hand, the cost of all the checks/tests/inspections mentioned on the other.</p>	
56	B. Draft Decision - AMC#2 M.A.302 (d) – Time Between Overhauls	9 - 10	<p>AMC#2 M.A.302(d)-Time Between Overhauls 2.g)</p> <p>The Aero-Club of Switzerland proposes to increase the precentage tiwce from 20 to 30.</p> <p>Rationale: All aircraft engines are checked before every take-off. Applying oil analyses to monitor engine condition would be a sufficient contribution to find out about the engine's state, a procedure also common within the CAT world. Safely running engines e.g. should not be checked/tested for the sake of the check or the test. Safety will not be increased, only operating costs. We think that our proposal for twice 30 % is a first step in the direction of the ideal "on condition" aircraft</p>	

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			maintenance world we live in.	
57	B. Draft Decision - AMC#2 M.A.302 (d) – Time Between Overhauls	9 - 10	<p>AMC#2 M.A.302(d)-Time Between Overhauls</p> <p>3. Additional considerations:</p> <p>a. We do not agree with the consideration presented that TBO extensions should not be considered for the aircraft engaged in the operations stated. We agree, however, with the point corrosion being a different story.</p> <p>Rationale: Aircraft engaged in commercial ops, in training ops, in towing ops are well catered for. These operations do not put stress on the aircraft, neither on the airframe nor on the engine(s). Before every take-off all relevant points according to an AFM will be checked, no PiC will ever take-off with an aircraft not fully serviceable. And it is the PiC who bears the ultimate responsibility for the flight intended.</p>	
58	B. Draft Decision - AMC#2 M.A.302 (d) – Time Between Overhauls	9 - 10	<p>AMC#2 M.A.302(d)-Time Between Overhauls</p> <p>3. Additional considerations:</p> <p>A supplementary one form the Aero-Club of Switzerland: Based on man-years of activities within clubs and looking at privately owned aircraft as well, we think that besides flight-hours based TBO's, or TBO's based on calenders, the external appearance of an aircraft also is perfect possibility to judge it's general state.</p>	
59	B. Draft Decision - GM M.B.301 (c) – Maintenance programme	10 - 11	<p>GM M.B.301(c)</p> <p>Para 1: We do not support this provision.</p> <p>Rationale: Aircraft arrive with TC or STC, with a complete AFM containing all relevant information and recommendations, therefore the proposed restriction is not needed as a standard solution, it may be a solution for special situations, but in no case for "individual aircraft" of a type already operated by the dozens in all the members states of EASA.</p>	
60	B. Draft Decision - GM M.B.301 (c) – Maintenance programme	10 - 11	<p>GM M.B.301(c)</p> <p>Para 2: We wish this provision to be changed.</p> <p>Rationale: Not the competent authority needs experience, it is the owner/operator/maintainer to which this fact applies. If the latter propose to increase TBO twice by 30 % these extensions should be granted, based on the experience made by those who operate the aircraft. It always is the operator who is at any time responsible for the safe operation of the aircraft.</p>	