



Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
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Bundesamt für Zivilluftfahrt BAZL

NPA 2010-09

Swiss FOCA Position

Part 1

Ronald Meier 28.6.2012

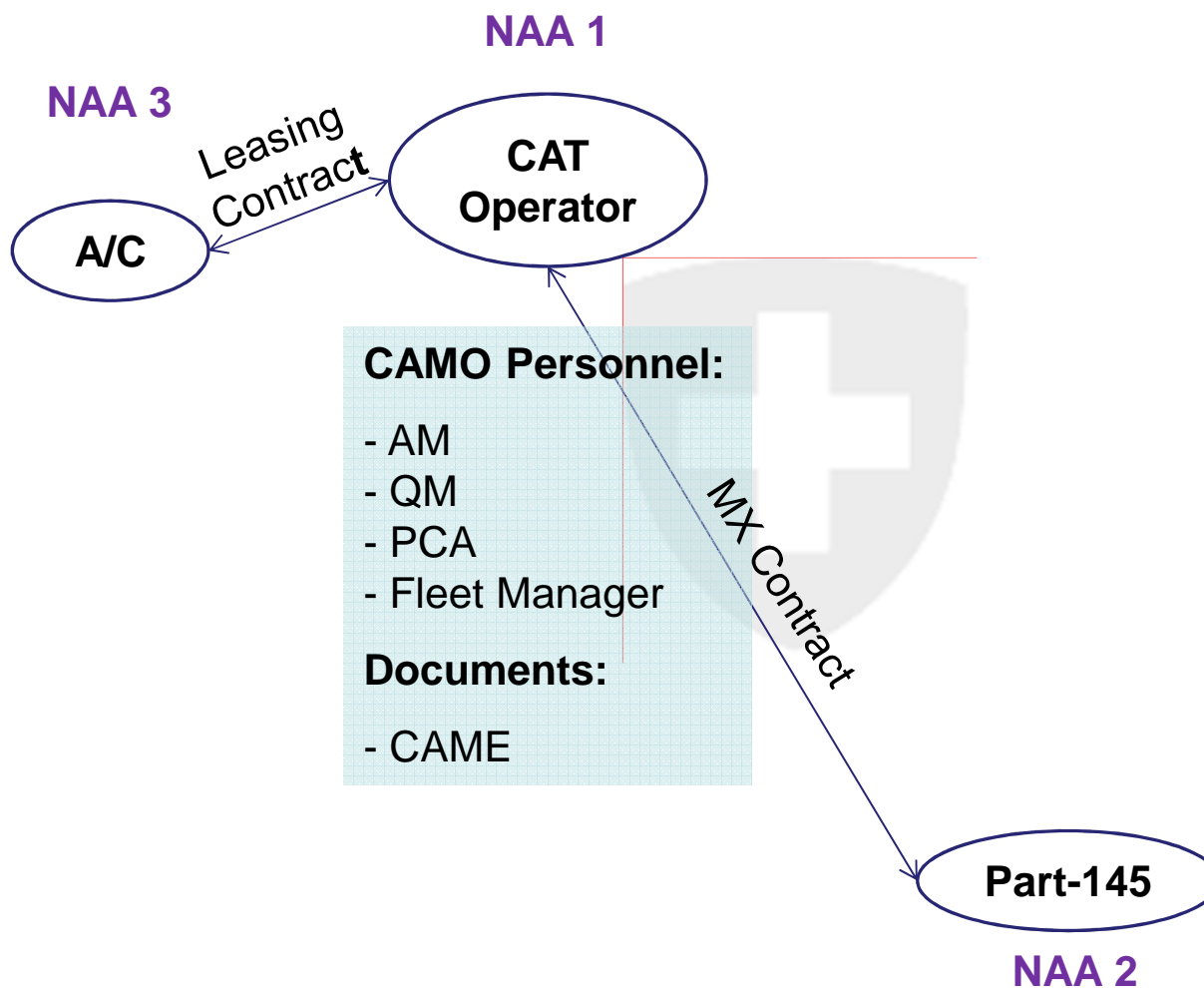


NPA 2010-09 - FOCA position

FOCA does not support
NPA 2010-09 „Contracting of
Continuing Airworthiness“

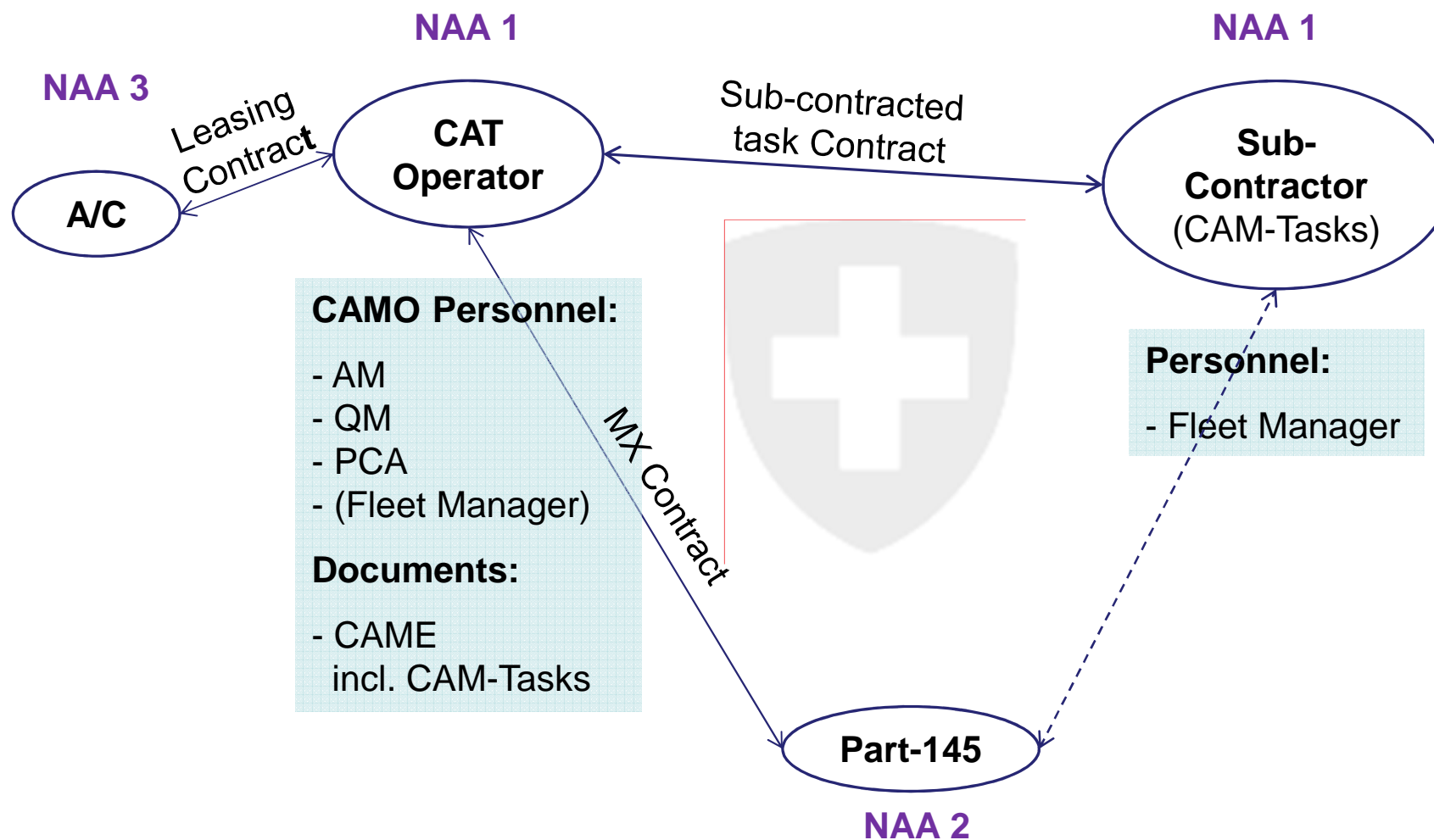


Current Situation



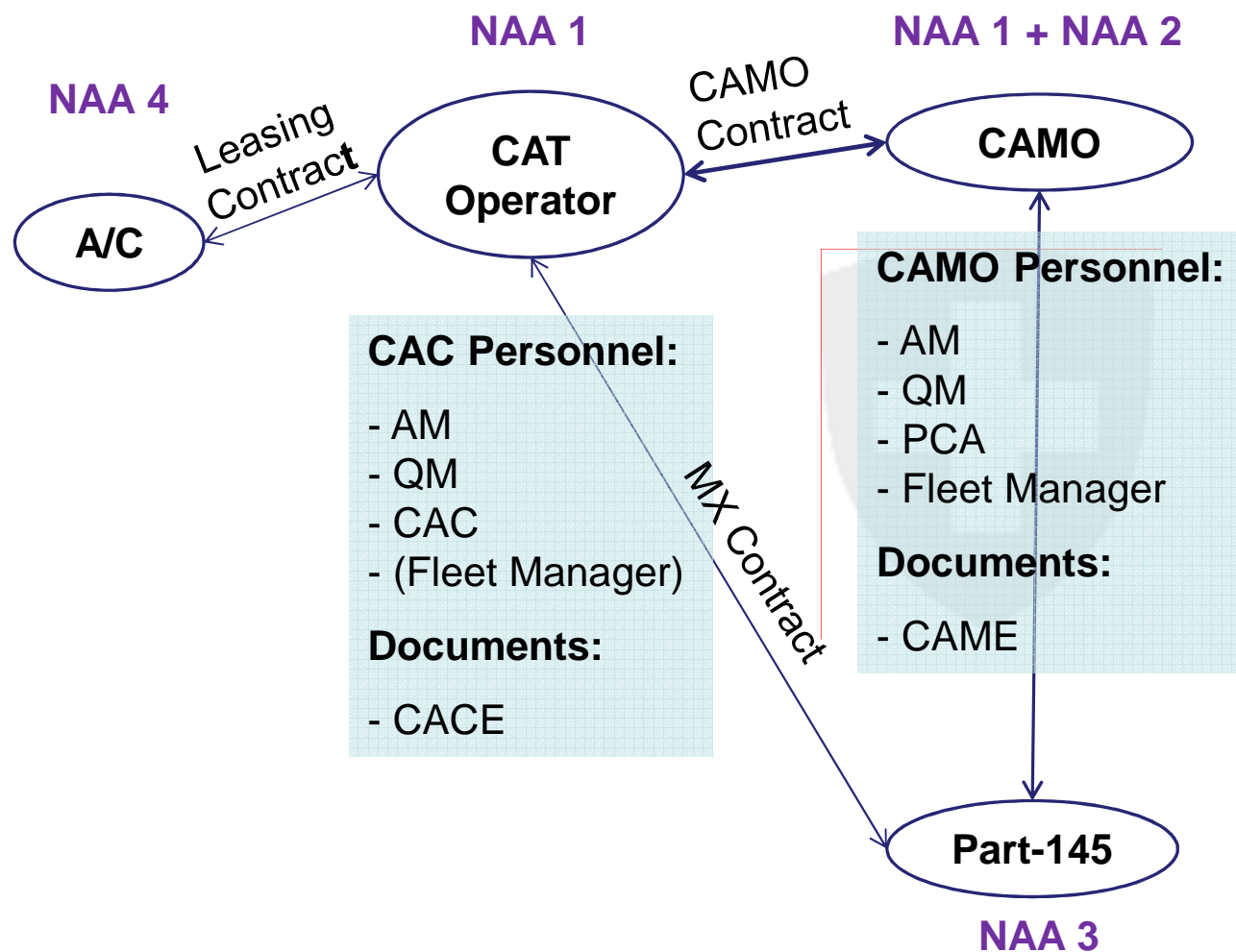


Current Situation



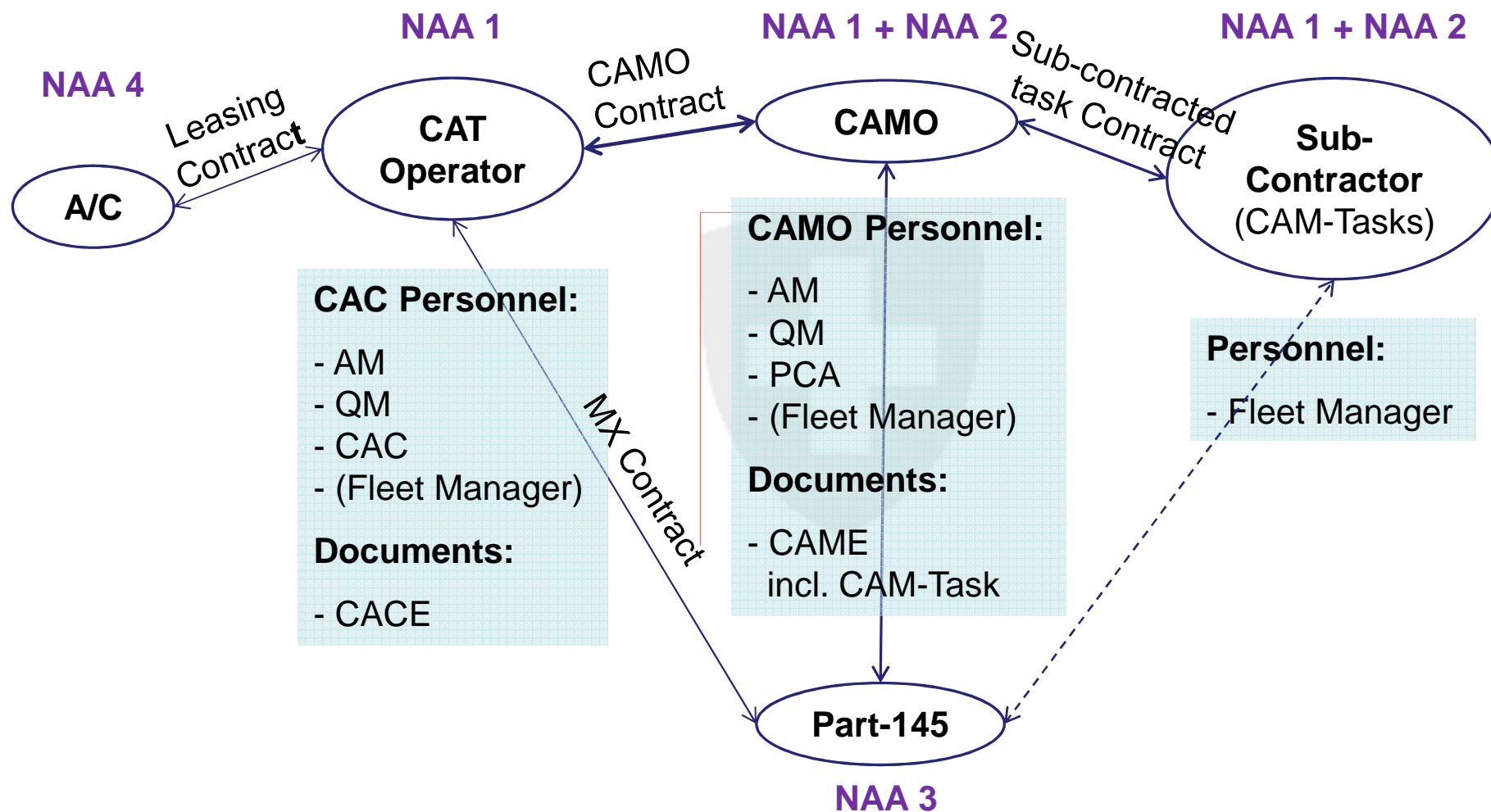


New Situation with Subpart J





New Situation with Subpart J





Major issues

- No safety benefit seen, but much higher complexity
- Continuing Airworthiness Controller (CAC) with experience similar to PCA. He remains PCA in the Ops-department
- Active control required
- Very complex document structure (CACE, CAME)
- Complex MX-Contract structure (3 or 4 parties)
- Oversight of NAA is complex and more expensive, as more parties are involved
- No savings expected



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Swiss FOCA Position

Part 2

Karlheinz Lenzke, 28.06.2012



Why CAMO

- Position of Rulemaking EASA (2006)
 - JAR OPS: Owner/Operator's ultimate responsibility
 - CAMO shall force Ops to live it
 - Planning Department from maintenance provider to operator
 - Why, at a sudden reverse development



Opponent in the Review Group

- Invitation into the group due to FOCA's opposition to the NPA
-
- Personal view as an expert
 - vs. FOCA opinion
 - Consensus





FOCA concerns during sessions 1

- Major Disagreements (Dangers)
 - Additional party in the continuing airworthiness chain (see Page 5 Phil Hall)
 - CAT operator gives “brain” away
 - Complication of oversight
 - Current system not yet mature
 - CA coordinator needs same background like PCA
 - No financial benefit for operators



FOCA concerns during sessions 2

- Major Disagreements (Dangers)
 - Additional administrative burden to the NAAs
 - Use of the word sub-contracting in Part 1 of NPA
 - Keep the word limited for CAM tasks



Advice

- Split of NPA
 - Part 1 necessary with active control
 - Part 2 to be discussed
 - Part 2 not through the backdoor



QUESTIONS?