

Dear Mr Ky,

We are writing you out of despair. Hopefully you are willing to spend a moment of your precious time to review our problem and help solving it as really it is a shared problem.

What is the matter? Some background. We are some 3500 recreational glider pilots, members of some 35 aeroclubs, associated under the Royal Dutch Aeroclub KNVVL. With a team of volunteers we operate one PART MG CAMO (since the introduction of EASA / European regulations for continuing airworthiness). This CAMO is a so called "uncontrolled" environment issuing ARC's for some 550 non complex gliders and powered gliders (sailplanes) owned by our members and associated aero clubs (not commercial). This MG CAMO works fine, and also the supervising Competent Authorities in The Netherlands are happy with our organization, the quality of the work and the safety level achieved. The fact that we run an uncontrolled environment means that the owner is responsible for the continuing airworthiness and aircraft technical logs. The owner needs to keep the records anyway to maintain the aircraft in airworthy condition and to hand the documents over to the new owner at the time of sale. Over the last decade we have thus been able to run a simple, high quality and cost effective and fit for purpose organization without the burden of unnecessary airworthiness management contracts with the owner, unnecessary double record keeping. Our Airworthiness Review staff operate from within the aeroclubs in which they are also members. They participate in the airworthiness work and assist owners. They have a good oversight of the aircraft in the club and perform every year a physical inspection of the glider prior to issuing an ARC. We feel this annual physical inspection provides much more safety, than a so called controlled environment, where a glider is only seen by Airworthiness Review Staff once every three years and ARC's are just meaningless pieces of paper with an expensive stamp. So far the background.

What drives us to despair (and probably also similar organisations in other European countries)? Well that is the recent PART CAO. We are facing a dramatic investment in time, resources and money. We have to rewrite manuals (CAE), procedures, train staff. In the end if we are lucky, we can issue FORM 15 C instead of 15b. So an erratic amount of work has to be invested to be allowed to do what we have been doing for the past 10 years. We wasted already at 200 hours (or some 20000 euro's) and we are far from ready yet.

We can accept a CAO certificate for airworthiness review to issue ARC's only. So similar to our MG CAMO, an uncontrolled environment, without the obligation to implement either continuing airworthiness management or maintenance privileges. However the competent authority forces us to incorporate also airworthiness management processes and documents (airworthiness management contracts, storage of aircraft data, lists with aircraft managed, etc.). This is totally stupid. Why implement an organization function that is unnecessary? As you know, for recreational flying the owner may perform the airworthiness management, the owner does **not** need to contract a CAO, CAMO, 145 etc. and may also design and approve his own Aircraft Maintenance Program.

The PART CAO causes a lot of work and cost and does not improve anything and does not make anything simpler (also the Competent Authority is facing this problem) The CAO is sold to general aviation as more proportional, lighter and according to the sectors wishes if we are looking at EASA promotional text. It certainly is **not** what we asked for and not lighter and not more proportional (we were not asked and not involved anyhow in the design of PART CAO, PART ML, Part 66L). PART CAO is a total waste of scarce resources for us and probably many others including competent authorities.

We hope you understand our problem. Also we hope that you agree that we should NOT implement organisations or capabilities in organisations that are of no added value and provide no improvement to what we have in place (MG CAMO, uncontrolled). Think of the LEAN method, ADD value, NOT COST. The CAO is only added cost (not added value or added safety).

Where can you (EASA) help:

1. Stop the obligation to convert to Part CAO immediately. Offer existing organisations the choice to:
 - i) Keep their MG CAMO in place and keep the MG regulations in place for years to come
 - ii) OR adopt PART CAO with an additional AMC or GM that stipulates that a CAO serving only recreational glider flying (non complex, non commercial) can obtain a CAO certificate to issue ARC's without the obligation to implement either maintenance and/or continuing airworthiness privileges (CAO.A.095 Privileges of the organization).
 - iii) Or if an organisation sees a benefit to convert to CAO or already has converted than give these organisations a free choice to follow PART CAO.
 - iv) NOTE: new organisations of course can be asked to follow PART CAO.
2. ALTERNATIVE:

IF the conversion to CAO cannot be stopped (and/ or Part CAO cannot be adopted ref. 1-ii) because the EU rather continues on the wrong road into the fog than make a timely and sensible turn around, then please provide (through AMC, GM or whatever instruction) an option that all Airworthiness Review Staff of an existing MG CAMO for gliders (and ELA-1) can apply for a right to issue ARC's to their AML License (PART 66 L1, L2). Where this application will be granted free of charge on the basis of grandfather rights. And further that this Airworthiness review/ ARC right is valid as long as the AML license is valid and the holder has at least performed one ARC review per year (so no costly renewals every 5 years). Ref. ML.A.901 (b)(4).

We (and probably quite a number of other organisations in other countries) hope you will help us. Feel free to contact us. We are willing to help to get effective and "first time right regulations". Either as a national organization or via our collective European Gliding Union. Thanks for your time and follow up.

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P.S. Over the last years I have noticed that regulations are constantly reworked changed etc. Every single paragraph that is changed in Köln causes work in all 27 countries and has effect on all people involved in aviation. The continued stream of changes does not make aviation safer. What perhaps missis is a "First time right philosophy". Also the philosophy of LEAN could be of help (avoid added cost, focus on added value or safety).

Further the ever continuing stream of (changes to) regulations and rules means probably that these rules and regulation have not been properly tuned with the sector and have not been tested. In our case: do not treat gliding activities in a similar way as other aviation activities (already balloon flying is quite different). And talk with us to discuss the need for regulations that do work and test new regulations and changes before you put them into effect. For instance Volkswagen or Toyota do not

put a prototype or concept car in production. Prior, they do severe testing. Legislation should also be tested prior to putting it into effect.

A similar drama as with PART CAO is also developing around PART 66 L 1, L2 regulations. In all 27 member states people are trying to figure out how to get a question database for examinations. Study material is missing. Knowledge and examination modules are derived from larger and more complex aviation and are not representing the competences required to inspect and repair gliders. It will be impossible to get a license to work on just powered gliders. There is a ridiculous current requirement. Part 66 L is not proportional and much more complex and strict than original national regulations in place (isn't that in contradiction with the basic regulation?)