



# The View from Washington

B Y R I C P E R I  
VICE PRESIDENT, AEA GOVERNMENT & INDUSTRY AFFAIRS

**T**his is the fourth article in a series about the Repair Station Training Program. The previous articles are archived on Resource One for your review if you happened to miss them. The purpose of these articles is to review in as much detail as possible the criteria of the upcoming mandated Repair Station Training Program.

A couple of excellent sources of information about any specific rule are the discussions contained in the Notice of Proposed Rulemaking (NPRM) and the preamble of the final rule. The NPRM is where the Federal agency will present the intent of a rule and the preamble to the final rule is where they will discuss specific questions that were raised during the NPRM public comment period.

From the June 21, 1999, Federal Register, we can review the FAA's proposed training program. (Keep in mind here that the section numbers of the regulations changed in the final rule.)

## Training Program

*Current §§ 121.375 and 135.433 require that each certificate holder, under part 121, and pursuant to § 135.411(a)(2), respectively, or person performing maintenance or preventive maintenance functions for these certificate holders, have a training program. This training program must ensure that each person who determines the adequacy of work performed is fully informed about procedures, techniques, and new equipment in use, and is able to perform all associated duties. Current § 145.2(a) requires that repair stations supporting operations under part 121 comply with the provisions of current § 121.375. Therefore, repair stations that*

*now perform maintenance or preventive maintenance for part 121 operators are required to have a training program. In some cases, only a portion of a repair station's personnel accomplish work for part 121 operators. Consequently, only those individuals are included in the training program.*

*Under the proposal, § 145.159 would require that each repair station establish and maintain a documented training program for all employees who perform work under the repair station's ratings and classes. The proposed training program would enhance aviation safety by ensuring that each employee who works for the repair station is fully capable of performing that work, and it would ensure a level of safety equivalent to that of maintenance performed under part 121 or part 135.*

*Because the FAA recognizes that repair stations vary in size, the repair station or any other organization such as a school or manufacturer could provide the training, provided the program is approved by the Administrator. The training program would be described in the repair station manual as set forth in proposed § 145.207(e).*

*The proposed training would be required to consist of initial and recurrent training for aviation maintenance personnel, be based on each individual's assignment, and ensure that each individual is capable of performing the assigned task. A person who is certificated or rated to perform particular duties, but is not currently assigned to perform those duties at the repair station, would not be required to participate in recurrent training for all of the tasks for which the person is certificated or rated until such time as that person is*

*assigned to those duties.*

*Because repair stations' activities vary greatly, information about the specific training needed to satisfy the requirements of the proposed rule would be published in advisory material that would be issued with this rulemaking.*

From the NPRM we learn that the basic intent of the rule is that the Repair Station Training Program should:

1. Ensure a level of safety equivalent to that of maintenance performed under part 121 or part 135;
2. Consist of initial and recurrent training for aviation maintenance personnel;
3. Be based on each individual's assignment; and,
4. Ensure that each individual is capable of performing the assigned task.

In the preamble of the final rule, the FAA discusses and provides answers to some of the questions and comments submitted by AEA and other persons (and Associations) who submitted comments during the comment period. The following information was taken from the August 6, 2001, publication of the final rule for Part 145.

## Section 145.163 (proposed § 145.159) Training Requirements

*Summary of Proposal/Issue: The FAA proposed to require each certificated repair station to establish a training program approved by the Administrator that consists of initial and recurrent training for employees assigned to perform maintenance, preventive maintenance, or alteration functions.*

*The FAA proposed to require that records of accomplished training be documented by the repair station in a form acceptable to the Administrator*

and that these records be retained for the duration of each individual's employment.

*Comments:* Commenters voiced various criticisms about the proposed training requirements.

Many commenters complained that the proposal does not contain specific requirements and stated that the FAA should issue advisory material for comment before publication of the final rule.

Commenters wanted to know the type of training required, the frequency of training, and what is required to quantify and qualify on-the-job training.

Some commenters stated that a "one size fits all" rule will not work for small repair stations.

One association stated that the hiring practices of small repair stations or the performance of limited and specifically defined, repetitive work does not require continuous training and retraining.

Many commenters stated that the training program should be acceptable to the Administrator rather than approved by the Administrator.

The NTSB noted that the minimum standards for the recurrent training of pilots, flight attendants, and ground personnel involved in deicing and currency of job-specific skills is no less important for mechanics.

The NTSB stated that the final rule should specify a reasonable quantity of recurrent training.

An association representing European air carriers stated that the FAA should not require training programs for foreign repair stations that are significantly different than those used by the JAA.

Unions and an association expressed support for a training requirement for repair stations.

With regard to the recordkeeping requirement, commenters stated that the FAA should specify which items to include in the records rather than state that the records should be in a format

acceptable to the Administrator.

Commenters also recommended that training records be maintained for 2 years only.

*FAA Response:*

The FAA has determined that adoption of a training program for repair station employees who perform maintenance, preventive maintenance, or alterations would enhance aviation safety by helping to ensure that those employees are fully capable of performing the work. It also would promote a level of safety equivalent to that of maintenance performed under parts 121 or part 135.

The FAA disagrees with commenters who contend that training programs should be accepted rather than approved. To ensure that the right type of program and amount of training is tailored to each individual repair station, the FAA has elected to approve training programs rather than accept them. The FAA recognizes that the training programs may vary depending on the size of the repair station and the nature of the work performed. Therefore, the FAA is not prescribing specific training requirements but will approve individual training programs submitted by repair stations.

Before the effective date of the final rule, the FAA will issue advisory material regarding the required training program.

The FAA does not anticipate that the training program requirement will be burdensome; many repair stations already provide employee training. In addition, the FAA anticipates that training requirements may be met by attending trade or technical society seminars and through on-the-job training. The FAA notes that repair station personnel performing maintenance for certificate holders conducting operations under part 121 or part 135 already must undergo training.

In adopting this rule, the FAA revised

the proposal to require repair stations to retain employee training records for a minimum of 2 years.

With regard to commenters' concerns regarding the content of the training records, the FAA notes that the language "in a format acceptable to the FAA" refers to the media by which the records will be submitted, for example electronically. When submitting its training program for approval, a repair station should delineate the items it intends to include in the records.

The FAA also disagrees that repair stations located outside the United States that operate differently from JAA-approved repair stations be exempt from the training program requirement. The final rule requires each repair station to implement a training program that is tailored to their individual operation. This may require that JAA training be included in the training programs for repair stations that are JAA-approved. This is not limited to only those repair stations located outside the United States. Likewise, repair stations located outside the United States that are not JAA-approved won't be required to include JAA training if this training does not reflect their operations. The FAA has taken great effort to standardize requirements for all repair stations regardless of their location to ensure only the best trained and qualified workforce performs maintenance on U.S.-registered articles.

To provide time for repair stations to develop their training programs, this final rule provides that beginning 2 years after the effective date of the rule, each applicant for a repair station certificate must submit a training program for approval by the FAA. A repair station certificated before that date must submit its training program for approval on the last day of the month in which its certificate was issued. Therefore, if a repair station was issued a certificate

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*in May 1995, that repair station must submit its training program to the FAA by May 31, 2 years after the effective date of the final rule. This compliance schedule allows each certificated repair station at least 2 years to develop its program. The FAA adopted this staggered compliance schedule for certificated repair stations to ensure that all training programs are not submitted to the agency at one time. A repair station may submit its training program before the deadline if it chooses to do so.*

Again, the FAA has provided more insight into the intent of the Repair Station Training Program, along with some of the limitations of the rule. Let's review some of the things the FAA's discussion tells us.

The FAA has determined that adoption of a training program for repair station employees who perform maintenance, preventive maintenance, or alterations would enhance aviation safety by helping to ensure that those employees are fully capable of performing the work.

*So the FAA again reinforces the intent of the rule is to ensure maintenance employees are capable of performing their assigned tasks.*

It also would promote a level of safety equivalent to that of maintenance performed under parts 121 or part 135.

*Here, the FAA again discusses the intent that the RSTP for a non-air carrier repair station should not be any more complex than a RSTP for a repair station currently regulated by Section 145.205.*

The FAA is not prescribing specific training requirements but will approve individual training programs submitted by repair stations.

*The FAA reinforces the criterion that they will not prescribe the repair station's stand practices with regards*

*to their training program but rather approve the basic program itself. Repair stations are cautioned not to submit their standard practices manual to the FAA for approval in place of their basic Repair Station Training Program.*

The FAA does not anticipate the training program requirement will be burdensome; many repair stations already provide employee training.

*The Administrator was cognizant of the possible burden that the Repair Station Training Program could place on small repair stations and her intent was clearly to not place any larger a burden than absolutely necessary on these small businesses. Repair stations are encouraged to only submit the basic repair station training program (similar to the one provided to AEA members on Resource One) to the FAA for approval.*

The FAA anticipates that training requirements may be met by attending trade or technical society seminars and through on-the-job training.

*AEA will continue to develop, produce and facilitate low-cost training for the avionics industry that meets or exceeds the criterion of the FAA.*

The FAA notes that repair station personnel performing maintenance for certificate holders conducting operations under part 121 or part 135 already must undergo training.

*Again reinforcing the basic intent of the rule; that is, all repair station maintenance personnel should meet the standard currently required for those technicians governed by the provisions of the air carrier maintenance training requirements.*

With regard to commenters' concerns regarding the content of the training records, the FAA notes that the language "in a format acceptable to the FAA" refers to the media by which the records will be submitted, for example elec-

tronically. When submitting its training program for approval, a repair station should delineate the items it intends to include in the records.

*The FAA makes a very interesting point here. Where in the past the FAA has dictated the information and form of the records, here the FAA is merely dictating that the medium must be compatible with the FAA's. That is, if you choose to keep electronic records, those records must be compatible with the FAA's computer system.*

*HBAW 05-03 contains specific guidance to the FAA inspector regarding the information that the training records must contain, the final rule clearly contradicts the policy guidance. Once again the FAA inspector has a conflict that they will need to resolve.*

The FAA adopted this staggered compliance schedule for certificated repair stations to ensure that all training programs are not submitted to the agency at one time.

*The staggered compliance schedule that the FAA proposed was not decided by accident. There is reason to their mandate that repair stations submit their RSTP on the last day of the month in which the repair station's original certificate was issued, and that is to "ensure that all training programs are not submitted to the agency at one time."*

*Repair stations are encouraged to honor the Administrator's schedule and not submit them early. Remember, there is no value to the repair station in submitting them early and there is benefit to the repair station in giving yourself as much time as possible to test and evaluate your program before it becomes approved (and mandated) by the FAA.*

Going back to the basics once again helps to clarify the intent of the rule. I encourage you to review Section 145.163 and continue to ask the questions as we prepare for the imple-

mentation of the new Repair Station Training Programs next year. In addition, I encourage you to share these articles with your local FAA Principle Maintenance Inspector and Principle Avionics Inspector (although your PAI should already be receiving *Avionics News*). In order for the transition to the new RSTP to be as smooth as possible, everyone involved should be as familiar as they can with the rules, regulations and intent of the rule.

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# Regulatory Update

## United States HazMat Final Rule

On October 7, 2005, the Federal Aviation Administration (FAA) published a Final Rule applicable to Hazardous Materials Training Requirements for some Part 145 repair stations.

The Federal Aviation Administration (FAA) is amending its hazardous materials (hazmat) training requirements for certain air carriers and commercial operators. In addition, the FAA is requiring that certain repair stations provide documentation showing that persons handling hazmat for transportation have been trained, as required by the Department of Transportation's Hazardous Materials Regulations (HMRs). The FAA is updating its regulations because hazmat transportation and the aviation industry have changed significantly since the FAA promulgated its hazmat regulations over 25 years ago. The rule will set clear hazmat training standards and ensure uniform compliance with hazmat training requirements.

The repair stations intended to be covered under this rule are the Part 145 repair stations that perform work for, or on the Part 121 or Part 135 operator's behalf and are regulated by 49 CFR Parts 171 through 180. This, by definition in 49 CFR, would include only the repair stations that offer or accept hazardous material for transportation. The remainder of the requirement is retained. All Part 145 repair stations that are regulated under 49 CFR currently are required to have hazmat training in place.

Sec. 145.165 Hazardous materials training requires that each repair station that meets the definition of a hazmat employer under 49 CFR 171.8 must have a hazardous materials training program that meets the training requirements of 49 CFR Part 172 subpart

H. Section 145.165 further prohibits a repair station employee from performing or directly supervising a job function listed in Sec. 121.1001 or Sec. 135.501 for, or on behalf of the Part 121 or 135 operator, including loading of items for transport on an aircraft operated by a Part 121 or 135 certificate holder, unless that person has received training in accordance with the Part 121 or Part 135 operator's FAA approved hazardous materials training program.

AEA members can get an electronic copy of the final rule on AEA's "Members Only" website: Resource One.

## Data-Link Recording Systems

On November 28, 2005, the FAA issued a proposed TSO for Data-Link Recording Systems. The FAA notice announced the availability of, and requests comment on proposed Technical Standard Order (TSO) C-177, Data-Link Recorder Systems. This proposed TSO tells persons seeking a TSO authorization or letter of design approval what minimum performance standards (MPS) their Data-Link Recorder Systems must meet to be identified with the appropriate TSO marking.

Digital messaging technology created a need for a data-link recorder system that would ensure the information and data necessary for the investigation of incidents and accidents continues to be recorded on-board the aircraft. It is important that these digital messages are properly recorded and that the timing correlation between cockpit displays and other aircraft systems are preserved. This proposed TSO prescribes the minimum performance standards for data-link recorder systems equipment necessary to receive, process, record, preserve, and retrieve Communication, Navigation, Surveillance/Air Traffic Management (CNS/ATM) digital messages transmitted to and from

the aircraft to assist in investigation of an incident or accident.

You can view or download the proposed TSO from its online location at: <http://www.airweb.faa.gov/rgl>. At this Web page, select "Technical Standard Orders." At the TSO page, select "Proposed TSOs."

Comments should be sent as soon as possible on this proposed TSO to: Federal Aviation Administration (FAA), Aircraft Certification Service, Aircraft Engineering Division, Avionics Systems Branch (AIR-130), 800 Independence Avenue SW., Washington, DC 20591. ATTN: Ms. Dara Gibson.

For further information contact: Ms. Dara Gibson at (202) 385-4632 or fax (202) 385-4651.

## Arc Fault Circuit Breakers

On December 5, 2005, the FAA issued a proposed TSO for Arc Fault Circuit Breakers. This notice announced the availability of, and requests comment on proposed Technical Standard Order (TSO) C-178, Aircraft, Trip-Free Single Phase 115 VAC, 400 Hz Arc Fault Circuit Breakers. This proposed TSO tells persons seeking a TSO authorization or letter of design approval what minimum performance standards (MPS) their arc fault circuit breakers must meet to be identified with the appropriate TSO marking.

The proposed TSO-C178 provides a minimum operating standard for Trip-Free Single Phase 115 VAC, 400 Hz circuit breakers that provides an equivalent level of thermal protection to existing thermal circuit breakers, with the added ability of detection and reaction to arc fault conditions, thus diminishing damage to the wiring system caused by prolonged arcing events. The Arc Fault Circuit Breaker thereby diminishes damage to the aircraft wiring from the

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circuit breaker to the first serial load element, which reduces the potential of igniting surrounding material.

You can view or download the proposed TSO from its online location at: <http://www.airweb.faa.gov/rgl>. At this Web page, select "Technical Standard Orders." At the TSO page, select "Proposed TSOs."

Comments should be sent as soon as possible on this proposed TSO to: Federal Aviation Administration (FAA), Aircraft Certification Service, Aircraft Engineering Division, Avionics Systems Branch (AIR-130), 800 Independence Avenue, SW., Washington, DC 20591. Attn: Ms. Charisse Green.

For further information contact: Ms. Charisse Green, at (202) 385-4637 or fax (202) 385-4651.

### Environmental Qualification Policy

The FAA issued Policy Statement Number PS-ACE100-2005-10039 regarding Standardization and Clarification of Application of 14 CFR Part 23, Sections 23.1301 and 23.1309, Regarding Environmental Qualification

On December 8, 2005, FAA published the proposed policy that clarifies and standardizes the application of the subject sections on environmental qualification. 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. This notice is necessary to advise the public of this FAA policy and give all interested persons an opportunity to present their views on it.

Comments should be sent as soon as possible on the proposed policy statement to Ervin Dvorak, Federal Aviation Administration, Small Airplane Directorate, Regulations & Policy, ACE-111, 901 Locust Street, Room 301, Kansas City, Missouri 64106; telephone: (816)

329-4123; fax: 816-329-4090; e-mail: [erv.dvorak@faa.gov](mailto:erv.dvorak@faa.gov).

Copies of the proposed policy statement, PS-ACE100-2005-10039, is available on the internet at the following address: <http://www.airweb.faa.gov/policy>.

### Advisory Circular (AC) 23-24, Airworthiness Compliance Checklists for Common Part 23 Supplemental Type Certificate (STC) Projects

The FAA has issued Advisory Circular (AC) 23-24, Airworthiness Compliance Checklists for Common Part 23 STC Projects. The AC standardizes compliance checklists for common Title 14 of the Code of Federal Regulations (14 CFR) part 23 STC projects. These checklists may be used to fulfill some of the requirements for a Certification Plan for STC projects. The standard compliance checklists show typical methods of compliance with the regulations and cross-references related guidance material. Checklists created using the information in the AC complement the guidance in the Guides for Certification of Part 23 Airplanes (ACs 23-8B, 23-16A, 23-17B, and 23-19) and other project-specific guidance. The checklists may contain complete certification requirements or may be used as a starting place when applying for an STC that may be beyond the scope of the checklists.

The AC will also be available on the Internet at: [http://www.airweb.faa.gov/Regulatory\\_and\\_Guidance\\_Library/rgAdvisoryCircular.nsf/0/A9809D6D AC184CFB862570C90078BA34?OpenDocument](http://www.airweb.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/A9809D6D AC184CFB862570C90078BA34?OpenDocument)

### Canada TCCA to review proposed Regulations for Certificate Holders and Delegates

Following the consultation meetings with industry in September 2005, Transport Canada Civil Aviation

(TCCA) tabled their proposal for a "New Accountability Framework" for Certificate applicants and holders, and aircraft certification delegates (DARs), at the CARAC Part V Technical Committee in December. The proposal would see a delegated organization changed from being a DAO or AEO to being an "Approved Design Organization" (ADO). A Ministerial delegate (DAR) could be changed to being a non-delegated "Approved Design Individual" (ADI). A new category of delegate would be created to issue approvals and certificates on behalf of TCCA. The proposed changes are to accommodate the introduction of Safety Management Systems (SMS) into the type certificate applicant/holder and delegate functions and processes. At the December CARAC meeting, TCCA identified 25 "theme" areas of concern with the proposal as a result of industry feedback at the consultation sessions.

AEA's position to CARAC on this proposal is that any introduction of SMS into the aircraft certification environment must be commensurate with the size and complexity of the organization and its products. SMS should not be applied to individuals (DARs), or small organizations that currently do not have or need an in-house design engineering capability. Also, AEA does not see any compelling need to review or replace the current DAR system, which has been in place for over 20 years and serves an essential function for both TCCA and industry.

As a result of industry pressure at the CARAC meeting, TCCA agreed to form a CARAC Working Group to formally review the changes that would be necessary to implement SMS into the Type Certificate and STC applicant/holder environment. The Terms of Reference and members of the WG (and any sub-groups) will be discussed at a follow-on CARAC Part V (AC) meeting to be held in Spring 2006.

## **TCCA to Allow Repair Design Certificates on Foreign-Certified Aircraft**

At the CARAC Part V (AC) meeting in December, a NPA was approved to expand the issuance of Repair Design Certificates (RDC) to repairs on aircraft that are not type-certificated or accepted by TCCA, provided that TCCA has a bilateral agreement with the country of registry of the aircraft for their acceptance of the RDC issued by TCCA. Initially, this will allow TCCA to issue RDCs for repair designs on United States-registered aircraft that do not have a TCCA Type Certificate. Under the TCCA/FAA bilateral agreement, such RDCs will be accepted by the FAA.

## **TCCA Forms Aging Airplane Working Group**

TCCA has formed the Aging Airplane Rulemaking and Harmonization Initiatives Working Group to evaluate the aging aircraft initiatives and programs of the FAA and EASA, and recommend the regulations and standards that will be required in Canada to satisfy the Aging Aircraft Program objectives. The Working Group is to evaluate the requirements applicable to Transport and Commuter Category airplanes only, with the objective of harmonization with the FAA and EASA initiatives and regulations. WG members include TCCA, Bombardier and operators and maintainers of aircraft in the affected categories.

## **Europe**

### **EASA:**

NPA 11-2005:

The above NPA was issued to amend previously issued JAA NPAs into Decision 2003/12/RM (AMC-20). The text of the proposed AMC 20-9 thru AMC 20-13 is a transposition of JAA NPAs which have followed and completed the JAA consultation process.

The new proposed AMCs are:

AMC20-9: Temporary acceptable means of compliance on approval of departure clearance via data communications over ACARS. Based on draft ACJ20X8.

AMC20-10: Digital ATIS via Data Link over ACARS.

AMC20-11: Approval for use of Initial Services for Air-Ground Data Link in continental airspace.

AMC20-12: Recognition of FAA Order 8400.12a for RNP 10 Operations.

AMC20-13: Enhanced Surveillance with SSR Mode S. This AMC gives some guidelines on MAJOR / MINOR classification of such ELS and EHS modifications.

With the Executive Director's Decision 2005/06/R, the Certification Specification CS-25 was revised by Amendment 1. It was issued on December 12, 2005.

On November 17, the Fourth Industry Meeting organized by EASA and held in their facilities in Cologne took place. Approximately 200 delegates of the European industry were shown a number of EASA presentations including an overview on the EASA budget and the Mio. € 13.5 / Mio. \$16 gap in the balance sheet for the past 23 weeks since the Fees and Charges regulation came into force. A Working Group consisting of EASA officials and industry representatives are working in close coordination to define ways to overcome this budget problem in the coming months.

The European industry was also able to present their own view of the current status of EASA in their view. Under them were AEA, the Association of European Airlines, leasing companies and design organizations.

Prior to the meeting EASA asked groups to present any questions which could be clarified during the meeting. A list with all questions and their answers was issued.

Here are a few examples of the

questions raised:

Question 28: Procedure to approve a MINOR AFM change.

Question 33: Clarification on requirements for the issuance of Authorized Release Certificates for Components and Parts (EASA Form 1 or equivalent).

Question 34: Standardization on STC package.

Question 35: Clarification on Standard parts and consumables.

Question 48: Getting AML 66 A1 having a B2.

Question 49: Part 145: duplicate inspection.

Question 59: Acceptance of FAA PMA parts and many more...

The attendance list and the Questions and Answers document are available on the EASA Events website.

## **JAA**

NPA OPS-39A: Previously issued NPA OPS-39 has been split up into two separate NPAs due to different rates of development of the individual proposals. The newly adopted OPS 39A will include now only NAV Performance, ACAS and ATQP issues. The related JAR-OPS requirements will be amended soon.

JAR26: Amendment 3 to the Additional Airworthiness Requirements for Operations was issued on December 1.

## **RTCA/EUROCAE**

DO-281A

This document issued in November presents Minimum Operational Performance Standards (MOPS) and test procedures for Aircraft Very High Frequency (VHF) Digital Link (VDL) Mode 2 physical link and network layer protocol components of an avionics transmitter/ receiver (transceiver).

DO-271C

DO-271C—issued in November—  
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# Frequently Asked Questions

The following information is Federal Aviation Administration (FAA) Advisory Circular (AC) 145-10.

## TOPIC:

## Training Program Submission Date

**QUESTION:** My Air Agency Repair Station Certificate has an issue date of March 5, 1971, and below that a reissue date of November 15, 1985. Which date should I use for submitting my Repair Station Training Program?

**ANSWER:** AC 145-10 CHAPTER 2, Paragraph 200 states that beginning April 6, 2006, persons applying for a repair station certificate under 14 CFR Part 145 must submit a training program for FAA approval. Additionally, repair stations that were certificated prior to April 6, 2006, must submit a training program for approval by the last day of the month in which their 14 CFR Part 145 certificate was originally issued.

So in this case, you would have to submit your RSTP to the FAA on March 30, 2007 which is the last working day of March in 2007.

*Note: AEA offers these Frequently Asked Questions (FAQs) in order to foster greater understanding of the Federal Aviation Regulations and 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, then these should be directed to an attorney.*

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provides verification procedures for an aircraft VHF Digital Link (VDL) Mode 3 Transceiver used for air-ground (A/G) voice and data communications. This revision includes updates based on changes to RTCA DO-224B, and includes errata and vocoder test vectors.

### DO-186B

Issued in November, this document recommends standards and test procedures for airborne VHF communication transmitters and includes test conditions and procedures for installed equipment. This update incorporates Changes 1 and 2 of DO-186A and establishes performance standards for equipment designed for offset carrier operations, i.e., equipment classes A and C. The document also includes Class E receivers which are able to be used in an 8.33 kHz channel separation environment.

### DO-297

DO-297 contains guidance for Integrated Modular Avionics (IMA) developers, application developers, integrators, certification applicants, and those involved in the approval and continued airworthiness of IMA systems in civil certification projects. IMA is described as a shared set of flexible, reusable, and interoperable hardware and software resources that, when integrated, form a platform that provides services, designed and verified to a defined set of requirements, to host applications performing aircraft functions.

## EUROCONTROL

### Mode S; EHS, ELS

Eurocontrol lists some important safety issues with current transponder types of both Honeywell and Rockwell Collins. More information can be found on the Mode S part of the Eurocontrol website.

## Australia

### CASA's new financial plan

A new long-term financial management plan for the Civil Aviation Safety Authority took effect January 1, 2006.

The financial plan will see CASA moving to full cost recovery for regulatory services, a cut in aviation fuel excise, CASA adopting more efficient work practices and improvements in service delivery to the aviation industry.

In addition, the Federal Government has decided that no additional revenue from taxpayers will be allocated to CASA's budget. The move to full cost recovery is a Federal Government requirement.

There will be a phased reduction in aviation fuel excise from 2008, with the rate to be cut by eight percent. Fees charged by CASA for regulatory services will increase from \$5 million a year to \$20 million a year by 2008-09.

Fees will make up 16 percent of CASA's revenue by 2008-09, with the remaining 84 percent coming from fuel excise and government funding. Fees will apply to licenses and ratings, medicals, aircraft registration, certificates, permits, exemptions, approvals and authorities. A number of these services previously attracted fees.

About two thirds of the fees will be charged at an hourly rate, with the rest attracting fixed charges starting from \$65.

CASA undertook consultation with the aviation industry on the new financial management plan, reducing a number of proposed fees as a result of feedback.

There are transition arrangements in place for people or aviation organizations who applied before January 1, 2006 for regulatory services that previously attracted a fee.

Full details of CASA's new financial management plan are at: [www.casa.gov.au/fees](http://www.casa.gov.au/fees). □