**European Perspective**

**CAMO Evolution**

**LONDON**—The European Aviation Safety Agency EASA is considering an innovative proposal that would allow commercial operators to outsource their continuous airworthiness management organization (CAMO) functions, enabling them to adopt, for example, Boeing’s Goldcare maintenance model for Boeing 787 and 737NG operators. Boeing, which has CAMO approval, could manage its European-based 787 fleet from a central organization that would provide operators with airworthy 787s. Boeing staff would run the CAMO, while operators would use aircraft from a pool.

Boeing’s proposed model is to maintain, for example, 200 EASA-compliant 787s for five Europe-based airlines that operate 40 aircraft each on a cost-per-flight-hour basis. Aircraft due for a C check would go back to Boeing, which would outsource each check to a Boeing-approved maintenance provider. A serviceable aircraft then would be supplied to replace the one in maintenance. After the C check, the aircraft could be returned to the next operator in need of an airworthy aircraft. This concept is based on aircraft in a standard configuration for a fairly standard operation.

But assuming Boeing owns these aircraft and retains responsibility for their maintenance, how would operators convince regulators that they retain control over airworthiness? Bob Simmons, technical director at aviation safety training consultancy Baines Simmons, believes it’s that conundrum which could motivate EASA to introduce a new approach to CAMOs.

“One possibility,” posits Simmons, “is for an operator to have an AOC without a CAMO, providing it can contract an approved CAMO (such as Boeing) to undertake that work. That said, the operator will still retain a duty-of-care to its passengers, which includes the condition of the aircraft it flies, so it must have a continued airworthiness control exposition to detail its process for active involvement in the CAMO process.”

This means that an operator wouldn’t manage its aircraft airworthiness any more, but it would be actively involved in the decision-making process with Boeing. To achieve this, each operator would have to have a very close interface with Boeing and effectively maintain the “buy-off” on all major decisions related to airworthiness.

“It’s a great concept,” says Simmons, “but nothing has been finalized.”

Currently, an airline such as British Airways flies and maintains its own aircraft, and as these aircraft degrade at an anticipated rate, its maintenance programs and organizations restore the aircraft to the right airworthiness level at the right time.

But if the maintenance organization were to change, the equilibrium potentially could be upset, causing a mismatch between the airline operation, airworthiness management, the MRO provider and the maintenance program. Gearing a single maintenance program to accommodate a mix of airline operations and route structures will be difficult.

“From a regulatory perspective, a safety management system must be integrated into an airline operation,” Simmons says. “So an operator like ThomsonFly will likely have to convince its regulator that it has integrated all of the risk and safety management from Boeing (and its Goldcare maintenance contractors) to provide a safe operation because the aircraft collectively maintained by Boeing and its contractors will deliver risk into airline operations. The airline will consequently need to explain how it will manage its safety responsibilities through its aircraft maintainers and contracted CAMO.”

While the commercial and technical aspects of the concept appear attractive, ThomsonFly is talking to Baines Simmons about the safety programs associated with the technical aspects of this model to ascertain the full picture.

“A proposed Sub-Part J to EASA’s Part M regulation would enable operators to outsource CAMO activities to another CAMO-approved company,” Simmons explains, “and this will allow Boeing 787 operators to keep their CAMO or outsource it to Boeing, for example.”

Simmons reflects on the way EASA’s concept of control of airworthiness has evolved. “Previous regulations made clear that MRO providers were responsible for the overall condition of the aircraft, yet a lot of people have forgotten that a maintenance organization certifies that the work it undertakes is done to appropriate standards. But that doesn’t certify the aircraft as serviceable or airworthy. It used to, but now we’re asking: How can a maintenance organization manage airworthiness when it’s not in full control?” he says. “Hopefully the new regulation changes should clarify the shared responsibility between the operator and the CAMO, with the CAMO taking more responsibility.”

—BILL BURCHELL