



MISASA

Microlight & Sport Aeroplane Association of South Africa

Technical Feedback

TECHNICAL FEEDBACK January 2020

AP PANEL MEETINGS

PLEASE TAKE THE TIME TO READ

Technical report back

I thank you for joining me on our journey together this year. I am looking forward to a great year with lots to offer. The year has started off at a run. I spent the last 7 days in Johannesburg being held busy every day with MISASA technical work. Monday to Friday was SACAA AP Panel work. Monday afternoon was the ARO annual SACAA audit and Tuesday afternoon was the Aero Club Council meeting.

My main focus this week was the ARO audit and the AP Panel meeting. The Panel meeting was the result of us taking an amendment to Part 66 Subpart 4, which is the part under which APs operate, to CARCom (Civil Aviation Regulations Committee). The proposal was sent to ASO subcommittee to discuss further and they in turn referred it to a workshop by the AP Panel. We took this opportunity this week to actually not only work on the proposal but in fact work on the regulation (SA-CAR) and the technical standards (SA-CATS). With great participation from SACAA, which we did not have during Project 24, we were able to complete the rewrite of both the regulation and the technical standards.

20 AP applications were reviewed during the week alongside the rewrite of Part 66 Subpart 4.

This proposal will now go back to the ASO subcommittee where it will then be referred back to CARCom for publication. We have proven that an amendment, if pushed, can be put through in a very short time. In this proposal we have included new hourly requirements for people to become Approved Persons. Another breakthrough we have is that we are going to set up an accelerated course to assist MISASA APs to get their licences easier. This course and the reduction in hours will only be available for MISASA members.

We need to look at Part 24 (Airworthiness) and Part 44 (Maintenance of NTCA). Please if you have found problems with these regulations I would like you to let me have them in an email to rowena@lefssa.com so that we can look at the problems and propose solutions via the rewrite. I would like to get this proposal in as soon as possible so that we can get the process going.

On Friday the AP Panel had the opportunity to pose questions from industry to Johan Armstrong for clarification. We thank him for taking the time to reply to our questions. This is the level of communication that MISASA as one of the members of the panel has with SACAA staff now. I asked members to give me their questions and I thank you guys very much for helping out with the questions. If you don't let us know you have problems, we are not able to assist you with them.

I am going to give you facts and replies that we received from SACAA in answer to our questions and to questions raised by other members of the Panel. We are not alone out there. If these facts do not answer your questions that you have, please email me directly with your problems and we can look at each one.

1. Inspection of trikes by SACAA:

This is something new to the industry because RAASA never applied the law. The law states that if an ATF expires, it is to be returned to the SACAA. This has never been applied. Because the ATF has expired, it is necessary to get your ATF re-issued, as it cannot be renewed because it has expired, SACAA has the option to inspect the aircraft. They don't inspect all. SACAA realised that there was an industry problem, that people don't fly their aircraft very often and sometimes overlook the expiry date of the ATF. They therefore came up with the leniency of 90 days after expiry that renewal can still take place. This is in a technical guidance material and not in the law.

There were issues found by the SACAA inspectors on aircraft that had been released to service which should not have been released to service. The APs must stop being slapdash and sign out aircraft when they do find issues. If you do an annual inspection and find issues, get the owner of the aircraft to get them fixed. Get the owner to phone you to come and re-inspect the snags so that you can sign it off. What is happening is that the APs are releasing the aircraft on the word of the owner saying that they will fix the snags after you have left. Very often the snags are not fixed and you have now released the aircraft as airworthy. Please make sure that the aircraft is airworthy before signing the release to service.

NB. NB. NB. If you notice that your ATF is about to expire and you cannot arrange for an annual inspection in time or work has to be done before the aircraft can be signed off, fill in the application form, pay the money and send an email with the two documents to say why the annual inspection form and the documents have not been submitted. Your ATF can then expire and the 90 days will not be applicable and the renewal process can proceed.

2. No. of documents supporting the ATF renewal process.

SACAA started with the new EMPIC system in October last year for ATFs. The system was shown to the Panel. Before you have submitted your information your aircraft details on the system is blank. They have not filled any history in. They are trying to get the most up to date correct information into the system. Once all the aircraft have gone through this initial phase and the system has been populated with the information, the only supporting documents will be ones that have been renewed so that they have a complete set of current documentation. E.g. weight and balance will only have to be submitted when you get issued with a fresh one after 5 years. They will be changing the forms next year to say this. Submit all the current documents required and you shouldn't have any problems.

3. Submitting of ATF application to atf@caa.co.za

We brought the fact to the inspectors that this email is not working the way it is intended to. You should receive an automated reply to your application that has been sent to this

email and this is not happening. They have undertaken to fix it. Once it has been received, an inspector will be assigned to your application. If you have not heard anything from them by 3 – 4 days send an email again with the same heading.

Queries regarding ATFs can be sent to the line manager gouwsj@caa.co.za . e.g. you have been waiting for your ATF for three months. You can then find out why this is the case.

4. Invoicing for inspections done by SACAA

Many people had different charges for the inspection. If your aircraft is ready for inspection (all documents available and aircraft is clean) and there are no problems, the invoice should read 1 hour for planning by the inspector before coming to the airfield, 1 hour practical inspection. If there are snags/findings then you will be charged a third hour for the report that has to be written when back in the office. The process is quite intense and tedious once it gets back to SACAA. SACAA doesn't charge for the following. Once your aircraft is ready for re-issue the inspector has to take your file and advocate on your behalf that he has checked the aircraft and that everything is OK before the conformity and standards committee who will then allow the re-issue if they approve everything. This process of review will take about three days. The reason why SACAA have charged the hourly rate fee is because there are no fees in Part 187 for the inspection of aircraft by weight for the re-issue of a NTCA ATF. This was totally overlooked by the fees committee.

The process will be:

- a. inspector will prepare for the inspection
- b. make a date with you for the inspection
- c. inspection will take place
- d. inspector returns and writes report. Two options:
 - i. no findings – process will be completed
 - ii. if there are findings you will be given notice that they have to be fixed within 14 days
 - iii. you are required to fix and return with proof and/or information required.
- e. Application goes to the review board. This is presented by the inspector that did the inspection.
- f. ATF re-issued if board approves.

This process is not necessary for a renewal.

5. Release dates and ATF dates after annual inspection.

SACAA is working differently to RAASA who was not operating within the law. Your ATF will have an anniversary date (this is what you previously thought of as the expiry date). If the ATF is not renewed before the anniversary date, the ATF will expire. Not what you want to happen. This anniversary date will be the same date every year. The SACAA is trying to move the anniversary dates to the last day of the month. The reason for this is that you can apply for renewal in the beginning of the month and you will have your ATF by the time it expires.

When an annual inspection is done, the AP must release the aircraft for 365 days. E.g. if the ATF is done on the 5th February this year it will expire on the 4th February next year. The

release to service does not, and will now not very easily have the same date as the ATF anniversary date.

6. Please remember that your ATF expires when you have an accident where class 1 engine or airframe components have been damaged.

One last request: We are looking to put a database together where we have all the incidents reported to MISASA. We have to show oversight and accountability for our members. I am the quality auditor for MISASA and we need to show that we are attempting to reduce risk to our pilots. This does not negate your obligation by law to report incidents and accidents to SACAA.

What we would like is the following information:

Aircraft registration

Date of incident

Type of incident

Why you think the incident occurred.

This information will NOT be shared with SACAA. It will NOT be punitive by any means. It is for statistical purposes only and the trends will be discussed at AP and instructor seminars.

The committee had lost its momentum after the establishment of the Technical Approved Persons Advisory Committee by RAASA. After meeting again it was decided to start up with an ARO for APs to give the body the strength it needs in this troubling time since the disbanding of RAASA by CAA. We are hoping that the CAA will see the ARO as a body able to manage the APs without the need for extreme regulations that have now been drafted. The drafting of the MOP is now underway.

We have managed to finally get an updated AP list from RAASA. AROs to work out list of active and non-active members.

James Pitman has offered to help with the new AP MOP. Johan Lok to send a message to all AROs saying that the AP Scheme still going forward with a plan.