

NPRM Response Form

MANDATORY FLIGHT SIMULATOR TRAINING – CAOs 40.0 AND 82.0

Please complete your response by **21 January 2011** and return it by one of the following means:

Online (preferred method) casa.gov.au/newrules/ors

Fax 1800 653 897 (free call)

Post (no stamp required)
CASA Standards Development Branch
Reply Paid 2005
Canberra ACT 2601, Australia

E-mail nprm1007os@casa.gov.au

* A web-based online response form is offered as an alternative to the printed form in this NPRM. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type casa.gov.au/newrules/ors into your web browser and follow the links for this NPRM.

Your Details

Please provide relevant information below and indicate your acceptance or otherwise of the proposal presented in this Notice of Proposed Rule Making by ticking [✓] the appropriate boxes.

Your name: Paul Tyrrell ARN* (if known): _____

Organisation: Regional Aviation Association of Australia ARN* (if known): _____

*Aviation Reference Number, usually your CASA-issued licence or certificate number

Address: 11/26-28 Winchcombe Court, Mitchell ACT 2911

Your telephone number (optional): (02) 6162 0305 (to enable the Project Leader to contact you as necessary)

Do you consent to have your name published as a respondent to this NPRM? YES [✓] NO []

Signed: Paul Tyrrell Date: 21 January 2011

How are you responding to this questionnaire/proposal, i.e. whose views are represented in your response?

Private individual Aviation industry body/association Staff association/ union Government agency/authority/ department/council Aviation business owner/ service provider Other

Please advise your main involvement in aviation:

Passenger/ public consumer of aviation services Air crew for passenger-carrying activities Air crew for non-passenger-carrying activities Ground support for passenger-carrying activities Ground support for non-passenger-carrying activities Other (specify below*, e.g. parachutist)

* **Details:** Aviation Industry Association

Are you satisfied with CASA's consultation on this issue?

Very satisfied Satisfied No opinion Dissatisfied Very dissatisfied



21 January 2011

Rick Leeds
Acting Executive Manager
Standards Development and Future Technology
Civil Aviation Safety Authority
GPO Box 2005
Canberra ACT 2601

Dear Mr Leeds,

**NOTICE OF PROPOSED RULE MAKING
Mandatory Flight Simulator Training
Proposed Amendments to
Civil Aviation Orders (CAOs) 40.0 and 82.0**

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) was formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 27 Ordinary Members (AOC holders) and 53 Associate/Affiliate Members. The RAAA's AOC members directly employ over 5,000 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional areas.

Some examples of RAAA members' presence in regional Australia is the REX hub in Wagga Wagga, SkyWest in WA, Sharp Aviation in Hamilton, Kimberley Aviation at Broome, Airnorth, Chartair and Vincent Aviation Northern Territory networks, West Wing Aviation in Mt Isa and Skytrans operations from Cairns, to name a few.

Serving regional aviation, and through it, the people and businesses of regional Australia

Unit 11, 26-28 Winchcombe Court, Mitchell ACT 2911

ABN: 23 008 568 054 Telephone: 02 6162 0305 Facsimile: 02 6162 0308 Email: office@raaa.com.au Website: www.raaa.com.au

RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- ➔ promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- ➔ lobbies on behalf of the regional aviation industry and its members;
- ➔ contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- ➔ encourages high standards of professional conduct by its members; and
- ➔ provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

RAAA Response to NPRM

Regional Aviation Industry

The industry is part of Australia's essential transport and emergency response infrastructure. It is a highly regulated industry, with very high entry costs, high capital and operating costs plus relatively low margins.

Regional ports being serviced by RPT have more than halved over the past twenty five years.

Governments must be cognisant that regional aviation cannot continue to absorb extra charges without a further loss of aviation services to towns and communities.

General Issues

The RAAA does not intend to mount a case that will cover the interests of all its members in this short submission but provide comment that will encourage a balanced approach by CASA.

If the government is determined to pursue a mandated approach for simulator training then it should be carefully tailored so as not to impose unnecessary costs and restrictions on operators.

In particular mandatory requirements should not be imposed if there is no simulator available within Australia, as per the Canadian model that covers North American access to appropriate simulators. Operators of aircraft without in-country simulators should be given the opportunity to design CASA approved in-aircraft non-normal training regimes that would mirror the safety benefits of the simulator.

It should be noted that the current CASA regulations and supervision have served the industry well in terms of over-sighting both in-aircraft and simulator training for non-normal training. A move to mandated simulator training exclusively must deliver greater, observed safety benefits otherwise it could be seen as an unnecessary and substantial cost on operators.

Policy development must balance the public benefit with the economic cost. Forcing operators to send crews to overseas simulators would drive up operating costs substantially. It might have the unforeseen consequence of encouraging operators to stay with older airframes due to the need to access an in-country simulator rather than choosing a more modern, more efficient regional aircraft.

If however there is a substantial safety improvement from mandated simulator training, while acknowledging the above caveats, the RAAA is generally supportive.

Regional operators offer Australia a substantial variety of flexible aviation services because their fleets contain aircraft that can operate into and out of remote environments with minimal support. These assets are now taken for granted but they have in fact opened up Australia to ongoing economic development including the establishment of new towns and mining operations.

The smaller airlines will continue to operate the majority of these services in a professional and safe manner. As CASA considers mandating simulator training it should not be divorced from the realities of providing flexible aviation services to regional Australia.

Simulators provide a safe environment for non-normal event training. It may be the best solution in the majority of cases. However, for a small number of regional operators in-aircraft training may continue to be a viable and safe training solution. These operators should be afforded the opportunity to design a training regime that would exceed CASA proscribed safety minima.

The RAAA would welcome any questions that the CASA Standards Development and Future Technology might have and can be available for meetings with any reasonable notice.



Paul Tyrrell
Chief Executive Officer