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To European Aviation Security Agency
EASA

NOTICE OF PROPOSED AMENDMENTS

No 2011 – 15

Comments presented by

AOPA Sweden

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The purpose of this NPA is to harmonize the European authorities in the implementation of M.A. 302 and the TBO but also to simplify the maintenance for the users, i.e. airplaneowners, mechanics, CAMO and others. This is of course a positive thing and to perhaps make it even more simple to follow the maintenance rules, AOPA – Sweden has the following proposal and comments.

It is important that there is made a difference between maintenance on details for safety and other details not directly linked to the safety, e.g. seats, floorcarpets and similar. There are several and extensive rules about maintenance for safetyreasons, part M, part 66, part F, part 145, CAMO and others, which are not commented here. The other components mentioned in the manuals who are recommended to be overhauled with specified timelimits, should be regarded as recommendations and

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not as mandatory overhaul by authorities. Considering this, there should not be any rules or AMC at all from EASA stating that recommended TBO must be observed. Hence, the proposed rules in AMC # 2 M.A. 302 (d) item 2 g, h, j are not then necessary since the reader might conclude that they have to follow the established timelimits and that they can only extend the TBO for a certain period of time. More comments below on the proposed rule.

Maintenance recommended by the manufacturer have been continuously performed over the years by mechanics. Whenever there is an obvious fault or remark it has been mended or when there has been a certain period of time elapsed, i.e. 50, 100 and 200 hour inspection. So there is already an existing, well established maintenance program where all parts of the plane are checked, either because they have to be, or because they need to be checked and repaired. Thus, there is not any need for more rules in that matter.

Comments on the text in the NPA

An obvious fault of the proposal, is the amount of text. Long sentences, subordinate clauses, references to various laws and the use of abbreviations, makes the text very difficult to read, understand, interpret and follow. As a matter of fact, this applies to all text and rules written by EASA. There are often discussions between airmen what the rule is on a specific topic. Giving examples in the text of parts that are more important than others to examine is positive in the sense that extra attention is made to those parts. However, that might exclude other parts that have to be examined at a specific time of inspection. As mentioned above, all these measures are considered at the usual overhaul at 50, 100 and 200 hours inspection. Many smaller defects are also found during daily overhaul.



Suggestion

What we have is a rule that seems to be difficult to interpret and to remedy that, EASA intends to establish a directive how to follow and implement the rule. Instead, AOPA – Sweden propose that EASA change the rule M.A. 302 and make it shorter and apparent. Particularly since the proposed directive is also ambiguous. The changes below are underlined.

M.A. 302 d (ii) should be read: when applicable, instructions for, continuing airworthiness issued by the holders of the type certificate.....

At the end in AMC M.A. 302 d 1, following should be added: “Recommended maintenance in the maintenance manual should never be regarded as mandatory in the maintenance program. TBO should continue on the same basis as before in connection with the 50, 100 and 200 hourly overhaul.”

Stockholm 11-11-28

AOPA - Sweden

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