

Robert L. Cassidy

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Dear Honourable Senators,

Submission: Future of Australia's Aviation Sector Issues Paper 2020 - Flying to Recovery

Please allow me to introduce myself. I am Robert Cassidy, from Bothwell, Tasmania. **Despite my accent**, I have been an Australian citizen, since 11 February 2005. I have held the highest available Pilot Licence from seven countries, earning my first Airline Transport Pilot Licence, on 31 December 1982. Then, I earned the highest available Pilot Licence for Helicopters, the Instrument Airline Transport Pilot Licence, on 5 October 1983. I have held Commercial single and multi-engine Seaplane Pilot Licence. I have held the highest available Flying Instructor Ratings for single and multi-engine Aeroplanes and Helicopters, allowing me to teach Pilots to fly with reference to Instruments in fog, clouds and at night, without a natural horizon, from 1981 and 1987, respectively, until 2013, though I could only ever achieve Grade 2 Flying Instructor, in Australia, which expired after only 2 years. I have held an F.A.A. Aircraft Mechanic Licence for Airframe and Powerplant, for Aeroplanes and Helicopters, since 1993, but could never achieve that in Australia, as wrenches work differently, here, I suppose. I served as a US Army-trained helicopter Pilot, Maintenance Officer and Maintenance Test Pilot. I have flown approximately 130 different aircraft to include single and multi-engine aeroplanes, single and multi-engine seaplanes, single and multi-engine helicopters, two and four engine turboprops and jets, including serving as a Captain of Boeing 747-400, 747-300, and 747-200 jumbo jets, as well as Boeing 737-800 and 737-700 jet aircraft.

I made my first trip as a new Captain flying a Boeing 747-400 jumbo jet to Australia, 20 September 1999. Throughout my career, spanning thirty-six years, I fought hard against hostile forces and commercial pressures to maintain a perfect Aviation safety record. I have enjoyed a career that has taken me to forty-seven countries. I have been a published Aviation safety Writer, since 1983, and I am a published author of my autobiography, titled, "Dancing With Clouds", which is in the National Library. I have no ax to grind against C.A.S.A., I am just passionate about Aviation, which is my reason for making this submission.

When I separated from Active Duty with the U.S. Army, as a Bell Iroquois Pilot, to pursue a civilian Aviation career, March 1982, I was 28 years old. **Back then**, I fully expected that I would still be earning my living as a Pilot well into my seventies. That means I have another decade of usefulness, as a Pilot. **And(!)**, why not, if I can still pass an Aviation Medical

examination? The egregious costs to keep my Australian Pilot Licence, Command Instrument Rating, Class 1 Aviation Medical, and Aviation Security Identification Card valid -are more than I can afford.

I believe the real reason for the decline of General Aviation is the egregious over-regulation, verbosity, the regulatory complexity, and the cost burden on everyone involved, for no added safety benefit. To purchase the several volumes of C.A.S.A. Regulations is nearly \$500 compared to \$25 for the F.A.A that comes in one book. I believe I have provided sufficient information in the attachments of my written submission to prove that Aviation-Safety statistics for Australia are worse than for the U.S., though C.A.S.A. has wrapped every aspect of Aviation in cotton wool that does not involve straight and level, fair-weather flying.

I would like you inform the Future of Aviation Reference Panel members that I made a written submission to the Senate Standing Committees on Rural and Regional Affairs and Transport, Phone: (02) 6277 3511, Email: rrat.sen@aph.gov.au

My submission was #22, on page 2 of 3. You may down load it from here-
https://www.aph.gov.au/sitecore/content/Home/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/GeneralAviation/Submissions

I provided statistical analysis and information to demonstrate that egregious, prescriptive, over-regulation by the Civil Aviation Safety Authority is so costly to General Aviation that the industry is dying slowly, almost unnoticed, by a thousand cuts –for no added safety benefit! In fact and truth, I proved Aviation statistics for Australia are worse than for the U.S.A., under the much simpler and more straight forward Federal Aviation Administration system of Regulation, contrary to what C.A.S.A. would make you believe. Why? How? To deliberately obfuscate and make their version of statistics look more promising, C.A.S.A., B.I.T.R.E., and A.T.S.B. define General Aviation differently than the U.S. Federal Aviation Administration, again, which is as straight forward as anything that is not military or airline must be General Aviation. Do you want to get to the truth and root cause of the decline of the General Aviation industry? Then, please read my submission and the script I read from to the Senate Committee when I was invited to give evidence, Friday 20 November 2020, 11:45 to 12:15. I have attached the Script.

Let me address specific points regarding the Future of Australias Aviation Sector Issues Paper:

**Page 17 Reducing the Regulatory Burden:
General Aviation**

The General Aviation (GA) sector comprises activities other than scheduled passenger operations. It includes commercial operations such as aeromedical operators, agricultural aviation businesses, aviation-based firefighting services, flight training, aerial work such as aerial photography and surveying, as well as non-commercial aviation activities such as private flying.

The Bureau of Infrastructure, Transport and Regional Economics (BITRE) 2017 General Aviation Study highlighted mixed fortunes in an evolving sector. Recent data from the General Aviation Activity Survey shows stagnation in certain sectors such as private flying and sport and recreational aviation. However, other sectors, including aerial work, are experiencing periods of growth. The Study outlined key challenges facing the industry such as fluctuations in the cost and availability of aviation gasoline (Avgas) fuel and maintenance of an ageing, fixed wing VH-registered fleet. It also outlined opportunities for the industry including harnessing the benefits

of potential multiple commercial applications of RPAS and targeted measures for enhanced pilot training.

Questions for consideration:

The Government understands the key challenges facing the GA industry. Given the impact of COVID-19, are there other areas where governments could be focusing to support GA?

Answers for your consideration:

Personally, I do not believe the “government” understands the key challenges facing the General Aviation industry. IF the government understood, then I would never considered making a submission. If the government understood, then it would abolish Civil Aviation Safety Authority and its entire suite of Regulations, bring its purpose and function back to government, call it the Department of Civil Aviation, headed by a Government Service Manager “Director”, at a salary and compensation and superannuation package that is more in line with other Government Service employees. The government would save \$1million/year, there. There should be no CEO, as in a Government Business Enterprise, like AusPost. The “Director” of the Department of Civil Aviation or Director of Aviation Safety MUST BE a Pilot, with a profound Aviation background with military, General Aviation, and airline experience and the holder (even if not current and active) of an Airline Transport Pilot Licence (the highest available Pilot Licence) –a person who is absolutely in touch with Aviation. A career bureaucrat, without even a Private Pilot Licence is the antithesis of the person I described.

B.I.T.R.E. statistics are not correct nor conclusive. Why? The definition of General Aviation is wrong. Ask B.I.T.R.E. what contribution to the Gross Domestic Product does G.A. make? The department statisticians would not be able to tell you. BUT, in the U.S. that contribution is known, almost to the dollar. I provided that data set. B.I.T.R.E. is wrong about Recreational Aviation being stagnant. In fact, it is growing as Pilots desert traditional General Aviation, due to the regulatory cost burden. The training cost burden, which I have proved in my Evidence presented to the Senate Committee. Crop Dusting is in decline, due to E.P.A. Regulation, especially in Tasmania. The issues surrounding AvGas (Aviation Gasoline) is down to lack of manufacturing/refining facilities, storage facilities, and the biggest driver Demand versus Supply (Economics 101). The declining General Aviation activity, due to the cost of over-regulation, has reduced demand. These issues really are links of a chain. Break any one link and you should see a reversal in activity. The ageing aircraft fleet costs too much to maintain, under current C.A.S.A. Regulation. Can you believe there are aeroplanes, like the Bleriot constructed in 1909 still flying, just as there are pilots still flying who are 99 years old? **Why not?!**

(Note: Page 29 is directly related to Page 17, thus I am addressing them out of sequence)

Page 29 Targeted assistance: Aviation skills and workforce development

1) Access to skilled workers is a prerequisite for a competitive and efficient aviation sector. The Australian Government plays an important role in assisting industry address this challenge by providing assistance to students and employers **2) through various education initiatives, as well as managing the migration framework.**

Prior to COVID-19, **3) the shortage of skilled personnel in the aviation sector was a global problem.** Previous forecasts suggested **4) strong aviation growth, particularly in the Asia Pacific, would translate to pressure on training systems to meet the huge demand for skilled personnel.** The impacts of the COVID-19 crisis have forced airlines to make drastic cuts to workforces, which has alleviated the skill shortage in the short term. However, this current respite may be

short lived. 5) Issues have arisen relating to maintenance of skills and capabilities during the downturn, due to the ongoing professional training requirements for some professions, such as pilots.

6) As the pandemic continues to impact aviation activity, it may be difficult for current licence holders to continue to meet these requirements. Further reduction in the qualified workforce through a large scale lapse in skills and accreditation or an exodus of skilled personnel could exacerbate prior skills shortages as the sector recovers.

It is possible the current workforce cuts may create a significant pool of aviation workers looking for future opportunities elsewhere in the industry. It may be prudent to harness this current excess to address ongoing skills issues previously forecast such as providing access to aviation skills for regional aviation businesses or redirecting skilled workers into training and education roles to increase capacity.

Questions for consideration:

Noting the complexity added by COVID-19 to the changing nature and structure of the aviation workforce:

Are there other or modified options to improve the aviation workforce training framework to better meet the current and future needs of industry, beyond those identified in the Expert Panel Report?

Are there options to improve the longer-term development and/or retention of aviation skills?

Answers for your consideration:

For emphasis, “Personally, I do not believe the “government” understands the key challenges facing the General Aviation industry.”

If you will heed what I have previously written, here and in my submission to the Senate Committee, **we can fix this**. It is not too late. The COVID pandemic has given us a unique opportunity to do an Aviation-industry **Reset**.

In the highlighted excerpts of the Issues Paper 2020 I have inserted numbers followed by a parenthesis, which will be addressed below.

1) The first challenge for Aviation employers Australia-wide is to cut the “Tall Poppy Syndrome crap! and nepotism, the first challenge for the government and C.A.S.A. is to understand what is a “skilled worker”. I NEVER knew what a Certificate II or a Certificate IV was, until immigrating to Australia. Is the purpose merely a tick on the box, for a Flying School to issue a Diploma, when the level of specific training, knowledge, and experience exceeds what is taught for either a Certificate III or a Certificate IV? There should be exemptions to this inanity or a certificate III or IV simply issued, especially if it is merely for a tick in the box.

Consider, by 11 February 2005, when I became a fully fledged, naturalized Australian citizen, I already held the highest-available Pilot Licence (Airline transport pilot Licence) from the U.S.A., Taiwan, and Iceland. I had already served more than two decades in Aviation, including military service, General Aviation, and airline. I had already served as a Captain of Boeing 747-400, 747-300, and 747-200 jumbo jets. I already held a higher level Airline Transport Pilot Licence for Helicopters, from the U.S., that is an Instrument Airline Transport Pilot Licence, which I could NEVER achieve in Australia, chiefly due to the egregious cost explained in my Evidence to the

senate Committee and availability of aircraft, Instrument Instructors, and examiners. And, I had already been an Instrument Examiner/Assessor/Testing Officer, based at LAX, for two engine corporate helicopters. I earned the Airline Transport Pilot Licence for Multi-engine Aeroplanes, 31 December 1982 and for Helicopters, 5 October 1983. Yet, to earn the C.A.S.A. Airline Transport Pilot Licence, which was issued 4 December 2004 (ARN: 573213), I was treated AS IF I didn't even know how to fly a kite. I have operated various aircraft in forty-seven countries, around the world. Trust me when I write here a Boeing 747 functions exactly the same flying over the Sierra Nevada mountain range, which separates California and Nevada and are as high as 14,494 feet as flying over the Snowy Mountains' Mount Kosciuszko, at half the height of Mount Whitney. The only difference is Air Laws, of the separate countries. Yet, I sat a very expensive and time-consuming battery of written examination. By comparison, for my Icelandic ATPL, I only sat an Air Law Exam. So, recognition of a pilot's foreign licence, especially from a Western ally and first world country should be no harder than sitting an Air Law examination, because an aileron is an aileron and its purpose and function is the same, whether on a Boeing or a Cessna, regardless if flown in America or Australia. If you are not a professional pilot, then you would not know that.

2) I had been awarded a third contract to fly Boeing 747-300 and Boeing 747-200 aircraft as Captain, starting December 2003, but Department of Immigration deliberately delayed issuing a Re-Entry Visa to me for two weeks. In fact, it was issued one hour after my rescheduled Qantas flight to London had departed. I lost the contract and that ended my career as a Boeing 747 Captain. Consider I just had a victory against Department of Immigration at the Migration review Tribunal, 16 October 2003. By the way, the previous two Re-Entry Visas were issued virtually across the counter after making application, same day or within a week. So, the **"migration framework"** was egregiously flawed, in my case.

Insofar as, **"Education initiatives"**, may I suggest HECS-type loans for Flight Training. When my previous employer went into liquidation and I became unemployed and subsequently eligible for NewStart Allowance, I BEGGED CentreLink and JobServices for an Interest-free loan so I could renew my Multi-engine Command Instrument Rating costing \$9,000 and to renew my Class 1 Aviation Medical costing about \$1,200 –to no avail. What if there was a program to make a \$15,000 interest-free loan available from CentreLink or through JobServices, so I could revalidate my Pilot Licence? I would have been able to gain employment, back in 2014 and continued to work up until COVID decimated the Aviation Industry. I told CentreLink and the Tribunal that they would end up paying me more in NewStart payments in the first year than I was asking for? CentreLink have a closed mind. They are merely intransigent, obstructionist bastards! **Unhelpful**, in a word.

3) The global pilot and aircraft mechanic shortage has been around, since I began my civil flying career, in 1982. It is not news.

4) Boeing has forecast even with the COVID pandemic affecting the industry, a requirement for 248,000 pilots and 253,000 aircraft mechanics, just in the Asia-Pacific Region. IF we do not start changing C.A.S.A.'s egregious over-regulation of Flying Instruction, Flying Instructors, and Flying Schools, Australia will be in the unenviable position of grounding fleets of aircraft across the country, due to lack of qualified Crew, as is currently the case in China, (I was an airline Captain flying Boeing 737-800 and 737-700 jets, in China from June 2007 to November 2011). Under the U.S. Federal Aviation Administration a Flying Instructor does not have to be wedded to a Part 141 Flying School and can operate as "independent" Flying Instructors, creating their own employment opportunities. Considering aviation Accident Statistics are worse, in Australia, than in the United States, what is the benefit of forcing Flying Instructors to be wedded to a

Flying School, under C.A.S.A.? Of course, C.A.S.A. will tell you that Flying Instructors can be independents, but the application process is about \$50,000 to get an Air Operator Certificate. Under the F.A.A., holding a Flying Instructor for Category, Class, and Rating is sufficient. Also, under the Federal Aviation Administration there is no “Graduated” Flying Instructor scheme, like there is in Australia (Grade 3 lowest, Grade 2, Grade 1). Under Australia’s scheme, it meant when I earned a Grade 2 Aeroplane and Helicopter Flying Instructor rating, November 2009, I would need to be supervised by a Grade 1 Flying Instructor for the first 150 hours. That Grade 1 Flying Instructor, building hours for the next rung on his career ladder, could be half my age and have a fraction of my flying experience. Consider I have held the highest-available Flying Instructor Ratings for single and multi-engine Aeroplanes and Helicopters (Certificated Flight Instructor Instruments), since 1981 and 1987, respectively, issued by the Federal Aviation Administration. I was never able to replicate that achievement under C.A.S.A., again, due to ridiculous costs imposed by C.A.S.A. Regulations. Australia needs to change the way it trains Pilots and Aircraft Mechanics to meet its future needs, to create job opportunities during the post-COVID recovery.

5) and 6) In the Evidence (attached) given to the Senate Committee, I addressed the “Issues . . . relating to maintenance of skills and capabilities during the downturn, due to the ongoing professional training requirements for some professions, such as pilots.” Again, C.A.S.A.’s egregious over-regulation and cost imposed upon pilots, directly caused me to give up my flying career. I just could not afford to maintain a current and valid Pilot License. BUT, I believe it is deliberate. No?

If a pilot (over 60 years of age) earning bare minimum award wage has not been stuffing wads of cash under his mattress over the previous 12 months, he would not be able to afford to renew his Instrument Rating and Class 1 Aviation Medical. In my case, I have a mortgage bills, cars repairs, and a family. In this day and age, if average Australians struggle to pay rent or struggle to save for a 20% down payment for a mortgage, then where does one get nearly \$11,000 to renew his Pilot credentials, annually?

If you will please read the Evidence (script) attached that I read to the Senate Committee, then you will gain a clear understanding the one common denominator to the decline of the General Aviation industry in C.A.S.A. egregious over-regulation –for no added safety benefit. That same common denominator will also limit growth and the rebound that is needed post-COVID. There is zero reason why a Pilot with my qualifications, 2% of Pilots licenced by the U.S. Federal Aviation Administration hold, should be unemployed. If that is 2% in the U.S., then how many Australia-born Pilots would hold as many Aviation credentials, plus experience and flying hours.

If someone with my background and credentials finds it this difficult, how about your average Australian-born Pilots? If you want to grow the industry and create Aviation job opportunities abolish C.A.S.A. and simply adopt the U.S. Federal Aviation Regulations.

Sincerely,

A large black rectangular redaction box covering the signature area.

SENATE HEARING EVIDENCE - 20 NOVEMBER 2020, 11:45

Good morning. Please allow me to introduce myself. I am Robert Cassidy, from Bothwell, Tasmania. **Despite my accent**, I have been an Australian citizen, since 11 February 2005. I have held the highest available Pilot Licence from seven countries, earning my first Airline Transport Pilot Licence, on 31 December 1982. Then, I earned the highest available Pilot Licence for Helicopters, the Instrument Airline Transport Pilot Licence, on 5 October 1983. I have held Commercial single and multi-engine Seaplane Pilot Licence. I have held the highest available Flying Instructor Ratings for single and multi-engine Aeroplanes and Helicopters, allowing me to teach Pilots to fly with reference to Instruments in fog, clouds and at night, without a natural horizon, from 1981 and 1987, respectively, until 2013, though I could only ever achieve Grade 2 Flying Instructor, in Australia, which expired after only 2 years. I have held an F.A.A. Aircraft Mechanic Licence for Airframe and Powerplant, for Aeroplanes and Helicopters, since 1993, but could never achieve that in Australia, as wrenches work differently, here, I suppose. I served as a US Army-trained helicopter Pilot, Maintenance Officer and Maintenance Test Pilot. I have flown approximately 130 different aircraft to include single and multi-engine aeroplanes, single and multi-engine seaplanes, single and multi-engine helicopters, two and four engine turboprops and jets, including serving as a Captain of Boeing 747-400, 747-300, and 747-200 jumbo jets, as well as Boeing 737-800 and 737-700 jet aircraft.

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National Library. I have no ax to grind against C.A.S.A., I am just passionate about Aviation, which is my reason for making this submission.

- When I separated from Active Duty with the U.S. Army, as a Bell Iroquois Pilot, to pursue a civilian Aviation career, March 1982, I was 28 years old. **Back then**, I fully expected that I would still be earning my living as a Pilot well into my seventies. That means I have another decade of usefulness, as a Pilot. **And(!)**, why not, if I can still pass an Aviation Medical examination? The egregious costs to keep my Australian Pilot Licence, Command Instrument Rating, Class 1 Aviation Medical, and Aviation Security Identification Card valid -are more than I can afford.
- I believe the real reason for the decline of General Aviation is the egregious over-regulation, verbosity, the regulatory complexity, and the cost burden on everyone involved, for no added safety benefit. To purchase the several volumes of C.A.S.A. Regulations is nearly \$500 compared to \$25 for the F.A.A that comes in one book. I believe I have provided sufficient information in the attachments of my written submission to prove that Aviation-Safety statistics for Australia are worse than for the U.S., though C.A.S.A. has wrapped every aspect of Aviation in cotton wool that does not involve straight and level, fair-weather flying.
- One key indicator of the health of the Aviation Industry is the numbers of Pilots with Expired Instrument Ratings, those whom hold current Instrument Ratings, and those applying for new Instrument Ratings, compared to the entire Pilot population, over the past decade. I cannot get any statistical data from C.A.S.A. about those numbers. I was refused or was told I would have to pay a fee, yet they provide other statistical data, supporting their agenda. Perhaps the Senate Committee can force the issue with

C.A.S.A., to get at the truth, to understand the real health of Australia's Aviation industry. To know that, you should know what contribution General Aviation makes to the Gross Domestic Product and Employment Statistics.

Just to recap the definition of an Instrument Rating, it allows a Pilot to takeoff and land in foggy conditions, fly through clouds, and fly at night, by referencing cockpit instrumentation, without reference to a natural horizon.

What is the value of an Instrument Rating? According to the Australian Transport Safety Bureau, in the decade from 1 July 2009 to 30 June 2019, 101 occurrences of continued flight visually into fog or clouds obscuring forward visibility and terrain were reported to the A.T.S.B. **Of those**, 9 were accidents resulting in 21 fatalities. That is, about 1 in 10 aircraft flying by Visual Flight Rules into weather the Pilot cannot see the natural horizon or ground, which resulted in a fatal outcome.

Why is this statistical data important? Would you be aware that the cost of an Instrument Rating for a Helicopter Pilot is a whopping \$65,000, in Australia, though little more than half of that in the U.S., to fly the same aircraft? A large part of the cost is the extra flying hours required by C.A.S.A. over-regulation, that must be administered by a Part 141 or 142 Flying School.

On the C.A.S.A. website, Part 61, specifies, *"To gain your Instrument Rating you need to hold at least a Private Pilot Licence . . . You also need to complete flight training at a Part 141 or Part 142 training operator, in addition, you need to have the following aeronautical experience in aircraft of the same category that the flight test is to be conducted in"* 50 hours Cross Country.

“Category” is defined as either an Aeroplane or a Helicopter. **To reiterate**, C.A.S.A. requires the 50 hours Cross Country experience to be in the “**same aircraft category**”, for no added safety benefit. That is, 50 hours flying an Aeroplane, plus 50 hours flying a Helicopter, for a Pilot like me, who flies both. **By contrast**, the F.A.A. requires only 10 hours specific to the Category. A Cessna 172S would cost \$297/Hour versus \$1,100/Hour for a Robinson R44 helicopter, just to give you an idea how C.A.S.A.’s over-Regulation builds-in unnecessary costs to Pilots. But, it has not improved Aviation safety one whit. And, those are minimum requirements, not what the Pilot may actually need to fly to pass the Test.

- Under the FAA, suppose a Private Pilot owns a two engine Beechcraft Baron, he will be required to hold a Multi-engine **Class Rating**. **Class** refers to Single Engine or Multi-engine. If that same Private Pilot wants to hold a Instrument Rating, he could conceivably receive all of his training for an Instrument Rating, in a Single Engine Aeroplane, because there is no separate Instrument Rating for Single Engine Aeroplane, Multi-engine Aeroplane, Single Engine Helicopter and Multi-engine Helicopter, like there is under CASA, **again** for no added safety benefit, **just added cost** to Pilots and the Aviation industry. Under C.A.S.A., that one word “**Class**” can add \$22,000 to get an Instrument Rating in a Multi-engine Helicopter, that would offer real employment prospects. The difference for a Pilot wanting an Instrument Rating in a typical Multi-engine Aeroplane like a Beechcraft Baron, leading to real job prospects and giving the Pilot a leg up toward an airline career, rents for circa \$780/Hour, versus a Single Engine Beechcraft Debonair at \$205/Hour. **That additional 10 Hours**, required by C.A.S.A. wanting to wrap everyone in cotton wool would cost the Pilot an additional \$5,750. **Why?!** Has it made Australian skies safer? An Altimeter and Airspeed Indicator works the

same in a Multiengine Aeroplane, as it does in a Single Engine Helicopter. **In fact**, as the holder of an F.A.A. Aircraft Mechanic Licence, I can assure you that you will find the same instruments designed and built by Mid-Continent Instruments & Avionics, installed in a wide variety of Single and Multi-engine Aeroplanes, Seaplanes, and Helicopters. So, why does C.A.S.A. demand a specific Instrument Rating for each **Category** and **Class** of aircraft. Did I end up in a crumpled heap or a smoking hole on a hillside? I have over 5,000 hours flying in Actual Weather requiring sole reference to instruments. Thus, I believe a conclusion **could be made**, due to the unaffordability of an Instrument Rating and keeping it current could be contributing to Australia's Aviation Accident Statistics. It is hard for A.T.S.B. to interview dead Pilots though.

Please recall, former Prime Minister Malcolm Turnbull's father, Bruce, was killed along with two other passengers and the Pilot, on 11 November 1982, in a single engine Piper Warrior. The Pilot was **not** Instrument Rated, yet he continued visually flying into adverse weather conditions, probably experienced spatial disorientation while flying in cloud, which occurs in about 178 seconds, before losing control of the aircraft, and exceeding the design strength limit of the aircraft –according to A.T.S.B

By contrast to C.A.S.A., under the F.A.A., I did all of my Instrument training in a Single Engine Helicopter, yet I could fly a Multi-engine Helicopter and became an Examiner for other Instrument Rated helicopter Pilots, based at LAX. Further, when I received my Instrument training for Aeroplanes, in 1980, I did it all in a two engine Beechcraft Duchess, and took my Flight Test in a Single Engine Beechcraft Sierra, yet under the F.A.A. my Instrument Rating was valid for both SE and ME Class Aeroplanes. I did not need to hold a Multi-engine Command Instrument Rating to fly any two engine

aeroplane, like under C.A.S.A. To reiterate, I maintained a perfect Aviation-safety record throughout my career, spanning 36 years. Not once did I inadvertently fly in a cloud. **How was that even possible**, without the benefit of C.A.S.A. wrapping me in cotton wool, just in case?

- In Australia, the egregious costs under C.A.S.A., discourages a Pilot from earning an Instrument Rating, in the first instance, and then, once he gets an Instrument Rating it if he hasn't been stuffing wads of cash under his mattress, over the next 12 months, then he would not be able to afford to renew his Instrument Rating. My previous employer, paid \$9,000 to renew my Instrument Rating, for me to fly a two engine aeroplane, just to give you an idea of costs of a **renewal**. I have **never once** had to pay for an Instrument Rating renewal, anywhere else. Please consider, I have held a current and valid Instrument Rating, since March 1979. **In Australia**, I just could not afford to renew it, at my own expense, thus it expired, after I was put out of work by a shonky operator who went into liquidation, owing everyone money. He owed me 8 weeks pay and he didn't pay any of the superannuation I had earned. **Are you beginning to get an idea** just how much over-Regulation costs the Aviation-industry? How it limits **jobs 'n' growth** of the Australian Aviation industry **and** the economy?
- Further, in Australia, under the egregious cost burden of C.A.S.A. Regulations, I would be required to perform an Instrument Rating Proficiency Check, in the more expensive Multi-engine **Class** Aeroplane or Helicopter to satisfy meeting Single Engine, as well. By comparison, it is only required, under the F.A.A. Regulations 61.57 to do it in the **same Category**, which is Aeroplane and Helicopter, for me. Under the F.A.A., I would not have to rent a much more expensive two engine Aeroplane and Helicopter, as I would according to C.A.S.A. Regulations.

This one set of C.A.S.A. Regulations about Instrument Rating is a very good example where the F.A.A. model should be introduced **completely**. I believe it would save lives, because more Australian Pilots could afford to earn an Instrument Rating and keep it current. That would certainly generate more activity and flying jobs. There would be fewer instances of Pilots flying Aeroplanes and Helicopters, from clear weather into clouds and crashing. A fellow Pilot, recently confided that the lack of an Instrument Rating has held his career back, as Commercial Helicopter Pilot, simply because he cannot afford it. Imagine that pilot coming up with \$65,000 to receive training in a Bell 206 helicopter, yet he would still not be able to gain employment, because most employers would require him to hold a Multi-engine Command Instrument Rating, that is learning to fly a helicopter with two engines, but one Main Rotor/Propeller, incurring greater cost, to fly an Aerospatiale 355 at \$2,200/Hour. With this kind of regulatory burden, it is surprising anyone can afford to learn to fly, at all, except the elite of our society? I could only afford a VFR Helicopter ATPL.

- Another set of C.A.S.A. regulations to consider is the requirement to hold a Night VFR Rating and again for both Category and Class, plus proficiency checks. F.A.A. merely requires 3 hours Night training in Category and Class, for a Private Pilot. C.A.S.A. states in its Advisory Circular 61-05, “Flight operations conducted at night under VFR—also known as NVFR operations—are not a common practice internationally”, yet I have enjoyed 3,263 hours flying at Night, during my career, without a C.A.S.A. Night VFR Rating. **C.A.S.A. don’t have a clue.**

Please consider economic recovery post-COVID and the lost employment opportunities in General Aviation under C.A.S.A.’s egregious, and verbose over-regulation, for no added safety benefit. This is our **one opportunity** to make real and meaningful change, to the way the Australian aviation-industry is regulated. **Post-COVID**, every job we create will count

toward economic recovery. The cost burden of over-regulation and bureaucracy kills jobs creation opportunities, in Aviation.

My hope is to allow you to fully understand the cost burden of the Regulatory differences under C.A.S.A. versus the F.A.A.'s much simpler and more practical approach. Statistically-speaking, flying in Australia is no safer than in the U.S.A., though topography combined with weather are easier, here.

The way C.A.S.A. administers its suite of Regulations is complex, expensive to comply with, does not encourage compliance, and does not provide the safety outcomes that Civil Aviation Regulation Act 1988, Section 9 mandates,

It is bad enough that C.A.S.A. is nothing more than a Government Business Enterprise, like AusPost, but worse, it writes Regulations out of fear of litigation. I believe Civil Aviation Safety Authority, along with Air Services Australia, should revert to the Department of Civil Aviation under a government Department of Transportation. I believe the Federal Aviation Regulations should be adopted and enacted completely, not simply rebadging the complex C.A.S.A. Regulations with F.A.A. style numbering system. I believe the CEO and Director of Aviation Safety should be two separate individuals. Thus, the CEO position could be eliminated entirely, saving one fat-cat bureaucrat's salary and benefits package, if C.A.S.A. reverted to the Department of Civil Aviation. The Director of Aviation Safety **must be** a Pilot and hold or held an Airline Transport Pilot Licence, with a breadth and depth of General Aviation experience, military experience, and airline experience, that is **someone who is truly in touch with Aviation**. Someone like me!

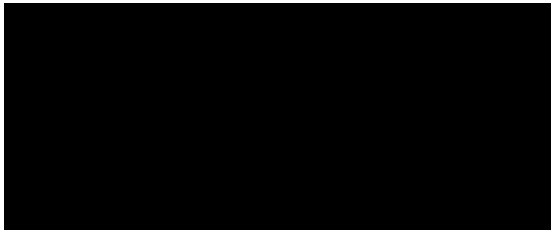
The over-supply of Aviation personnel will be temporary, due to the COVID pandemic. Regardless, both Boeing and Airbus still predict a requirement for 248,000 Pilots and 253,000 Aircraft Mechanics, just in the Asia-Pacific Region. **Where will**

they come from, if the Aviation industry is stymied by C.A.S.A.'s ridiculous over-regulation, for no added safety benefit, just greater costs to everyone involved? Australia will need to issue 457 Visas for Pilots and Aircraft Mechanics, if the status quo is maintained. General Aviation is being suffocated.

Please save General Aviation from C.A.S.A.'s choke hold.

Thank you, for listening.

Do you have any questions?



ROBERT L. CASSIDY



Robert L. Cassidy



2 September 2020

Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
P.O. Box 6100
Senate
Parliament House
Canberra, ACT 2600

Dear Honourable Senators,

Submission to inquiry into: Current state of Australia's general aviation industry

Please allow me to introduce myself to the Senate Committee. I held the *highest-available* Pilot Licence from seven countries, earning my first Airline Transport Pilot Licence, on 31 December 1982. Then, I earned an Instrument Airline Transport Pilot Licence for Helicopters, 5 October 1983. I held Commercial single and multi-engine Seaplane Pilot Licence. I held the highest available Flight Instructor Ratings for single and multi-engine aeroplanes and helicopters, from 1981 and 1987, respectively, until 2013, though only could achieve Grade 2 Flying Instructor, in Australia. I have held an Aircraft Mechanic Licence for Airframe and Powerplant, for aeroplanes and helicopters, since 1993, but not in Australia. I served as a US Army helicopter Pilot and Maintenance Test Pilot. I have flown 130 different aircraft to include single and multi-engine aeroplanes, single and multi-engine seaplanes, single and multi-engine helicopters, two and four engine turboprops and two and four engine jets, including serving as a Captain of Boeing 747-400, 747-300, 747-200 jumbo jets and Boeing 737-800 and 737-700 jet aircraft. I had earned my living as a Pilot for a very rewarding and interesting career spanning thirty-six years and maintained a perfect Aviation safety record, a career that has taken me to forty-seven countries and every continent except Antarctica. I have been a published Aviation safety Writer, since 1983. I am a published author of my autobiography, titled, "Dancing With Clouds", which is in the National Library now, and I have recently completed proof-reading and editing a more thorough second edition. I am passionate about Aviation, which is my reason for making a submission.

When I left active duty with the U.S. Army, as a Bell Iroquois Pilot, March 1982, to pursue a civilian Aviation career, I was 28 years old. Back then, I fully expected that I would still be earning my living as a Pilot when I am 75 years old. That means I have another decade of usefulness, as a Pilot. And, why not, if I can still pass an Aviation Medical examination. The costs to keep my Australian Pilot Licence, Class 1 Aviation Medical, and Aviation Security Identification Card current and valid are more than I can afford. I am between jobs and have been subservient to the hypocrisy of Newstart allowance (CentreLink), that merely serves to demoralise and then create and maintain an underclass, with no escape. Are you aware that CentreLink has no policy and no loan programs or any facility to help me pay the costs to renew my Australian Pilot Licence,

my Class 1 Aviation Medical, and my Aviation Security Identification Card? Without sufficient savings to cover these expenses, plus cover a mortgage and bills, I became one of the Liberal Government's "leaners". After 36 years experience as an Aviation industry professional, CentreLink seems to prefer to retrain me to flip burgers, as a Casual employee, earning minimum wage, rather than get me back to flying, where I can make a strong contribution to Australian society, doing what I know and paying tax. How did I get here? I was put out of work by a "shonky" Aviation employer, who went into liquidation owing everyone money, including eight weeks to me, per my contract. He didn't pay any of my superannuation. How did this happen to me? C.A.S.A. failed in its surveillance mandate, according to Civil Aviation Regulation Act 1988, Section 9 (see attached).

To give you an idea of the costs or the amount of savings I would need stashed under my mattress, my previous employer paid \$9,000 as a condition of employment, to renew my Multi-engine Command Instrument Rating, (which allows a Pilot to fly an aeroplane with more than one engine at night, to takeoff or land in low clouds and fog, for example). Add to that cost with all the additional tests required for a Pilot over 60 years of age, according to Regulation, to hold a Class 1 Aviation Medical, is \$1,200, if I could find a Designated Aviation Medical examiner and Specialists to do the tests in Tasmania. Add \$300 to renew my Aviation Security Identification Card.

Since 2014, I have received more in NewStart Allowance, than I was asking for in an interest-free loan to revalidate my Pilot credentials. And, I begged both CentreLink and the Tribunal they would condemn me to years on the dole, due to their bloody-minded intransigence, to no avail. Maybe, after the Senate inquiry into the General Aviation industry is complete, you could conduct another enquiry, into CentreLink intransigence and deliberate obstructionism, when they could easily have made an interest-free loan, to revalidate my Pilot credentials, so I could go back to work. I raise this important issue, only to demonstrate the true costs to an individual Pilot. By the way, I have applied for about 2,000 jobs. I fear my age is working against me.

I have attached a 2018 U.S. General Aviation Manufacturers Association Report into General Aviation's contribution to the Gross Domestic Product of the United States. Why is this relevant? Unless there is a similar comprehensive study undertaken, in Australia, then you will never know the truth. The truth is what you will need to base any strategic decision-making. The truth will be hard to determine. Why?

Interestingly, the U.S. Federal Aviation Administration defines General Aviation thusly, "*General aviation is defined as the manufacture and operation of any type of aircraft that has been issued an airworthiness certificate by the FAA, other than aircraft used for scheduled commercial air service or operated by the military.*"

Australia's Civil Aviation Safety Authority defines General Aviation as "*all non-scheduled flying activity in aircraft allocated a VH Registration by CASA, but excluding VH-registered sailplanes (powered and unpowered). Ultralight aircraft, hang gliders and autogyros are also excluded.*" Why should it be different from the F.A.A.? And, B.I.T.R.E. has its own definition referring to the International Civil Aviation Organisation. Shouldn't the definition of "General Aviation" be ubiquitous?

The 2018 G.A.M.A. Report defined, the General Aviation industry to include aircraft and component manufacturing, flight operations, maintenance, and other activities. The economic impact of the General Aviation industry is measured in terms of employment, labor income, output, and value added for 2018, the most recent year for which a full, consistent set of national and state-level data are available. I would urge you to read the report, then consider whether or not that same information is available for fiscal year 2018 or any year, in Australia. The short answer is No. Why?

What is the General Aviation industry's contribution to Australia's Gross Domestic Product? Does anyone really know? I could not get a definitive answer, when I contacted either Deloitte's Access Economics or the Bureau of Infrastructure, Transport and Regional Economics. More importantly, what is the General Aviation industry's potential contribution to the Australian economy, if we could make the Air Laws efficient, effective, elucidative, and less expensive to comply with. Would goals of this Senate Committee be to encourage economic activity and compliance?

So, what is or isn't General Aviation? It isn't Australian Defence Force aviation activities? And, it isn't Qantas, et al. Would you be aware that General Aviation aircraft also fly in support of the Police, Fire Fighting, Air Ambulance, transport cargo, survey and mapping flights, parachute jumps, aerial photography, flying instruction, mustering, etc.? The General Aviation industry can contribute to so many possible employment opportunities other than for Aircraft Mechanics, Avionics Technicians, and Pilots, plus jobs ancillary to the General Aviation industry.

When assessing Air Services Australia, A.T.S.B., B.I.T.R.E., and Civil Aviation Safety Authority statistics, the devil is truly in their details and the detail seems to be clearly and deliberately obfuscated –to make themselves look better on paper to produce a desired safety outcome, which is no better than in the U.S., in fact.

Though I am not a statistician and Australia's statistics area ambiguous, consider in 2017, that General Aviation fatalities in the U.S. were 331 for 21.7 million flying hours. By comparison, in the same year, there were 21 General Aviation fatalities for 1.2104 million flying hours (including Gliders), in Australia, which would equate to 376.5 fatalities, if we flew the same number of hours, in Australia. So, C.A.S.A.'s egregious over-regulation, wrapping everyone in cotton-wool is definitely not any safer. Thus, if C.A.S.A.'s over-regulation is statistically not any safer than the F.A.A. system of Regulation, then how much is the cost of this imposition to the Australian economy and, more importantly, how much is it costing Aviation Operators and Pilots, like me? How many Air Operator Certificate Holders are forced to either defer or cheat on aircraft maintenance, cheat on wages and superannuation, cannot hire additional Pilots, cannot expand, cannot buy new aircraft, or are forced to liquidate and how many Pilots let their Instrument Rating and Medical lapse, becoming non-current or are forced to retire?

Let us consider the following: To purchase a set of Civil Aviation Regulations (CAR) and Civil Aviation Safety Regulations (CASR) would cost \$169.95 and to purchase a set of Civil Aviation Orders (CAO) would cost \$99.95 and for the Airman's Information Publication it would cost \$69.95 + \$99.00 for a 12 month revision service. Or, \$438.85 for all, including 3 three-ring A4 binders. By comparison, the U.S. Federal Aviation Regulations combined with the Airman's Information Manual in one book would cost

\$17.95 (USD). Does a more voluminous and ridiculously expensive set of Aviation Regulations make it any safer? Or, do you think for Operators and Pilots to understand the CASA Regulations and try to apply them in every day practical ways, would make it less safe? I would bet on the latter. I believe C.A.S.A. has failed its mandate, under Civil Aviation Regulation Act 1988, Section 9.

We could take one recent fatal aircraft accident, that cost the lives of the five occupants, in a former Army Bell UH-1H Iroquois, when it crashed into Anna Bay, NSW, on 6 September 2019. I bring this particular accident to your attention, because I flew the Bell UH-1 Iroquois almost 1,000 hours as Pilot-in-Command, plus another 400 hours as a Copilot, though in the US Army and was an Army-trained Maintenance Test Pilot. I believe the UH-1H helicopter had an inappropriate modification to install an iPad in place of the normal flight instruments which would allow the aircraft to be flown in poor weather and at night, normally. Why would C.A.S.A. delegate its responsibility for safety to a non-regulatory body, such as the Australia Warbird Association, Ltd.? The Pilot-in-Command/Owner, was flying in moderate to severe turbulence, over-the-water, below the clouds, without a visible horizon, and after the last of daylight, at 6:02 pm. As an Army Pilot, I would have been prohibited to fly the UH-1H in those conditions, without those instruments. Consider the number of violations of the CASA Regulations, which had occurred. Did he not understand them or did he choose to ignore them? The pilot held Private and Commercial Pilot (Helicopter) Licences and qualified for daylight Visual Flight Rules. (Refer to ATSB Preliminary Accident Investigation AO-2019-050)

Where was C.A.S.A.'s regulatory duty of care or even common sense, when it gave a "Special Dispensation" to operate a single engine Cessna 172 (VH-PFT), for the Air Operator Certificate Holder, permitting low level flight down to 150 feet above obstacles, which is 350 feet lower than the lowest height permitted by Civil Aviation Regulation 1988 Low Flying Regulation 157 (1)(b). The Cessna crashed into the sea, in Maingon Bay, Tasmania, during the Sydney-to-Hobart Yacht Race, 29 December 2014, which killed a fellow photographer, Tim Jones, and the 29 years old Pilot? Though the Cessna single engine aeroplane did not suffer an engine failure, if it had, it would not have been able to safely glide to shore for an emergency landing, to comply with the Cessna 172 Pilot's Operating Handbook Emergency Procedures: "Best glide speed as shown in Figure 3-1, should be established as quickly as possible. While gliding toward a suitable landing area". The cold Southern Ocean is hardly a suitable landing area! (Refer to ATSB Accident Report AO-2014-192)

Please refer to Preliminary A.T.S.B. Accident Investigation AO-2018-078. Four years later, on 8 December 2018, the same Air Operator Certificate Holder suffered another fatal accident, that killed a young female Pilot who crashed a two engine aeroplane into the side of a mountain, in poor weather. She was not Instrument Rated, though she already accrued 540 hours flying experience. Why? It is just too damned expensive to earn an Instrument Rating, in Australia. Under the F.A.A., it is possible to earn an Instrument Rating in a single engine aeroplane, like a Cessna 172, which is much cheaper to rent, yet it would be valid for both single and multi-engine aeroplanes. In my case, I did all of my Instrument training in a multi-engine aeroplane, but took my Flight Test in a single engine aeroplane. I first earned an Instrument Rating in helicopters, March 1979, which was valid for both single and multi-engine helicopters. The way C.A.S.A. regulates simply discourages Pilots from earning an Instrument Rating, because C.A.S.A. requires a separated Instrument Rating to fly multi-

engine aeroplanes, called the Multi-engine Command Instrument Rating. Recall it cost my previous employer \$9,000 just to renew it, not get an initial issue. And, getting an Instrument Rating and keeping it current, is too hard and too expensive. I believe C.A.S.A. failed in its safety mandate, yet again. The AOC Holder should have been ordered to shut down, after the first crash that caused two fatalities. Even after this third fatality, C.A.S.A. has not suspended the operation. In this case, did C.A.S.A.'s over-regulation and wrapping everyone in a warm and fuzzy cotton-wool improve safety or make it worse? You be the judge.

To my way of thinking, the way C.A.S.A. administers its suite of Regulations is complex, expensive to comply with and does not provide the safety outcomes that Civil Aviation Regulation Act 1988, Section 9 mandates. So, what use is either, C.A.S.A. or its suite of Regulations, in their present form?

After I left active-duty, as a helicopter Pilot with the U.S. Army, March 1982, most of my civilian flying jobs in General Aviation came, as the result of the flexibility and simplicity of the U.S. Federal Aviation Administration system of regulation. It kept me employed flying both aeroplanes and helicopters, building upon my career, until I started flying for the airlines, 14 February 1994. To understand how I was able to remain continually employed as a Pilot, let me give you some examples to consider, –then ask yourselves, ***“Could that happen in Australia, under C.A.S.A. without jumping through flaming hoops and paying exorbitant amounts of money?”***

One day, someone ran to come and get me, from a neighbouring General Aviation business. Breathless, he explained there's a guy who wants to buy that old Bell 47J2A helicopter, sitting up against the fence. It sat there, with weeds and grass growing around it, covered in dust and bird dropping. I approached the tall, older gentleman, who said, with hands on his hips, *“Sonny, if you can make 'er fly, I'll buy 'er.”* I replied with every bit of confidence I had as a former Army helicopter Pilot, *“Don't worry, I'll make her fly.”* The aircraft was cleaned up, inspected, serviced, and certified as airworthy, before proudly sitting in front of the hangar. I inspected everything I could see, touch, and twist. I read and executed the items on the Checklist. I was told that helicopter had not flown in years, until I flew it on that day. I had never flown a Bell 47J2A previous to that. The older gentleman purchased the helicopter, then offered me the job to ferry it to his home in Northern California. When he upgraded to a Bell 206 Jet Ranger helicopter, he purchased an airline ticket for me to meet his new pride and joy. I taught myself to fly that in 30 minutes at North Las Vegas Airport, then employed as his personal Pilot. That experience led me to fly as a Charter Pilot and fly tourists in the same type of helicopter from China Basin heliport near downtown San Francisco. Then, when the company evolved into a helicopter airline, I decided to earn an F.A.A. Airline Transport Pilot Licence, with an Instrument Rating, 5 October 1983. That is the highest-available licence a helicopter Pilot can hold. I taught myself all the manoeuvres for the Flight Test. I taught myself to fly many other aircraft, as well, because I could, under the U.S. Federal Aviation Administration. This is not possible under the CASA system. Please bear in mind, in 1939, Aviation pioneer, Igor Sikorsky taught himself to fly helicopters, as did Floyd Carlson, in 1943, Bell Helicopter's first test Pilot. It can be done safely. I taught myself to fly many aeroplanes and two helicopters. The F.A.A. Regulations did not prohibit it. Who teaches a Pilot to fly a single seat aeroplane?

Continuing on, I applied for a job to fly a two engine Cessna 310Q, with a company across the bay, at Oakland International Airport. The owner of the company, threw me the keys to his personal aeroplane, and told me, *"Take 'er up and around the patch a half dozen times. And, if you like 'er, the job's yours, when you bring her back."* I replied, *"Sir, I have never flown a Cessna 310 before."* His confident reply to me was, *"Well, Sonny, if you can fly them thar whirly clipters, then I am sure you can fly my 310."* I took it up for six takeoffs and landings. On my last approach to a landing, the throttle cable snapped, and the engine roared to full power. I made a go around, decided what I would do to save the aircraft, because there is no written Emergency Procedure for that, and I returned to make a perfect landing. I accepted the job. As a Charter Pilot, I was certified to fly 12 different aeroplanes plus the Bell 206 helicopter. Some days, I would fly two different aeroplanes and a helicopter. My income as a Charter Pilot allowed me to buy my first house, December 1983.

How far have I come? On 20 September 1999, I flew a new Boeing 747-400 jumbo jet to Australia, as a new Captain. The following year, I came to live with my soon-to-be Australian wife, marrying her on 20 November 2001, followed by No-Right-To-Work, until I became a Permanent Resident, years later. To earn my Australian aeroplane and helicopter pilot Licences, I sat four written examinations (current fees: \$155.90 to \$178.60 per exam) and then did Flight training and a practical test in-flight for 3 hours and 36 minutes flying. I do not recall the costs, but it was not cheap. I earned an Australian Airline Transport Pilot Licence for Aeroplanes in December 2004 but could only ever earn a VFR Airline Transport Pilot Licence for Helicopters, due to lack of Instrument Instructors, Instrument Examiners, and Instrument Helicopters. Add to that, the egregious costs, if and when I was able to put it all together. I became an Australian citizen, 11 February 2005.

Though I held the highest-available F.A.A. Flying Instructor Licences for both Aeroplanes and Helicopters, in the US, I could never achieve that in Australia. Again to give the you an idea of the costs, I was quoted \$10,000 to earn Grade 2 Flying Instructor qualification, but spent \$14,000, in November 2009. Grade 2 means, I would have to be supervised for the first 150 hours by a Grade 1 Instructor, who could very likely be years younger and have vastly less experience overall, as a Pilot. Consider the Hughes helicopter that I earned my Grade 2 Instructor in, November 2009, I last flew 30 years earlier, as a U.S. Army Pilot-trainee, yet I still flew it.

Let's make further comparisons to demonstrate how expensive Aviation is, in Australia. I never paid for an Instrument renewal for any of my other six Airline Transport Pilot Licences. In the U.S., under the Federal Aviation Administration, there is no Multi-engine Command Instrument Rating. An Instrument Rating which allows a Pilot to fly at night, in cloud and fog, is valid for both single and multi-engine aeroplanes. When I earned my Instrument Rating for helicopters, in 1979, it was valid for both single and multi-engine helicopters. A Class 1 Aviation Medical, under the Federal Aviation Administration never cost more than \$150 (USD).

One key indicator of the health of the General Aviation industry would be, the number of aeroplane Pilots who hold Instrument Ratings and the number of helicopter Pilots who hold Instrument Ratings. More importantly, is the number of Pilots with expired Instrument Ratings and Aviation Medicals, over the past decade, as compared to the

numbers of Pilots issued a Pilot Licence by the Civil Aviation Safety Authority. How many Australian Pilots have been forced into retirement, when there was a well-known nation-wide shortage of Pilots, pre-COVID pandemic?

I was offered a contract 2001 to 2003 as a Boeing 747-300 and 747-200 Captain for an Icelandic airline. I had no job interview, no Flight Simulator assessment and only needed to pass one written examination (Air Law), then get a UK Aviation Medical. As Captain for Air Atlanta Icelandic, on 16 February 2003, I organized the rescue for one of the airlines Boeing 747-237 aircraft, Registration Number TF-ATD along with 12 excess crew from Kuwait, when it was under threat of a rocket attack, and my Crew and I flew it to Jeddah, Saudia Arabia. My real value and contribution to that airline, puts context on the one written examination that was required, versus a battery of examinations, in Australia, AS IF I wouldn't know how to fly a kite.

Operationally-speaking, a Boeing aeroplane or Bell helicopter would not know if it is over the Blue Mountains of Australia, or the Blue Ridge Mountains of the United States. The aircraft operate exactly the same. Aerodynamics is exactly the same. For the same altitude, temperature, and power setting, fuel consumption is the same. The Civil Aviation Safety Authority makes it harder than it has to be. And, comprehending as well as complying, with that level of complexity costs everyone money and hurts the national economy, for no discernable benefit. Australian General Aviation is not any safer than U.S. General Aviation. If you consider General Aviation the way the F.A.A. does, rather than the way it is broken down into Activity types, in Australia, Australia's safety statistics are actually worse.

We will be seeking home-grown ways to recover the Australian economy, post-COVID. Massive jobs creation will be one part of the economic recovery equation. Importing workers, including Pilots, when we have the talent and experience, in Australia, would only hurt Australian households. Australia has experienced its first recession in 30 years and Gross Domestic Product (GDP) 7% for the June quarter.

My sincerest recommendation to the Senate Committee, is to completely dismantle C.A.S.A., from top to bottom and discard the entire suite of Civil Aviation Regulations, Civil Aviation Safety Regulations, and Civil Aviation Orders and C.A.S.A.'s ridiculous way of regulating the Aviation industry, would be a good place to start. By squeezing the pedantic, wrap everyone in cotton-wool rules and regulations into the Federal Aviation Administration numbering system, as C.A.S.A. endeavors to achieve, is not the answer. The U.S. Federal Aviation Regulations are simple and practical. They should be adopted, completely, and wherever Federal Aviation Administration appears, change it to Civil Aviation Safety Authority and replace U.S. with Australia.

You should know that I had applied to C.A.S.A. to become the CEO and Director of Aviation Safety, when the position was advertised, but a career bureaucrat and the Acting CEO/DAS was the preferred choice. Does he even know how to fly? I do.

Respectfully,

A large black rectangular redaction box covering the signature area.

Addendum: Estimated costs to earn a VFR Commercial Pilot Licence Rotorcraft-Helicopter, under current C.A.S.A. rules and Regulations

\$65,575.00 for H-269 helicopter rental, including 2.5 Hr. flight test @ \$610/Flight Hour
\$1,066.30 for written examinations
\$175.00 for Dangerous Goods Certificate
\$1,275.00 for a Class 1 Aviation Medical, (for Pilot over 60 years of age)
\$256.00 for ASIC
\$169.95 for CAR/CASR
\$99.95 for CAOs
\$69.95 for AIP
\$80.00 for AIP 12 month Revision Service
\$34.00 for ERSA
\$2,500.00 for Helmet/Headset, kneeboard, maps, Study materials/books, plotters

\$71,301.15 minimum

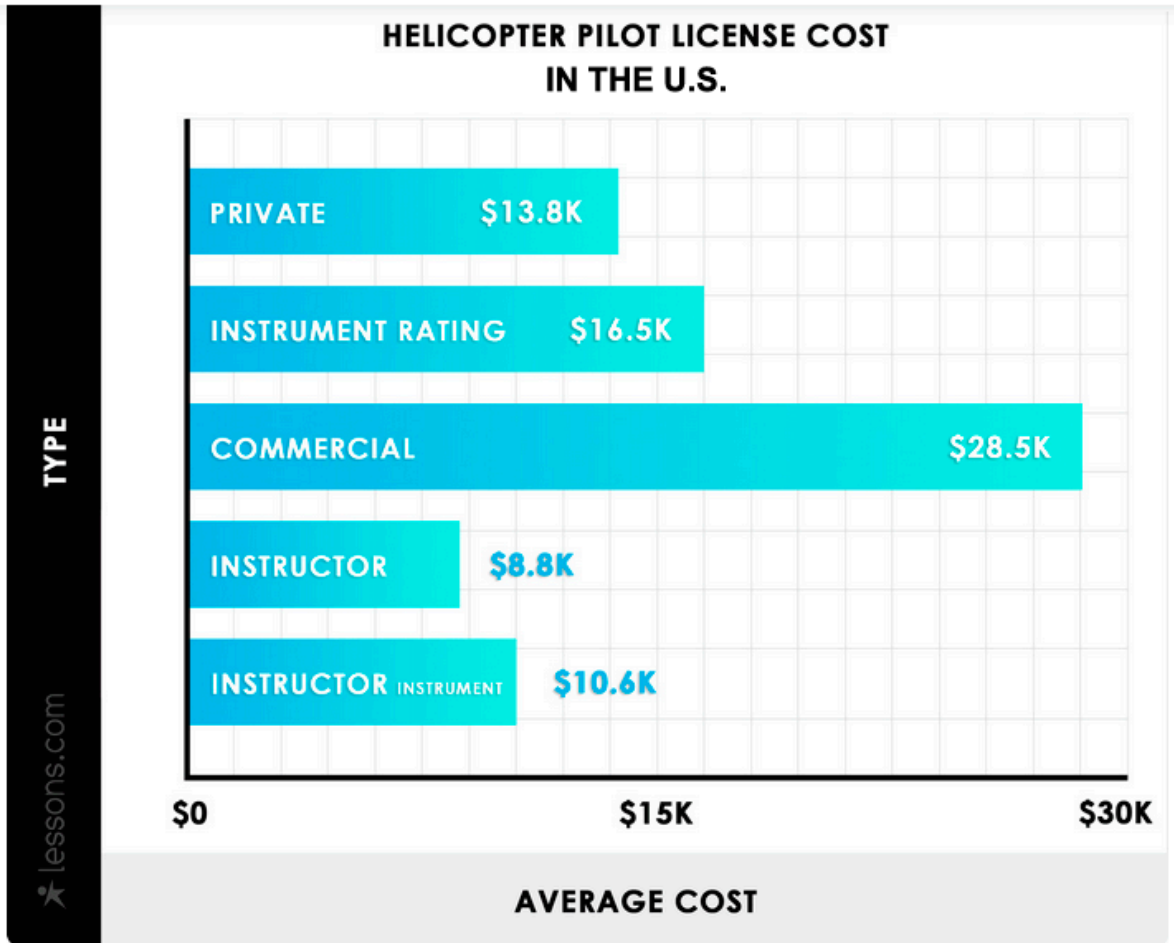
Assume Helicopter Flying Instructor time, Ground School Instruction time, Airport Landing Fees and Examiner Fee are additional costs . . .

Two different Flying Schools cited \$75,000 and \$80,250, but refused to give details.

Aside from profit margin, what contributes into these costs? How much of it, is driven by C.A.S.A. Regulations? Maybe these and others:

- Aircraft Insurance and Insurance for the Office
- Aircraft Maintenance replacement parts and components costs
- Aircraft Mechanics inspection and maintenance fees
- Initial purchase Price of aircraft amortised or maybe leased
- Cost for Office acceptable by C.A.S.A.
- Chief Pilot (wages) –must be approved person by C.A.S.A.
- Flying Instructor (wages) **Note:** Under C.A.S.A., a Flying Instructor cannot work as an independent and must be an employee of a Flying School, unlike under the F.A.A. system. Usually, it becomes the lowest rung on a Pilot's career ladder and a method to build flying hours at someone else's expense. How much do they really know? Under the F.A.A. system of Regulation, someone like me, with my background and experience, could teach "casually", under F.A.R. Part 61, without being an employee of a Flying School.
- Chief Flying Instructor (wages), if that person is not also the Chief Pilot -must be approved by C.A.S.A.
- Head of Training and Checking (wages) –must be approved person by C.A.S.A.
- CEO or President or Director and Office Manager/Receptionist/ (wages)
- Safety Officer (wages)
- Safety Management System
- Fatigue management Software
- Record keeping for C.A.S.A. and A.T.O.
- Utilities, Electricity, Telecommunications, Office Equipment
- Operations Manual
- Suite of CAR/CASR/CAO/Dangerous Goods Manual/Aircraft Manual, etc.
- Office / hangar rental or lease

Source: <https://lessons.com/costs/helicopter-pilot-training-cost>



HELICOPTER PILOT LICENSE COST

Estimate Price for Pilot License	Price
Private Pilot Certificate	\$13,760
Instrument Rating	\$16,482
Commercial	\$28,515
Certified Flight Instructor	\$8,805
Certified Flight Instructor Instrument	\$10,580

Submission Appendix:

Item:

- 1) Civil Aviation Regulation Act 1988, Section 9
- 2) 2018 U.S. General Aviation Manufacturers Association Report, PriceWaterhouseCoopers LLP
- 2a) 2018 U.S. General Aviation Manufacturers Association Annual Report
- 3) The economic and social contribution of Australia's airports – Deloitte Access Economics
- 4) 2019 State of General Aviation in USA by AOPA
- 5) B.I.T.R.E. General Aviation Study 2017
- 6) B.I.T.R.E. Aircraft Activity Study 2017
- 7) 2017 ATSB Statistics
- 7a) A.T.S.B. Transport Safety Report Aviation Occurrence Statistics 2010-2019
- 8) Excerpt Bell UH-1H Operator's Manual, TM55-1520-210-10 Instruments
- 8a) Photos of Bell UH-1H, VH-UVC, modification
- 9) ATSB Preliminary Accident Investigation AO-2019-050 UH-1H VH-UVC
- 10) C.A.S.A. Instrument 161/07 Australian Warbird Association Ltd.
- 11) ATSB Accident Report AO-2014-192 VH-PFT
- 11a) Pages 67 from 172S Skyhawk Information Manual, Maximum Glide
- 12) Preliminary A.T.S.B. Accident Investigation AO-2018-078, VH-OBL
- 13) Public Address by Dick Smith in Wagga, 26 April 2018, "Stop The Lie – Change The Act"
- 14) C.A.S.A. Statistics for Aviation Personnel, How many Instrument Rated Pilots?
- 15) General Aviation contribution to U.S. Gross Domestic Product
- 16) Redacted copy of email from a C.A.S.A. employee, expressing his opinion of my background and experience
- 17) Who is Robert Cassidy? Copy of Pilot Certificates and CV