
Civil Aviation Authority

AW-03 Certifying Staff Authorisation of Flight Crew – Personnel Requirements

RPC rating: Validated

Description of proposal

The CAA determines which maintenance tasks may safely be performed by a pilot on a given type of aircraft and has recently revised its processes, in order to improve consistency and efficiency.

Before the change, applications to allow pilots to carry out maintenance were handled on a case-by-case basis; the staff deciding each application were not always familiar with aircraft/helicopter types and/or the maintenance tasks under consideration. The result has been inconsistent decision-making and requests from maintenance organisations for a more standardised approach.

Under the new process, the CAA will assess only once applications for a given task to be performed by the pilot on a given aircraft (using suitably qualified personnel) and will publish a regularly-updated list of acceptable tasks on the CAA website. Businesses may, then, without making any further application to the CAA, authorise pilots to perform the pre-approved tasks listed on the website.

Impacts of proposal

The assessment states that the proposal applies to 152 businesses in the UK; this is based on the CAA's list of organisations approved to perform whole aircraft maintenance. Based on discussions with industry, the proposal could save approximately 0.5 staff days per request by reducing regulatory uncertainty, eliminating the need for repeated requests, and improving the quality of decision making.

Since the policy came into effect in November 2015, the CAA says that, based on its records, it estimates that on average half of all the organisations in scope would have sought acceptance for half of the tasks approved – around 16 approvals per business per annum. It, therefore, estimates a time saving of:

76 (organisations) X 16 (tasks per annum) X 0.5 days= 608 days.

The average salary for a reviewing manager is estimated at £50,000 +20.2% uplift = £61,100 (based on industry-supplied information), equating to £240 per day/£30 per hour. On this basis, the savings to business are:

$$608 \text{ (days)} \times £240 = £145,920 \text{ pa (£1.4m over 10 years)}$$

The CAA states that there will be familiarisation costs, but it expects that these would be negligible as all approved organisations are familiar with the applicable regulations; moreover, the revised information consists of 268 words. It estimates one-off familiarisation costs of £195, assuming a reading speed of 120 words per minute (based on Readingsoft data:-

$$152 \text{ (organisation)} \times 2.5 \text{ (minutes)} = 6.3 \text{ (hrs)} \times £30 \text{ (wage per hour)} = £189$$

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of -£0.1 million. This is a qualifying regulatory provision that will score under the business impact target.

Quality of submission

The CAA has clearly explained the proposals and provided sufficient evidence from its own data and industry-supplied information to support its estimate of the impact of the measure. The assessment is largely proportionate, though the CAA need not have calculated the familiarisation costs in quite such detail given the very small amount of guidance involved. In calculating familiarisation costs, the CAA uses an incorrect reading time. The reading time in total should be 6.3 hours not 6.5 hours. The revised cost therefore is £189 rather than £195. For reporting purposes, it does not change the EANDCB as the figure is rounded to the nearest £100,000. The CAA should ensure in further the calculations it submits are checked for accuracy.

Departmental assessment

Classification	Qualifying regulatory provision (OUT)
Equivalent annual net direct cost to business (EANDCB)	-£0.1million
Business net present value	£0.78 million

RPC assessment¹

¹ For reporting purposes, the RPC validates EANDCB and BIT figures to the nearest £100,000

Classification	Qualifying regulatory provision (OUT)
EANDCB – RPC validated	-£0.1 million
Business impact target score	-£0.5 million



Michael Gibbons CBE, Chairman