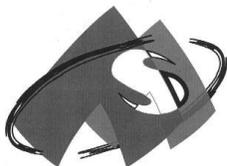


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AUSTRALIAN SPORT AVIATION CONFEDERATION



ASAC RESPONSE TO NPRM 1101CS – Proposed Performance Standards for Aircraft Pressure Altimetry and Maintenance Requirements for Certain Aircraft

21/10/2011

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Submitted via e-mail to: nprm1101cs@casa.gov.au

Response submitted by the Australian Sport Aviation Confederation (ASAC) – the Confederation of Air Sport Organisations – including the AAC, (Australian Aerobatic Club), ABF (Ballooning), APF (Parachuting), GFA (Gliding), and the HGFA (Hang Gliding). (Contact details below.)

This submission represents the combined views of the ASAC Air Sport Organisations.

ASAC consents to having its name published as a respondent to the NPRM

ASAC is not satisfied with CASA's consultation on this issue. The NPRM bundles up a number of issues which do not seem related to the basic proposal for single standard for altimetry. Further, while ASAC understands the logic behind this basic proposal – these changes go way beyond a simple rationalisation of testing standards for altimetry. There appears to have been no consultation regarding the effect on VFR operations, no attempt to outline the safety improvements expected, and no attempt at a risk management justification for these additional costs.

ASAC is aware of and supports the views expressed by AOPA.

Response prepared by Dr. R. J. (Bob) Hall, Chair of the Technical Committee, ASAC.

1. GENERAL COMMENTS

ASAC would like to make two points of principle regarding these proposals. Beyond that, ASAC would wish to support in detail the well-justified, detailed response made by AOPA, particularly as these apply to GA aircraft operated by any of our member organisations. ASAC has nothing of significance to add to this AOPA response and would accordingly like to make clear that this response is supported by ASAC in its totality.

1.1 Application to Sport Aircraft

- * ASAC expects that CASA will take appropriate action to ensure that Sport Aircraft, especially those which are not expected, or are unable, to maintain an altitude, and/or which are covered by alternate airworthiness requirements run under a self-administering organisation, are not involved in these requirements.
- * ASAC makes the point that it is obvious that there can be no basis for testing altimeters to the IFR standard, or in asking for routine testing of altimeters in aircraft unable, and not required, to hold an altitude. However, having made this point ASAC also understands that there is in fact no intention on the part of CASA to impose such changes – as indicated by the published addendum.

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- * Further, ASAC insists, as a general principle, that aircraft maintained under a self-administering organisation should not be subject to two airworthiness regimes. CASA has the power under the proposed Part 149 to approve manuals and, under such circumstances, and where it can be justified on a risk management basis, to require these organisations to include in these manuals, appropriate standards and procedures to achieve equivalent safety outcomes and/or, where justified, even harmonised outcomes. But CASA must not impose requirements which place these aircraft in double jeopardy, as it were, subject to two different and, at times, incompatible airworthiness systems.
- * These applicability outcomes must now, and in the future, under the CASRs (when completed), be clear and unequivocal.

1.2 Application to GA VFR Operations

- * ASAC understands and accepts the logic behind a single standard for altimeter testing. ASAC also supports the proposal that the standard used in Australia be the same as that in the US under the FAA.
- * However, as the AOPA response demonstrates so well, ASAC strongly believes that, should CASA opt for the FAA standard for all affected aircraft, then CASA, in implementing these FAA standards must not adopt procedures which are more onerous than those proved adequate over many years in the US at much higher traffic densities than in Australia.
- * It is clear to ASAC that before CASA can impose a more onerous implementation regime on VFR flight in Australia than is imposed on VFR operations in the US by the FAA, CASA must provide a risk management justification for these additional requirements.
- * ASAC points out that this risk management justification has not been published and, in fact, believes that this proposal cannot be so justified. Accordingly, ASAC believes that CASA must adopt the FAA implementation procedures as well as the FAA standard – ie specifically no routine testing for VFR aircraft – particularly those operating outside surveillance, ie in Classes E and G.

Formal Response

ASAC supports the formal response by AOPA.

CONCLUSION

ASAC would like to make a number of points of principle.

Application to Sport and Recreational Aircraft

- * ASAC expects that CASA will take appropriate action to ensure that Sport Aircraft, especially those which are not expected, or are unable, to maintain an altitude, and/or which are covered by alternate airworthiness requirements run under a self-administering organisation, are not involved in these requirements.
- * Further, ASAC insists, as a general principle, that aircraft maintained under a self-administering organisation should not be subject to two airworthiness regimes. CASA has the power under the proposed Part 149 to approve manuals and, under such circumstances, and where it can be justified on a risk management basis, to require these organisations to include in these manuals, appropriate standards and procedures to achieve equivalent safety outcomes and/or, where justified, even harmonised outcomes. But CASA must not impose requirements which place these aircraft in double jeopardy, as it were, subject to two different and, at times, incompatible airworthiness systems.
- * These applicability outcomes must now, and in the future, under the CASRs (when completed), be clear and unequivocal.

Application to GA and VFR in particular

The proposal is unacceptable without the following changes.

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- * ASAC supports the proposal to adopt the single FAA standard for altimetry testing.
- * But ASAC insists that, without a risk management justification, CASA may not impose more onerous procedures for implementing these standards than are imposed in the US by the FAA – specifically, that routine testing be not required for VFR operations.
- * ASAC believes that these more onerous requirements cannot be so justified.

Accordingly, this proposal is not acceptable to ASAC and CASA should simply adopt the FAA requirements in toto – both standards and implementation requirements..

Bob Hall

Chair of the Technical Committee, ASAC