

TRANSFERRING FROM A UK CERTIFICATE OF AIRWORTHINESS TO AN LAA PERMIT TO FLY

Normally it is not possible to transfer an aircraft from a Certificate of Airworthiness to a Permit to Fly. However there are specific circumstances when this does happen, generally when the type of aircraft concerned ceases to be technically supported by a Type Certificate Holder nor has a Type Responsibility Agreement been signed up between CAA and an organisation willing to look after the continued airworthiness of the type. In this case the CAA will generally write to owners of the type, saying that they are no longer able to renew Certificates of Airworthiness on the aircraft.

If the aircraft is an EASA Annex II type, (eg Auster) the CAA then offer the alternative of a Permit to Fly, issued either directly by themselves or, for an appropriate size of aircraft, via the CAA approved organisation of the LAA.

In April 2011 the CAA policy changed and for those aircraft supported by a Type Responsibility Agreement, (TRA) owners are now allowed to choose whether to operate the aircraft on a CofA or a permit to Fly, depending on their intended type of operation. Owners wishing to take advantage of this option must first notify the TRA organisation of the deletion of the individual aircraft from the TRA and then apply to CAA Applications and Approvals Section or, for aircraft listed in Appendix 1 of this TL, to the LAA.

If the aircraft is not an Annex II type, but is orphaned, (eg ARV Super Two) then in some cases EASA may agree to issue an EASA Permit to Fly on LAA recommendation. LAA are already the recommending organisation for the renewal of certain EASA Permits to Fly.

Aircraft types presently eligible for transfer are shown in the list included as Appendix One of this Technical Leaflet.

1. Maintenance

Operating your aircraft on an LAA Permit to Fly means that you have more flexibility in your maintenance program than if it were on a C of A, in that the use of released spares is not essential. All parts used in the aircraft must nevertheless be fit for purpose, and if of a modified design, modification approval must be obtained from LAA Engineering before use. This is not intended to be a passport to reduced safety standards and irrespective of whether it is on a Permit or a C of A the aircraft will need to be equally carefully looked after. The engine's exhaust manifold will corrode just the same whether the aircraft it is fitted to has a C of A or a Permit, so regular pressure tests of exhausts with cabin heat muffs will still be needed, likewise flight instruments must be kept in calibration, engine compressions checked, pressure vessels and flexible pipes pressure tested, fabric strength tested etc. The CAA LAMS schedule remains a well-tested means of keeping these aircraft airworthy and is generally mandated for three and four seat LAA aircraft. Alternatively, the LAA Generic Maintenance Schedule is also recommended, and is available to download electronically as a 'Word' document from our website for ease of customisation to suit the individual machine concerned. For single and two seat LAA permit aircraft, while the LAMS schedule or LAA Generic Maintenance Schedule is recommended, the owner and inspector are free to devise their own maintenance schedule providing the aircraft is maintained in an airworthy condition. Above all, the manufacturer's recommendations must be taken into account and included in the schedule used.

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2. Unapproved Modifications

- 2.1 In order to qualify for a Permit to Fly, the aircraft must comply with the approved design standard. The LAA inspector must check, as far as practical, that it does not include unapproved modifications or repairs. This can be very difficult, particularly with an old aircraft. It is not realistic to expect the LAA inspector to compare every detail of the aircraft against the drawings, even when the drawings are available.
- 2.2 Nevertheless, by comparing the aircraft against the maintenance and repair manuals, and particularly with experience of other aircraft of the same type, vigilant and observant LAA inspectors have often been able to spot where aircraft have been modified and then trace back through the paperwork to find out whether the mod is approved or not. Where an unapproved modification is found, either it must be returned to standard or the modification assessed by LAA Engineering to find out if it can be approved retrospectively.

3. Compliance with Airworthiness Directives

- 3.1 Before transfer to a Permit to Fly it must be checked that the aircraft, engine, propeller and equipment comply with all applicable Airworthiness Directives. These can be identified either in the latest version of the CAA MAMIS (which can be downloaded from the CAA website) or LAA inspectors can find them (where covered) in the Aircraft, Engine and Propeller Sections of the LAA Inspector's SPARS book. Compliance with applicable ADs can be checked by reference to the aircraft's logbooks. In cases of doubt, a physical check on the aircraft must be carried out. Note that some ADs require recurring actions, so even though it may have been actioned once it may need further action later. Also note the possibility that components may have been changed since AD actions were carried out so AD actions may be required on the replaced parts.
- 3.2 An Airworthiness Directive compliance list should be presented along with the application listing each relevant AD and stating compliance as appropriate.

4. Compliance with Mandatory Permit Directives

- 4.1 Before transfer to a Permit to Fly it must be checked that the aircraft, including its engine, propeller and equipment comply with all applicable Mandatory Permit Directives. While most MPDs refer to specific types of aircraft, some MPDs apply to all permit aircraft. Copies of MPDs can be sourced from the CAA website or LAA inspectors can find them in the MPD section of the LAA inspector's SPARS book. Suitable logbook entries must be made regarding any actions carried out to comply with MPDs or checks carried out to verify compliance status.

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- 4.2 An MPD compliance list should be presented along with the application listing each relevant AD and stating compliance as appropriate.

5. Airworthiness Notices and Generic Requirements

- 5.1 At transfer to a Permit to Fly it must be checked that the aircraft complies with all applicable Airworthiness Notices (CAP 455) and Generic Requirements (CAP 747). These can be downloaded from the CAA website, alternatively copies of the most relevant notices are included in the LAA Inspector's SPARS book.
- 5.2 An Airworthiness Notice and Generic Requirements compliance list should be presented along with the application listing each relevant AN and stating compliance as appropriate.

6. Service Bulletins

- 6.1 Compliance with manufacturer's Service Bulletins is recommended but not legally mandatory unless enforced by the issue of an Airworthiness Directive or Mandatory Permit Directive. Actions called up in many Service Bulletins are no longer practical to carry out because replacement parts described are long since used up, or have been superseded by later events. However the Service Bulletins do often include useful advice and background information.

7. Placards

- 7.1 Generally the majority of the operating limitations (max speeds, weights etc) remain unchanged when an aircraft is transferred from a C of A to a Permit to Fly therefore most of the cockpit placards are not affected. However all Permit to Fly aircraft must display a placard in full view of the occupants indicating that they do not meet (in the case of ex C of A aircraft, no longer meet) international standards for certified aircraft. The wording is prescribed by the CAA as follows:

Occupant Warning
**This aircraft has not been certificated
to an international requirement**

For ex-military aircraft, the alternative wording is as follows:

Occupant Warning
**This aircraft has not been shown to comply with
civil safety standards for commercial passenger flights.
It is illegal to carry passengers in this aircraft in
exchange for money, goods or services**

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- 7.2 All Permit to Fly aircraft are currently restricted to Day VFR flight only and this must be indicated by a cockpit placard stating as follows:

This Aircraft shall be flown by day and under VFR only

- 7.3 Any existing placards indicating that night or IFR flying is permitted must be altered to remove this implication.

The LAA supplier's list includes custom placard suppliers who can match the style of your existing aircraft placards.

- 7.4 Other than as described above, the LAA inspector must check that the aircraft carries all the placards called for on the expired Certificate of Airworthiness or Flight Manual, ASI 'red line' correctly reflects VNE etc.

8. Weight Schedule

- 8.1 A copy of the current weight schedule must be supplied with the application. The weight schedule must be based on a weighing carried out not more than ten years previous to the date of receipt of the application and must not pre-date any major recover, repaint, modification or repair.
- 8.2 The weight schedule must be of an acceptable format as supplied by professional weighing companies or using the LAA weight and balance report form LAA/WB available from the Engineering section of the LAA website.

9. Airframe Life and Lifer Components

- 9.1 In those rare cases where airframes or components are lifed when operating on a C of A, the life limitations continue to apply when operating on a Permit to Fly. This includes for example trim control cables on Auster aircraft.

10. Engines

- 10.1 LAA policy is that conventional engines fitted to Permit to Fly aircraft may be operated beyond the manufacturer's recommended time between overhauls (TBO) as described in Airworthiness Notice 35 (GR 24), but note that certain engines (the two-stroke Hewland AE75) are specifically excluded in notice 35 and in this case any operation beyond the TBO may only be carried out with the written agreement of LAA Engineering. For conventional engines, LAA inspectors must refer to notice 35 for details of extra routine condition checks, compression checks etc appropriate for an

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engine operating beyond TBO. There is no limit to the life of the engine, subject to ongoing condition checks remaining satisfactory.

- 10.2 Note that Airworthiness Notice 35 (GR 24) is intended to allow an engine which is still sound in wind and limb to continue to operate in an existing installation beyond TBO, subject to careful monitoring. It is not intended that a 'time expired' engine be removed from an aircraft and fitted into another, as the continuity of the condition monitoring would be lost in switching from one installation to another.

11. Propellers

- 11.1 For type-certified aircraft of UK origin, Airworthiness Notice number 4 provides a list of accepted types of propellers. For aircraft types certified abroad, the Fiche de Navigabilite or type certificate data sheet usually lists the propellers which have been approved.
- 11.2 If the propeller fitted is not amongst those specified for this airframe/engine combination in these sources, its use in this application will need to be individually investigated by LAA Engineering.

12. Logbooks

- 12.1 At transfer to a Permit to Fly, the LAA inspector must check that the airframe, engine and (for VP propellers) propeller logbooks are of the CAA approved format, and that they appear to be up to date and a true record of the aircraft's condition and maintenance history.
- 12.2 At transfer to a Permit to fly, either the LAA Inspector must confirm that the logbooks indicate that the history of the aircraft appears to have been straightforward and well documented, or contact LAA Engineering for advice. In some cases the logbooks may need to be sent to LAA Engineering to study.
- 12.3 Standard CAA approved logbooks include the wording for a Certificate of Release to Service (CRS) at the top of each page, so that a licensed engineer can raise a CRS for a C of A aircraft simply by signing and dating the signature column of the logbook alongside the entry relating to the maintenance work which the CRS is to refer to. With a Permit to Fly aircraft the CRS is replaced by a 'Permit Maintenance Release' (PMR) which has different wording to a CRS. Logbook stickers are available from LAA Engineering which can be fitted to CAA logbooks to convert the CRS wording to PMR wording; alternatively either the owner can transfer to new LAA-supplied logbooks which are specially printed with the PMR wording on each page, or the LAA inspector will have to write down the PMR wording manually in the logbook(s) each time he has to sign off any maintenance activity.
- 12.4 Appropriate entries must be made in the logbooks describing the maintenance work and other checks carried out at the time of transferring to a Permit to Fly. Normally more detailed worksheets would also be raised at this time as a record of the work done, the date and reference of the worksheets being cross-referred to in the summary statements appearing in the logbooks.

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- 12.5 Following the maintenance work and other checks made at transfer to a Permit to Fly, the LAA inspector must sign alongside the appropriate logbook entries and certify the work by raising a PMR. The PMR may be completed in the logbook, at the base of the worksheet or by raising a separate PMR document cross-referenced to the worksheet or logbook entry concerned.

13. Registration Markings

- 13.1 The aircraft's G-???? registration letters must be displayed on the wings, fuselage or fin as described in the CAA's CAP 523 unless special dispensation has been granted by the CAA to operate without civil registrations markings visible, usually to replicate a military livery.
- 13.2 It must be checked at transfer to a Permit to Fly that either appropriate civil registration letters are in place or that a current dispensation exists and that the alternative markings stipulated in the dispensation are in place.
- 13.3 It must also be checked that a fireproof metal identification plate is also fitted, indelibly engraved with the aircraft's registration as required by CAP 523.

14. Pseudo Military Markings

- 14.1 If military insignia are displayed (eg roundels) then permission must be obtained from the Air Force, Navy etc whose insignia are carried.

15. Flight Testing

- 15.1 LAA Permit aircraft are required to undertake a simple flight test annually. The flight test required at initial issue of a Permit to Fly is slightly more involved and similar to the one used for renewal of a C of A. If the flight test which was carried out for the last C of A issue is dated no more than 24 months prior to the date of the application form LAA APP-Transfer-2, and the aircraft has remained in use in the intervening period, and the aircraft remains in the same configuration as when flight tested, then LAA can accept a copy of this flight test report. However LAA reserves the right to reject the flight test report if not satisfied with the content.
- 15.2 If the Certificate of Airworthiness is valid and the aircraft is airworthy at or just prior to the time when the aircraft is submitted for transfer to a Permit to Fly, then an LAA flight test can be carried out under the flight authorisation of the existing C of A. Note that the C of A is invalidated as soon as any work requiring certification is carried out on the aircraft under LAA inspector authorisation rather than a suitably approved LAE, so most likely you will need to carry out the flight test before the maintenance commences for the 'annual'. The flight test schedule LAA/FT-NEW can be obtained from the LAA website or from LAA Headquarters on request. Persons acceptable for carrying out the flight are any licensed pilot with a minimum of 100

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hours P1 and 10 hours P1 on this aircraft type (or closely related type). In this case the flight test report can be submitted along with this form.

- 15.3 If the Certificate of Airworthiness has expired at the time when the aircraft is submitted for transfer to a Permit to Fly, or been invalidated because modifications have been made or work has been carried out which has not been certified by an appropriately licensed LAE, then the aircraft will need to be test flown using a special authorisation issued by the LAA for the purpose. In that case, the application LAA/APP-TRANSFER -2 form and associated paperwork must be sent to LAA with a request for a flight test authorisation. If satisfied with the contents of the application form, LAA Engineering will then issue a short-term flight test authorisation and flight test schedule to be completed and returned to LAA Engineering. Acceptance of pilots for carrying out the flight test is at the discretion of LAA Engineering, depending on the characteristics of the aircraft and the scope of the recent maintenance work. Pilots who have previously been briefed in carrying out C of A renewal flight tests by the CAA Flight Department and experienced in carrying out C of A renewal flight tests will generally be well placed providing they are in current practise on the class of aeroplane involved. Applications for carrying out this flight testing are to be made to LAA Engineering using an LAA Check Pilot Application Form.
- 15.4 The flight test schedule to be used is normally LAA/FT- NEW. In the case of an unconventional or specialised aircraft (eg aerobatic or twin), additional schedules may be specified.

16. Application for Issue of Permit to Fly

Initial application is made to the LAA using form LAA/APP-TRANSFER-1 along with copies of the Certificate of Airworthiness and the 'Operating Limitations' section of the aircraft's Flight Manual, when one is available. This allows LAA to check that the aircraft is eligible for transfer and triggers LAA into sending out the further pack of information required, including form LAA/APP-TRANSFER -2.

The aircraft then undergoes the maintenance work and inspections required by the LAA as described in this information leaflet, and, where appropriate, a flight test. When the aircraft is ready for issue of the Permit to Fly, form LAA/APP-TRANSFER-2 is completed and sent to LAA Engineering together with full details of the aircraft and work carried out, Flight Test Schedule and the Permit to Fly issue fee. LAA Engineering will then check the details and, if satisfied, arrange for the new Permit to Fly to be sent directly to the owner.

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APPENDIX ONE

Aircraft types eligible for transfer from C of A to a Permit to Fly

ARV Super 2 (EASA Permit to Fly)

Rollason Condor

Taylorcraft Plus C/2, Plus D

Auster 3

Auster 4

Auster 5, 5A(Alpha)

Auster 5C, 5D

Auster J1, J1A Autocrat

Auster J1B Aiglet

Auster J1N Alpha

Auster J1U Workmaster

Auster J1S

Auster J2 Arrow

Auster J4

Auster J5B Autocar

Auster J5F Aiglet Trainer

Auster J5G Autocar

Auster J5K Aiglet Trainer

Auster J5L Aiglet Trainer

Auster J5P Autocar

Auster J5Q Alpine

Auster J5R Alpine

Auster J5V

Auster AOP6

Auster 6A Tugmaster

Auster D4

Auster D5

Auster D6

Auster T Mk7

Auster T Mk10

Auster AOP9

Beagle Auster D5-180

Beagle A61 Terrier 1, 2 and 3

Beagle A109 Airedale

Beagle E3

DH 60, 60G, 60M, 60 III, Moth Major (from April 2012)

DH 82, 82a Tiger Moth (ditto)

DH 80a Puss Moth (ditto)

DH 83 Fox Moth (ditto)

DH 85 Leopard Moth (ditto)

DH 94 Moth Minor (ditto)

DHC-1 Chipmunk (ditto)

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Jodel D117, 117A
Jodel D120, 120A
Jodel D140, 140A
Jodel D150, 150A
Jodel DR100, 100A
Jodel DR1050, 1050M1
Jodel DR1051, 1051M1

Miles M13 Hawk
Miles M2 Hawk
Miles M3 Falcon
Miles M11 Whitney Straight
Miles M17 Monarch
Miles M38 Messenger

Scintex CP1310-C3
Scottish Aviation Bulldog (from April 2012)
Stampe SV4A, B and C
Taylorcraft BC12
Taylorcraft BC12D
Taylorcraft F19
Taylorcraft F21
Taylorcraft F22
Taylorcraft F22A

Thruxton Jackaroo