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Advanced Aviation Training and Testing

Attention:- Mr Richard Farmer  
General Manager  
Aviation Safety Regulation Review  
Department of Infrastructure and Regional Development  
GPO Box 594  
CANBERRA ACT 2601

Thursday, 30 January 2014

Dear Mr. Farmer,

Some background:- I have been involved fulltime in the General Aviation field since I was 17 years of age and moved into part-time when I turned 67. I am now 71 and still an examiner and delegate of the CASA. I continue to hold a Grade 1, Multi Engine Instructor Rating Issued first in 1967 and a Command Multi-engine Instrument Rating issued since August 20, 1969.

I firmly believe we have seen the best years of the Aviation Industry where the industry was promoted and nurtured by government and the operatives within the regulator were skilled professionals taken from the military, the airlines and successful general aviation operations. Now very few of those operatives have the skills and basically would be un-employable in aviation outside of the CASA.

So what lies ahead may result in disaster particularly if this current crop of regulators are permitted to continue on their present course. They seem to think that regulation and their personal opinion alone will be the saviour of a "failing industry". It is not totally broken yet, but if these standover bullies are allowed to continue on their present course in forcing opinion or CASA policy onto established businesses in place of or in addition to regulation, then Heaven help us.

Many of the operatives have failed within their own business ventures, some are undischarged bankrupts and yet they are giving advice and making demands on operators in how to correctly run their own business?

The present new and proposed regulations are so poorly written that even the CASA are unable to interpret their meaning. Some 28 years ago, the then Department of Civil Aviation was charged with rewriting the **Regulations** into an **easy to read single document** which would be unambiguous to all involved in this industry; to remove the copious cross referencing needed by the old documents! This new stuff (for example Part 61) is anything but easy to read and comprehend.

I have been training people in all sorts of Multi-engine aircraft since 1969 without incident, and whilst I am absolutely convinced that fully functioning true to type simulators (QSTDs) are invaluable, their enforced use, without a proper safety case is untenable.

The Beechcraft Kingair 200 is probably the most popular and widely used General Aviation aircraft in Australia. The Kingair series also includes the 90, 100, 250, 300 and 350 each have similarities one with the other but also many differences particularly differences in size, engine/propeller combinations, maximum gross operating weight and operating altitude.

Because the aircraft has been operating in Australia since the early 1970s there have been many changes in the installed equipment. With the modern "Glass" Cockpit it is better to train applicants on the concept of glass from the outset, particularly where a large operator such as the RFDS operates this type of equipment exclusively. Conversely it is easier to "go back" to standard equipment than to progress up to the glass. e.g. in my own case I had over 5000 hours of experience on the Kingair when the RFDS introduced this modern equipment into their fleet and I still took some 18 hours of hands on training until I was confident to operate it on my own.

The CASA since April 2013 have made it mandatory that all type ratings in the Kingair 200 be conducted in a Type Simulator. The only one in Australia is based in Melbourne and this is anything but modern! But at the same time type ratings for the other types of Kingair and other twins may still be conducted in an aircraft. Their "safety case" for the edict was based on a totally different aircraft type and manufacturer! This "tombstone mentality" regulating never results in appropriately considered outcomes.

Further we have already seen gross abuse of statutory position by CASA officers running an on the side aircraft seat belt business for personal gain, being involved in the regulation of same. The introduction of the above referred simulator regulations confining industry to use a monopoly provider of a sole Australian King Air simulator has some remarkable similarities as the CASA seatbelt saga. The corporate world requires directors to declare and absent themselves from decisions where they have a conflict of interest or could be seen they might have a conflict of interest. CASA should be no exception.

The FAA does not micro-manage this area. It does not require any specific regulated endorsement of aircraft type below 5700kgs and its safety record is not compromised. We are massively over-regulated in Australia.

The Aviation Medicine branch (AvMed) have removed from the web a previously published set of standards required to be met by flight crew and Air Traffic Controllers. Even the Designated Aviation Medical Examiners (DAMEs) seem now to be kept in the dark by these inept folk who seem to prefer the opinion of yet other doctors and specialists in their locale, who are not DAMEs, and ignoring the advice of experienced doctors around the country as to the condition of the health of pilots and controllers.

The DAMEs have become information gatherers only. Pilots have lost their employment whilst awaiting lengthy decisions from Canberra or being asked to undergo hitherto unknown additional tests, some potentially life threatening such as Angiograms and Thallium ECG, the latter of which has ongoing potential for harm. One pilot I am aware of was required to undergo the Thallium ECG in two consecutive years despite his local Cardiologist's protests!

It would seem that the CASA is what is broken through the granting of inappropriate powers to the Flying Operations Inspectors, AvMed, the choice of people with little or no aviation experience holding positions responsible for assessing standards and compliance and their attitude of being above the law.

**Yours Truly,**

**Captain John Appleton**