

Submission to the Independent Aviation Safety Regulation Review Panel

Name: David Billings

Address:



I am a Glider Pilot who has been a member of the Gliding Federation of Australia for over thirty years.

I am also an Aircraft Engineer and my experience in aircraft engineering has encompassed Hangar Maintenance, Line Maintenance, Modifications, Aircraft Manufacture, Helicopter Maintenance and Manufacture, Aircraft Records and Maintenance Scheduling. I have also been active in the Quality Assurance field being a QA Manager at three Maintenance Organisations.

This has been my career spanning some 55 years after completing a three year Apprenticeship in 1959. I am still working and at present I am an Airline Company Representative in attendance at a Maintenance Organisation while maintenance is carried out to a Fokker F100 aircraft in Singapore.

I joined the Gliding Federation of Australia in 1980 by becoming a member of a small club in Queensland. I quickly became involved in Airworthiness matters and after attending a GFA Course on Glider Maintenance, I eventually became the Club Airworthiness Officer maintaining the two aircraft that the Club operated. Since then, I have continued to maintain Gliders at Clubs and to do so attended further courses even though I was already an Aircraft Engineer.

The point being that the Gliding Federation of Australia is "self-regulating", both in matters of Operations where the Qualified Instructors are the mentors who show pupils how to fly and further their piloting skills and in Glider Maintenance where only people who have been through courses and are assessed as "competent" are allowed to hold Maintenance Authorities and carry out maintenance on gliders.

There are definite similarities between the normal Commercial Aviation fields in "Operations" and "Maintenance" and the Gliding Fields in these areas of regulation.

1. I have read CASA Part 149 - Approved Organisations - and it appears to be no different in part to the requirements that are normal requirements in Commercial Aviation Administration. I consider that the Part 149 requirements are no more onerous than existing requirements in the Aviation spectrum. I would support the move to Part 149.

2.

2. Internal Auditing of the Gliding Federation of Australia by a qualified Quality Assurance body within the GFA Administration presents an establishment funding problem for GFA. Internal Auditing of the Administration of the movement would be done at Head Office, Melbourne but Internal Auditing of Regions and Clubs by a formal QA appointee requires extra funding. Previously, this role has been carried out by Regional Officers both in Operations and Airworthiness (RTO/Ops and RTO/A's). These Officers carry out local observance during visits to Clubs in their assigned Region. Australia has many clubs spread across the country and costing for a role such as this has never been done by GFA. Assigned Regional Officers carrying out visits to Clubs within GFA, bore the costs to some extent, as a duty to the Gliding Movement and only receiving modest travel expenses. This Quality Assurance requirement by Part 149 would not be an impost if funding for this role to a GFA QA Office was adequate and commensurate with an Auditing Schedule envisaged or required by CASA Rule Part 149.
3. The Gliding Federation of Australia has been to some extent "looked on with envy" by emerging Sports Aviation groups such as Hang Gliding, Light Sport Aircraft Groups and Parachutists; in that these emerging groups saw an example of how it could be done to gain Approval and were successful on the GFA model. As said, the self-regulating facet of GFA has served GFA well in the past and can do so in the future.
4. The Gliding Federation of Australia has successfully incorporated methods of dealing with disciplinary matters by removing privileges of piloting activities and maintenance activities when infringements of the rules have been observed or reported. Everyone's interest is Flight Safety and miscreants are dealt with in a friendly manner and those involved usually know when they have done something wrong. Serious offenders have been banned from the movement. The manner in which discipline is imposed is quiet, explanatory and accepted. CASA has sometimes drawn bad press over the years from some of the authoritarian, punitive and disrespectful manners in which it has dealt with alleged offenders against the Rules imposed and sometimes CASA Officers have been wrong in their localised judgements. The Gliding Federation does not need, nor does it want such kind of action from CASA.
5. The Gliding Federation of Australia would certainly aspire to the Minister advocating that CASA, by introducing Rule Part 149; will endeavour to support and promote the Sport of Gliding and that mutual benefit will apply.

There are many benefits to the Australian Aviation Sector with the continuation and support of the Government of Australia to the Gliding Federation of Australia.

Yours Sincerely,



David Billings