

NPA 2010-07 : reaction

SVFB SAMA Swiss Aircraft Maintenance Association.

We represent maintenance companies from very small to big size.

Due to handover of the function within our association we are only now able to comment.

For companies with staff of 20 or more the option one: do nothing may be adequate as indicated by the low number of comments. The reason why there was not much feedback is because companies in the upper segment are not concerned and the smaller ones don't have the resources to act on the cumbersome regulation process.

Therefore we do not address here the upper segment of public air transport or "real" commercial business operations.

Please consider that companies with few staff will not have the time to follow the process of legislation development and to act preventive on it. Hence you don't get feedback on the issue from those who would probably benefit but whom have no lobby due to lack of resources.

We are clearly addressing the scope and size of companies here who are operating either in an Association environment, club aviation, flying school and small Fob's, companies who have no lobby nor in Brussels nor in Cologne.

What one can see in this environment is a process of concentration where small companies are sold to other small companies forming a bigger entity.

Some of them clearly claim that they do this because they can't cope anymore with the flow of regulation not adapted to this lower segment of aviation.

In total we have contacted 5 companies:

- 1 FBO (145) who is dealing with business aviation jets, propjets and single and twin engine airplanes,
- 1 AOC holder with an own line maintenance (145) and
- 3 maintenance facilities taking care of about 20 to 80 single

and a few twin engine aircraft each.(M sup-part F
Companies like those contacted and all other from one up to about
20 staff would benefit from option two.

All postholder's were unanimously of the opinion that there is no
benefit from the arrangement with the separation of the two
functions.

- The 145 line maintenance manager was stating that due to the size of his maintenance operation it does not harm him economically to have the functions split, as he is contracting the heavy maintenance outside, but he could clearly handle it as good as with the present arrangement with a 145 manager and a the Continuous Airworthiness Manager under his supervision.
He sees not a big disadvantage but no advantage either.
- The FBO 145 deals with several aircraft where the owner or the chief-pilot is the CAM or its contracted by the aircraft owner to a external CAMO and therefore the 145 gets his instructions from several different and geographically elsewhere located offices with different working patterns, changing persons dealing with the same issue at different times having different standards. For him the safest and most efficient arrangement would be if the CAMO function and the 145 Manager are the same person or depending on size persons in the same organization. Have all record keeping at one point and done in a uniform way, exchange of information would be short and information gaps less then now.
- The club like organisations stated the same and highlighted, that now instead of having the aircraft data's and all necessary documentations and records in one place, they have to exchange information with up to 10 different CAMO's for the same amount of aircraft, the CAMO's being located elsewhere.
- One said that the quality is good in 2 of 4 of them, one is bad and one is just acceptable. He would have much better quality and hence safety if all this would be in one hand. Furthermore the present legal rule leads to organizational ways of setting up things unseen in other industries no pressed into such a corsage. One of his engineers works 80% for him and 20% for the CAMO, at least theoretically just to satisfy the rule book.

The resulting processes are complex if not to say stupid: e.g. an pilot lands with a very minor defect and due to weekend etc. the CAMO which is far away, cant be contacted or does not react.

This prevents swift fault rectification in an orderly, safe and efficient manner. Processes who went through very few hands before are going through much more and more often changing hands which is much more time consuming and much less transparent for proper follow for the management as well as for the NAA's.

(see remark (1) at the end)

In many different CAMOS our very professional and experienced maintenance managers with a joint maintenance experience of more than 100 years have to deal with CAMO staff whom quite often lacks the dedication as well as the competence.

One might ask why this small maintenance companies don't deal with all CAMO tasks in their own CAMO: because due to the outflow of regulations from the EASA and the pressure from the NAA to have the regulations implemented in the "quickest" manner, owners of aircraft jumped to the next best solution and to the next or first CAMO available.

All this is less safe, more time consuming, frustrating and costs much more and on top of it:

- its more complex to supervise

They have mainly adapted to it because they are forced to.

Asked if the could follow the regulation process and understand what was coming out of it all of the stated that they feel hopeless.

In reference to the possibility of the NAA using their freedom to decide for option two in today's regulation ends most of the time in the restrictive option. Authorities seem to have lost faith in making own decisions and the possibility that they decide for the simpler option is considered with a lot of scepticism from all persons questioned above.

This is to be expected as EASA nowadays only talks in superlatives of the highest, the best , the most etc. safety standards loosing out of sight that quality means to continuously be at the required level not below nor above and if above within a reasonable margin and not at the highest possible level.

Excessive cost will lower quality and safety over time.

EU legislation principles requests that:

1.1 The drafting of a legislative act must be: clear, easy to understand and unambiguous; simple, concise, containing no unnecessary elements; precise, leaving no uncertainty in the mind of the reader.

One will have a hard time to find one single engineer on the hangar floor and very few if any in the offices which would fulfil this EU request.

The serious professionals questioned above all ask themselves when the regulators will descend from the ivory tower they are locked in since the inception of EASA and step down to where the fingers get greasy to learn what the real life in THIS segment of aviation is like and that it must not be treated like a JUMBO JET operation.

By embracing the lower end segment of aviation with regulations which are adapted for companies in public air transport and eventually for real commercial air transport, a lot of uncertainty has been created in the mind of those readers which still try follow the process.

Once more we highlight that most of the difficulties of the lower end segment of aviation comes from the fact that EASA has set the borderline what is to be considered as commercial aviation and what is not (is there anything left ?) set far too low.

remark (1)concerning the authorities: on the outset of JAA the need for common norm and standards, not questioned by ourselves but fully supported, was sold to the industry and the politicians with the prospect of producing synergy's, simplifying things, make them more efficient and safer at the same time. Due to this and the reduced workload on the NAA's those would be reduced thus compensating for the build up of the AGENCY.....

Today the result is: the NAA's have expanded heavily due to the much higher workload from Cologne and Brussels and the Agency is building up and building up.

One of the side effects directly felt by our association is that money spent a decade ago from our won NAA to improve engineers training is now spent in paperwork moved around within the EU, because the states and the agencies are running out of money.

Engineers training has a direct effect on safety.

Increased paperwork and exponentially growing bureaucracy has as well: in the opposite direction.