6 January 2015

European Aviation Safety Agency (EASA)
Ottoplatz, 1
D-50679 Cologne, Germany

Subject: GAMA Comments to EASA NPA 2014-24, CS-STAN

The proposed CS-STAN appears to directly address the immediate safety and sustainability needs of the existing general aviation (GA) fleet in Europe. The proposed NPA 2014-24 will dramatically improve the maintenance and modification environment for the lighter end of the European GA fleet in a very significant manner. GAMA believes this proposal addresses a number of critical recommendations of the GA Roadmap and will be widely embraced by the general aviation community.

EASA has done a good job of assuring that the program includes future flexibility by placing the changes and repairs standards in appendices. Over time it will be critical for EASA to continue to update these appendices as new methods and technology become accepted and beneficial. GAMA believes this approach allows for the European maintenance providers to focus more time and resources on aeroplanes and less time on paperwork and non-safety added process. CS-STAN represents a process that is superior to the current system for the maintenance and modification of light GA aircraft in Europe today and in fact, the proposal is ground-breaking on a global level. EASA is leading the world's aviation regulators in creating sensible and beneficial aviation policy in the area of maintenance and modification with this proposal.

To assure that the proposal realises the full benefit for the light GA fleet in Europe, GAMA recommends that EASA assures that section 3.2.2 be slightly modified to allow for items that meet ETSO or equivalent. Currently, EASA has a bilateral agreement with Canada and Brazil which includes recognition of these articles however these articles may not include an ETSO-A. For the policy to be fully effective, these articles should be able to be easily incorporated into the CS-STAN program without further paperwork and approval. Further, there are articles which contain FAA TSO which should be considered for applicability into the program as well. As EASA works in a more global manner with global NAAs, GAMA believes it will be important to include language that allows for the acceptance of these articles which clearly meet the technological needs of the program but which may not carry the ETSO-A.

GAMA believes that EASA should review the applicability of the current and future standards in the change and repair appendices to rotorcraft. Just as in the fixed wing community, the light European rotorcraft community can see tremendous benefit from many of the proposed modification and maintenance permissions included.

For the safety and vitality of the European rotorcraft community, EASA should work with this segment of aviation to assure they can see the same benefits as aeroplanes will.

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For additional thoughts or comments, please contact us at the GAMA Brussels office (gbowles@gama.aero).

Respectfully,

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GAMA represents over 80 of the world's leading manufacturers, general aviation aeroplanes and rotorcraft, engines, avionics, components, and related services. In addition to building nearly all of the general aviation aeroplanes flying worldwide today, GAMA member companies also operate fleets of aircraft, fixed-based operations, pilot / technician training centres, and maintenance facilities worldwide.