



COURTESY TRANSLATION

**Madame Florence Leblond
Chef du service Agréments
et maintien de la navigabilité
DGAC
50, rue Henri Farman**

75720 Paris cedex 15

Paris, 18th October 2012

Dear Madam,

Following the general assembly of the GIPAG France, last autumn on the 5th of October, the working group of the "maintenance" session has commented the preliminary elements of the "Task Force" by EASA about simplification of the maintenance requirement for General Aviation (GA). Therefore, I am pleased to share with you the outcome of our remarks and thoughts, and to ask you to "bring them up" inside the EASA group whose you belong to.

FOREWORD

Any services giving rise to a financial contribution is considered by the GIPAG France as a commercial transaction.

NPA's propositions

1. & 2. The GIPAG France will not take legal responsibility to apply an owner maintenance program which would be "non-approved" by the authority.

3. The GIPAG France considers that the only and unique reference which has to be taken into consideration for the maintenance of an aircraft is the "manufacturer's program".

4. The GIPAG France agrees to the application of a lighter format of this program (cancelling of the 6 sections).

5. Unanimous agreement of the GIPAG France to combine the annual visit with the ARC but only within an approved maintenance organisation. The GIPAG France asks the possibility for operators to switch from an approved maintenance organisation to another without loss of this privilege. It should be added to this disposition the advantage of a "CofA" with an unlimited validity for these aircraft.

6. The GIPAG France asks confirmation that the "suitability of the facility" do be placed under the only responsibility of the organization.

7. Agreement of the GIPAG France on this procedure.

Phase II: Proposals

1. What is the benefit of introducing in a non-approved section of the MP, the tasks of the private pilot?

2. & 3. Agreement of the GIPAG France

4. In order to avoid (as currently recorded) implementation distortions between the different Member States, the GIPAG France suggests that EASA transforms into AD all Mandatory SB issued by the manufacturer of a Third-Country.

This would prevent from different interpretations by the various Member States and thus, the "recommended" SB would remain "recommended".

5. This item is to be investigated.

6. Agreement of the GIPAG France.

7. **Firm refusal** of the GIPAG France to grant to the independent mechanics the same privileges as those granted to the approved maintenance organisation as these approved frameworks are the sole to be audited and to pay fees.

8. The GIPAG France asks more explanations for this last item.

To conclude

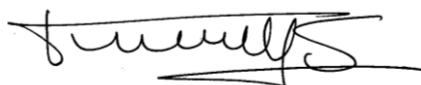
The GIPAG France is requesting that the privileges granted to the approved maintenance organisation do be much higher than those given to the independent mechanics.

The GIPAG France suggests:

- The advantage of a CofA with an unlimited validity for the aircraft they maintain,
- The ability to switch from an approved framework to another without loss of privileges,
- The integration of the G + I approval within the Part F or Part 145 agreement (only one approval),
- The limitation of the number of audit,
- The implementation of a direct control of the independent mechanics.

Yours faithfully,

Françoise



Françoise HORIOT
Présidente