

Dear Committee members,

May 2011

Below is an edited version of an email I sent to CASA in April. Whilst it might appear that this material is not directly relevant to your hearing, it shows what the industry has to put up with year in and year out. Maintenance of training aircraft is of course germane to the cost of training and therefore my submission has direct relevancy.

In general terms the CASA modus operandi is well demonstrated here and is typical of the incompetent make work mentality of CASA which uses such programs like the Ageing Aircraft Maintenance Program, subject of the email quoted, to justify its voracious appetite for taxpayer and general aviation dollars. Thus the great exodus to the self administered low weight category of general aviation using the less capable, 600 kilogram maximum takeoff weight aircraft. The points I have submitted to CASA, have not been rebutted or refuted, but no doubt the program rolls on. Please note the reference to "Cessna 150" in the following text. This model has been probably the most common training aircraft in the world and it is still ubiquitous in the training role in Australia.

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(Email correspondence with CASA, minor editing)

"Peter Gibson, Thank you for your 'unclassified' reply, I would like to know who is the author of the this detailed defence of the Ageing Aircraft Maintenance Program (AAMP) does the author prefer to remain anonymous? In the mean time it is quite obvious that your author is struggling to justify the program which looks like the same old re-cycled make work program, the kind that we have seen time and time again. The claim, "Mr Reith is not correct in assuming that all owners are as diligent ..." is false, I made no such claim and I invite the author to re-read my submission. It is an obvious fact of life that some maintainers will be better than others, but the thrust and tone of your reply insults the GA industry as a whole by making out that just because your paperwork maintenance programs are, in your eyes, somewhat deficient, that our maintenance people are not capable of maintaining our aircraft to a safe level in spite of a deficient regulatory regime. Your author would seem to have little practical knowledge of heavy maintenance practice within GA. In reality lots of "ageing" aircraft have been pulled apart and had their "spars and longerons" replaced and generally de-corroded and re-built with anti-corrosion coatings (better than new). This is just commonplace practice. Has the author talked to LAME's (licenced maintenance engineers) and inspected such aircraft? In terms of age per se, has the author considered the fact that there are numerous aircraft more than 50 years old that are in very good airworthy condition? There are so many older aircraft with various stages of re-build that the notion that you might separate them out for 'special treatment' is patently wrong and stupid. One can point to younger aircraft that have had severe 'ageing' problems when less than 15 years of age, so where is your basic premise now?

My question to the expert is;

Show me the comparative data that must be the basis for this expensive taxpayer funded Ageing Aircraft Maintenance Program (AAMP). How many Cessna 150's, for example as quoted, have suffered structural failure in flight? In Australia and say, rest of world?

Your author talks about the Cessna 150 and it's surprising longevity. Truth is that these structures, like the DC3 (most of which are much older than the Cessna 150) may never have been intended for such a long life. This fact does not in any way make them less

valuable or capable or unsafe or less strong. I invite the author to inspect and fly in a 40 year old Cessna 150 and then in an some ultralight (low weight category) of his choosing and say which is safer and stronger. Your author talks authoritatively about the assumptions that were made when the Cessna 150 aircraft were built. Please advise me how the author was able to be appraised of these assumptions? Are these assumptions public knowledge? I would be pleased to receive a copy of the assumptions (design philosophy?) from the Cessna company which your author must have. Also can your author explain how these assumptions relate to the performance of these structures over time? The reference to untreated surfaces which may lead to accelerated corrosion in some cases has been widely known, to my certain knowledge, since before the seventies. Is your author aware that there were different Alclad alloys with the same strength designators but performed differently in terms of corrosion? In some cases corrosion in the late late 70's was so bad that 3 and 4 year old aircraft were coming into Moorabbin for corrosion work and re-painting on Cessna warranty. Other aircraft built and untreated in the sixties remain in pristine condition. The whole notion of treating aircraft from a maintenance point of view on the basis of age alone is false and has no substantive basis in fact or statistics or in practice." A. C. (Sandy) Reith Former owner operator Phillip Island Air Services and Airport. Instrument rated twin training Chief Flying Instructor, Chief Pilot, and owner 24 Cessnas, Beechcraft and Pipers and Wren aircraft. Current pilot now 46 years flying.