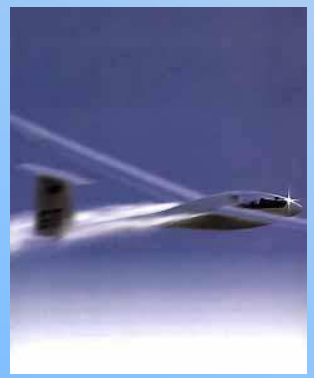

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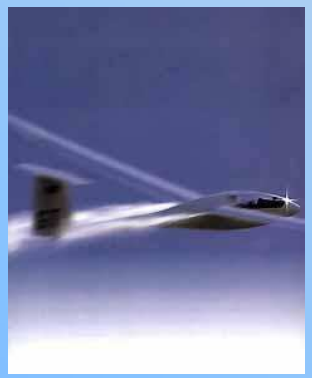
Part-M in General Aviation

The perspective from the European sailplane manufacturers

by

Werner Scholz, Spokesman of the
European Sailplane Manufacturers



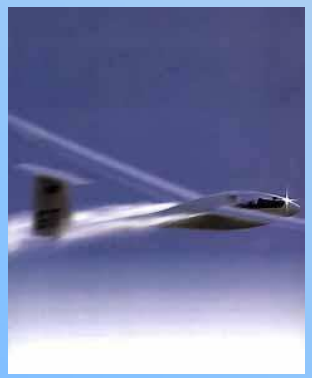
Introduction

„The European sailplane manufacturers"

- two associations:
  - Verband deutscher Segelflugzeughersteller, Germany
  - European Glider Manufacturers and Suppliers association, Czech Republic, Slovenia, Lithuania

- approx. 20 manufacturers of sailplanes in Europe
- representing nearly 90 % of world-wide production
- more than 20.000 sailplanes produced

- typical small companies (10 – 120 employees)
- often very long tradition (up to 84 years)

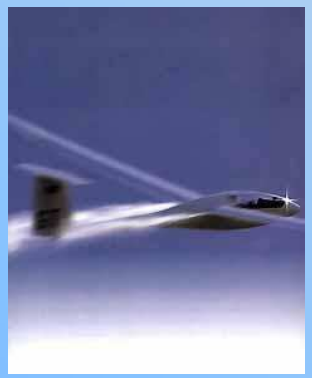


Introduction

„Why are we caring about Part-M?"

Close ties to the 70.000 glider pilots in Europe:

- We know "our market" (= the operators & the maintenance sector) very well since a long time
- Manufacturers often have approved maintenance organisations
- As TC holders any safety problem due to a lack of proper maintenance would be known immediately…
  … there is none!
- Complicated regulations lead to a loss of pilots
  ➔ this will erode our market!!!

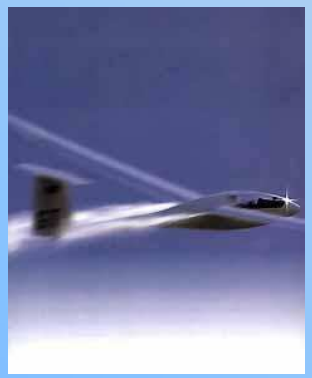


Introduction

„Our opinion about Part-M?"

....well, to be honest....:

- Part-M did not solve any problem – it became one
- Manufacturers see MUCH more paperwork on their desk caused by Part-M introduction
- Customers are frustrated…
  …either seeking help by manufacturers
  (without the will to pay for it)
  …quit recreational flying to avoid such paperwork
- Part-M did not improve safety in gliding but has become another threat to this wonderful sport

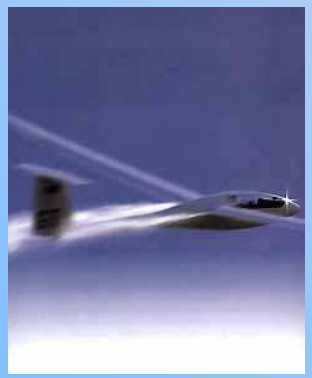


Comments regarding Part M

„Part M is a very complex regulation"

Part-M too complex & difficult to read & understand!

- regulation for pilots, maintenance organisations, manufacturers & inspectors
  (= many persons without an academic background)
- format with many cross-references within Part M and towards other regulations
- language with many abbreviations
- partition into regulation and AMC material
- official translation only for regulation (not for AMC) and often too late regarding consolidated versions



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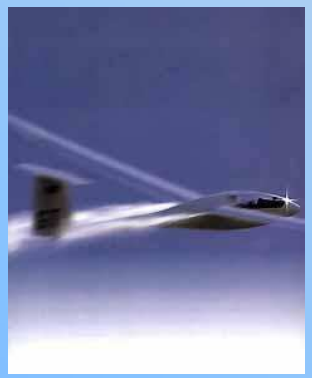
Proposal regarding Part-M

„Part-M could be a simple regulation"

Create a dedicated Part-M for small aviation!

- Limitation to ELA 1 aircraft
- No rules for commercial applications included
- Possible to "read through"
- No abbreviations (or explained by footnote)
- AMC material or explanations placed after each paragraph
- official translation available for full text

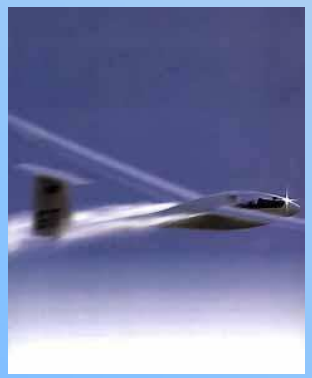


Comments regarding AMP

„Maintenance programs often not needed"

Aircraft Maintenance Programs (AMP) come from commercial aviation & are unnecessary complex!

- airworthiness codes for ELA 1 (CS-22 / -23 / -VLA etc.) require adequate aircraft maintenance manuals (AMM)
- existing AMM were basis for maintenance for decades before Part-M … this was sufficient!
- proper application and approval of AMP is still a problem (even for inspectors and manufacturers!)
- NAA ask often for very different AMP and procedures – even within one state
- big money for no safety benefit (> 2 Mio. € in Germany)

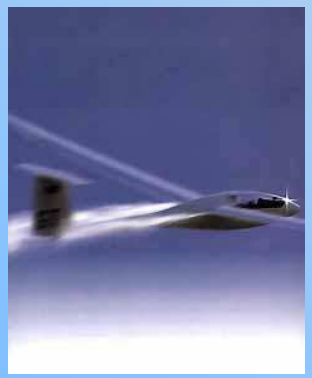


Proposals regarding AMP

„Maintenance programs only if needed"

AMP should only be required if needed!

- if existing AMM and (national) operational rules are sufficient for operation of an ELA 1 aircraft then no AMP shall be required
- if modification against such documents is asked for by the operator then an AMP has to be approved
- the majority of sailplanes would then be exempted from AMP with regarding recovery of man-power and costs (for operators, maintainers and NAA!)

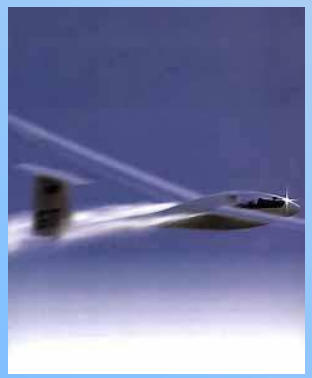


Comments regarding standard changes

„Standard changes not possible"

Standard changes & repairs are today much to complicated to approve!

- a typical change of instruments or equipment has become easier than the associated approval paperwork!
- existing AMC in Part 21 for "gliding equipment" is negated by necessary installation approval
- consequence: more "personal equipment" instead of fixed installation in the cockpit ➔ less safety!
- even long-established repair procedures need approval if the aircraft lacks a repair manual

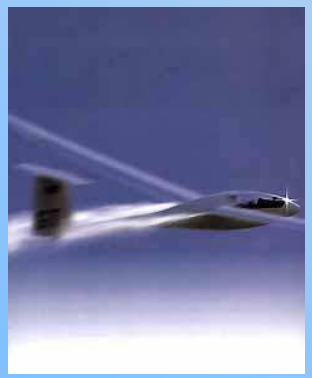


Proposals regarding standard changes

„Standard changes for small aircraft"

Standard changes & repairs for ELA 1!

- a typical change of instruments or equipment should only trigger change of the equipment list!
- approval of typical "gliding equipment" installation should be possible "on the spot" by inspector – the associated Subpart F maintenance organisation should document this change for later NAA audit
- long-established repair procedures need general approval

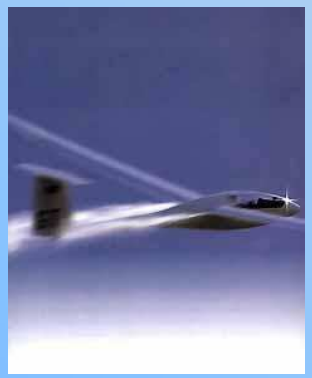


Comments regarding Pilot-owner maintenance

„Pilots cannot help each other"

Pilot-owner maintenance is too restrictive!

- typically on each airfield some few pilots / club members would qualify for pilot-owner maintenance (POM)
- with existing rules they are limited to aircraft they own or belong to their club – no help allowed to the neighbour
- the scope of work as given in AMC is used by NAA as a "catalogue" – only these tasks are allowed

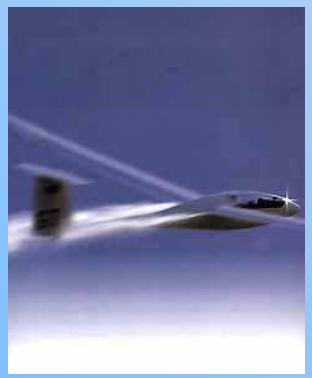


Comments regarding Pilot-owner maintenance

„allow pilots to help each other"

Pilot-owner maintenance improved:

- allow POM to be done also for aircraft which are not owned by the pilot – even today the pilot signing the POM is often not the pilot doing the next flight…
- the list in AMC has been drafted as a list of examples (with help of the manufacturers) – it must not be used too restrictive
- listing all POM tasks in the AMP does not work – drop it!

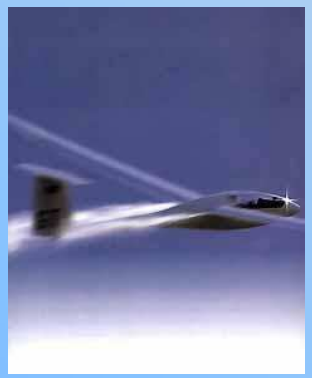


Comments regarding Certifying staff

„Qualified people are excluded"

Existing qualified staff cannot be used!

- national sporting associations offer courses for technical staff which do not result into a "full inspector" rating (e.g. limited to simpler inspections or tasks) – today they have no more privileges compared to a pilot-owner
  ➔ this is a waste of thousands of qualified persons
- according to AMC material in Part-M today NAA oppose that the very same certifying staff (inspector) issues an ARC on an aircraft where he signed of a repair (release to service)
  ➔ repair shops with a single inspector cannot function

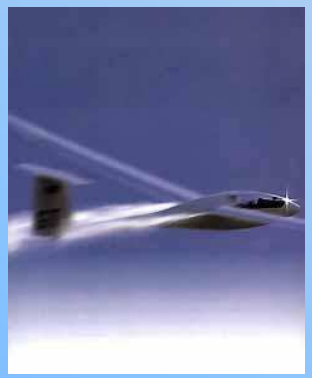


Comments regarding Certifying staff

„allow qualified people to participate"

Existing qualified staff must be used!

- create AMC / rules to allow technical staff holding lesser licences than "full Part-66 staff" to work according to these licenses – this will ease the burden on full Part-66 staff and make such training interesting again
- drop the AMC regarding issuance of RTS / AMC by the same certifying staff
- both should be made possible at least for ELA 1 aircraft



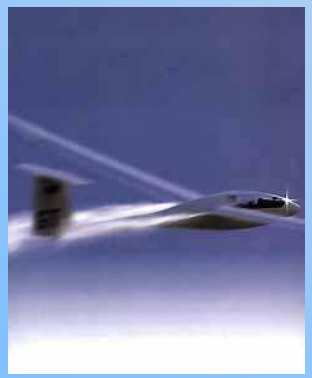
Comments regarding ACAM

„Punishment alone does not work"

Authorities become hated people!

- NAA got via Part-M the task to monitor continuing airworthiness also in the non-commercial aviation
  ➔ for some NAA this was an invitation to create more in-house work and justification for personnel…
- on small airfields ACAM teams are seen as a plague – also caused by lack of understanding Part-M and supporting national regulation (on both sides!!!)
- as these activities (together with difficult to understand regulation) are associated with EASA in the end…

…. everybody hates EASA & the NAA !!!



Proposals regarding ACAM

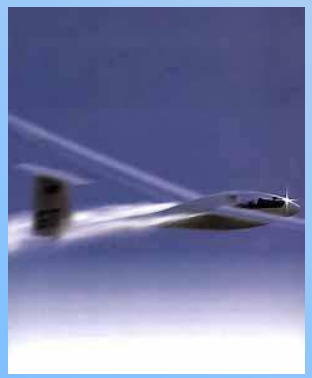
„Incentives and information will work"

Authorities should be partners!

- delegating all training & information about European regulation to sport associations is not enough…
  ➔ make information & training of General Aviation stakeholders a primary task for the authorities!

- find incentives for easier compliance with new regulation (simple forms, fees structure, …)

- sport aviation ONLY works based on motivation
  …. transform EASA & the NAA into partners!!!

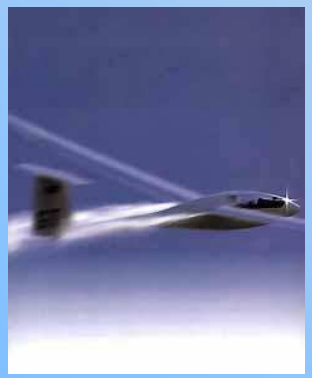


Comments regarding Part-M today

„It is a mess but could be working"

Nothing is perfect – certainly true for Part-M!

- the division into maintenance organisations and CAMO has created a huge extra effort and costs
- the basic underlying principle of "introduction of just another layer of control and supervision" makes things much more complicated and expensive
- the non-cooperation between EASA and NAA makes efficient application of Part-M unnecessarily hard
- it is naïve to believe that more than 50.000 people in sport aviation could become Part-M experts



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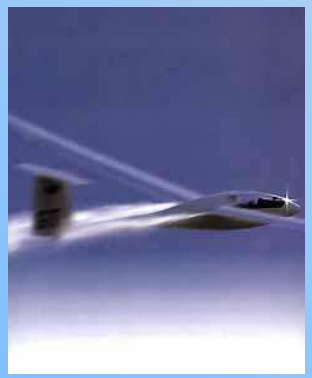
Comments regarding Part-M today

„make it working"

With good will and smart ideas Part-M could be OK!

- streamline organisations approval and oversight
- form teams ONLY dealing with small aviation to support, train and supervise the sport aviation communities
- create a "moderation office" where everybody could directly ask for advice and harmonization could start
- Don´t forget – we have NO maintenance safety problem!



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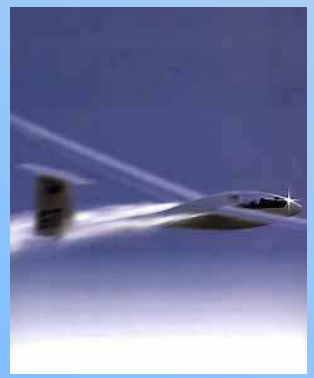
Some Brainstorming beyond Part-M

„EASA versus small aviation"

How really to revitalise small aviation in Europe!

- what about a "small aviation department" within EASA? (ideally with all areas of EASA-responsibilities in one big office – rulemaking, airworthiness, licensing, etc…)
- why force into small aviation things which no one needs? (keep old rules as alternatives as long as possible)
- never forget that sport pilots fly because they want - with motivation they will do everything, but with more rules and fees you destroy small aviation in Europe!



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Thank you -
any questions?