



NATIONAL HEADQUARTERS
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14 October 2009

MEMORANDUM FOR CAP/EX
CAP-USAF/CC
CAP/CC
IN TURN

FROM: LG

SUBJECT: Draft CAPR 66-1, *Civil Air Patrol Aircraft Maintenance Management*

1. The draft change to CAPR 66-1, *Civil Air Patrol Aircraft Maintenance Management*, was posted on the NHQ website for comments 7 Apr 09 through 7 May 09.

a. Comments received and incorporated in final draft:

(1) Attachment 1, Item 8. – *“Updating self-contained front instrument panel mounted Air Traffic control navigational databases, excluding those of automatic flight control systems, transponders and microwave frequency distance measuring equipment, provided disassembly of equipment is not required. Prior to intended use, an operational check must be performed in accordance with appropriate sections of FAR 91.”* FAA has provided CAP a waiver to allow the AIF form log sheet “GPS database Update Record” to be compliant with the log entry mandate.

Response: Item 8 was modified to read, “Navigational database updates may be kept on a separate log such as the AIF, however a one time entry must be made in the aircraft airframe log book stating the following: “Navigational database updates will be kept in the aircraft in a separate log identified with the aircraft’s N number, serial number, make and model of the aircraft and make and model of the navigational unit”. This entry should be made by a person meeting the requirements in FAR Part 43.”

“The above action is not mandatory, however if this system is not used then an aircraft log book entry will be required for each database update as per FAR Part 43.”

(2) Paragraph 6d – This reads as though our members are less valued.

Response: This particular entry was the result of of a real-world incident that occurred on the first flight following an engine cylinder replacement. While engine failure is highly unlikely under normal circumstances, the first flight following major engine repair should not be an orientation flight. This policy is in no way intended to devalue the lives of our members, it just adds an extra margin of safety to the Orientation Flight Program.

(3) Paragraph 9g – Delete last sentence. Wing approves kits, let them specify seasonal kit as necessary.

Response: Deleted “Contents of these kits may be adjusted based on seasonal requirements.”

(4) Paragraph 10d – It is FAR 45.11, not 45-11

Response: Changed 45-11 to 45.11

(5) Attachment 1. In the last statement, add ...performing the task “ the pilot’s name and certificate number.

Response: Changed the last statement to read, “and name and certificate number of the person performing the task whether it be a pilot or mechanic.”

(6) Attachment 1. Could preventive maintenance be recorded in the AIF, especially the nav data updates

Response: Changed the text to read “Navigational database updates may be kept on a separate log such as the AIF, however a one-time entry must be made in the airframe log book stating the following: “Navigational database updates will be kept in the aircraft in a separate log identified with the aircraft’s N number, serial number, make and model of the aircraft and make and model of the navigational unit.”

(7) Para 7f – this is an improvement, but again fails to say in plain English what is required. Do we want control wheel locks (NOT Iron Maidens) installed inside hangars or not?

Response: Reworded text to read: **f. Aircraft Security.** Corporate aircraft shall be locked, securely tied down, and wheels chocked when not in use. With exception of Garmin G1000 equipped aircraft, avionics/control locks shall be installed any time aircraft are not in locked or guarded areas. Install control wheel locks on Garmin G1000 equipped aircraft when outside and not in use.

(8) Para 9f – Typo. “These detectors will be replaced every....” -- text says “ever”

Response: Corrected spelling

b. Comments received and not incorporated in final draft:

(1) Paragraph 6a – Mid-cycle oil change- change between 40 and 60 to “After 50 hours.....”

Response: The 40 to 60 hour range was approved and implemented in an earlier revision to CAPR 66-1. The consensus is that this 40-60 hour range is reasonable and offers some degree of scheduling flexibility while still meeting the intent to change the oil mid way through the 100-hour cycle.

(2) Attachment 1. – item 9 “tire inflation has nothing to do with tire inflation but appears to be part of 8

Response: item 9 “tire inflation” is one item in a list of tasks that may be performed on CAP aircraft by CAP pilots and uninsured. It is in no way associated with the preceding item.

(3) Paragraph 9f. Carbon Monoxide Detectors. – To read, in part, “A current carbon monoxide detector will be maintained in all aircraft including those equipped with electronic detectors. National will provide detectors annually.” *The objective here is to maintain by regulation the requirement to have a current detector in all aircraft and to remove the requirement to replace them at a specific time.*

Response: This item is written as approved by the 2009 Summer National Board. It has been the practice for NHQ/LGM to ship carbon monoxide detectors to wings, each year, during the month of December, so that each assigned aircraft can begin the calendar with a new detector. Any change to this schedule would simply add confusion to an installation cycle that has worked successfully for years.

(4) Paragraph 9c. Avionics/Control Lock. – Theft of older radios is no longer a problem. “Stack” locks that were provided years ago are not necessary any more. They are not very effective because they are relatively easy to remove, If someone has the know-how to remove the old radios the “stack” locks are no longer a deterrent. Experience shows that we are doing some damage to the panel and instruments while installing and/or removing them.

Response: The use of avionics/control locks is policy established by previous National Board action. We can revisit this request during the re-write.

(5) The re-write of CAPR 60-1 established some new criteria for CAP Regulations. The draft CAPR 66-1 does NOT conform to those objectives. I suggest that the entire document be re-thought from that perspective. John Salvador can provide insight into the CAPR 60-1 re-write process, and for that reason I have copied him on this email.

The objectives for the CAPR 60-1 re-write were:

1. Simplify the document! Many CAP Regulations (including the draft 66-1) are so cluttered with unnecessary information that it is easy for members to miss what is important.
2. Eliminate anything that is already contained in another regulation. In particular, CAP Regulations should not try to regurgitate FAR’s. Just saying that FAR’s still apply is plenty.
3. Move fast-changing material to a website external to the regulation itself. This reduces the need for frequent regulation updates.

I believe that the draft CAPR 66-1 needs to be rewritten from the ground up to comply with these guidelines. I will list a long list of examples, but they are NOT meant to be all-inclusive. I am certain a drafting committee will find many more things which should be changed.

Response: This change to CAPR 66-1 was not intended as a total re-write. The purpose was to incorporate all of the outstanding ICLs into one change. Perhaps at some time in the future CAPR 66-1 can be turned over to a drafting committee for a total rewrite, most likely after all of the wings are under consolidated maintenance. Until then, we feel 66-1 in its current configuration adequately addresses the CAP maintenance program .

(6) Para 2 – General. You have already said in para 1 that FAR’s apply. Para 2 adds nothing to that, except the last sentence which requires NHQ/LGM approval in addition to FAA approval. The rest of the paragraph can be deleted. Moreover, I am confused about the current approved terminology for LGM. Is it LGM or LGMA or LGMX? Various CAP documents and regulations use each and every one of those terms – bad idea.

Response: The earlier comment applies. We did not re-write the regulation, we merely incorporated current changes. The issues of LGM, LGMA and LGMX are a carryover from an organizational change. Those have all be corrected.

(7) Para 3e – Completely useless. The defined term (“Major Repairs and Alterations”) appears NOWHERE in the regulation outside of this paragraph.

Response: This was not an item addresses by any of the Ices. We will evaluate this change during the complete re-write of CAPR 66-1

(8) Para 3i – A perfect example of useless words. “Time from the moment that the aircraft leaves the surface of the Earth.....” Time in service is tach time – period. Interestingly, using the tach would be in direct violation of the definition given. The tach does not measure time from leaving the surface of the Earth. This is exactly the kind of nonsense we want to eliminate from CAP regulations.

Response: Definition extracted from FAR subchapter A – Definitions and abbreviations.

(9) Para 4 – “A maintenance management programs...” (Cannot use “a” with a plural.) This is all inconsistent with the new centralized maintenance program. We will be 100% shortly, so delete all these unnecessary words. There should no longer be Wing supplements required.

Response: Corrected the grammar error. Even under consolidated maintenance wings will still be play a role in managing aircraft maiontenane. A supplement allows a wing to identify organization-specific procedures and practices.

(10) Para 6b – all this information is contained in FAR’s and should not be in 66-1. Just say that 100 hour inspections are required.

Response: This paragraph not only describes the 100-hr inspection requirement, it also provides reference for inspection requirements in FAR Part 43 and FAR Part 21 for the maintenance officer’s use. It goes on to discuss the 10% over-fly authorization and explains how the the time used to reach the inspection site is accounted for in the time for the next 100-hr inspection.

(11) Para 6c – this is like saying corporate aircraft cannot be flown unless they have an airworthiness certificate. Pointless. Covered in FAR’s.

Response: This information, “Corporate aircraft shall not be operated unless within the preceding 12 calendar months in service it has received an annual inspection in accordance with FAR Part 43, performed by an FAA-certified mechanic holding an inspection authorization or a certified repair station certification.” Is intended to provide specific guidance for individuals

involved in scheduling aircraft for inspections, who may not have a thorough knowledge of the FARs.

- (12) Para 6d – all covered by FAR's.
Para 7a – covered by FAR

Response: Response: We can certainly address in the total re-write, however given the errors in scheduling inspections and over flight of scheduled inspections we have seen, we feel it is important to retain this information as a backup to the FARs

- (13) Para 7c – Preventive maintenance has already been defined in para 3. No need to repeat.

Response: This particular item addresses CAP authorized preventive maintenance which varies somewhat from that described in the FARs

- (14) Para 7d – this misses the only important point – that discrepancies must be addressed. Refer to discussion at last NB meeting. Namby-pamby words which say nothing are useless in a reg. Say what must be done.

Response: This section remains unchanged, but will be modified by formal change once the final format for delayed discrepancies has been clarified

- (15) Para 8a – the first sentence is meaningless.
Eliminate Para 8b – the first sentence is meaningless. Eliminate

Response: We left those comments unchanged. They do not detract from the overall intent of the text.

- (16) Para 8b – this is included in CAPR 60-1, which is the appropriate place. Repeating here is redundant and useless. CAPR 66-1 is intended for LGM's - - they do not release cadet flights.

Response: This information was included in both regulations at the request of CAP senior leadership for emphasis. Flight release officers may not have immediate access to engine change or overhaul data.

- (17) Para 10c(2) – When no max demo xwind is published, use 15 knots.

Response: This particular section only describes text actually printed on the placard.

- (18) Para 10d – FAR requirement – eliminate

Response: We acknowledge the fact that this information is extracted verbatim from the FARs, but we have experienced some problems with ID plate placement and feel that this passage provides good guidance for the maintainer who has to replace an ID plate.

(19) Para 11 – This is FAR information. Should not be in CAP regulation

Response: This information was extracted from the ICL

(20) Para 13b – Inconsistent with new consolidated maintenance program.

Response: Will be changed when all wings are under consolidated maintenance

(21) Para 13c -- Not sure, but may be inconsistent with consolidated maintenance.

Response: Will be changed when all wings are under consolidated maintenance

(22) Para 14a – Already contained in another CAP regulation

Response: Portions of this will be included in the new CAPR 174-1.

(23) Para 14b – This is NOT what actually happens in practice. Review this section for applicability. All pecuniary liability info is supposed to be removed from CAP regulations and moved to the new regulation being drafted.

Response: Guidance will be included in CAPR 174-1

(24) Para 15 – “Where applicable, the control lock shall be installed.” What does this mean?

Response: It means when control locks are available for the aircraft they should be installed

2. No further comments were received.

//Signed//

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