

Ageing Aircraft Systems The JAA Position

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A Brief Background of JAA

ALBANIA
ARMENIA
UKRAINE

AUSTRIA
BELGIUM
CZECH Rep.
DENMARK
FINLAND
FRANCE
GERMANY
GREECE
HUNGARY
ICELAND
IRELAND
ITALY

LUXEMBOURG
MALTA
MONACO
NETHERLANDS
NORWAY
PORTUGAL
ROMANIA
SLOVENIA
SPAIN
SWEDEN
SWITZERLAND
TURKEY
UNITED KINGDOM

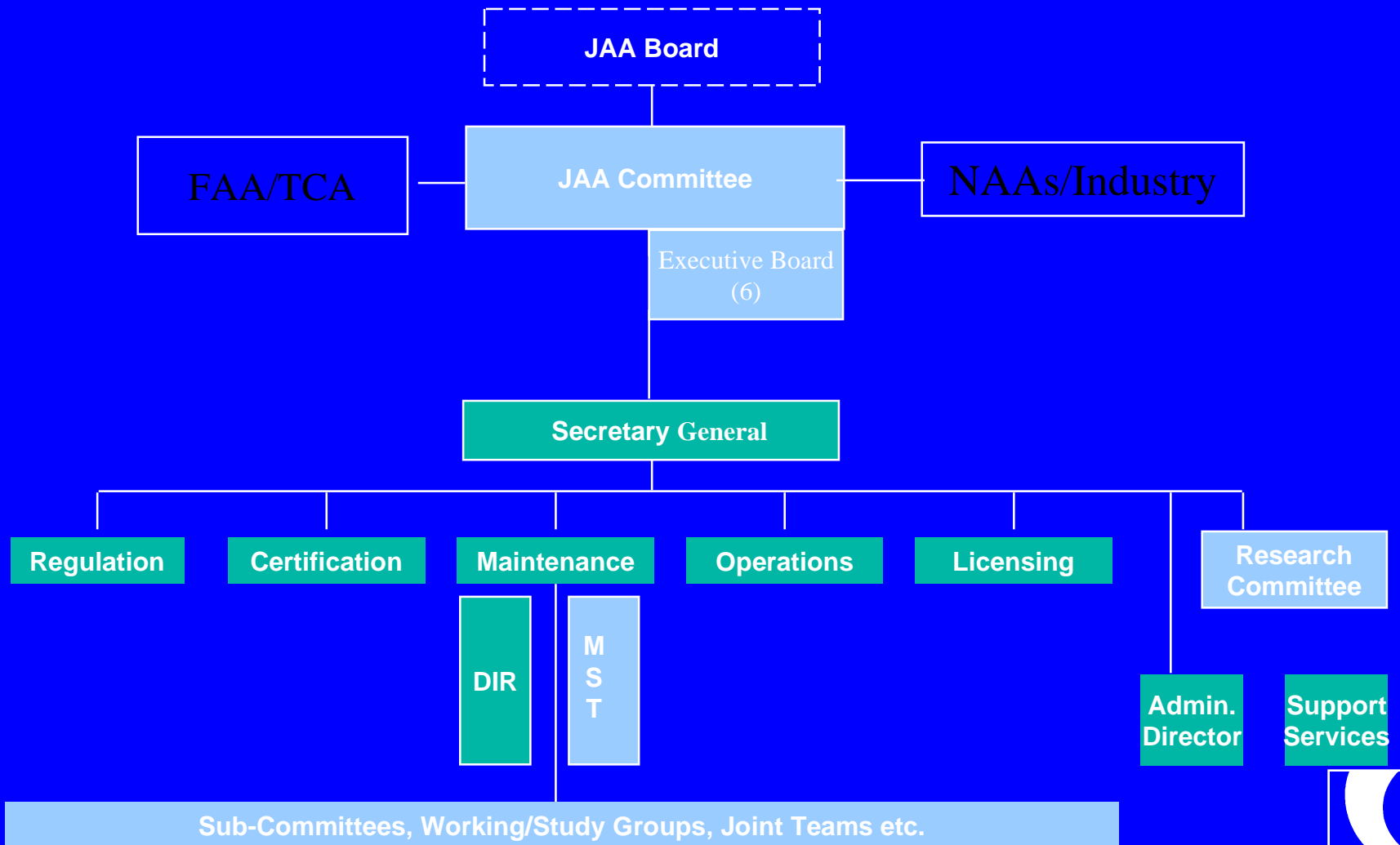
BULGARIA
CROATIA
CYPRUS
ESTONIA
LATVIA
LITHUANIA
FYROM
MOLDOVA
POLAND
SLOVAK Rep.

JAA (35)

JAA Full Members (25)

ECAC (38)

JAA Structure



European Maintenance Regulation

FULL MEMBER NATIONAL AUTHORITIES	-	25
REGIONAL OFFICES	-	55
MAINTENANCE SURVEYORS	-	500
MAINTENANCE ORGANISATIONS	-	2100
OPERATORS	-	2400

Current Joint Aviation Requirements (JAR's)

General & Maintenance Related:

- ❖ JAR-11 JAA Regulatory and Related Procedures
- ❖ JAR-145 Approved Maintenance Organisations
- ❖ JAR-66 Certifying Staff Maintenance
- ❖ JAR-147 Approved Maintenance Training/Examinations

Current Joint Aviation Requirements (JAR's)

Certification Related:

- ❖ JAR-21 Certification Procedures for Aircraft, and Related Products & Parts
- ❖ JAR-25 Large Airplanes (Turbine powered MTWA greater than 5,700Kgs)
- ❖ JAR-TSO Approved Joint Technical Standard Orders

Current Joint Aviation Requirements (JAR's)

Operations Related:

- ❖ JAR-OPS Part 1 Commercial Air Transportation (Aeroplanes – all weights)
- ❖ JAR-26 Additional Airworthiness Requirements for Operations (Commercial Air Transportation Aeroplanes)

Current Joint Aviation Requirements (JAR's)

Developing Requirements

- ❖ JAR-39 JAA Airworthiness Directives (subject to JAAC approval being granted this JAR could be available for use in the near future)

ATSRAC Technical Recommendations

Certification:

- ❖ Consolidated section/paragraph in part 25 for Wire Systems
- ❖ Requirements for wire separation and identification
- ❖ ICAW's to include Enhanced Zonal Analyses Procedure, Standard Wiring Practices Manual
- ❖ Advisory/Guidance Material for the above

ATSRAC Technical Recommendations

Operations:

- ❖ Require Operators to incorporate outcome of retroactive assessment to amended ICAW's into their Maintenance Programmes.
- ❖ Require Operators to introduce initial and recurrent training programmes on wiring systems for their engineering, maintenance and ground service personnel.
- ❖ Advisory/Guidance Material for the above

ATSRAC Technical Recommendations

Maintenance:

- ❖ Require maintenance providers to introduce initial and recurrent training programmes on wiring systems for their engineering, maintenance and ground service personnel.
- ❖ Advisory/Guidance Material for the above

ATSRAC Technical Recommendations

Training

- ❖ There are possibly three areas/levels of required training coming out of ATSRAC:
- ❖ Operator
- ❖ Maintenance Provider
- ❖ Ground Servicing Provider

Note: What about the fourth – Manufacturer/STC Holder?

Rulemaking Comparison

- ❖ SFAR
- ❖ FAR 25
- ❖ FAR 91, 121, 125, 129 and 135
- ❖ FAR 145
- ❖ FAR 147
- ❖ FAR 65
- ❖ No JAA Equivalent
- ❖ JAR 25
- ❖ JAR OPS 1
- ❖ JAR 145
- ❖ JAR 147
- ❖ JAR 66

JAA Possible Rulemaking

- ❖ Certification aspects are probably the easiest to achieve a harmonised position i.e. FAR 25 and JAR 25 are almost identical documents. Plus the relevant working groups follow harmonisation principles.
- ❖ Retroactive mandate of the above changes will be a problem for JAA, a possible short term solution could be via AD action of some sort.

JAA Possible Rulemaking

- ❖ Operational aspects – JAA have only one operating rule for all fixed wing commercial operations. There might therefore have to be a difference in aircraft discriminant used.
- ❖ The requirement to include the output of EZAP into the maintenance programme could be achieved via a change to JAR-OPS 1.910 and/or AD action.
- ❖ A JAA operator is not required to produce an “Operating Specification” in the same way as an FAA operator

JAA Possible Rulemaking

- ❖ Training aspects could be handled in several ways i.e by amending/updating:
- ❖ JAR 66 & 147 – Initial training for certifying personnel
- ❖ JAR 145.30(d) – Maintenance Organisation in-house practices and processes
- ❖ JAR-OPS 1.895(b) – Operator aircraft specific training on wiring systems as it affects their aircraft

JAA Possible Rulemaking

Advisory/Guidance Material

- ❖ JAA have several mechanisms i.e. Acceptable Means of Compliance (AMC) and Interpretive and Explanatory Material (IEM) used in both JAR-145 and JAR-OPS 1. And Advisory Circular Joint (ACJ) used in certification documents such as JAR 21 and JAR 25.
- ❖ These guidance mechanisms are an integral part of the document i.e. JAR 21, JAR 25, JAR 145 etc. and therefore can only be amended via the NPA process.

JAA Possible Rulemaking

- ❖ JAA Administration & Guidance Material
Temporary Guidance Leaflets (TGL's) have been used in the past for long term guidance but this is to be discontinued. The aim of this document is to provide temporary prior notification of proposed rule changes.
- ❖ A possible solution is a new JAA guidance document – GAI 20 And is probably closer in nature to the FAA AC.

JAA Possible Rulemaking

Retroactive Compliance:

- ❖ JAA Regulation Sectorial Team (RST) are now looking into the benefits of introducing an equivalent to the FAA SFAR (i.e. SJAR)
- ❖ This will not be a short term solution – at best two to three years away.
- ❖ JAR 39 is close to introduction
- ❖ or maybe a Central JAA recommendation for national AD issuance

In Summation

- ❖ Whenever an SFAR is issued that calls, within it, retroactive compliance to a certification code JAA will have (for the foreseeable future) a problem with harmonised rulemaking.
- ❖ Operating Rule alignment could pose some problems i.e. aircraft weights, payloads and operating regime.
- ❖ Mandating training or maintenance via an Ops Rule “OpSpecs” does not align with JAA methodology

In Summation

- ❖ If harmonisation is the goal then it is imperative that direct FAA/JAA dialogue is initiated from the outset.
- ❖ At this stage both Regulation Systems can be reviewed and the pros and cons of available and appropriate vehicles considered.

Questions?