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CFAMEA /TCCA MEETING, 0830, MONDAY, Oct 17, 2016

In Attendance:

Transport Canada;

Mr. Jeff Phipps, Chief, Operational Airworthiness, Standards.
Mr. Ryan Hennigar, Project Manager Maintenance Performance Standards

CFAMEA Representatives:

Bob Rorison, President Pacific AME Association
Rod Fisher, President Western AME Association
Sam Longo, President Ontario AME Association
Uli Huber, President Atlantic AME Association
Owen Duffley, Treasurer Atlantic AME Association (Observer)
Steve Farnworth, VP Ontario AME Association (Observer)

Absent:

Mike McCartan, President Central AME Association (was present via phone patch for AGM)
Ole Nielsen, President CFAMEA (Family matters)

Presentation (Handout) by Jeff of current activities within TC, review of Org Chart and current vacant positions due to budget restraints.

- Regulatory Development in action:

- STD 571 Appendix G, ELT Maintenance. The current maintenance requirements for the 121.5 MHz (TSO-C91a) have been rewritten with Industry Input to include the 406 MHz ELT (TSO-C126). The NPA should come out soon and the amendment will be ready in conjunction with the amended 406 ELT Equipage requirement outlined in STD 605.38
- IPB (internal Process Bulletin) on SFAR 41C addressing experience and skill. These certified aircraft have now been deemed to be equivalent to AWM 523 commuter category with regards to the experience and skill gained by AME's applicants. As such, applicants will qualify for M1 license only in the future. The IPB 2015-02 will be the guidelines used until an AC will clarify the subject, which currently allows applicants to obtain either an M1 or an M2 rating.
- General changes to STD 566 dealing with License; TC will follow the ICAO standards for information contained on the licence credential, which will in the future include nationality, date of birth, and TCCA is considering removing the photo requirement and extending the validity period to 10 years from the current 6 years.
- Internal Process Bulletin (IPB) stopped new approvals for AWM 563 (Distributors) in order to determine future requirements for this AWM standard. It is a particular problem with AMO's that distribute parts, components in addition to their ratings such as avionics AMO's that also distribute parts and equipment.
- Standard 571, Appendix H, - This is being worked on with a revised version for evaluation of undocumented aircraft parts.



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- Standard 573, AMO Ratings, - the way ratings are currently issued requires some realignment and changes are coming
- CAR 573, PRM Requirements – This also requires some review and may allow more authority to the applicant to select the person and review his qualifications.

Current Exemptions Operational Airworthiness:

Jeff informed us of the various exemptions that are currently available and can be found on the website of:

http://wwwapps2.tc.gc.ca/saf-sec-sur/2/exemptions/e_s.aspx?lang=eng

- Some of these exemptions are,

Special CofA (no expiry)	549 Amateur- Built (no expiry)
Independent QA (no expiry)	Amending ID Plate (no expiry)
Air Cadet League of Canada (no expiry)	Undocumented Aircraft Parts (Feb 2017)
IHI CF-34 Fan Blades (Jan 2017)	Installation of 406 MHz ELT's (Mar2019)

Documentation Framework:

Jeff informed us of recently completed and nearing completion Documents.

- **Recently Published; AC 571 -024**, Documentation required for the installation of parts onto Canadian Registered Aircraft: - This clarifies the required documents from suppliers, manufacturers all across the world of new and used parts. *This new AC 571-024 will cancel AN B073*

- **Guidance material nearing completion,**

- SUP SI (MSI 50) suspected unapproved parts (Winter 2016) ----- AC on Special CofA Limited (March 2017) ----- Amend AC 573-002 Aircraft Certifying Authorities based on Foreign AME Licences (February 2017) ----- AC on AME Licensing (addresses MSI18, MPL18, MSI32, MSI48, ANCO02/3/4/11/12) and should be ready by July 2017 ----- ATO Approvals, review of current ATOs and approval requirements (March 2017) ---- MD Approval, changes and clarification for Minister Delegates Authorisation

- **Guidance in Development,**

- AC on SOMCM (Small Operator Maintenance Control Manual)
- AC/SI on Production QA
- AC Supplier Control
- SI on PRM Acceptance
- SI on Conformity Inspection
- AC/SI on ICAs
- AC on MRB Process

Foreign Approved Maintenance Organisations (FAMOs):

Currently there are three FAMOs issued by TCCA to the following companies:

- Hamilton Sundstrand Customer Support Center, Malaysia
- Moog, Philippines
- Fields Airmotive, South Africa



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Foreign Agreements (EASA)

- MAG (Maintenance Annex Guidance) was implemented February 02, 2012
- SI (Staff Instruction) was developed for TCCA Inspectors for reviewing EASA supplements
- SI introduced to all Regions by Operational Airworthiness, completed June 2012
- SIs Inspection completed in 2016 and rev2 of the MAG currently being developed, which will simplify the approval process.

Foreign Agreements (FAA)

- Amendment being developed in 2014 and expected to be signed in 2017
- AMO's must have TCCA approved FAA Supplement to its MPM for Part 121/135 Air Carriers and FAA Repair stations must have FAA approved TCCA Supplement for Part VII operated aircraft.
- Issues regarding rebuilt parts and territorial boundaries

Bilateral Agreements:

- Israel bilateral has TAM (Technical Arrangement on Aviation Maintenance)
- TAM with Brazil; requires supplement and approval
- Japan bilateral does not have implementation procedures for maintenance. Currently developing a TAM and expected completion by April 2017
- Revised BATA signed with China (CAAC) for certification and manufacturing with expected completion September 2016
- Hong Kong, requires supplement and approval
- Singapore, Requires supplement and approval
- New Zealand, in progress

Items for TCCA submitted by CFAMEA Directors;

CFAMEA: Access to the CARs by AME's and others. Right now there is no direct access via TC Standards

TC - this is a Fed Government decision, CARs regulations found on Department of Justice website, Standards on Transport Canada website. Both are part of Canada.ca.

CFAMEA: concerns of NTA dismissal of CFAMEA from meetings.

TC - we don't have to allow NTA to our meetings so why should they allow us to theirs. Best way to deal with changes to regulatory requirements that affect both groups is to ensure the use of the CARAC process and Focus Groups where TCCA will oversee and administer future changes.

CFAMEA Issues re: Transport Canada its lack of accessibility to inspectors. Specific concerns have not been reported.



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TC - surveillance is our number one concern, so majority of manpower is focused there and this leaves less time for service. This along with a backlog of unfilled positions makes it hard to provide the same service.

CFAMEA: would like to know the number of AME's in Canada and if the AME population is increasing or decreasing with the aging work force.

TC – handout on AME statistics given out, total 17457. This info is available by contacting TC but does not appear on any website. (See attached document)

CFAMEA: Concerns by some Air Operator entities in Canada for the need of an alternative method for the issuance of type specific aircraft certification authority for aircraft out of production.

a) Many aircraft operating commercially in Canada have not been in production for many years and in some instances have been significantly modified over their lifespan.

b) The current methods of training are done in house through documentation and in house training because of major/minor alterations covered under specific supplemental type certificates, issued for individual aircraft.

c) It has become non cost effective to provide blanket training through type courses provided by, as example, Flight Safety. This is largely due to the cost to air operators of sending staff for training on aircraft to which they may be the only operators of older aircraft types.

d) Most large air carriers have in place an approved safety management system, effective quality assurance, and control, specific for their operation and mission profiles.

e) Training of the AME by the schools is not parallel to the operator's aircraft type. This has provided a pool of potential engineers with basic knowledge of theory of flight.

f) Older aircraft systems are not taught or even briefly touched on, as the schools are geared towards student employment in the major commercial air carriers.

Summation:

being as most large air carriers have geared their maintenance training through their safety systems and quality assurance programs; no need exists for an employee to possess an M2 license issued by the federal government.

It is recognized however that there is a need for basic aircraft general knowledge program, supplied through ATO's

It is therefore recommended that sections;

402.02(03) requirements and issuance of AME license.

571.10(11) maintenance release.

573.06 training program.

All other related Air Regulations to be amended to reflect no industry need for an M2 license issued by



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*the minister for the certification of large aircraft over 12500 lbs including helicopters.
This would be pursuant that the air carrier proves an acceptable level of safety can be maintained.*

Option 2 would be for the minister to invoke a global exemption for air carriers operating large and small aircraft to supply their own training and issuance certification for specific aircraft operating under a type certificate, and no longer in production.

TC – 571 allows for one-time approval for type courses to be conducted by an AMO provided it is just to their employees. This is a possibility for older aircraft where it is hard to find courses for. Also Airworthiness Notice AN-C004 Edition 7, 31 March 2005 allows for release of 1900, 1900C and 1900D without an endorsement course, as TCCA approved type training is required for transport category airplanes and turbine helicopters.

CFAMEA: Is the plan for SMS implementation for 702, 703, 704 and AMO's still being pursued or will the SMS remain a requirement for the CAR 705 related world only?

TC – For now, SMS will stay in the 705 world and there will likely be no new SMS requirements develop for other certificate holders in the near future. TCCA is currently reviewing ICAO SMS requirements for future implementation.

CFAMEA: UAV maintenance progress is CFAMEA on the advisory panel ref maintenance.

TC – For now the new UAV rules will maintain UAVs based on manufacturer recommendations. When rules are developed for larger UAV that have an Approved Type Design they will include new rules for maintenance and ICAs. These future requirements may be developed using CARAC and focus groups that would be chaired by TCCA and supported by stakeholders such as CFAMEA.

CFAMEA: If there is a curriculum review for AME license; will CFAMEA have a representation.

TC – At such time when the review takes place, there should be a Focus Group and CFAMEA should be part of that Group, together with NTA and other stake holders

CFAMEA: Are the CAR's 566 going to be moved to an AC or similar for easier amendment.

TC – It looks like they will be staying in 566 for the foreseeable future.

CFAMEA: If TC is getting out of the examination business, will the CCAA, NTA and CFAMEA be part of the process.

TC – The winner of this international tender in about a years' time will have to provide equivalent service and standards as TC has now. Database of over a 1000 questions to be collected for automatically generating exams. This will allow exam completion from anywhere in the world from a controlled and secured place. It is unlikely that CFAMEA could win this contract



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on their own but may be able to partner with schools, etc. It was also highlighted that unless we are truly National Organization, chances of winning such a contract would be very difficult.

CFAMEA: Any new update on the MPM and MCM revisions not requiring prior TC Approval (PNR Pilot project review).

TC – The review is in its final stages and should be done by years' end and roll out in New Year.

CFAMEA: SI's are kept out of public view; can they be made available to ALL and accessible via internet.

TC- The SIs are for internal use and will stay internal. However if a request for an SI is sent to TCCA they should be able to provide the request document. (CFAMEA brought up that you can't ask for something you don't know exists with no TC reply.)

CAMEA'S relationship with TCCA has been good although we have not had many issues to present them. TCCA attended our most recent symposium and also participated in a panel discussion with association members. TCCA is committed to maintain communication with the AME's and has plans to attend AME conferences across Canada whenever possible. In particular, since CFAMEA is a national organisation with regional representation it is a good venue to 'spread the word'. The future and purpose of the CFAMEA came under extensive discussion amongst association members during our AGM and it was agreed by all members that a review is necessary.

Meeting came to conclusion 13:00

Minutes submitted by

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