The issue of Cessna Mandatory SIDs for the 100 and 200 series - from the perspective of the aircraft operators and an association manager

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How to identify the SID´s impact in Europe

A chronological overview of the last 575 days

August 2012

IAOPA Europe is made aware of the issue.

Colleagues from AOPA-USA declare this is not a major issue in the USA. Although declared as mandatory, operators have the option and cost for the SIDs are low.

FAA is happy, Cessna is happy, Owners are happy, AOPA is happy

16. AUG 2012, First Response from EASA after a phone call on the same day

Our below response addresses the case of non-large aircraft not used in commercial air transport.

We can confirm that the Cessna Supplemental Inspection Documents (SIDs) for 100/200 series are not included in the airworthiness limitations sections of the Cessna instructions for continuing airworthiness (ICA), and at this point they are also not covered by an AD. Hence, **the Cessna SIDs for 100/200 series qualify as non-mandatory inspections in terms of ICA, even if they are designated "mandatory"** in the revisions to the Cessna maintenance documentation. The position of the Agency is that compliance with SID for Cessna series aircraft **should generally be recommended** to aircraft owners/operators in line with the principles set out in M.A.302 and the related AMCs (cf. in particular Appendix I to AMC M.A.302 and AMC M.B.301(b) "Content of the Maintenance Programme", item 1.1.13a). **If the owner/operator then decides not to include the optional modification/ inspections in the maintenance programme, he/she takes full responsibility for this decision.**

- **17 AUG 2012, AOPA informs LBA and goes public**

- AOPA-Germany **informs the German CAA/LBA about the EASA information** received the day before
- EASA-information **is posted on AOPA-Germany´s Website**

- **SEP 2012, LBA replies**

- LBA informs us that the **decision** for executing the full SIDs **could not rest solely with the operator** as also the maintenance shops and the national authorities would be liable in case of an accident.
- Some LBA employees declare towards operators the **"AOPA-information about the SIDs as irrelevant",** ignoring EASA as the source.

- **8 NOV 2012, AOPA asks EASA:**

The German LBA has now taken the position that these SIDs are mandatory and that the operators must not have a right to chose. **Can the LBA really just require the SIDs**, or isn´t the LBA obliged to give the private owners a choice?

- **9 NOV 2012, EASA replies to AOPA:**

"Thank you for your e-mail and subsequent phone call. As I told you, **I can only confirm what we wrote to you in August**. This is how we understand the regulation. I have copied our colleagues from standardisation who are best equipped to take any follow up action they may deem necessary on this topic."

- **7 DEC 2012, AOPA informs EASA:**

"Yesterday I had a telephone conversation with Head of Division T - Airworthiness/Environmental Protection of the German LBA. He regretted, but insisted that the **LBA - because of obligations of the German Administration Law - had no other choice but not to give the private aircraft operators the freedom of choice EASA intends to give to them.**

So I assume this is indeed an "opportunity" for a direct contact between EASA and LBA."

- **Spring 2013: EASA and IAOPA agree on a meeting to be held soon**

- **17 July 2013: LBA Field Office in Hamburg**

- Declares the SIDs as binding for all operators

- **30 AUG 2013 UK CAA publishes Information Notice IN 2013-138**

- Good news in the UK: The CAA recommends the SIDs, but the operators can decide, the SIDs are not required

- **7 NOV 2013, EASA and IAOPA meet in Cologne**

- Detailed exchange of information face to face under leadership of EASA Rulemaking Director Jules Kneepkens , EASA announces that an SIB resolving the issue will go online soon

- **9 DEC 2013, DAeC, BBAL and AOPA meet LBA**

- LBA discusses its point of view with the industry, why it won´t give operators the option to decide

- **11 DEC 2013, EASA, EAS, ECOGAS and AOPA meet in Cologne**

- All parties explain their points of view

- **7 JAN 2014, EASA publishes SIB 2014-01**

- EASA declares the SIDs as not required, but NAAs or CAMOs will finally evaluate the operators substantiated decisions not to perform the SID. We fear that NAAs will interprete this SIB in different and finally arbitrary ways.

Conclusion

- A simple question is not clearly answered in many member states. The EASA system can´t provide this even 575 days after our first request for clarification of the issue.
- The EASA system is far away from the safe, efficient and customer-friendly FAA benchmark, where this issue is resolved to the satisfaction of all involved parties..
- EASA and NAAs are not as interacting as they should as partners, phones are deliberately not used, there is no harmonised level of regulation, NAAs can and do intepreté EASA rules in a different way
- Some maintenance shops abuse the information-vacuum and offer flat-rates in a desingenuous manner starting with 9980,-€ without fixing any findings
- If the SIDs were finally interpreted this way about one third of German GA aircraft have to be considered as potential write-offs
- GA operators did not receive any official publications from EASA for more than one year. We don´t see that EASA is proactively managing the problem.
- GA flight-schools and maintenance shops are required to have Accountable Managers following EASA rules, but NAAs obviously are out of control of EASA Standardisation. JAA was a loose debating club, but what is EASA?
- Many German Cessna operators currently consider a flagging out into the UK- or USA-register
- Will we go home any smarter today?

European Aviation Safety Agency

Jules Kneepkens • Rulemaking Director

EINGEGANGEN
5 Feb. 2014
AOPA GERMANY

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Subject: **Cessna SIDs**
Reference: Your letter dated 25 November 2013 (EASA ref. 13/A/0762)

Dear Dr Erb, Michael

Thank you for your letter dated 25 November 2013 related to the Cessna SIDs, where you request that the Agency stresses the non-mandatory nature of the SIDs both in the corresponding Safety Information Bulletin (SIB) and in the future proposed workshop.

Regarding the SIB, this has already been done. On 7 January 2014 the Agency issued SIB 2014-01 , which clearly states that, although the Agency is still evaluating whether any mandatory action on some of the content of the Cessna SIDs may be necessary in the future, currently their content is only considered as a mean of ensuring that the Aircraft Maintenance Programme (AMP) ensures the airworthiness of the aircraft. Furthermore, the SIB states that it is possible not to include in the AMP the applicable SIDs if properly substantiated to the satisfaction of the competent authority responsible for the approval of the AMP.

This will be further communicated during the workshop that the Agency is going to organise in the coming month of March.

Yours sincerely,

Information Notice

Civil Aviation Authority

INFORMATION NOTICE

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The Cessna Aircraft Company Supplemental Inspection Documents (SIDs) – 100/200 Series Aircraft

This Information Notice contains information that is for guidance and/or awareness.

Recipients are asked to ensure that this Information Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	
Air Traffic:	
Airspace:	
Airworthiness:	All Aircraft Owners/Operators All Maintenance Organisations, Continuing Airworthiness Management Organisations and Approved Airworthiness Review Persons.
Flight Operations:	Approved Training Organisations Registered Training Facilities
Licensed/Unlicensed Personnel:	All Licensed Engineers

1. Introduction

1.1 A number of enquiries have been received regarding the applicability of Supplemental Inspection Documents (SIDs) published by Cessna. This Information Notice has been produced to advise aircraft owners/operators of their options regarding the inclusion of SIDs into an aircraft's maintenance programme. It is applicable irrespective of whether an aircraft Owner/Operator has decided to use a programme based on the aircraft manufacturers recommendations, or the CAA generic Light Aircraft Maintenance Programme, CAP 766 (LAMP).

2. Scope

2.2 Cessna have published SIDs for its 100/200 series aircraft. They are not included in the airworthiness limitations sections of the Cessna Instructions for Continuing Airworthiness (ICA), and are not subject to any Airworthiness Directives. Therefore, Cessna SIDs for 100/200 series are not mandatory inspections from a regulatory point of view, even though they may be designated "mandatory" by Cessna.