

## SAMA/SVFB NEWS No. 11-2, JUNE & JULY 2011

Dear SVFB/SAMA Members,

We have updated the **NEWS/NACHRICHTEN** on the **SVFB/ASEA/SAMA** homepage with the following items: <http://www.svfb.ch/1.html>

- 1) **Update of all WBT and other course information: please check it out.**
- 2) **110505\_EU: Our answer to the answer from the EU.**

We are now asking for a meeting with the EU. You may remember that we have addressed EU over regulating maintenance in the General Aviation **AND** Business Aviation Sector. This affects big organizations and mainly **Small and Medium Sized** companies (SME's –KMU's) are suffering. (See following chapter)

For this effect SAMA has been invited by ECOGAS <http://www.ecogas.aero/> the **European Council for General Aviation Support** to their next meeting in September and join their organisation.

- 3) **110704\_EU: Part-M implementation in the field of General Aviation.**

It looks like EU has told EASA to react to the endless complaints concerning adapted regulations for GA. EASA invites the stakeholders, provokes a lively discussion, gives the impression of a democratic process ,everybody can express his concerns. EASA will nevertheless provide the regulation they have in mind, reporting to EU that all stakeholders are satisfied.

In the attached letter **EASA** is even asking **the stakeholders** for the **SOLUTION**.

This is so important that I urge you to study this paper, make notes and give feedback how you would see the **Part M** changed for your benefit. ( here the link to the consolidated version of Part M: [http://easa.europa.eu/rulemaking/docs/technical-publications/EASA\\_Part-145.pdf](http://easa.europa.eu/rulemaking/docs/technical-publications/EASA_Part-145.pdf) )

A draft of our submission will follow this week.

We propose to set up a small workgroup to address **the ideal part M** in a short kick off meeting and then follow it up to have a proposal until mid of August. This proposal to be sent to all members for final comment.

**Please send your e mail to ask for participation in the workgroup.** [franz.meier@svfb.ch](mailto:franz.meier@svfb.ch)  
**First meeting proposed between 25 July to August 5<sup>th</sup>.**

As you can see from the letter EASA limits the task to private flying. This is not acceptable- The **Small and Medium Sized** companies will still have to live with the present overregulation. We will address this in our submission.

- 4) **110301\_Bilateral Agreement EU-USA**

The EU has made an agreement with the USA. Basically, it should simplify reciprocal approvals.

Here are some links for deeper explanations' by **aviation today**:

[http://www.aviationtoday.com/regions/usa/EU-U-S-Bilateral-Agreement-In-Effect\\_73246.html](http://www.aviationtoday.com/regions/usa/EU-U-S-Bilateral-Agreement-In-Effect_73246.html)

as well as very detailed description of the subject by **QCM** under this two links:

<http://qcm.snewsletter.com/Newsletter/Issue0511.html#art3>

<http://qcm.snewsletter.com/Newsletter/Issue0611.html#art3>

We have asked the FOCA what Switzerland is planning. FOCA has to goal to reach a similar agreement with the USA with high priority however the timing remains to be seen. The answer from FOCA is attached (3)

- 5) **S\_Licence\_agenda** ( all meetings in German ).(attachment 4 n the homepage)

The agenda is published to keep you informed in an early stage about progress and direction and is an opportunity for you to feedback via e mail

- S-Licence folder, where you can find all previous agendas of the project
- **NEW:110622\_S\_Grundlagenpapier zur S Lizenz.**
  - this paper summarizes the present status of the S- Licence.
  - The GOAL is to have the work finished before the end of 2011 and the situation for S Licence applicants should be clear by then.
  - so far there has been one feedback from members, more feedback is welcome.

- 6) **110420\_SVFB\_Ausb\_Förderung04.**

Proposal to the "Commission for Education and Research" (KBF) is on the homepage News May 6 under 110420\_svfb\_kbf\_support.

The proposal has been acknowledged by the KBF, so far only AeCS and SAMA forwarded a

proposal on time.

The next meeting of the KBF on 10. August should update us about the progress.

7) **NPA Status:**NPA 2011\_07 is a proposal to update the present aircraft type rating list.  
(Link: [http://hub.easa.europa.eu/crt/docs/viewnpa/id\\_122](http://hub.easa.europa.eu/crt/docs/viewnpa/id_122) )

- Concerned: General Aviation and Business Aviation Maintenance Organisations.  
(Public Air Transport Categories may give feedback if you think the list has to be changed for Transport Category Airplanes as well).
- Reason to Comment for SVFB/ASEA/SAMA: Many of our members have expressed their dissatisfaction with this list in general and specifically for B2 and its application in Switzerland. The general impression is this list restricts the scope of work unnecessarily for B1 and much more so for B2.
- Goal of the SVFB/ASEA/SAMA comment to this NPA is to open up the scope of work to pre EASA scope: you should be able to do what you had been able to do before EASA.
- Latest date of your feedback to me: new, 22. of July in order to clarify the feedback with you and have the response ready in due time.
- I have collected some feedback from MFGZ, JETAV ZRH, ASB and AVIONITEC.
- **What you can do:**

Please print the list and then group the aircraft together by a **B1 expert** as you see it reasonable. **If you work with B2 licences in your organisation**, print a list and group those aircraft reasonably together, which according your **B2 expert** could be done with one rating or have an other proposal, like group them around avionic product lines.

Part of the *proposed* text for the final NPA comment may be:

- 1) **For B1:** the list requires many TR's for types which could be grouped together and had been grouped together in PRE EASA Times. The list is a unnecessary cost generator for General and Business Aviation in many cases.
- 2) **For B2:** much more so for B2 Avionics licences, where even more types could be grouped successfully together. EASA has worsened the situation without any safety benefit. In most cases the list is a cost generator for B2 in GA and Business Aviation in most cases.

When the draft is completed we will comment on the EASA homepage and send this consolidated comment to all members beforehand. You can then copy or arrange and paste into the EASA comment page as you deem necessary and send it to EASA as well.

8) **NPA 2011-07 is the only one of interest for our members at present.**

If you are interested in the overview of all NPA's here is the link which brings you directly to all NPA's including due dates. <http://easa.europa.eu/rulemaking/notices-of-proposed-amendment-NPA.php>

For your info only: Comment Response Document CDR-NPA 2009-01 concerning the Operational Suitability Concept or Data (OSC or OSD concept) the answer of SAMA on the homepage: [http://www.svfb.ch/media/110718\\_uploads/5oper.suitabilitycertificatesamareaction.pdf](http://www.svfb.ch/media/110718_uploads/5oper.suitabilitycertificatesamareaction.pdf)

The OSD makes it mandatory for the **Type Certificate Holder** to issue all necessary material for Maintenance/Pilot & Cabin Crew Training and other **Data** as part of the TC.

My visits (to be continued) to several of our members is providing feedback for all kind of issues. From all of the lately visited members I got the feedback that the relation with our FOCA in Audits and aircraft inspectors has been rated normal to good at the last five inspections **without exception**.

Sincerely,

Franz Meier

Swiss Aircraft Maintenance Association

Mobile: +41 79 334 61 70

Office : +41 44 586 79 31

SVFB Verbandssekretariat % Lufthansa Technics Switzerland POB 4002 Basel

[franz.meier@svfb.ch](mailto:franz.meier@svfb.ch) [www.svfb.ch](http://www.svfb.ch)