EUROPEAN AVIATION SAFETY AGENCY
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE
EUROPÄISCHE AGENTUR FUR FLUGSICHERHEIT

Cessna Supplemental Inspection Documents 100/200 Series

NAAs Questionnaire

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NAAs Questionnaire

Scope of this presentation is to analyse and discuss the information provided by the NAAs in respect of the implementation of the *Cessna* Aircraft Company ***Supplemental Inspection Documents* (SIDs)** – 100/*200 Series* Aircraft in the EU Member States.

NAAs Questionnaire

- In order to collect information on the implementation and interpretation of these SIDs by the European Member States, on 12 February 2014 EASA has distributed a specific Questionnaire to the Airworthiness Coordinators of the 32 EASA NAAs;

- 12 NAAs have provided an answer to our request of information.

NAAs Questionnaire

- In respect of the first question if the SIDs are mandatory in your Country:
  - 4 Yes
  - 4 No
  - 4 Partially

NAAs Questionnaire

NAA	YES	NO	Partially	
Cyprus	x			
Czech Republic	x			
Spain	x			
Germany	x			
Greece			x	To be included in AMP
Croatia			x	To be included in AMP or justified by the owner
Switzerland			x	To be included in AMP or justified by the owner
Belgium			x	To be included in AMP
France		x		
Poland		x		
Sweden		x		
The Netherlands		x		

NAAs Questionnaire

- The NAAs that have the SIDs as mandatory or partially mandatory are requiring to comply with these tasks including them in the Aircraft Maintenance Programme;
- Those for which the SIDs are not mandatory, are in general referring to the EASA SIB 2014-01 for supporting their decision.

NAAs Questionnaire

- In respect of the second question on the acceptance of owner justification for not embody the SIDs:
  - 4 Yes
  - 5 No
  - 3 Partially

- Nobody is mentioning the financial impact of their embodiment as justification.

NAAs Questionnaire

- In respect of the third question related to the difficulties to implement the Part M, it was reported:
  - To comply with the M.A.302 (d) (ii);
  - The difficulties of having technical expertise for "deviating" from TCH recommendations;
  - Lack of criteria and/or guidance for the owners to support their decision of "not embody" the SID;

NAAs Questionnaire

- Different interpretation between Member States (i.e. aircraft managed by CAMO not of the State of Registry);
- Application of the "indirect approval procedure" to AMP;
- Not compliance with TC Holder approved Maintenance Manual;
- Possibility of de-registration of A/C in Europe in favour of N-registration with the A/C still flying in Europe;

NAAs Questionnaire

- Different implementation of SIDs in European Countries creates unfair competition between maintenance organisations and CAMOs;
- Impact on facilitation of free movement of aircraft in Europe;
- EASA SIB 2014-01, because it is leaving the decision……"to the satisfaction of the Competent Authority"……with different levels of "satisfaction".

NAAs Questionnaire

- In respect of the fourth and fifth questions :
  - All the NAAs have answered that they do not have any National Structural Ageing Programmes;
  - However, all of them consider it is necessary to have these programmes.

NAAs Questionnaire

- In respect of the sixth question related to harmonise the implementation of the SIDs process the majority of the NAAs is requesting:
  - Clear guidance from EASA;
  - Clear Instructions for the maintenance of ageing General Aviation Aircraft;
  - Clear requirements in the EASA SIB 2014-01.

NAAs Questionnaire

- In respect of the seventh question related to the Instruction for Continuing Airworthiness (ICA) all NAAs requested **more and clear requirements in Part M**.

NAAs Questionnaire

- In respect of the eighth question related to the feed back from the Maintenance Organisations it was reported:
  - High costs related to the inspection;
  - Postponed embodiment waiting for EASA/NAA explanation on AMP;
  - Some difficult tasks (i.e. NDT with Eddy Current qualification);
  - Long "downtime" of the aircraft.

NAAs Questionnaire

- In respect of the ninth question related to different classes of aircraft or operations, most of the NAAs mentioned the assessment of the aircraft use (i.e. training schools, aerial work, commercial operations, etc.), of the weather environmental (i.e. high corrosive conditions, etc.) and other relevant "national" factors for deciding on the applicability of ICA.

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Thank You

Questions?

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