



The View from Washington

BY RIC PERI
VICE PRESIDENT, AEA GOVERNMENT & INDUSTRY AFFAIRS

Repair Station Training Program

Tired of the topic? Well, this is the last of the series focusing on the FAA-approved Repair Station Training Program.

We have spent the last six months focusing our communications on the topic. We conducted three-hour RSTP training sessions at each of the United States AEA regional meetings last year. We expanded the course offerings in 2006 to include five, eight-hour RSTP seminars, which have been presented all over the country prior to the annual AEA International Convention & Trade Show in Palm Springs this month. And now we have decided to expand the offerings yet again.

During the AEA convention, there will be a four-hour training session focusing on “how” to implement the required topics of the RSTP, as well as a four-hour program for supervisors on Human Factors training — a necessary element of technician training and something the FAA will look for in its audits.

We also have decided to offer the complete eight-hour RSTP seminar the day before each of the U.S. regional meetings in 2006.

In addition, we have located a source of affordable AMT maintenance log-books for AEA member companies to log the experience of each of their technicians — a necessary step in performing a “needs assessment.”

The three-hour RSTP seminars that took place during the 2005 regional meetings were captured in a CD format and are available from AEA. But those sessions only discussed “what” was required. They do not address “how” to

effectively implement the required elements of the RSTP.

In addition, each of the past six months of RSTP articles are archived on the AEA website and are available for you as you develop and implement your RSTP. You can access the *Avionics News* archives at www.aea.net.

After nearly a year of training and communicating about the Repair Station Training Program, there are three things I have learned:

- First, the Repair Station Training Program is not a training program; it is a qualifications program. There is no training mandate. You train to qualify people.
- Second, the required qualifications of the technician haven’t changed. The regulatory requirements for an AMT to be qualified to perform a task are the same. Part 65 has not changed.
- Third, the RSTP has moved the repair station technicians from an industry of trust to a maintenance industry that requires documentation of their knowledge, skills and experience. The secret to minimizing the economic burden of the Repair Station Training Program is preparation. Simply documenting the knowledge, skills and experience of their technicians will eliminate most, if not all, start-up training requirements.

The Repair Station Training Program is not a training program; it’s a qualifications program

When the regulation was initially published, most of the trade journals touted the value of the RSTP as being long overdue and that it was about time the AMTs received “mandatory” train-

ing.

But as I have discussed many times, you must read the fine print in regulations. This rule does not mandate training. So, what does the RSTP require if not training? It requires individuals to be qualified to accomplish their assigned tasks. It only requires training if an individual isn’t qualified to do his assigned task. The RSTP does not mandate training for training’s sake; it mandates training to accomplish a need, to fill a gap in an individual’s qualifications.

Let’s look at the rule,

§ 145.163 Training Requirements:

(a) A certificated repair station must have an employee training program approved by the FAA that consists of initial and recurrent training. For purposes of meeting the requirements of this paragraph, beginning April 6, 2006—

(1) An applicant for a repair station certificate must submit a training program for approval by the FAA as required by § 145.51(a)(7).

(2) A repair station certificated before that date must submit its training program to the FAA for approval by the last day of the month in which its repair station certificate was issued.

(b) The training program must ensure each employee assigned to perform maintenance, preventive maintenance, or alterations, and inspection functions is capable of performing the assigned task.

(c) A certificated repair station must document, in a format acceptable to the FAA, the individual employee training

required under paragraph (a) of this section. These training records must be retained for a minimum of 2 years.

(d) A certificated repair station must submit revisions to its training program to its certificate holding district office in accordance with the procedures required by § 145.209(e).

Now let's look specifically at Section 145.163 (b),

§ 145.163 Training Requirements:

(b) The training program must ensure each employee assigned to perform maintenance, preventive maintenance, or alterations, and inspection functions is capable of performing the assigned task.

Now let's investigate AC 145-10, Repair Station Training Program:

The AC states: "This advisory circular (AC) provides information on developing the repair station employee training program required under Title 14 of the Code of Federal Regulations (14 CFR) part 145, section 145.163, categories of training, training program components, and sample training programs. This AC also provides an acceptable means, but not the only means, of showing compliance with 14 CFR section 145.163."

AC 145-10, Paragraph 204. PROGRAM SCOPE AND COMPLEXITY states: "a. The purpose of the repair station's initial and recurrent training program is to ensure repair station employees performing maintenance (including inspection); preventive maintenance and alteration are capable of performing assigned tasks as required by section 145.163."

AC 145-10, Paragraph 301. INDOCTRINATION (INITIAL AND RECURRENT) TRAINING states that indoctrination training is core training for all repair station personnel. And that the repair station should determine the level of indoctrination training required for each job assignment, through its training needs assessment process.

AC 145-10, Paragraph 302. TECHNICAL TRAINING. States that

the repair station should have procedures to determine the applicable scope and depth of initial and/or recurrent training based on each job assignment and each employee's experience and capability established by the needs assessment and that the needs assessment is the basis for determining an individual's initial and recurrent training requirements.

The needs assessment is a simple process comparing the "needs" of the repair station's task to the qualifications of the repair station personnel and identifies if a "gap" exists between the two. If a gap in qualifications exists, it is filled with training. If there is no gap in the analysis, no training is required.

With the administrative aspect of indoctrination training, if a new regulation, policy or procedure is introduced into the repair station, a gap exists between the employee's current knowledge and experience of regulations, policies and procedures and the actual regulations, policies and procedures, thereby creating a gap in indoctrination "qualifications" and necessitating the need for recurrent training.

With respect to the "technical" aspect of initial training, when the repair station either reassigns a person to a new task, or the repair station expands the services it offers by adding a new repair station task, an analysis is performed between the skills necessary to perform the repair station task and the qualifications of the individual. If a gap in technical qualifications exists, the employee would need initial (or recurrent) technical training applicable to his lack of qualifications.

The regulations are clear in that the Repair Station Training Program is a program that documents the skills necessary to perform the repair station's tasks and the qualifications of the repair station's personnel and the analysis comparing the two. It is only when a "gap" exists that the RSTP requires any training be provided.

The qualifications of the technician haven't changed

Section 145.163 states that "the training program must ensure each employee assigned to perform maintenance, preventive maintenance or alterations, and inspection functions is capable of performing the assigned task."

That's great, but what is "capable of performing the assigned task?"

Let's look at Part 65 for that answer:

Section 65.81 General privileges and limitations states that a certificated mechanic may perform or supervise the maintenance, preventive maintenance or alteration of an aircraft or appliance, or a part thereof, for which he is rated (but excluding major repairs to, and major alterations of, propellers, and any repair to, or alteration of, instruments), and may perform additional duties in accordance with §§ 65.85, 65.87, and 65.95.

For a certificated mechanic to be qualified to perform a maintenance task, he must demonstrate a basic level of aviation maintenance knowledge and skills as defined in Part 147 or, if qualified by experience, by demonstrating a well-rounded knowledge of the skills listed in Part 147.

However, the certificated mechanic may not supervise the maintenance, preventive maintenance or alteration of, or approve and return to service, any aircraft or appliance, or part thereof, for which he is rated unless he has satisfactorily performed the work concerned at an earlier date.

For a certificated mechanic to return to service an aircraft, appliance or part, the mechanic must have completed the task earlier under supervision, which is under OJT.

And when looking at the RSTP requirements for return to a task after an extended period, Section 65.83 addresses the recent experience requirements of the certificated mechanic by stating that a certificated mechanic may not

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Frequently Asked Questions

TOPIC:

Applicability of Advisory Circulars

QUESTION:

Can an FAA inspector reject the use of a published AC?

ANSWER:

No, not if the AC is applicable to the task being performed and the procedures in the AC are followed.

It is widely understood that an advisory circular is just that, “advisory,” and it may show “a means but not the only means” of compliance with a regulation. In fact, most current ACs contain language in the Purpose section that indicates “Like all AC material, this AC is not mandatory and does not constitute a regulation.” Or other ACs contain language such as: “The material presented in this AC describes an acceptable means, but not the only means, to comply with the referenced regulations.”

Advisory Circular 00-2.14 explains that the FAA issues advisory circulars to inform the aviation public of non-regulatory material. Unless incorporated into a regulation by reference, the contents of an advisory circular are not binding on the public. The public may, at their discretion, choose to develop and apply for an alternative means of compliance to a particular regulation rather than following the guidance in an AC.

The AC goes on to explain that an AC is issued to provide guidance and information to show a method for complying with a related Federal Aviation Regulation that is acceptable to the Administrator.

Therefore, while an AC may not be binding on the public, it does show an acceptable means of compliance to the FARs and, for that reason, must be accepted by the local FAA inspector.

Note: AEA offers these Frequently Asked Questions in order to foster greater understanding of the rules that govern our industry. AEA strives to make them as accurate as possible at the time they are written, but rules change so you should verify any information you receive from an AEA FAQ before you rely on it. AEA DISCLAIMS ANY WARRANTY FOR THE ACCURACY OF THE INFORMATION PROVIDED. This information is NOT meant to serve as legal advice — if you have particular legal questions, you should contact an attorney.

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exercise the privileges of his certificate and rating unless, within the preceding 24 months—

(a) The Administrator has found that he is able to do that work; or

(b) He has, for at least 6 months—

(1) Served as a mechanic under his certificate and rating;

(2) Technically supervised other mechanics;

(3) Supervised, in an executive capacity, the maintenance or alteration of aircraft; or

(4) Been engaged in any combination of paragraph (b) (1), (2), or (3) of this section.

The Repairman Certificate, Privileges and Limitations, Section 65.103, addresses the privileges of a repairman. Section 65.103 states that a certificated repairman “may perform or supervise the maintenance, preventive maintenance, or alteration of aircraft or aircraft components appropriate to the job for which the repairman was employed and certificated...”

To be eligible for a repairman certificate, according to Section 65.101, a person must, among other requirements, “be specially qualified to perform maintenance on aircraft or components thereof, appropriate to the job for which he is employed...”

These requirements have not changed. So, while the Repair Station Training Program highlights the requirements to be “capable” of performing an assigned task, the basic requirements to perform an assigned task have not changed.

The RSTP has moved the repair station technicians from an industry of trust to an industry that requires documentation of their knowledge, skills and experience.

If the basic regulatory requirements necessary to perform maintenance, preventive maintenance and alterations

have not changed, what has changed? Simply, how we acknowledge our qualifications — the personal records we keep.

We currently record our knowledge — the schools we've attended and the training we've received. But how do we document our experience? We typically use our resume. But a resume only shows general employer and equipment platform type information. And, while the information can be verified, it really doesn't have much depth.

So, what employee records will be necessary to perform a basic needs assessment? A log of the employee's knowledge, skills and experience.

AC 145-10 Paragraph 400 recommends that the repair station should have defined processes for objectively identifying its training requirements and assessing each individual's capabilities.

In addition to the basic requirements of performing a needs assessment, Paragraph 407 states that the "capability of each employee depends on training, knowledge and experience. Consequently, the determination by the repair station that an employee is able to perform the maintenance preventive maintenance, or alteration assignment requires an analysis of the factors that contribute to the employee's capability. The data to accomplish this analysis should be found in the employee's training records if the principles of this AC are followed when the training program is developed."

Therefore, based on the data necessary to complete a "needs assessment," each employee needs to have a "record" of his prior training, knowledge and experience. Prior to the RSTP, previous knowledge and experience of each technician was a matter of "trust" and only demonstrated in the work environment to qualify previous work claims. Under the requirements of the RSTP, and its requirement to document

and record the needs assessment analysis, documentation of a technician's previous knowledge and experience must be documented.

As we move forward toward implementing the Repair Station Training Programs, repair stations should keep in mind that:

- The Repair Station Training Program is not a training program; it is a qualifications program.
- The required qualifications of the technician haven't changed.
- The RSTP has moved the repair station technicians from an industry of trust to a maintenance industry that requires documentation of their knowledge, skills and experience. □

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Regulatory Update

United States

High-Intensity Radiated Fields (HIRF) Protection for Aircraft Electrical and Electronic Systems

The FAA has issued a Notice of Proposed Rulemaking proposing to add certification standards to protect aircraft electrical and electronic systems from high-intensity radiated fields (HIRF). The FAA argues this action is necessary due to the vulnerability of aircraft electrical and electronic systems and the increasing use of high-power radio frequency transmitters. The intended effect of this action is to create a safer operating environment for civil aviation by protecting aircraft and their systems from the adverse effects of HIRF.

The electromagnetic HIRF environment results from the transmission of electromagnetic energy from radar, radio, television and other ground-based, shipborne or airborne radio frequency transmitters. This environment has the capability of adversely affecting the operation of aircraft electrical and electronic systems.

Although the HIRF environment did not pose a significant threat to earlier generations of aircraft, in the late 1970s designs for civil aircraft were first proposed that included flight-critical electronic controls, electronic displays and electronic engine controls, such as those used in military aircraft. These systems are more susceptible to the adverse effects of operation in the HIRF environment. Accidents and incidents on civil aircraft with flight-critical electrical and electronic systems also have brought attention to the need to protect these critical systems from high-intensity radiated fields.

The proposed HIRF certification requirements would apply to an appli-

cant for a new type certificate and to an applicant for a change to an existing type certificate when the certification basis for the aircraft includes the proposed requirements. The applicability of the proposed requirements to an applicant for a change to an existing type certificate would be governed by the provisions contained in current AC 21.101.

Comments must be submitted before May 2, 2006. Your comments can be submitted to the DOT Docket website at <http://dms.dot.gov>.

You can get an electronic copy of this NPRM on the FAA's Regulations and Policies website at www.faa.gov/regulations_policies/.

Proposed Technical Standard Order (TSO)-C166a, Extended Squitter Automatic Dependent Surveillance — Broadcast (ADS-B) and Traffic Information Service — Broadcast (TIS-B) Equipment

On Dec. 28, 2005, the Federal Aviation Administration published a notice of availability of a proposed Technical Standard Order, TSO-C166a, Extended Squitter Automatic Dependent Surveillance—Broadcast (ADS-B) and Traffic Information Service—Broadcast (TIS-B) Equipment.

This notice announces the availability of the proposed revision to TSO-C166, Extended Squitter ADS-B and TIS-B equipment operating on the radio frequency of 1090 MHz, issued Sept. 20, 2004. The resulting changes to this proposed revised TSO tells individuals seeking a TSO authorization or letter of design approval what minimum performance standards their Extended Squitter ADS-B and TIS-B equipment must meet to be identified with the applicable TSO marking.

A copy of the proposed revised TSO-C166 can be obtained from the FAA website at www.faa.gov/aircraft/draft_docs/.

Copies of all RTCA documents can be purchased from RTCA Inc., 1828 L St., NW, Suite 815, Washington, DC 20036. Copies also can be obtained through the RTCA website at www.rtca.org/.

For more information, contact Robert H. Duffer, AIR-130, Federal Aviation Administration, 800 Independence Ave., SW, Washington, DC 20591; telephone: (425) 227-2722; fax: (425) 227-1181.

Service Difficulty Reports

On Dec. 29, 2005, the FAA published in the Federal Register a final rule and withdrawal of delayed final rule regarding service difficulty reports.

The FAA is withdrawing a delayed final rule published Sept. 15, 2000. That final rule would have amended the reporting requirements for certificate holders concerning failures, malfunctions and defects of aircraft, aircraft engines, systems and components. They are withdrawing this rule to allow the FAA time to re-examine the SDR program and consider the comments received since the delayed final rule was published.

In this action, they also adopted several amendments that improve the functioning of the SDR program.

The following is the change to Part 145—Repair Stations.

Sec. 145.221 Service Difficulty Reports:

9. Amend Sec. 145.221 to revise the heading as set forth above and to revise paragraph (d) introductory text to read as follows: (d) A certificated repair station may submit a service difficulty report for the following.

For more information, contact Emilio Estrada, Flight Standards Service, Aircraft Maintenance Division (AFS-300), Federal Aviation Administration, 800 Independence Ave., SW, Washington, DC 20591; telephone: (202) 267-5571; e-mail: emilio.estrada@faa.gov.

Thermal/Acoustic Insulation Installed on Transport Category Airplanes

On Dec. 30, 2005, the FAA published in the Federal Register a final rule affecting thermal/acoustic insulation installed on transport category airplanes. This is a change to the thermal/acoustic insulation final rule as reported during the AEA regional meetings in 2005. This information is critical for the maintenance of transport category aircraft interiors and should be passed along to your director of quality/chief inspector.

This action modifies the requirements for improved flammability characteristics of thermal/acoustic insulation used as replacements on airplanes manufactured before Sept. 2, 2005. The FAA has provided information to the Aircraft Electronics Association, General Aviation Manufacturers Association and other general aviation associations that the rule as originally published would apply to a much broader range of components in currently operating airplanes than was originally intended by the FAA.

In addition, since publishing a final rule on July 31, 2003, the FAA has learned that some requirements for improved flammability covered materials do not have a significant effect on airplane fire safety. Further, in many cases, compliant replacements are not readily available.

This rule change focuses the requirements on replacement materials that have a greater effect on safety and are readily available, and is necessary to avoid grounding of airplanes. It also

significantly reduces the burden for compliance on in-service aircraft.

The following is the “new” language for Part 91. There are similar rule changes for Parts 121 and 135.

Sec. 91.613 Materials for compartment interiors.

(b) Thermal/acoustic insulation materials. For transport category airplanes type certificated after January 1, 1958:

(1) For airplanes manufactured before September 2, 2005, when thermal/acoustic insulation is installed in the fuselage as replacements after September 2, 2005, the insulation must meet the flame propagation requirements of Sec. 25.856 of this chapter, effective September 2, 2003, if it is:

(i) Of a blanket construction or (ii) Installed around air ducting.

Maintenance Recording Requirements

The FAA has published a final rule affecting maintenance recording requirements on aircraft operated under 14 CFR Parts 121 and 135.

This final rule amends FAA regulations dealing with recording of maintenance data for large, transport category, propeller-driven aircraft. It changes the requirement for recording engine and propeller “total time in service” for certain aircraft operated under Part 121. These relieving changes are necessary to correct an oversight in the rule when it was originally drafted in 1996. The amendment removes the requirement to record total time in service for engines and propellers installed on certain aircraft certificated for cargo operations. The FAA also is amending sections of Parts 21 and 135 to correct several outdated references to sections previously deleted in Parts 121 and 135.

Sec. 135.419 Approved Aircraft Inspection Program:

(a) Whenever the Administrator finds that the aircraft inspections required or allowed under Part 91 of this chapter

are not adequate to meet this part, or upon application by a certificate holder, the Administrator may amend the certificate holder’s operations specifications under Sec. 119.51, to require or allow an approved aircraft inspection program for any make and model aircraft of which the certificate holder has the exclusive use of at least one aircraft (as defined in Sec. 135.25(b)).

Antidrug and Alcohol Misuse Prevention Programs for Personnel Engaged in Specified Aviation Activities

The FAA published in the Federal Register on Jan. 10, 2006, a final rule that could have significant impact on repair station contracts.

This final rule amends the FAA regulations governing drug and alcohol testing to clarify that each person who performs a safety-sensitive function for a regulated employer by contract, including by subcontract at any tier, is subject to testing. These amendments are necessary because in the 1990s, the FAA issued conflicting guidance about which contractors were subject to drug and alcohol testing. This action also rescinds all prior guidance on the subject of testing contractors.

Maintenance activity is considered “a safety-sensitive function;” therefore, this “clarification” affects any contracted maintenance at any tier of the subcontracting activity.

An electronic copy of this rule is available by visiting the FAA’s Office of Rulemaking’s website at www.faa.gov/regulations_policies/.

Advisory Circular 23-26, Synthetic Vision and Pathway Depictions on the Primary Flight Display

The FAA has issued a notice of issuance of advisory circular.

This AC sets forth an acceptable means, but not the only means, of showing compliance with Title 14

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REGULATORY UPDATE

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Code of Federal Regulations (14 CFR) Part 23 for two new concepts in small airplanes. The two concepts are: Synthetic Vision and pathway depictions displaying the navigation course on the primary flight display. This AC addresses the two concepts in a head-down display format only. This AC covers airplanes in the normal, utility, acrobatic and commuter categories approved to fly under IFR.

A copy of AC 23-22 is available at www.airweb.faa.gov/ac.

Draft Advisory Circulars, Proposed Technical Standard Orders and Other Policy Documents

The FAA has announced that the Aircraft Certification Service of the FAA maintains the "Aircraft Certification Draft Documents Open for Comment" website at www.faa.gov/aircraft/draft_docs/.

The Aircraft Certification Service will make available on this website draft ACs, proposed TSOs and other policy documents open for comment. The Aircraft Certification Service will no longer publish an individual Federal Register Notice for each draft AC, proposed TSO or other policy documents made available for public comment. There is no requirement to publish these documents or notices in the Federal Register. Comments on the documents published on the website must be received on or before the due date specified on the website for each document.

The FAA will publish in the Federal Register a recurring generic Notice of Availability and Request for Comments announcement reminding the public to check the "Aircraft Certification Draft Documents Open for Comments" website at www.faa.gov/aircraft/draft_docs/.

Policy Statement Number PS-ACE100-2005-50001

This notice announces an FAA-proposed policy on applying AC 20-152 to complex airborne electronic hardware (CEH) installed in Part 23 aircraft or in airships. The specific issues addressed concern selecting and applying hardware design assurance levels to CEH. This notice advises the public, especially manufacturers of normal, utility and acrobatic category airplanes, and commuter category airplanes and their suppliers, that the FAA intends to adopt this policy.

Although the comment period ended Feb. 27, 2006, comments can be submitted after the closing date but should be submitted as early as possible.

Send all comments on the proposed policy statement to Robin Sova, Federal Aviation Administration, Small Airplane Directorate, Regulations & Policy, ACE-114, 901 Locust St., Room 301, Kansas City, MO 64106; telephone: (816) 329-4133; fax: 816-329-4090; e-mail: robin.sova@faa.gov.

Proposed Technical Standard Order C176, Aircraft Image Recorder Systems

The FAA has published a notice of availability and request for comments on a proposed TSO C176, Aircraft Image Recorder Systems. This proposed TSO tells individuals seeking a TSO authorization or letter of design approval what minimum performance standards their aircraft image recorder system must meet.

Although the comment period ended Feb. 27, 2006, comments can be submitted after the closing date but should be submitted as early as possible.

A copy of the proposed TSO is available at www.faa.gov/aircraft/draft_docs/. See section titled "FOR."

For more information or to send comments on the proposed technical standard order, contact

Veronica Gardner, Federal Aviation Administration, Aircraft Certification Service, Aircraft Engineering Division, Avionic Systems Branch, AIR-130, 470 L'Enfant Plaza, SW, Suite 4102, Washington, DC 20024; e-mail: veronica.gardner@faa.gov.

Advisory Circular 25.856-2, Installation of Thermal/Acoustic Insulation for Burnthrough Protection

This FAA notice announces the issuance of AC 25.856-2, Installation of Thermal/Acoustic Insulation for Burnthrough Protection. The AC provides information and guidance regarding an acceptable means, but not the only means, of compliance with the portions of the airworthiness standards for transport category airplanes that deal with the installation of thermal/acoustic insulation.

A copy of AC 25.856-2 can be downloaded from www.airweb.faa.gov/rgl.

For more information, contact Kenna Sinclair, FAA Standardization Branch, ANM-113, Transport Airplane Directorate, 1601 Lind Ave., SW, Renton, Wa. 98055-4056; telephone: (425) 227-1556; e-mail: kenna.sinclair@faa.gov.

Australia

Advisory Circular 91.U-02 — Required Navigation Performance 10 Operational Authorization

Civil Aviation Advisory Publication RNP-10 — Required Navigation Performance 10 operational approval has been cancelled and replaced by AC 91.U-02 — Required Navigation Performance 10 Operational Authorization (www.casa.gov.au/rules/1998casr/091/091Uc02.pdf).

This AC provides Australian aircraft owners and operators with comprehensive information on a means of gaining an authorization to undertake

“RNP 10 Operations,” such as obtain an RNP 10 Operational Authorization.

Canada

Transport Canada Recreational Aircraft Review Committee

At a CARAC Part V maintenance and manufacturing meeting in January, TCCA proposed a Recreational Aircraft Review Committee be formed to review operational and certification requirements for recreational aircraft.

Barry Aylward has been accepted as AEA Canada’s representative on this committee. AEA’s focus will be with respect to avionics equipment and maintenance requirements driven by airspace operational requirements. This is planned to be a Fast-Trak committee with a life expectancy of less than two years.

Transport Canada to Revise Altimeter and Transponder Calibration Requirements

At the January CARAC meeting, NPA 2005-093 (CAR 625 App. C) was accepted with consensus and will expand the requirement for 24-month altimeter calibration from “IFR and VFR in Class B Airspace” to “IFR and VFR in Class B and C, or Class C and D Airspace that is designated as Transponder Airspace.” This applies to all aircraft in the airspace, regardless of certification basis or category.

Also, NPA 2005-094 (CAR 571 App F) was accepted and will formalize the requirement for a full integration transponder/encoder system test every 24 months. Of specific interest are the notes at the end of the NPA, which state:

2) Whenever an error is reported in the Altitude Reporting Data, or when maintenance is performed on the system that could introduce correlation errors, the integration test must be performed.

3) Subject to the above note, when the maintenance performed consists of the installation of a Line-Replaceable Unit (LRU) and the installed LRU is a known airworthy part, the integration test need not be accomplished as long as an operational test is carried out prior to flight.

The proposed regulations and related guidance material will formally acknowledge that a correlation error is the calibration relationship between the pilot’s altimeter and the Mode C encoder, and that replacement of a transponder cannot introduce a correlation error. It could cause a complete failure or gross and variable errors in a scenario in which the interface is compromised, but never a correlation error.

Transport Canada will accept UK and EASA advisory documents for modification approvals.

NPA 2005-095 (Ref 571.06) was accepted at the January CARAC meeting. This NPA is intended to allow advisory materials from the UK and EASA similar to that of FAA AC43.13 to be used as “specified data” references in documenting and certifying modifications.

Transport Canada Delegates Conference

The 2006 Transport Canada Delegates Conference will take place from June 27-29 in Ottawa.

TCCA delegates have received notice of this conference; however, other individuals from the aircraft certification/modification industry persons can attend. A number of sessions will deal with modification issues, such as major/minor mod classification; ICAs; certification of integrated systems in GA aircraft; aircraft interiors compliance; and updates on policy affecting modification certification, including the outstanding policy items from the 2004 TCCA/AEA Avionics Modification Workshop.

For more information about the conference, visit www.tc.gc.ca/CivilAviation/certification/delegations/2006DelegatesConference.htm.

Europe

JAA

A new training course program provided by JAA is available on the JAA website at www.jaa.nl.

TGL 40—Operational considerations for the use of initial services for air-ground data-link communications in European airspace: A new temporary guidance leaflet was issued. It is complementary to and should be used in conjunction with EASA AMC 20-11. The operational guidance material was issued in response to the Eurocontrol Link 200+ initiative.

JAA welcomed Bosnia and Herzegovina as a new candidate member in December 2005. With the addition of Bosnia and Herzegovina, the JAA now has 40 members of which 33 are full members and seven are candidate members. □