

As agreed, the information coming to all will be sent in English language, thank you!

Note: *This News Flash is mainly for all SVFB Members being involved in Maintenance for ATOs and DTOs!*

ECOGAS Feedback Request July 2019 (ATO/DTO)

E-Mail to Michael Erb Chairman of the EASA General Aviation Committee (GA.COM) from Kurt Dahlmann member of the EASA Taskforce Part-ML to produce the AMC/GM thereto.

These are some additional information to Michael Erb as Chairman of GA.COM concerning commercial ATOs and DTOs:

In older regulation EASA defined that all commercially used aircraft should be maintained in a Part-145 organization (including ATO or DTO).

In the past in our ECOGAS (European Council of General Aviation Systems) discussions we had a demand for simpler regulations for the SMEs, also for commercial General Aviation operation.

In the RMT (EASA rule making tasks) for the new simple Part ML the members used all possibilities to reduce bureaucratic burden for SMEs and to find a better equal treatment between the different commercial and non-commercial organizations.

With Part-ML it is no more requested for a commercial ATO / DTO to maintain their aircraft in a Part-145 organization, when in addition these aircraft are not used as an airline aircraft and they are non-complex motor powered aircraft.

The commercial ATO / DTO could decide what would be the simplest and best solution for their own organization.

For airworthiness they should have an own approval as CAMO or CAO and in accordance to the size of their organisation they could contract also an external CAMO or CAO for continued airworthiness of the aircraft.

For maintenance the same, they could have an own approval as Part-145 / Part CAO or they could have a contract with an external organization with Part-145 or Part-CAO approval (depending of the type of aircraft in use).

Different is the situation for a non-commercial ATO / DTO: These organizations could use the aircraft as they would be private ones. This means, that they would have all the privileges a private owner has to maintain the aircraft or for continued airworthiness (contracted CAMO, CAO, self-declaration, TBO extension, pilot/owner maintenance).

It is intended that the new Part-ML gives a lot of flexibility also to commercial ATO / DTOs, but the differences between commercial and non-commercial at the lower end of training (LAPL, PPL-A) could have an extreme negative economic effect for the commercial organisations.

In Part-ML there are no definitions, paragraphs nor AMCs / GMs to have an equal treatment between commercial and non-commercial organisation. Three years ago at the time it was already discussed for Part-ML, that it was not clear if it should be possible to maintain continued airworthiness for a commercial organisation in Part-ML and Part-CAO.

In Part-ML and Part-CAO (and its AMCs / GMs) it will be defined how these aircraft have to be managed concerning continued airworthiness and how they have to be maintained.

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There are no procedures for commercial licence training yet or for the size of a training organisation.

ECOGAS should support GA.COM to contact EASA Management Board, European Commission and their Legal Services for an assessment.

ECOGAS should use the results from this assessment to add it to our Part 145 GA, if there is not an acceptable equal treatment between commercial and non-commercial ATO/DTO.

Please give us (mq.svfb@luewin.ch) any information if you agree or disagree with our opinion to support the initiative of GA.COM and to support Kurt Dahlmann in his task to help producing AMs/GMs for the new EASA Parts, thank you in advance.

Note: Definition of General Aviation by ICAOⁱ:

GA is defined by ICAO as "all civil aviation operations other than scheduled air services and non-scheduled air transport operations for remuneration or hire".

Kurt Dahlmann



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Dr Michael Erb



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We have already received an answer/question from a Danish member of DAA:

I have severe difficulties in understanding, why there is a difference between an ATO and a DTO, when it is about maintenance of aircraft; it will give a falsification in the economy and an economic advantage for PPL customers at the DTO.

We must assume that many ATOs educate pilots to CPL and higher, resulting in all their aircraft must be maintained in a more cost heavy way.

What if a DTO rent out their aircraft, isn't it not commercial?

And the French FNAM (Fédération Nationale de l'Aviation Marchande) and GIPAG (Groupement des professionnels et industriels de l'Aviation Générale) are both in favour of the approach of Kurt and Michael:

GIPAG and FNAM totally support your position and your proposal.

EASA's proposal will legalize current unfair competition between commercial and non-commercial training centers.

We agree that an equal treatment should be provided for commercial and non-commercial organisations.

ⁱ **Please see also Paper on our Homepage regarding missing definition of GA by EASA!**