

Dear Mr Carmody, CEO CASA.

Please accept this letter from me, Glen Buckley the CEO of the Australian Pilot Training Alliance, a business that has almost 15 years of well intentioned, safe and compliant operations. CASA records will clearly support that contention.

Also accept this letter from me, as someone that could be considered a Subject Matter Expert (SME) on safety and flight training. I say that drawing on over 35 years industry experience.

Nearly 25 of those years as a professional flight instructor, and 15 years as an owner of a well respected flying school.

I rate my experience in my field as industry leading. I am well qualified to make the comments I do.

I also write to you as a very lucky husband, proud father and the son of two amazing parents, Fay and Derek who have supported APTA's continuing operations since October last year when CASA initiated its current action.

I write to you as someone who has obligations to suppliers with relationships that are becoming increasingly strained. The fact is that the CASA action has impacted on me, to such an extent, that APTA continues only because of their unwavering commitment to APTA or due to the relationships that we have.

I intend to very publicly thank them, because without their support APTA could not have sustained operations, during the period CASA has taken action against me.

To the aircraft owners Tony Kidd, LUAC, Express, David De Souza, and most especially Malcom Yates. A man who has offered to hold off in voicing him, to assist me meeting obligations to existing suppliers as best I can.

To a professional team of flight examiners, Lawrence, John and Mox.

They continue delivering professional testing on very supportive payment terms.

To Nathan James at SmartClass who continues to provide exceptional support through his Flight School Manager system. Your loyalty and support rewards my decision to purchase an Australian Made product. I would not receive the empathy you have shown from someone offshore who did not appreciate the unique challenges we have here.

(4)

I thank Russell Lucas for just being you, somewhat stern and ~~but~~ forthright but forever gentlemanly and professional.

I also need to thank Yaffa publishing and especially Steve (thankyou) and Adam (sorry).

The MAC / Goodman group have been exceptional in the support they have shown. You folk come under a bit of 'flak' I appreciate. From my own personal experience every one of you has been compassionate, supportive, flexible and understanding. I'm looking for a home. You can be my landlord any day. Marc. It's your shout for the "Burning Man Festival". I can't afford it.

To BP. A large multi-national that we expect to be ruthless. Throughout my 15 years I have had the opportunity to build a valued relationship with you. On more than one occasion I decided to stay with BP, because I trusted them. I made that decision despite significant financial incentives to swap to another provider. Thankyou for working with me.

The support of these suppliers has allowed me to avoid redundancies in the organisation. For that I am forever appreciative, and it has allowed APTA to continue.

With the support of family, suppliers, customers and an industry leading team of professional and loyal staff, APTA has continued.

So Mr Carmody that brings me to the point of today's correspondence.

In October 2018 CASA reduced my date of operational status to only 7 days.

After having spent years working with CASA as we wrote our "Exposition" and together attended to over 600 CASA requirements we were approved and operating for almost two years.

ie. Without any prior warning or without any suggestion from anyone within CASA that there were any concerns at all, in fact quite the opposite, you issued a notice without warning that you intended to bring the entire operations of APTA and its members to a halt. That action was disproportionate and a face to face conversation should have happened prior. It could have

completely been resolved that way

We now know rather embarrassingly
for CASA, and a matter for later

correspondence, that the CASA process

was so substantially flawed that it is

in fact impossible to defend it.

Irrespective a game of ducking, weaving,
and constantly changing goal posts, it started
and after 7 months I am still waiting on

CASA to work out what you want in

our contracts. As throughout the

process I remain willing, but CASA do

need to work out what they want.

It is repeatedly on
written record that I have highlighted

to CASA that its action it will cost

me personally \$10,000 a week to

sustain operations while CASA place the

operational restriction on my business

We have built and resourced APTA to manage ten well intentioned schools.

The cost of operating is \$800,000 p.a. and the Business Plan requires 10 members contributing \$80,000 each.

In cases of rural based aero clubs they are offered means based fees.

The CASA action has prevented me taking on members who want to join. This impacts on me and those potential members. If CASA place a limited expiry date on my business, stops me renewing existing capability + prevents me taking on customers. Consider QANTAS if you told them they could only operate on a temporary approval for 7 months with no customers. My expectation is that such substantive actions would be based on safety considerations. They are not !!

this matter has now dragged on for 30 weeks at a cost to me, and my suppliers of \$300,000. so what is my personal situation after the CAA transition delay followed by the CAA action initiated in October 2018.

I have lost my home, my superannuation, my life savings and soon my entire business. my attempts at selling the business have failed as no buyer is interested in a business only CAA approved weeks into the future. Unfortunately I have no resources, financially or emotionally to keep fighting this ridiculous battle. Quite seriously, your action has left me destitute with my parents lending me money for a rental property as I move out of my home of 25 years.

But this correspondence is not about my personal claim on CASA. It's actually about APTA. I am convinced that the CASA action ~~isn't~~ really about safety or regulatory compliance, because it can't be justified on safety or compliance grounds. The manner in which CASA acted was a conscious decision not to act in accordance with procedures. I suggest that it may be based on motivations other than safety or compliance. Glen Buckley being somewhat "controversial." I have been a critic of CASA, and I have put my name to that criticism. The passage of time has validated many of my criticisms, and I genuinely feel that has been a contributing factor. To remove this as being a potential issue I will offer to stand down and remove myself.

from any Key Personnel role in APITA,
To every single employee at CASA
that is involved in this process. There
are personnel that are genuinely interested
in safety, genuinely interested in
regulatory compliance, genuinely want
to work collaboratively with industry
and care about it. There are personnel
that respect that they operate under
the Australian Coat of Arms and work
to comply with their obligations under
CASA's own Regulatory philosophy,
the Minister's Statement of Expectations,
Administrative Law, Procedural Fairness,
Natural Justice, and CASA's own procedures.
You are fortunately the vast overwhelming
majority, and in fact you will
empathise with the contents of
this letter. Please step back from this
process and choose not to become involved

but if someone chooses not to, then as in my organisation, action must be taken. We aren't stacking bread on shelves at a supermarket, we are operating in the area of aviation safety.

I make no mention of names but I have filed an official complaint via the ICC of a senior executive of CASA. In my opinion decisions have been made by personnel within CASA that demonstrate unconscionable conduct. Well intentioned people making decisions in the interest of aviation safety could not reasonably be expected to arrive at the same decisions. Let me be very clear that I will challenge any CASA decision by any person if it compromises safety. I am obligated to I urge all personnel in CASA involved in my matter to be professional. I will require it.

The fact of the matter is that I am no longer in a position to continue based on my finances and health. Therefore mindful of the fact that during the period of a CAIA restriction the business has no commercial value I am immediately making the business available for sale. I have no other option. There is no reserve price.

I am calling on a well intentioned Australian citizen or permanent resident to step up and take over APTA. A business previously valued as a multi-million dollar business will be effectively given away. It will require an injection of \$300,000 only to ensure APTA continues and meets all obligations to suppliers. With the CAIA restriction lifted the business will be

robust. I am prepared to walk away with no personal benefit if required.

My ONLY interest is that APTA continues. If you are well intentioned and feel you are the right person, I urge you to establish contact with me glen.b@aurpta.com.au.

The business could potentially include

- Building
- Simulator
- Port 141 and 142 school
- multi base delivery
- RTO
- CRICOS
- enormous potential growth.

I am hoping the right person is out there. You will have an exceptional team of professional, well intentioned staff sharing the vision with you, and with the CASA restriction lifted you will be able to focus on moving forward.

TO my valued APTA members. Please be assured that I will not leave anyone hanging and I will resolve this.

To Mr Carmody, I urge you to find a well intentioned person within the organisation that can work with me to have the CASA action explained and lifted. That person must not be Graeme Crawford. In the interim I call on the suppliers for short ~~term~~ term continuing support.

Had I have known that this matter would have dragged on so long, I may well have made different decisions. ~~It~~ My personal preference is to immediately walk away from GA and commence a new career, but I cannot do that until I resolve this issue for the

group of members, staff, students
and customers that I have significant
obligations too.

To all my staff. I appreciate that you
have all been working under challenging
conditions with no surety of continuing
employment since CASA initiated the action
in October 2018. Whether you be in
APTA or MFT or even at our other base,
I am sorry, and I will fix this. Thank you
for your loyalty and professionalism.

TO CASA, please don't waste your
time sending me another warning letter
about what I publish. Quite frankly
your reputation can be judged on
your ~~conduct~~ conduct, and I am
now acting to protect mine.

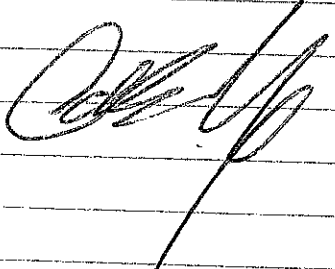
The fact is that CMT 2 headed up by Mr John Costa displayed the qualities I expect of professionals within CAA, and CMT 3 under different leadership did not. CAA have worked diligently to cover that up, and that has effected the reputation of me, my staff and APTA. Going forward I intend to defend our reputation. I will defend everything I say if required.

CAA's task now is to put well intentioned people onto this matter and resolve it. I look forward to receiving contact to confirm that will be CAA's attitude going forward and most importantly that will be reflected in CAA action.

There is no doubt in my mind that the cause of the current debacle is two fold.

- CASA's failure to achieve clear and concise aviation safety standards as is required of them in the Civil Aviation Act
- personnel making decisions that are not well intentioned and in the interests of aviation safety.

This continuing failure by CASA demonstrably has a commercial impact on my business and many others. I remind you that in fact on my matter CASA is unable to play the usual "safety" card because CASA actions actually degrade safety hence the claim of unconscionable conduct.

Respectfully  GLEN BUCKLEY.

I will also take this opportunity to append an email that I sent to Mr Graeme Crawford in October 2017.

It clearly demonstrates that Mr Crawford was aware of APTA, it demonstrates good intent on APTA's behalf.

I have also attached a recent statement from CACA on their "support" of GA. Let me very clearly state that my business experience with CACA is not aligned with that statement.

From: Glen Buckley
Sent: Saturday, 7 October 2017 10:50 AM
To: Crawford, Graeme <Graeme.Crawford@casa.gov.au>
Cc: john.costa@casa.gov.au
Subject: Request for meeting with Glen Buckley from APTA (dont roll your eyes)

Dear Mr Graeme Crawford,

You may recall me from this previous email,

"Dear Mr Graeme Crawford,

I am writing to update you on our process in working towards the Part 142 Approval. I have been advised by Mr John Costa that the issue is imminent.

The purpose of my letter is to provide some feedback.

As you are aware I have some concerns about the Process and associated costs. But that is not the purpose of this email.

I would like to convey my appreciation for the exceptional support provided by the Southern Region team. It was obvious that a very significant allocation of resources was made available to my Company and I am very appreciative of that

Every person involved in the process was nothing less than exceptional. I do appreciate that some direction did come from your Office, and that required a number of CASA Personnel to redirect their efforts. Could I respectfully request that you pass my thanks down the line.

Although the Transition process got off to a somewhat slow start, I am very confident that the process is improving significantly. Lots of lessons learned by both sides that will benefit future applicants and facilitate smoother Transitions going forward.

Once again thank you for your initial direction, and thanks to the Southern Region for so professionally executing the task.

Cheers. Glen."

But alas, I fear you will better remember me, from our meeting in Aviation House on Wednesday 18th January 2017, which I will choose to gloss over if that's OK?

You may recall that towards the end of that meeting you queried me about my "project", which I assumed to be the Australian Pilot Training Alliance (APTA). I brushed your query aside, because I felt I was there as the CEO of Melbourne Flight Training, and that was totally independent to my role as CEO of APTA. In this correspondence however I am writing to you as the CEO of APTA.

I am certainly not "eating humble pie" but; I am, now nibbling at the crust of it. It actually looks and smells quite good. I needed more ingredients than the recipe book said, and the ingredients were much harder to get, I had to cook it much much longer, but it came together very well.

In all seriousness, the Product is exceptional. Not just my own, but I am now truly convinced that any well intentioned, well resourced Part 142 Organisation has a lot to contribute. It is a measurably

safer organisation. On that point I unreservedly admit that component of my initial argument was wrong. It is, Safer.

My project APTA, had an extremely slow start, part due to the 12 month delay of the Transition date. We now have that date locked in by CASA, and I have had significant interest from a number of Operators with three other Organisations joining over the last few weeks. Information about this concept is on our website at www.auspta.com.au. A recent media release has generated a level of interest from a number of media outlets. APTA is not intended to deliver a significant ROI. It is intended and designed from the outset as a means to increase Safety and Quality, while actually stimulating Business. It is an umbrella organisation and the Profit and Loss is fully disclosed to all members including wages and salaries paid. All member subscription fees are re-invested into developing and improving the group.

My area of preference to operate in is, Victoria and Tasmania. If this system works, nothing would give me greater satisfaction, than to see it replicated. To fully reach its potential, it depends on an almost intertwined relationship with CASA, and that is the purpose of this correspondence.

Am I able to request a meeting with the appropriate Personnel within CASA. The request is not urgent, and I appreciate it will require many weeks scheduling. The purpose of this meeting is to find out what CASA wants. How can APTA help CASA to get the product out there. I need to build a strong relationship. I want to work very closely. Ideally I would like to have somebody from CASA placed within the group as a liaison person with all expenses of that deployment met by APTA. That is simply one option, but I would like to explore all options.

My only time constraint is that I anticipate discussing the concept with the media over coming weeks, Australian Flying has approached me and intend to do a fairly comprehensive article on the concept over Christmas

I have included our draft contract that has variations applied to it, as required. In particular the final pages contain the "spirit of APTA". It will give you an overview of the concept. Obviously it has a level of commercial sensitivity attached to it, but I do appreciate that by the nature of this correspondence I am sharing it.

Thankyou for your consideration. I have included Mr John Costa in on this email, as I am sure he is eagerly looking for more things to get involved in, in the lead up to Christmas,

Cheers. Glen.

The CASA Briefing - July 2018

Date of publication: 25 July 2018

who writes this rubbish?

THE CASA BRIEFING

YOUR MONTHLY CASA UPDATE

From acting CEO and Director of Aviation Safety, Graeme Crawford

Recent debate about safety regulation and the general aviation sector has focused on the need for a sustainable and viable aviation industry. Implicit in this debate is the suggestion by some people that CASA does not support a sustainable and viable general aviation sector. I would like to assure everyone this is simply not true. There is no CASA agenda against general aviation and we regard the sector as a vital component of the national aviation community. Many of CASA's staff are participants in general aviation, or started their careers in the sector, and have a practical understanding of the issues and challenges the sector faces. CASA can't deliver solutions to the broader economic and social changes that are affecting parts of general aviation, but we can and will do our best to provide an appropriate safety regulatory framework that creates confidence in general aviation across the broader community. It is important that people from outside aviation have trust in the safety performance of general aviation and part of our job is to help ensure that trust is maintained.

CASA is focused on regulatory solutions that are both practical, proportionate and address aviation safety risk. We use available aviation sector information such as accident and incident data, surveillance findings and sector risk profiles to develop informed solutions. With that in mind the term 'general aviation' may not be granular enough as it covers a variety of aviation activities of which there are varying opinions within the aviation community regarding what is and what is not under the general aviation umbrella. Whilst this is challenging it is not unsurmountable and CASA will continue to develop regulatory solutions that consider risk appetite and safety consequences.

Finally, if there are people doubting our words about our commitment to general aviation then please look at our recent actions. Three major reforms this year to the aviation medical system are practical examples of reducing costs and impacts on the aviation community, particularly general aviation. The Basic Class 2 medical, which became available in early July 2018, is targeted at private pilots and makes getting an appropriate medical quicker, easier and cheaper. If you haven't already please find out more about the [Basic Class 2 and other medical reforms](#) [/standard-page/changes-medical-certification].

Best wishes

Graeme Crawford

(Shane Carmody is on leave)

Minister requires CASA to look at costs

CASA is required to consider economic and cost impacts on individuals, businesses and the community in its regulatory approach. That was a key message delivered by Deputy Prime Minister and Infrastructure and Transport Minister, Michael McCormack, to the general aviation summit in Wagga in July 2018. Mr McCormack said CASA was also required to take a pragmatic and proportionate approach to regulation as it applies to different aviation sectors. He said these requirements were contained in the Government's Statement of Expectations issued to the CASA Board in March 2017. "These are not just words," Mr McCormack said. "The statement of expectations is a legislative instrument and I expect the Board of CASA to ensure its requirements are met. I can also assure you that I will work in partnership with our aviation agencies and industry in tackling the challenges and opportunities for the general aviation sector, identified in the Government commissioned Bureau of Infrastructure, Transport and Regional Economics (BITRE) study released late last year. These challenges are diverse. They range from fuel and maintenance costs, airport leases and charges; the impact of some regulatory changes and delays in CASA reviews to a lack of robust data on the general aviation sector. The study also showed that Australia is not alone in facing economic, demographic and regulatory factors affecting general aviation, with several major countries such as the UK, US and Canada also suffering declines in general aviation activity. BITRE's recent release of the 2016 general aviation activity survey has showed some encouraging signs in terms of increased flying activity in some parts of general aviation such as aerial work, flying training and aerial mustering. But I acknowledge that there are still serious challenges facing general aviation. I will continue to listen and carefully consider the issues raised by people in the general aviation sector, and the Government and portfolio aviation agencies will respond appropriately. I am keen to hear from you on the key issues you want tackled by Government and industry that relate to general aviation operations in Australia."

Go to [Michael McCormack's speech](#)

Comment now on new rotorcraft rules

A package of proposed new regulations and safety standards for the rotorcraft sector have been released for consultation. The package is made up of the proposed Parts 133 and 119 of the Civil Aviation Safety Regulations, as well as the manual of standards for Part 133. Part 133 establishes the operating rules for rotorcraft conducting air transport operations and Part 119 covers air operator certificate requirements for air transport. The proposed changes for the first time create a specific set of operating rules for rotorcraft air transport operations. The central purpose of the new regulations is to enhance safety by improving standards in areas of known operational risk. Key changes include introducing an adaptable rotorcraft code of performance, specific mandatory simulator flight crew training requirements for certain rotorcraft, additional flight preparation and planning requirements, new fuel planning and fuel use rules, additional requirements for flights over water and medical transport requirements in line with international best practice and industry feedback. The Part 133 regulations will cover rotorcraft passenger charter, regular public transport, ambulance and cargo operations.