

EAPAS Implementation Plan -- Air Carrier Input --

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Here's the truth!

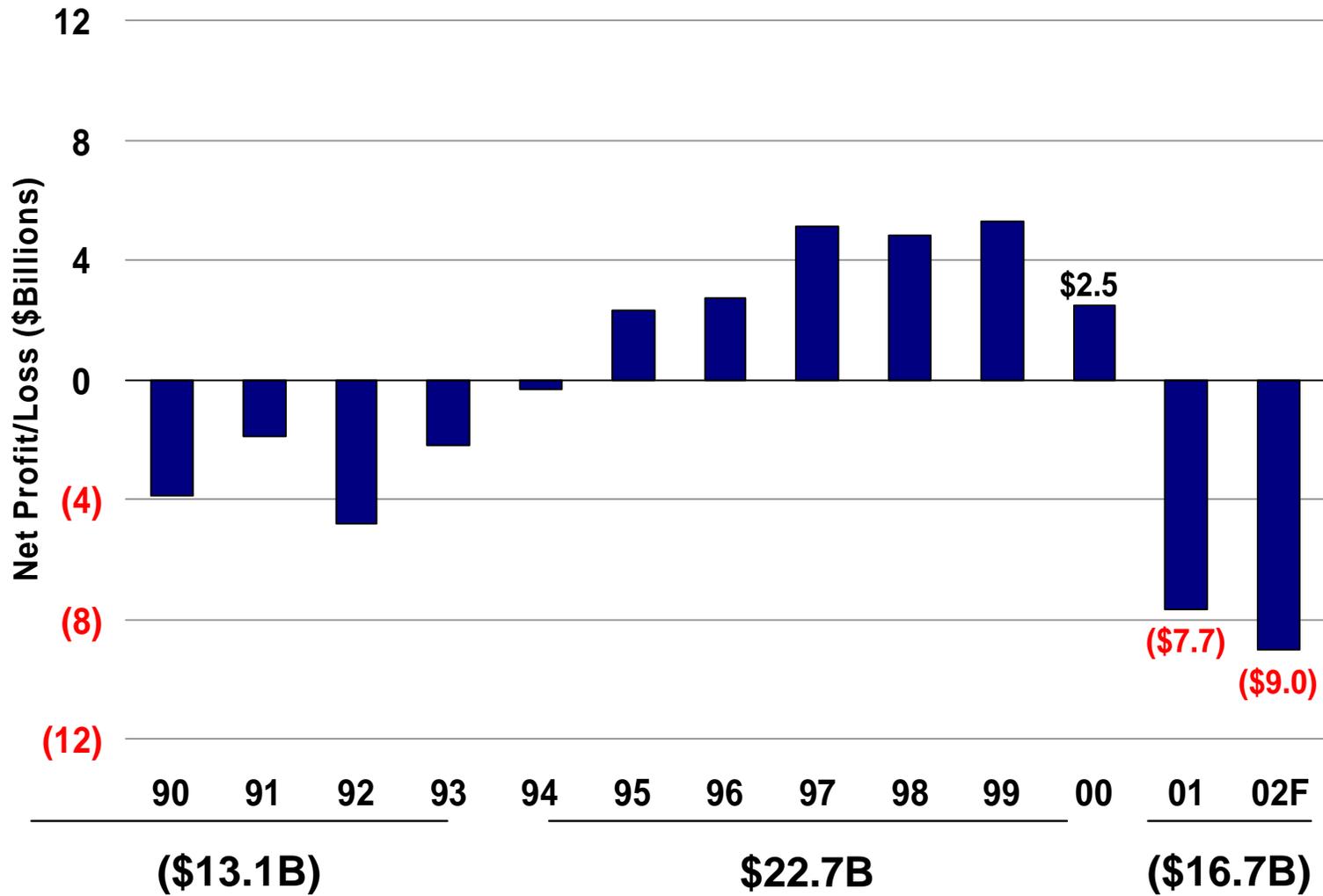
With regard to the FAA's counter-proposal of an EZAP Compliance Plan, the air carriers can no longer afford to concern themselves with anyone's political agenda or time table; here's the reality . . .





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The "Earnings" Picture Since 1990

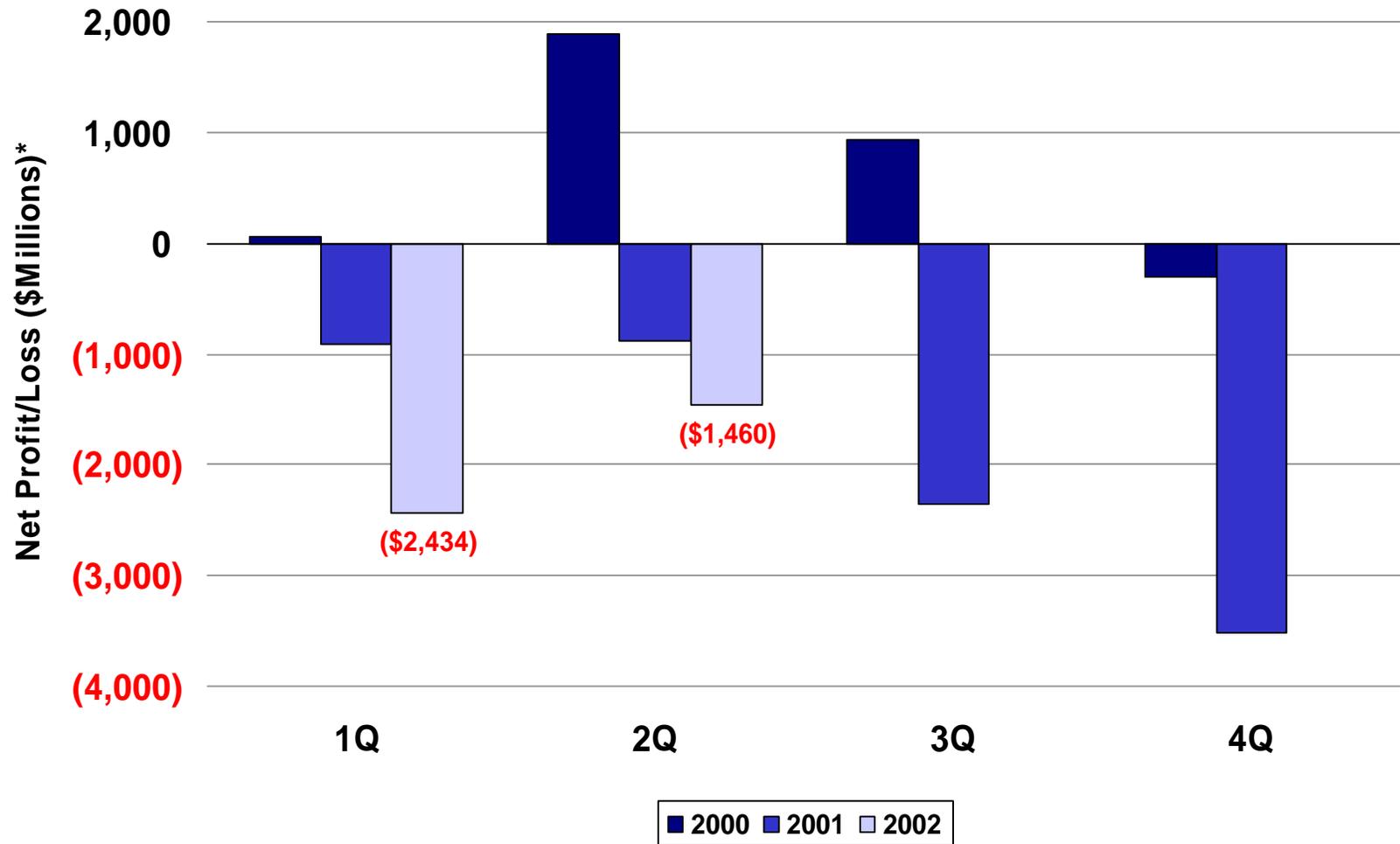


Note: 2001 and 2002 include federal compensation remitted to air carriers under P.L. 107-42 (roughly \$5B pre-tax distributed over two calendar years)

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Heavy Losses Continuing in 2002



* 2001 loss mitigated by federal compensation remitted to air carriers under P.L. 107-42; 2002 figures are for passenger carriers only



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A Word on Corporate Responsibility

Projecting Record 2nd Quarter Losses

“...perhaps the most positive thing I can say about the losses you’re likely to see is...you can have utter confidence in the airlines’ reported results because nobody in their right mind would *make up* numbers like these.”

Don Carty, Chairman — American Airlines
Remarks at the National Press Club (July 11, 2002)

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Here's the truth!

. . . if this reality is not taken into consideration, then the FAA will have a nice Compliance Plan, and no airlines in existence to comply with it!





Now let's talk compliance

TC/STC holder development of full EZAP, and make it available to operators:

-- HWG#9 decided on 24 months

-- FAA's Plan cut that in half; 12 months

In the real world of SFAR 88, 18 months were planned, but with just 7 weeks remaining, NO operator Working Groups have met . . . E-mail & Web site comments only!

“Orphaned” STCs present a real problem!

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24 Months was not a “high-ball” bid

TC/STC holder development of full EZAP, and make it available to operators:

ATA member air carriers truly believe this **MUST** be 24 months if the FAA presumes coordination/exchange with the operators, and realistic incorporation of the time needed for FAA approval of ICAWs (examples of it requiring 7+ months are available).



Operator Implementation

Time for the operators to modify their maintenance programs, and obtain FAA approval to implement:

- HWG#9 decided on a minimum of 36 months
- FAA's Plan cut that by 2/3's for the oldest; 12 months

In the real world of SFAR 88, 18 months planned, but

- TC/STC holder's submission approval = 6 months,
- printing/distribution = 2-7 months, and
- operator's program approval = 4 months.

That leaves 1 to 6 months of the planned 18 months!

Operator Implementation

**Operators can do the oldest aircraft
in 12 months!**

If they truly get 12 months . . .

starting with FAA-approved ICAWs, and only
having to obtain local [PMI] approval of their
maintenance program changes



Initial Clean/Inspect of CEEPF

Time for the operators to perform initial clean & inspect of CEEPF (cockpit, E&E, and power feeders):

-- HWG#9 decided on 36 months (for oldest)

-- FAA's Plan selected 36 months and added, "...& items identified by type design holder as critical." In SFAR 88 we still don't know what are "critical."

In the real world, this is a "pig in a poke", nobody knows what the ICAWs will contain, but one major carrier estimates a 25% increase in their maintenance budget for just the clean/inspect of CEEPF!





Defining a “pig in a poke”

Time for the operators to perform initial clean & inspect of CEEPF (cockpit, E&E, and power feeders):

Spec 111, “Airworthiness Concern Coordination Process” recommends that tasks requiring 4+ days of aircraft downtime comply within 60 months.

Defining a “pig in a poke”

At least in SFAR 88, the FAA did not try to define the ICAW “pig in a poke” and mandate maintenance task accomplishment intervals (operators “have” 18 months to implement).

The FAA’s proposed Compliance Plan for ATSRAC’s EZAP has somehow “divined” the ICAW “pig in a poke,” and is mandating maintenance task accomplishment intervals!

What are we proposing?

- TC/STC holder development of full EZAP, and make it available to operators:
 - 24 months (to allow operator input to Working Groups)
- Time for the operators to modify their maintenance programs, and obtain FAA approval to implement:
 - 12 months *for oldest* (if we start with “approved” ICAWs, & only need PMI approval)
- PERIOD! (allow the operators to incorporate the EZAP-derived ICAWs at the intervals determined by the EZAP analysis, as is being done with SFAR 88)

What are we proposing?

If you must guess at defining the ICAW “pig in a poke” up front, then we propose:

- Time for the operators to perform initial clean & inspect of CEEPF (cockpit, E&E, and power feeders):
– 60 months
- With the rest of the EZAP ICAWs at the interval determined by the EZAP analysis.



What are we NOT proposing?

Since our crystal ball cannot divine the ICAW “pig in a poke,” we cannot determine which is the best fleet subdivision . . .

- Two groups (< or > 10 years, or 20 years), as per HWG9’s recommendation, or
- Five groups, as per the FAA’s proposal.

PLEASE REMEMBER!

- We are in financial crisis, and
- ATSRAC's EZAP is but one of a dozen "mandates" here or on the near horizon . . .

- SFAR 88
- SFAR 92
- Aging Airplane Safety
- CPCP
- WFD
- SDR Final Rule
- CASS Model
- Domestic RVSM
- EES Mx.
- 16-g Seats
- etc.

