



European Powered Flying Union

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Dear Readers

Contrary to December 2017 January 2018 was a quiet month as regards powered flight. However, when we listen to the discussions, the deliberations, and read all the reports and publications informing a wide audience on all aspects of future operations of drones, difficult times are ahead. Please remember: **"Everything in the air not made of feather and bone should have electronic conspicuity"** they say.

Besides this, the latest NPA 2018-01 on Instructions on Continuing Airworthiness (ICA) will require our full attention.



European Plan for Aviation Safety (EPAS) 2018-2022, the rulemaking programme for 2018 to 2022

The individual sheets for all tasks are now available, as well as the re-worked Excel sheet contain all tasks, the individual sheets being included.

NPA 2017-19 Installation of parts and appliances that are released without an EASA Form 1 or equivalent (RMT.0018)

is still open for consultation on the EASA website. This is the «link»:

<http://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-19>

This was my message distributed on 5 January 2018:

In the meantime I read NPA 2017-19. If the provisions will be respected as proposed there will be a positive impact particularly on our sports and recreational activities. In general the proposals of the Agency are well in line with what we have been asking for in the past, RMT.0018 is the oldest task on the table containing all the RMT/EVT/SPT/RES/FOT/MST elements I prepared per 3 December 2017 based on EPAS 2018-2022. EASA is looking for precise answers to technical statements requiring a more profound assessment, i.e. the one only allowing approved maintenance organisations being allowed to repair parts regardless of the production method applied (top of page 5/32).

Unfortunately the Agency will not harmonise confusing terms used in various Regulations/Decisions/AMC/GM, details are on page 5/32. One example, also on page 5/32: In some cases the Agency will define Criticality Levels (CL) «where there is a small fleet». I think I shall ask for a reasonable definition... I shall write a remark on Opinion 13/2016 «Technical Records», RMT.0276, in orbit for quite a long time .

Please look at 21.A.308 and 309 «Criticality levels» on page 8 and 9/32, the Agency is interested in our opinion. You will also find GM on pages 14...16.

On page 10 and 11/32 we find amendments to M.A.501 in (a), in (e) addressing ELA1 and ELA2 aircraft, and in (f). As regards M.A.502 (d) 1 on page 12 I have to find out if CS-23 could be integrated somehow. AMC .A.501(c) is now named «Standard parts» replacing «Installation» which fits better. Interestingly ASTM



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is not mentioned in paragraph 1. The „Rationale“ on pages 19...22 clarifies the Agency’s position.

The «Impact Assessment» contains a long-known conclusion that it really is not proportionate to ask for an EASA Form 1 for parts produced and used by the thousands in other than aeronautical products.

By week 6/2018 I shall prepare a set of intermediate comments I shall send to you. You may then use my statements for your individual comments or integrate your comments in my proposal, sending the package back to me. The deadline for submission of comments is **14 Mar 2018**.

NPA 2017-20 Embodiment of Level of Involvement in AMC/GM of Part-21 (RMT.0262, formerly MDM.060)

was published on 15 December 2017, comment period will end on 15 March 2018. No rulemaking group was established, the texts are based on Opinion 07/2016, resulting from NPA/CRD 2015-03, not commented by me. It is a manufacturer-centric NPA. This is the «link» to the text:

<http://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-20>

Part-21 not being our core-business. After consulting specialist in the field covered by this RMT I decided to do nothing. Please let me know if you disagree.

NPA 2017-21 «Technical and operational requirements for remote tower operations» [RMT.0624 (PHASE 2)]

was published on 20 December 2017. Comment period will end on **3 April 2018**. The «link» is:

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-21>

EPFU comments could be:

- 1) Why does the Agency use so many times “should” when ICAO uses “shall” addressing the same topic?
- 2) Replacing the “should” used by the dozens by “shall/has to/must...” would create a more convincing background for future Regulations and Decisions containing Acceptable Means of Compliance (AMC) and Guidance Material (GM).
- 3) The importance of best possible weather information is recognised, however, the wordings chosen are in several cases not convincing. (AutoMETAR e.g. only partially delivers what really is required for safe operations in all conditions.)
- 4) In quite many cases addressing “flight crews” instead of “aircraft” would enhance reading and understanding.
- 5) To me it is not acceptable that “multiple mode” remote tower operations may provoke delays. In my eyes “multiple mode” operations only are helpful when truly low density aerodromes operations will be combined with no simultaneous traffic peaks and, to the extent of the possible, similar procedures and traffic patterns in place.
- 6) It must be made clear somewhere in the future regulation that we will not accept closing airports for VFR traffic supervised by remote towers in case of for us irrelevant systems degradations. More precise procedural considerations are needed.
- 7) New/adjusted radiotelephony procedures must be introduced to avoid confusion when “multiple mode” is in operation, useful proposals are missing, just adding a letter or a figure as suffix is not reliable enough as we apply Guglielmo Marconi’s technology.



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- 8) Some role description need clarification.
- 9) I did not find any paragraph as regards "drones".

You will read me again a bit later, some brainwork is required to be done during the weeks ahead.

NPA 2017-22 Updating Part-MED and related AMC and GM, RMT.0287(b) (MED.001)

was published on 21 December 2017. Comment period ends on 21 March 2018. The "link":

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-22>

Work is still in progress, a bit delayed by my own medical problems. I shall continue to study the texts and report as soon as possible after consulting the specialists, doing this together with Europe Air Sports medical advisers.

NPA 2017-05 (A)(B) Introduction of a regulatory framework for the operation of drones — Unmanned aircraft system operations in the open and specific category (RMT.0230)

We already know: On 23/24 November 2017 experts of all faculties discussed the some 3600 comments submitted by stakeholders on NPA 2017-05 to prepare the future CRD. The main elements to look at were Registration, identification, geo-awareness, U-space, safety, privacy, model aircraft operating in clubs outside, electronic conspicuity. We have to bear in mind that this was told to the audience:

"Everything in the air not made of feather and bone should have electronic conspicuity", and

"Over recent years, there has been a view from other sectors of the aviation community that drones should adapt to fit in with their established operations. This should no longer be the case and all actors should be treated the same and all should be required to take the necessary steps to ensure safe sharing of the airspace"

Unfortunately, the Comment Response Document (CRD) is yet to be published, it is therefore too early for comment, but I shall keep you informed as quickly as possible.

NPA 2018-01 Instructions for continued airworthiness [RMT.0252 (MDM.056)]

was published by the Agency on 29 January 2018, comment period will end on 30 April 2018. In the Executive Summary the Agency writes: «The objective of this NPA is to mitigate the risks linked to the uncertainty of the status of instructions for continued airworthiness (ICA) and therefore **to avoid there being too much room for interpretation in the rules and standards, leading to differences and possible safety risks.** This NPA proposes to amend Annex I (Part 21) of Regulation (EU) No 748/2012 **to clarify that ICA are part of the type certificate (TC), and to develop the related acceptable means of compliance (AMC) and guidance material (GM).** It also merges the requirements related to record keeping, manuals and ICA in the various subparts into a single requirement for each of these aspects in Subpart A (new points 21.A.5, 6 and 7).

The proposed changes are expected to improve the harmonisation of ICA among the design approval holders (DAHs) in relation to the identification, approval, formatting and availability of ICA to the end users.»



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That is heavy stuff. Those who have already studied the full text consider these provisions to put a heavy burden on a large part of General Aviation actors. Many say it is one more step away from the «simpler, lighter, better» idea, put on hold by the EPAS 2018...2022, it is not in-line with the General Aviation Roadmap and it does not bring what we urgently need to develop sports and recreational aviation. I will start working on this NPA in week 6/2018 and keep you informed as soon as I will be able to present tangible results. The „link“ to the NPA is

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2018-01>

Comment Response Documents (CRD), Opinions, Agency Decisions published last month

There were no publications by the Agency falling under the titles mentioned above.

My adjusted E-mail address

One month ago I stopped my activities in favour of the Aero-Club of Switzerland. For this reason the rene.meier@aeroclub.ch is no longer operational, please make use of the president@epfu.eu or of the rene.meier2540@bluewin.ch

HOT NEWS, sent to the 2018 EPFU AGM participants for your information

EPFU Annual General Meeting 2018 at Paris Side Events, Saturday, 3 and Sunday, 4 February 2018

Dear Delegates, Friends and Guests

The Seine level is too high for Cuise Dinner on a boat, it is replaced by a Dinner at Eiffel Tower on Saturday evening

François Roy et Xavier Barral reserved therefore tables at the restaurant on the first floor of the Eiffel Tower. The departure time at the Ibis-Hotel remains unchanged.

Because of the sad events of the recent past safety checks are performed at the entrance, not tolerated objects will be confiscated. This is the pictogramme whose contents we shall have to respect:



Presidents' Proposal for visiting the „Musée des Arts et Métiers“ for Sunday 60 rue Réaumur, 75003 Paris, open from 10.00 h until 18.00 h

We best take Metro no 13 direction «Châtillon-Montrouge», change to Metro no 3 direction Galliéni at «St Lazare», leave the Metro at «Arts et Métiers» to go to the museum.

To those interested in this visit I propose to meet in the hotel lobby at 09.00 h



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Due to the recent events that occurred in the Paris region, suitcases of all sizes are not allowed in the museum. Only small bags of cabin luggage dimensions (55x35x25cm) are allowed. Only coats and umbrellas are accepted in the museum's cloakroom. Thank you for your understanding and have a nice visit!

There is free entrance on the first Sunday of every month.

Personally I shall stay at the museum from 10.00 h until 13.00 h, then go back to the hotel to pick-up my bags and to start trip back home, as I shall travel by train, departing at the Gare de l'Est AT 14.55 h

The website of the museum is <http://www.arts-et-metiers.net/musee/visitor-information>
You will find there a lot of information to create your own plan for an individually tailored visit.

There are hundreds of points of interest in the most-visited town on earth, so feel free to make your own choice.

Please let me know your plans for Sunday morning on arrival.

Best wishes, kind regards, welcome to Paris!

René Meier

CH-2540 Grenchen, 1 February 2018

Distribution

EPFU Members
EPFU Board Members
EPFU Friends

