

DOUGLAS AIRCRAFT SALES PTY LTD ABN 57008 272 535

PO BOX 850 ASHMORE CITY GOLD COAST QLD 4214

PH: 07 5563 2600

EMAIL: aircraft@onthenet.com.au WEB: www.douglasaircraftsales.com/



31st June 2014

The Aviation Safety Regulation Review Panel

Richard Farmer
General manager Review Panel

Dear Sirs

In response to the request for submissions I would like to add my latent comment re the recent mandate by CASA of the Cessna Supplementary Inspection Document (SID) to cover all the piston and turbine powered Cessna aircraft irrespective of operational category of each aircraft

Whilst I do not disagree with taking action to ensure the ongoing safety of our ageing aircraft fleet I believe it can be done in a far more cost effective manner for the aircraft owner.

Firstly I would like to point out that the U.S regulator, the FAA, have not mandated compliance with the SID document unless the aircraft is operated commercially. It does not include aircraft which are operated privately, for business or pleasure, or used for flying training in the aerial work category.

It should be borne in mind that there are far more Cessna aircraft operating in just a few states the U.S. than are currently flying in all of Australia. These aircraft are subjected to operation in generally far more severe weather conditions and a good percentage are stored in areas which require extra care in terms of the preservation of the aircraft and its components.

I understand all aircraft have to be maintained to some sort of schedule and it is difficult for a regulator to cover all the corners and maintain a standard of ongoing safe operation. However under the new requirement in quite a number of cases the cost of compliance can exceed the value of the aircraft and therefore deny the owner his or her democratic right to fly, even though the aircraft is in good general condition.

I recently valued a 1974 model Cessna which had been hangared on a rural property since new by its one owner who had recently passed away. It was in good condition, had no damage history and had a lower than average total airframe time. It was difficult to explain to the family half way through that the value had lessened considerably from my original estimate because of the mandate of the Cessna SID. You may argue that the cost is recoverable in the sale price. My 30 plus years in aircraft sales says I very much doubt it.

I believe CASA should withdraw the requirement forthwith pending a properly conducted investigation into a cost effective program that will achieve the same result without severely reducing or destroying the values of older Cessna aircraft.

Regards


R.A.Douglas