

New SVFB/ASEA/SAMA CAE (with Help of FOCA!)

**ANYBODY'S
COMBINED AIRWORTHINESS
EXPOSITION
(CAE)**

Organisation's name

Approval Certificate: CH.CAE.xxxx

Address: This should be the organisation's registered office

Telephone Number:

Facsimile Number:

Email:

Document Ref Number: XYZ / / (Reference number to assist in correspondence)

Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Federal Office of Civil Aviation FOCA

SVFB
ASEA
SAMA

Anmeldung_CAE_CAE_Reg_08m04112020 V02

Swiss FOCA and SAMA had decided on December 14, 2020 to publish the „A-CAE“ (Anybody’s Combined Airworthiness Exposition) example document for general use!

It can be found on our SAMA / ASEA / SVFB–Homepage (www.svfb.ch) under „Regulations“ and „FOCA“.

For FOCA Mr. Michel Caboussat has coordinated all FOCA-internal and our external inputs and changed the initial draft issued by SAMA, which was based on the former FOCA „Anybody’s CAME“.

We would like to express our special thanks to Flight Maintenance MFGZ AG and Fliegerschule Birrfeld AG, who helped me in the beginning of 2020 just before we were forced to cancel the physical meetings. It was quite a challenge to establish the document and Mr. Michel Caboussat and his team helped a lot to finalize the sample document as it is today.

The „Anybody’s CAE“ is only available in English language on our Homepage and also from FOCA.

If you would like to write your Exposition in one of our official languages, please do not hesitate to contact me or any board member of our association.

So „have fun“ to transit from M/F, 145 and M/G into the CAO, ML, M and CAMO World.

If you do have any question, please do not to hesitate to contact us/me,



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Federal Office of Civil Aviation FOCA

your assigned FOCA inspector or Mr. Michel Caboussat

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Serie Confederation

Federal Department of the Economy, Transport, Energy and
Communications 80700
Federal Office of Civil Aviation FOCA
Sala 0000 - 0000
Batter: Continuing Airworthiness Management Organisation - 8702

Part CAO Compliance List Non-Complex Motor-Powered aircraft	Part CAO Initial	Part CAO Variation	FOA Internal Use
			Appr. Ref.
		Other	
Organisation			Appr. Pending <input type="checkbox"/>

ANWB/FAA 8130.104 132.0204 CAO.A	Content	CAE Reference
CAO.A.010	Scope Maintenance & continuing airworthiness on aircraft and components not classified as CMPA and not listed in AOC	
CAO.A.015	Fabrication or change To the NMA in form and manner as established	
CAO.A.017	Means of Compliance Alternative means of compliance if applied for	
CAO.A.020.01	Terms of Approval Scope of work	
CAO.A.020.02	Terms of Approval Type of aircraft / Change of scope requires approval from FOCA	
CAO.A.020.03	Terms of Approval Scope of work for Turbine engine and manifold parts (prop., temp or type maintenance tasks)	
CAO.A.020.04	Terms of Approval Limitation of privileges	
CAO.A.020.05	Terms of Approval System usage	
CAO.A.020.06	Terms of Approval CAO Approval	
CAO.A.020.07	Terms of Approval Fabrication of parts	
CAO.A.020.08	Continuing Airworthiness Exposition (CAE) Content of CAE	
CAO.A.020.09	Continuing Airworthiness Exposition (CAE) Approval of the initial CAE	
CAO.A.020.10	Continuing Airworthiness Exposition (CAE) Amendments to CAE	
CAO.A.020.11	Continuing Airworthiness Exposition (CAE) Initial approval of CAE	
CAO.A.020.12	Continuing Airworthiness Exposition (CAE) Amendment to the CAE	
CAO.A.020.13	Facilities Description of the facilities	
CAO.A.020.14	Facilities Protection from contamination and environment	
CAO.A.020.15	Facilities Secured storage facilities for components, equipment tools and material. Restricted access to them	
CAO.A.020.16	Personnel requirements Duty and responsibility of Accountable Manager	

8702-GL-Non-Complex motor-powered aircraft-CompL-List.doc 870200m Page 1 of 6

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Note 1:

If you do have an FAA Repair Station Certificate you are not able to migrate from Part-145 to Part-CAE, since there is no bi-lateral agreement yet between the EU and the USA. Nevertheless, you could perhaps ask your FOCA inspector, if you could use some of the Part-CAO/Part-ML privileges for maintenance of Non-CMPA (Non-Complex Motor Powered Aircraft) through your MOE-Procedures.

Note 2:

There is guidance material available in the Regulations and Member Section of our SAMA / ASEA / SVFB Homepage!

EASA Meeting on Part-CAO and Part-ML Issues



Combined GA TeB & COM dedicated topic slot 'Part ML, Part CAO Implementation Issues':

(Webex meeting with 62 participants and first time of conducting a meeting with external experts)

EASA Minutes of Meeting

Primary AIM:

Sharing and discussing the "lesson learned" from the implementation of Part-ML and Part-CAO and find solutions for identified weak points.

Presentation of known Issues: (Extracts from the GA COM meeting 7th October)

- AOPA see challenges and hold courses.
- ECOGAS wants to postpone the deadline with 6 months for the Part CAO.
- The Commission has to take decision.
- Henrik Svenson (Swedish CAA): Challenge to be able to implement by SEP 2021. Recommend a delay of Part-CAO.
- Julian (EAS): Why is there a deadline for Part-CAO? What would be the problem to extend the date?
- EASA answers that the rule is there with date because of the requirement of nations Competent Authorities.
- IAOPA wants an information for easy understandable publication to the owners.
- What are the implementation difficulties?
- There is a need to have lessons learned from the Part-ML process.
- Part-66 mechanics outside companies (Independent Certifying Staff - new in Part-ML), do they also have the ARC issuing permission?

ECOGAS issues forwarded 13th October to all participants:

- The issues with "engine potential" extensions are essentially legal. Since the implementation of Part ML of Regulation (UE) 2019/1383, there has been a change of responsibility. The authority no longer takes responsibility for approving a request for an engine potential extension. This responsibility is now given to Continuing Airworthiness and Maintenance Organizations.
- General Aviation members regret this change of responsibility. In fact, in the case of an accident or incident, responsibility is now only placed on the organization without the supervision or approval of the authority.
- In the event of an incident or accident with only material damage, French insurance companies are not willing to cover the organization concerned.
- In addition, with this issue, we are requesting an extension of the transition period to Part CAO implementation.
- With the sanitary crisis (COVID-19), both organization and authorities have delayed starting working on transition to Part CAO and it appears that all organization won't be able to have the new agreement by September 2021.

EGOGAS and SAMA combined internal Notes on same meeting!

Transfer between CAW regimes – ML/CAO Issue. CAW stands for Continued Air Worthiness and includes the move from Part-145 or M/F and CAMO to the Combined CAO! *Remark: ECOGAS will ask EASA (Dominique and Astrid) if they have any idea whether CAO will have any bi-lateral MIP with FAA – otherwise a 145 has to change their CAME to a CAE but with CAM only, so Maintenance will still be covered by an MOE using Part-145.*

- Same legal organisation = same controlled environment. It is important to understand that the move from Part-145/MF/CAMO to CAO will happen smoothly (for sure in CH) and therefore it is understood by EASA and NAA having helped to develop Part-CAO, that the transfer will be covered in the “Controlled Environment” of the same Organisation and the same Competent Authority and therefore we can move on with the existing approvals until being approved under Part-CAO and Part-ML and Part-M (where applicable).

ARC Extension in controlled environment – New EASA Form 15c required.

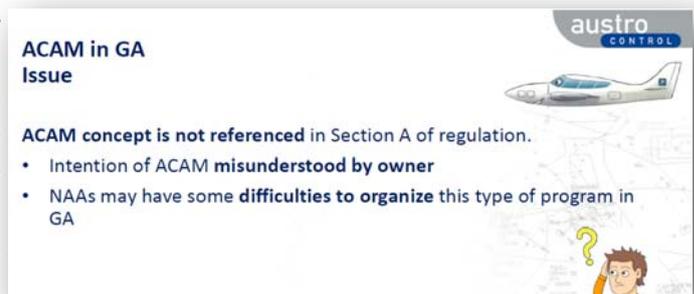
- FR CAA comment. Clement Dufix. Why a new ARC?
- EASA Ludwig A: You can make a link to previous a and b, but they are referring to the old Part-M. The idea is to issue an “Extension” with a new Form 15c Issue 1 with a note/Statement on the new Form to the Form 15a or 15b having been issued before 24.03.2020.

Part 21 versus ML Transfer of registration within the EU or import from EU.

- Regulatory change in progress.
- What to do in the interim phase? A: The ARC can be used as recommendation or article 71.
- No comments from NAAs and both solutions can be used.
- EASA webpage should contain the information.

ACAM – how to organise a proportionate ACAM (Aircraft Continuing Airworthiness Monitoring) program for GA? → See also GM1 ML.A.302 “Aircraft maintenance programme”

- Intention of ACAM misunderstood by owner. Internal ECOGAS remarks about thoughts from the avionics side ACAM is understood having a box to help with the IT system of an airline to run an Aircraft Continuing Airworthiness Monitoring system for all kind of outputs to OPS and Maintenance. We are not sure how EASA has planned to have GA doing this monitoring since an owner has different “dirty-finger-prints” (original papers, like Tech Log, Form 1, CofA, AOC etc.) under his control and might not need or have a complicated ACAM – who knows?
- NAAs may have difficulties to organise this type. Therefore, it would be nice to get some support from the Competent Authorities (CA) – we think they are also known as: Service Public ?!
- ACAM is a data catching tool – sharing best practice and information to owners would be helpful.
- Information and exchange.
- BE has same issues. Has not yet found the right way to do it.



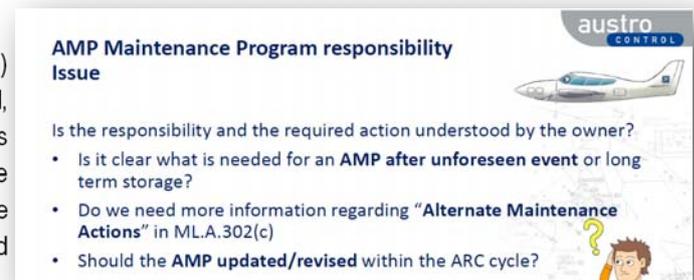
ACAM in GA Issue

ACAM concept is not referenced in Section A of regulation.

- Intention of ACAM **misunderstood by owner**
- NAAs may have some **difficulties to organize** this type of program in GA

Alternate Maintenance Program (AMP) Maintenance Program – responsibility understood by the owner?

- Safety Promotion for AMP development needed.
- Alternate Maintenance Action according to ML.A.302(c) is somewhat unclear and the question must be raised, what can the owner do and does he understand his responsibility, since the CA is not approving the change until next audit (therefore, this could be an issue for the insurance companies whether they really like this) and not before the next T/O or accident!?!)
- Minimum inspection program debated (Q: lowest Standard acceptable?). Inspection within one year. Tolerance one month or 10 hours.
- Airworthiness Limitations must be clarified as well, this includes Permit-to-fly (and again insurances?).



AMP Maintenance Program responsibility Issue

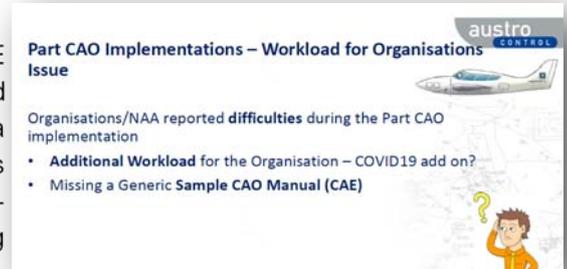
Is the responsibility and the required action understood by the owner?

- Is it clear what is needed for an AMP **after unforeseen event** or long term storage?
- Do we need more information regarding “**Alternate Maintenance Actions**” in ML.A.302(c)
- Should the AMP **updated/revised** within the ARC cycle?

EGOGAS and SAMA combined internal Notes on same meeting! (Continued from page 3)

Part CAO implementations – workload for organisations (ECOGAS Input from France, Denmark, Germany etc.).

- Big workload – extension of the implementation period possible?
- Marcel Gisel (ECOGAS/SAMA) informed about the Anybody's CAE (A-CAE). ECOGAS proposes to extend the implementation time and work together on the exposition. EASA Guidance is ok, but needs a lot of cross references and since COVID-19 no Working Groups were possible to help each other to find all necessary (but incomplete) references in Part-CAO, Part-ML and also Part-M including AMC/GM material (which came quite late) to be revised.
- Extending the deadline won't have any impact for organisations already ready but will help other organisations.
- Need no extension in CH. Marcel Gisel, ECOGAS Swiss member: Super solution proposed by FOCA! If somebody wants to talk to Mr Michel Caboussat or Mr Rony Meier please do not hesitate to contact them directly or SAMA/ECOGAS.
- ECOGAS' offer appreciated. Share the manual update at next meeting. EASA wants to issue it. Marcel has to check the copyright. Action from ECOGAS.
- Mr. Ronald Meier (CH FOCA for continuing airworthiness). There is no copyright—it can be issued when ready. Needed help from FOCA (is now implemented!), since we had no guidance like in France with the issues of ML/M (DGAC Guide G-42-11_IF) - Newest A-CAE is on SAMA Home-page under FOCA, incl. FOCA Checklist!



TBO extension – responsibility – insurance issues.

- ECOGAS information that insurance companies will not ensure aircraft without an organisation program. Ref also to AMP responsibility!
- TBO recommendation. In the hand of owner and organisation. If the TBO is in accordance with rules and guidance material.
- What is mandatory and not is difficult to find out for TBO.
- It was understood, that if there is no ALI, then the issued numbers are recommendations only with the responsibility of the owner could be extended – check also AMC1 ML.A.302(c) which is quite extensive to read and then everybody understands why it is so tricky to draft a CAE!?!
 - Part-ML is a law and insurance companies will / should have to accept it.
 - More communication to insurance companies may be needed, so a reasonable premium is paid.
 - Maybe improve the interaction with the insurance companies.
 - Take into account, that Approved Data is normally approved by National Aviation Authority of the TC.Holders country.



Systematic solutions for an improved transition.

- Proposal to put more information on the EASA FAQ List / Toolbox.
- Ludwig Hessler (EASA) will answer Q.
- Michael Erb (European AOPA) surprised of the many questions half a year after the approval of the AMC/GM to Part-CAO, Part-M and Part-ML.

Latest important Info from EASA for our Industry:

Take also note that EASA NPA 2020-12 (Complete) Review of Part-66 is published and the deadline for the submission of comments (direct to EASA or through our association to mg.svfb@bluewin.ch) is on 31. March 2021

New SVFB/ASEA/SAMA Members

Spectro | Jet Care



Since 1976 **Spectro | Jet-Care** has been providing a comprehensive range of analysis services; engine trend monitoring by Gas Path Analysis, Oil, Hydraulic Fluid, Fuel, Chip and Filter Analysis – all developed to identify operational issues at the earliest possible stage. Our trend monitoring programs continue to set the benchmark for first class condition monitoring services and are available for engines from all major OEMs.

Our three laboratories in the UK, USA and Switzerland are available 24/7/365 for AOG situations and hold accreditations, approvals or preferred supplier status from the key engine and airframe manufacturers.



Heli-Maintenance AG



The NEW Rotorcraft Service Station at Airport Altenrhein

Originally founded as Ben-Air AG by Bernhard Tschachtli in 1992, the company was taken over by Mécanaïr SA and Avionitec AG in 2016.

In November 2018 the company got part of HeliAlpin AG with New Base Station Altenrhein (LSZR).

As a small, independent company with very experienced staff we are capable to perform all kind of maintenance works at your Rotorcraft in due time.



WildWings



Silvan Wild is on the way to receive a Part-CAO certification, but only for the Continuing Airworthiness Management part.

Furthermore Silvan Wild has started in 2020 as an independent certifying staff.

His experience is more than eleven years as an Aircraft Maintenance Manager and Postholder CAMO.

wildwings@hispeed.ch

8tree



8tree is delighted to join the Swiss Aircraft Maintenance Association (SAMA). We look forward to contributing to and learning from the SAMA community's wealth of knowledge and best practices.

8tree is a leader in portable 3D optical surface inspection tools that are used in a variety of industries. dentCHECK, our 3D damage-mapping tool, specifically designed for aviation maintenance, is now widely used by airlines/MROs and aerospace OEMs globally. The tool streamlines the process of damage assessment (dents, bumps, blend-outs, lightning strikes, etc.), and while benefiting from our 8cloud connected-solution. This empowers airlines/MROs with a complete end-to-end digitized, paperless and easily-referenced damage-mapping and reporting workflow.

Our vision is to make complex 3D measurement systems unbelievably easy to use by stressing user-experience as much as technical performance.

Founded in 2012 in the US and Germany, 8tree is a diverse team of about 20 passionate individuals spread over three continents.



Junkers Flugzeugwerke AG



The world's first all-metal commercial aircraft, the Junkers F13, celebrated its 100th anniversary last year. This famous aircraft has seen its revival just a few years ago with the manufacture of newly built airplanes. To service the F13 and also US-designed and built WACO and Great Lakes historic aircraft, Junkers Flugzeugwerke has set-up its own maintenance operation at the St. Gallen-Altenrhein Airport in Summer 2020 and has received the EASA Part 145 approval in December 2020. We are an independent maintenance services provider and offer line and base maintenance as well as AOG support for European owners of WACO and Great Lakes biplanes at the new Junkers Service Center in Switzerland.

Altenrhein, 01 December 2020



Schweizerischer Verband Flugtechnischer Betriebe
Association Suisse des Entreprises Aérotechniques
Swiss Aircraft Maintenance Association



**We would like to welcome all the new members to our association
and we are looking forward to meet soon in person
to enable networking
and to maintain personal relationships.**

Next SVFB/ASEA/SAMA Event(s)

Next **General Assembly 2021** is planned again in Payerne at



07. May 2021



**We wish you a
happy New Year
and good Health !**

C Lasagni / I. Bruchlen / M Gisel