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

SVFB/SAMA (franz.meier@svfb.ch) has placed **7** unique comments on this NPA:

Cmt	Segment description	Page	Comment	Attachments
63	TITLE PAGE	1	<p>Comments of SAMA to 2011-15 v01</p> <p>Swiss Aircraft Maintenance Association, a member of ECOGAS, represents most of the maintenance organisations in Switzerland.</p>	
61	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	<p>In respect to the often cited level playing field: more concern should be given by EASA to proportionate rule-making as is the case in this NPA.</p> <p>As correctly stated, if a less restrictive rule works in one NAA without safety shortcomings, it must work in all the other NAA's satisfactorily as well. It seems that in the past the rule-making with the exception of this NPA always ended on the most restrictive level of one of the participating NAA's. The result is that more and more SME's give up, a very unhealthy trend in the EU in economical difficult times. SME's are within EU are providing 60 % of the economical output and adapted rule-making would help them to continue. This is not the case at present.</p> <p>The restrictions have to be more stringent proportionate to risks and associated accident potential and be less stringent and create less authority involvement, the smaller the risks and accident potentials are.</p> <p>We see a constant inflow of complaints who are citing examples of less restrictive handling of specific rule application around us.</p> <p>We do not advocate stricter handling in those cases around us, but more proportionate handling by those NAA which are unwilling to change to less restrictive regulations.</p>	
62	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	<p>We think the proposal on this page a progress in the right direction.</p>	
64	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	<p>We fear that the gain in cost reduction by an sensible reduction in TBO will be more than lost by complex and bureaucratic approval of the maintenance programme approval and associated paperwork by the NAA's.</p> <p>This statement is based on the finding, that our SME members ratio of productive versus administrative staff has changed from 8 % to an unbelievable and unpredicted 45 % since EASA, a deadly ratio, topped by a similar or worse increase in Authority oversight costs.</p>	

			<p>The 20 % increase should be extendable according enough collective experience.</p> <p>Club aircraft and schools as well as sightseeing flights, operating in well known environment, should be able to use the TBO extension as well.</p>	
67	A. Explanatory Note - IV. Content of the draft Decision	5 - 7	<p>Calendar limits and operating hours limits should not be considered with the same importance at least not for whole engines and whole propellers. There is a tremendous positive experience that piston engines can be operated safely beyond the calendar limit, which for many TCM is only 10 years for example. Also propellers may easily be extended beyond the 5 years limit of McCauley for example. The proper protection of the aircraft in a Hangar has a very positive effect on a possible extension of owner operated aircraft with low utilisation.</p>	
65	A. Explanatory Note - V. Regulatory Impact Assessment	7 - 8	<p>We are sceptical as to the value of CAMO's with the exception of public air transport with a non integrated MRO.</p> <p>The CAMO has not added value to safety in the leisure and private flying segment, only costs and additional administrative burden for the SME Maint Organisation.</p> <p>This is true for both: those (SME) maintenance organisations whom have established their own CAMO as well as for those who depend on an external CAMO. They all claim an tremendous increase in paperwork without any increase in safety. In contrary, the unjustified heavy paperwork may "blind" the SME's from eventual problems.</p>	
66	B. Draft Decision - AMC#2 M.A.302 (d) – Time Between Overhauls	9 - 10	<p>The one who should make this decision is the owner, together with the organisations whom physically maintains the aircraft regularly.</p> <p>The authority should have data available of the European fleet to understand if there are findings who would prevent an extension and make this information available to the owner/maintainer.</p>	