

The Chairman, Mr. David Forsyth,
Mr Don Spruston and Mr Roger Whitefield
The Review Panel
Aviation Safety Regulation Review

Dear Sirs:

I am attaching together with this submission correspondence in relation to several attempts to have my LAME License [REDACTED] re-instated in a capacity where I can sign out maintenance, at the very least, for my own aircraft and the engine of the Motor Glider of the Gliding club of which I am a member, which also requires membership in the GFA. My L.A.M.E. License was not renewed in 1996 and I passed the Air Legislation exam in 2006 but I have been unable to have my license renewed. I have the following questions for your consideration.

Are the issues of safety better served by keeping experienced, qualified maintenance personnel, who are no longer directly employed in the aviation industry, out and from being signatories for aircraft maintenance?

I am a Glider pilot from 1961, Gliding instructor from 1964, Glider Inspector from [...], Private Pilot Australia from 1968, LAME from 1970, Private Pilot USA from 1975, A & P USA from 1976 and owner of two registered aircraft: VH-IGD Cessna 172, 1978 N model (long strut) from 1989 and VH-RIR Cessna 172, 1962 C model from 2011.

Under the existing Part 66 requirements for recent experience in the industry I am unable to have my LAME License reinstated without having six months experience in the industry in the last two years as well as having to pass an Air Legislation exam in the same period and thereafter to have six months certified experience in the industry every two years.

I take it that Part 66 applies to all Australian L.A.M.E.s irrespective of what type of aircraft they are licensed for. This being the case Part 66 L.A.M.E. A, B1, B2, and C rated maintenance engineers only need to work 25% of the time employed in the industry in order to keep their licenses current. What do they do in the remaining 75% of the time; free lance? This appears to be a minimal recent experience requirement especially for C rated L.A.M.Es Licensed on B747s and A380s. The point is this that Part 66 appears to be written for the heavies and those that work on them.

What about the GA light aircraft industry, GFA and the likes of me with more than adequate total aviation experience and wanting to be able to sign for the airworthiness of my own Private aircraft (C172s) and the engine of the Motor Glider for the Gliding Club; not Public A380s and 747s?

Has safety been enhanced in the area of maintenance by this requirement?

Do experienced maintenance engineers forget how to maintain an aircraft that they need six months experience in the industry every two years?

Are aircraft changing in design so rapidly and in such numbers and air legislation changing so significantly that justifies an experienced previously licensed person to have six months experience in the Aviation Industry and have passed an Air Legislation Exam within two years in order for the License Holder to be able to renew that license and then having to meet this requirement in perpetuity?

Have the “has beens “ nothing to continue to contribute to safety in the Aviation Industry in Australia; the very industry that trained them and to which they gave their lives in service? If they do then there needs to be a more realistic set of requirements for them to meet.

Who enabled the industry to come to its present point?

Does new legislation to bring Australia in line with the rest of the world, e.g. EASA, warrant throwing the baby out with the bath water in the name of progress? Have our controlling bodies e.g. CASA, EASA, FAA, ICAO, become so clinical and heartless that they forget how they got there?

Is Australia now so locked in to Globalization that it can no longer come up with an original idea when up until the 27th of June 2011 we were going it alone when CAR 31 became Part 66?

People presently employed fulltime in the industry are also required to meet the requirements of Part 66; e.g. Aircraft Surveyors, Maintenance School Instructors, Pilot Engineers, L.A.M.E.s not directly employed in the Aviation Industry The very qualifications that got them their jobs are now no longer valid. Working in the industry are they required to pass an Air Legislation exam every two years? How is it being current ensured among CASA staff? If they, by the nature of their work, are considered to be kept up to date, then why do they have to sit for an Air Legislation exam and have six months experience in the aircraft maintenance industry, the very industry they oversee and control, if they wished to return to the industry that qualified them for their present job in the first place?

What is there to show for it? Has safety been increased or the Publics perception of safety improved? Is the monkey getting off the back of the controlling bodies e.g. the European Aviation Safety Agency, CASA, FAA etc. as a result of Part 66 and its equivalents?

Does a regularly flying Private Pilot's or other Pilot's flying experience in the Australian Aviation Industry, who are also experienced qualified maintenance engineers, count for naught in meeting recent experience requirement considerations?

How likely is a maintenance organization to employ a previously licensed engineer for six months, over a period of two years, so that engineer, after passing the required Air Legislation exam, can free lance or work part time for all

and sundry, including the opposition, signing for work that might otherwise come the employing organizations way? If it should happen the renewed license holder has to then accumulate a further six months of certified experience in the aviation industry in the next twenty-four months in order to continue to hold his license or the whole process has to be repeated.

Take a hypothetical situation of a pilot engineer whose L.A.M.E. license is renewed under new, yet to be created legislation in a Private or limited capacity, to enable him to work on and certify for his own Private Category aircraft and Glider engines of the club that he is a member of. This would have minimal impact of taking work from the GA Aviation Industry. The need to point this out suggests that one is up against the impact, though not necessarily intentional, of protectionism, discrimination, legalism, preventing competition and authoritarianism under the banner of safety, which can be argued is supported by Part 66 license renewal requirements. Should this be the case it would not be difficult to see that being qualified to sign off on one's own aircraft and one's own maintenance would get little further consideration or support.

In conclusion gentlemen, previously qualified L.A.M.E.s, who are also current Private Pilots or Commercial Pilots, who own their own aircraft and are qualified to maintain them, may not be particularly numerous to warrant a lot of your further attention. I have given to the industry over my lifetime and am still active in it and want to give further. Am I and I presume others to be content at being forced to be put to pasture with no further contribution to be made to safety in the Aviation Industry in Australia? Are we an untapped resource ready to be of further service in General Aviation and Gliding and other clubs but prevented from doing so by the unrealistic requirements of Part 66.

I am heartened by this review and congratulate all who played a part in bringing it about. I trust that as part of your review you will reiterate or recommend the need for such future reviews which, as far as I am aware, is the closest thing that the Industry has, outside of the very expensive Court process, to being able to appeal. Yours is an enormous task and may your recommendations fall on fertile soil.

Yours Sincerely
Terrence (Terry) Schmidt

CASA
Mr Peter Goodwin
Team Leader,
Certificate Management,
Team 3

Dear Peter,

I apologize for the delay in not getting this letter to you sooner following our telephone conversation. I will pick up where I left off when I first began this letter that was required for you to take further my request for the re-instatement of my L.A.M.E. license [REDACTED]

I own two Cessna 172 aircraft; VH-IGD a C172N and VH-RIR a C172C. VH-RIR is airworthy and I fly it regularly and VH-IGD is in state of repair. I purchased VH-IGD in 1989 from the Port Pirie Flying Group as a damaged aircraft. In 1996 my maintenance license was cancelled stipulating that I had to sit for an Air Legislation Exam. I have done this only to be subsequently informed that I needed six months experience in the aviation industry.

In August 2009 I agreed with [REDACTED], the previous owner of VH-RIR, to purchase his aircraft subject to a current Maintenance Release.

Upon inspection I found three pockets of corrosion on the spars of the right wing; two being exfoliation in the extrusion of the upper spar beam of the front spar and one at the lap joint at the outboard end of the flap well on the rear spar. I was employed by South Coast Aviation to carry out the necessary repairs during which time I was drug tested to meet CASA requirements to work in the industry under the supervision of my employer.

VH-RIR was returned to an airworthy condition in July 2011. From late 2009 to the cessation of South Coast Aviation in late 2011 I remained under their employment for the purposes of the repairs to VH-RIR.

I have owned and regularly flown VH-RIR since July 2011 on an average of 2.4 hours per month i.e. 64 hours in 27 months

VH-RIR is based at our own airstrip at Bowhill. It is presently tied down at the southern end of the airstrip. I am in the process of fabricating and building a hangar; Development No. 711/124/10.

I have been a renewed member of the GFA and Murray Bridge Gliding Club since Nov 2008. With my Engine License re-instated I could assist in the signing out of the engine in the Grob 109 VH-FFQ. I have assisted with maintenance on this aircraft. I have previously held Glider Inspector Certificate [REDACTED] which would be renewed if my LAME License is re-instated. I hold Silver C Badge No 493 and have recently had my Annual Flight Revue check flight with the Murray Bridge Gliding Club

My PPL and ARN is [REDACTED] and my Class 2 PPL Medical is due for renewal on Aug 21 2014. I have previously sat for and passed 4 of the 5 required CPL subjects.

My American A & P License No. is [REDACTED] and my American PPL No. is [REDACTED]

I have been assisting and working under the supervision of LAME Denise Wisby of Aero Services of Parafield with the Annual Inspections on VH-RIR. The most recent of these was the 10th of Sep 2013.

I began gliding in 1961; was employed by Graham Treloar of Aero Kair in April 1964 which subsequently became Ross Aviation and Rossair. During this time I qualified for LAME License S8625 A/F GRP1 and GRP6 and ENG GRP1 and GRP3. After 11 years, April 1975 I left Rossair to be married in USA where I became qualified as an A & P Mechanic and Private Pilot after 5 months of study in my own time and at my own expense. I then worked in the Aviation Industry from Mar 1976 to Oct 1977. I returned to Australia in Dec 1977 and worked part time in the Aviation Industry doing Sailplane repairs and work on GA aircraft for Winair, Wakerie.

I trust that the above outline of my experience will enable my LAME License to be re-instated.

My contact details are as follows:

Terrence R Schmidt

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Yours Sincerely

Terry Schmidt

Subject: Request for Reissue of Expired AME Licence [SEC=UNCLASSIFIED]

Date: Thursday, 9 January 2014 12:04:32 PM Australian Central Daylight Time

From: Strauss, Ashley

To: Terrence Schmidt

CC: GOODWIN, PETER

UNCLASSIFIED

Hi Terry,

As discussed during our phone conversation on Wednesday, all maintenance licencing applications and requests are now coordinated through CASA Maintenance Personnel Licencing (MPL) section in Canberra. We have discussed your request with MPL and they have reiterated that the following points must be addressed before an expired AME licence over two years can be assessed for reissue;

1. Application for the reissue of an expired AME licence must be completed on CASA Form 1372 (a copy is attached for your reference). This process is available until the 28 June 2015 when transitional licence requirements cease;
2. Airworthiness Administration (AA) examination completed and passed within 24 months of the application date;
3. Letter detailing recent aircraft maintenance experience, totalling 6 month's work within the previous 24 months of the application; and
4. Supporting letter from the organisation where the maintenance experience was conducted.

I have also attached an article from CASA bi-monthly aviation safety magazine; Flight Safety Australia which discusses the recency requirements for a Part 66 aircraft maintenance engineer's licence. The article states that a LAME licence is only current or valid provided that the individual has exercised the privileges of their licence for 6 months within the preceding 24 months.

Concerning your request for a refund of the licence fees paid for the renewal applications in 1996 and 2006, the request must be addressed to CASA MPL section; ame.licencing@casa.gov.au

I hope this explains the process, any additional queries on licence reissue or application refunds please forward such enquiries to MPL through email on ame.licencing@casa.gov.au or alternatively they can be contacted by phone on 1300-737-032.

Regards,


Ashley Strauss

Airworthiness Inspector - Adelaide Office - Central Region

Operations Division

CIVIL AVIATION SAFETY AUTHORITY



From: Terrence Schmidt [mailto:

Sent: Wednesday, 8 January 2014 6:21 PM

To: Strauss, Ashley

Subject: Scanned PPL, LAME Licenses etc

Ashley Strauss
CASA Airworthiness
Adelaide Airport

Dear Ashley,

Please find attached scanned copies of my current PPL and LAME Licenses.

From the enclosed receipt dated 20-6-96 it, can be seen that I made application for the renewal of my LAME License before its expiry on 30-6-96. I have not received a refund of sixty dollars as a result of my license not being renewed. Does this mean that the matter is still open? I also re-applied for renewal in 2007 which also was not granted and I believe that the application was also accompanied with the necessary fee. Are the fees a cost to the applicant irrespective as to whether the License is renewed or not?

As I mentioned in our telephone conversation earlier today, I would like CASA to explore the possibility of renewing a previous license holders LAME license on a restricted, limited or provisional basis as pilots are able to hold a Restricted Pilots License. For example, I own and fly regularly a Cessna 172C VH-RIR for which I believe I am qualified to maintain because of my experience in the GA industry and the licenses that I currently hold and have held in Australia and USA.

To qualify for an Airframe and Power Plant License I was not issued a license on the basis of my Australian LAME License. My eleven years of experience at the time (1975) in the GA industry in Australia was taken to be sufficient to meet the 18 months experience required in the US aviation industry in order to hold a A license or a P license or A&P License. I was required to sit and pass the necessary exams that were 3 three hour exams requiring as much detailed knowledge as the 15 some exams that were required for my LAME Licenses in Australia. I studied for 5 months in my own time and expense. As a result I was successful in becoming dual licensed on Engines and Airframes as an A & P Mechanic in the USA, as I was as an LAME in Australia. My American PPL was issued on the basis of my Australian PPL, producing my log book and signing a form.

The point is this, I have devoted a considerable time to meeting qualification requirements apart from the actual experience and as recently as from 2009 to 20011 being employed by South Coast Aviation and being drug tested; not to mention the study involved for CPL, PPL and Air Legislation exams.

In light of the above, it is disappointing after contributing extensively to the Aircraft Maintenance Industry in Australia that this self same industry in its present form is saying that I am not qualified to be responsible for work on my own aircraft. Is there any opportunity to obtain an explanation for the necessity for the present legal requirements?

Should my file still be open from June 1996, is it possible for me to be issued with a Perpetual LAME License as is my USA A&P License?

Yours Sincerely

Terry Schmidt