

Title

Revised Part-M requirements for aircraft not used in Commercial Air Transport and Pilot owner maintenance

NPA Number

2007-08

Barry Plumb (barry.plumb@btconnect.com) has placed **6** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
387	(General Comments)	0	<p>The EASA are urged to consider derogation from the requirements of subparts G and I for all light aircraft not used for commercial purposes. For these aircraft the organisations approved under subpart F should be granted the privilege to carry out the airworthiness review and recommend the issue of an ARC.</p> <p>Time scale. The expected timescale for the introduction of Part M by September 2008 is too short to allow the outcome of the MDM 032 working group to be promulgated, commented upon and ratified. Many of the proposals from the MDM 032 group will have a significant effect on Part M, and therefore the introduction of Part M should be delayed until these aspects of MDM 032 can be incorporated. Further, there is now little time left for maintenance and continuing airworthiness management organisations to complete their preparations and obtain approval of expositions prior to the proposed introduction of Part M.</p> <p>Safety. The NPA 2007-08 makes no case at all for any increased level of safety that would be achieved as a result of the introduction of Part M. In fact the increased burden of regulation will add to costs and therefore reduce the level of flying activity working counter to safety. It is therefore considered that Part M is not fit for purpose.</p> <p>Costs. There is no consideration of the increased costs likely to occur as a direct result of the extra level of bureaucracy, and extra approval fees expected as a result of the introduction of Part M. It is therefore considered that the NPA 2007-08 is wholly inadequate.</p>	

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390	A. Explanatory Note - IV. Content of the draft opinions and the draft decision - A) Background information	5 - 6	<p>The EASA have confirmed in NPA 2007-08 that they do not intend to produce a dedicated Part M (light) to suit the operation and continued airworthiness of light aircraft not used for commercial purposes. This means that the full rigor of Part M as amended by NPA 2007-08 will apply to light aircraft and gliders not used for commercial purposes. The existence of just one regulation to cover the whole range of commercial and non-commercial aviation has come about to suit the purposes of the EASA rather than the purposes of the industry that it seeks to regulate.</p> <p>The EASA working group MDM 032 was brought into being as a result of COM 579 which demonstrated the EASA's view that the development of light aviation in Europe was being stifled by over-burdensome level of regulation. Yet the EASA now intend to introduce a regulation, which seeks to impose further over-burdensome constraints on the operation of light aircraft and gliders used for non-commercial purposes. This is contrary to the EASA's stated aims for the MDM 032 working group. It is of little purpose reducing the level of regulation for initial airworthiness and certification, if the regulation of continuing airworthiness continues to stifle development.</p> <p>The introduction of the highly successful LSA category in the United States of America, with its attendant reduction in the level of regulation has demonstrated that reduced regulatory burden leads to significant growth in industry.</p> <p>The existing operating procedures in UK allow all of the maintenance and continuing airworthiness activities for light aircraft to be carried out by organisations approved to M3. This system has worked well up to date with a demonstrably good safety record. Part M seeks to introduce an entirely new level of bureaucracy (the subpart G approved CAMO) with the inevitable increase in costs, without</p>	

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			<p>making any case for an increased safety level resulting from this addition. The increase in operating costs will work counter to increased safety, as operators are forced due to financial burden to fly less frequently and therefore maintain a lower level of currency. The increase in costs will also serve to further reduce the development of light aviation in Europe, counter to the stated aims of MDM 032 and COM 579.</p> <p>Since the existing UK system of maintenance and continuing airworthiness produces an good level of safety it is considered that there is no need for the requirements of subpart G (CAMO) as this function can be carried out by the maintenance organisations approved under subpart F, for all light aircraft and gliders not used for commercial purposes.</p>	
393	B. Draft Rules - II. Draft Opinion (EC) No 2042/2003 - M.A.302 Maintenance programme	50 - 51	As noted above, for light aircraft not used for commercial purposes the subpart F approved organisation should be able carry out the full maintenance and airworthiness review functions therefore the subpart F approved organisation should be granted the privilege to approve the maintenance programme.	
394	B. Draft Rules - II. Draft Opinion (EC) No 2042/2003 - M.A.615 Privileges of the organisation	52	For light aircraft not used for commercial purposes the subpart F approved organisation should be granted the privilege to carry out the function of a CAMO, carry out the airworthiness review, issue or recommend issue of the ARC and extend it twice.	
396	B. Draft Rules - II. Draft Opinion (EC) No 2042/2003 - M.A.901 Aircraft airworthiness review	54 - 56	The wording of MA901(e)2 as written indicates that the NAA shall carry out the airworthiness review and issue the ARC for aircraft below 2730 kg not used for commercial purposes. It is considered that this must be a mistake, as that is clearly not the intention of the regulation.	
397	B. Draft Rules - II. Draft Opinion (EC) No 2042/2003 - Part M Appendix VIII A/Pilot	62 - 65	The list of allowable tasks to be carried out by the pilot owner of an aircraft has been revised in NPA 2007-08, and differentiation is indicated between aircraft of MTOM <1000 kg and 1000 to 2730 kg. In many cases the task is allowed up to 1000 kg but not for 1000 to	

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	Owner Maintenance Tasks for Powered Aircraft (Aeroplane)		<p>2730 kg. There is absolutely no logic at all in this. Eg "Leak check of pitot static system", or "Replacement of worn break pads". What possible difference is the MTOM expected to make to this function, particularly when two models of the same aircraft design fall below or above the break point (Cessna 172B MTOM 998 kg, Cessna 172M MTOM 1043 kg). It is probable that the SAME COMPONENTS are fitted to each of the two aircraft.</p> <p>The contents of Appendix VIII part A should be re-written to allow all listed activities up to 2730kg</p>	