

**From:** Peter Rundle [pr.p2v7@bigpond.net.au]  
**Sent:** Tuesday, 17 June 2008 3:10 PM  
**To:** RRAT, Committee (SEN)  
**Subject:** Various CASA actions against industry Senate,

The [attached document](#) explains various **unreasonable, incorrect** and **inappropriate CASA actions** against Industry.  
Some of those actions occurred before 2003 but all those actions assist confirming the overall **CASA inappropriate actions attitude**.

**PLEASE CONSIDER** - I have mentioned the persons names of the attached to assist you; however during any Report it may possibly be appropriate confidentiality not to publicly mention those names - obviously that will be your decision.

[Sect 28\(1\)\(a\)](#) of the [Act](#) only requires CASA issuing an AOC to be satisfied the applicant has complied with, or is capable of complying with, provisions of the [Act](#), [Regulations](#) and [Orders that relate to safety - Logical](#) as some Regulations and orders only relate to simple technical concepts.

**NOTE** - Following complaints about the Nth QLD Operator and the Nth Qld Pilot items there was a [JIM VENN Investigation](#) regarding **CASA's** actions - **IMPORTANT** - You [should obtain the original Report](#) by Jim Venn; not a **CASA summary report** of the [Venn Report](#).

Industry includes Operators ( Air Operator Certificate - AOC Holder), Pilots, Engineers and Admin staff.

**NOTE** - The many months between those "alleged incidents" and **CASA's** knowledge of the "alleged incident", but when CASA Suspended the Pilot stating he was unsafe - "IF" unsafe why did **CASA** leave that pilot continue flying paying passengers over those many months?

**NOTE** - 1988 **CAA** was changed to **CASA** under new Director Mick Toller and Assistant Director Laurie Foley who had a Senior Manager who trained all those new **CASA** structure Area Managers - the Townsville Area Manager briefed Townsville Staff that the goal was to cancel as many AOCs etc as they could to achieve a great Scorecard for Assistant Director Foley - that assists proving the **CASA inappropriate action decisions** which continued past 2003.

**NOTE** - As previous **CAA** DFOM (District Flight Operations Manager) based at **CAA** Townsville with the relevant Delegations and having arrived at [reasonable decisions](#) confirmed by **CAA** Solicitors, and the **AAT** at a Hearing Case; some decisions suspended and cancelled Certificates/Licences due unsafe actions, and some decisions decided not to take action against the holder due lack of appropriate evidence and lack of unsafe actions - Acting DFOM in Cairns when a helicopter crashed in the sea just near Cairns due bad weather, one passenger drowned, I decided not to take action against either the Operator or the Pilot due the evidence including information from the Control Tower.

NOTE - With the DFOM experience including Legal awareness training I would not have taken variation, suspension or cancellation action in those attached cases.

In one action **CASA** charged the Operator due a LAME certifying maintenance when that LAME licence had expired - **CONSIDER PRACTICAL** - A LAME (Licensed Engineer) whose Licence expired on one day, but while waiting for the renewed licence, the next day or week he/she conducted maintenance which was a technical breach due the expiry and not receiving the renewed licence - **BUT** he/she was **not unsafe** as he/she had not lost experience, skills and knowledge, due to the expiry - no penal action needed - just a letter reminding the LAME of the technical breach.

[Sect 28BD](#) of the [Act](#) clearly only requires the Holder of an AOC to comply with provisions of the Act, Regulations and Orders that apply to the Holder - **Logical**

NOTE - There are relevant Regulations and Orders that expressly apply to Pilots and or Engineers - **Logical**

As a Consultant I assisted the persons in those attached examples of **unreasonable, inappropriate and incorrect CASA actions** - ALSO I have heard of many more **incorrect unreasonable CASA** actions.

## Various incorrect CASA actions against Industry

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**Nth Old Operator** - 2003 and 2004

**Nth Old Operator** -

CASA having conducted some surveillance, and became aware of an alleged Penetration of Controlled Air Space and a Restricted Area; and an aircraft Accident - CASA issued a large number of RCAs (Request Corrective Action) against the Operator - -

and CASA also advised 2 other Govt Departments (the Operator's customers) that CASA considered the Operator unsafe -

that CASA advice probably a breach of the Privacy Act - and CASA issued a Show Cause Notice to the Operator in Dec 2003 .

NOTE - Reviewing all those RCAs it was very Logical that Operator had not acted unsafe, and except that Penetration of Controlled Airspace that Operator's pilots had not acted unsafe.

NOTE - A significant percentage of those RCAs were about alleged Legislative Breaches by pilots -

and ALSO covered breaches by the previous Owner of that AOC whose breaches occurred a long time before the new existing Owner became the Holder of that AOC.

THAT - current AOC Holder was not involved back then - therefore as the current AOC Holder the current Operator did not breach [Sect 28BD](#) of the Act.

NOTE - The Operator sent a written letter compliant to CASA CEO Byron in Jan 2004 rejecting the incorrect RCAs, and accepting some RCAs (which were not relating to unsafe matters) -

NOTE - CASA CEO Byron responded to that complaint letter stating "He did not propose to respond to each point in the complaint letter as he was advised the Show Cause Notice was issued based on genuine safety concerns" -

THAT Byron letter - did he actually write it or only sign a CASA Staff drafted letter?

One of the Pilots admitted he penetrated Controlled Airspace - Regulation [CAR 100](#) covering Controlled Airspace Clearances and Instruction expressly requires the pilot-in-command to comply with the Control Instructions.

THAT CASA charge against the Operator, was inconsistent with [Sect 28BD of the Act](#) - no CASA action against that pilot.

That pilot also failed on a number of items specified in the Operator's Operations Manual -

[CAR 215\(9\)](#) requires all pilots to comply with all specifications in the Operator's Operations Manual - those CASA RCAs issued against the Operator were inconsistent with [Sect 28BD of the Act](#), no CASA action against that pilot.

Another pilot had failed to enter all aerodrome names he landed on during Mail run, he only entered "Mail Run" which was a breach of [CAR 5.52](#) expressly requiring pilots to enter flight information in their personal log-books -

THAT CASA charge against the Operator was inconsistent with [Sect 28BD of the ACT](#) - CASA did not take any action against that pilot; BUT that incorrect personal log entry was not unsafe, only a technical breach.

The other Pilot did not penetrate the Restricted Area - and that accident in a aeroplane was a private operation not under the Operator's AOC - and that pilot did not breach any legislation in that accident flight.

NOTE -One RCA referred to a LAME conducting maintenance with an expired Licence -

THAT was not unsafe as that Engineer only missed waiting for the renewal of the Licence and he had not lost any maintenance skills or knowledge due the expired Licence - that CASA action decision using that LAME item was unreasonable.

NOTE - At the Show Cause Conference (CASA and that Operator) the Operator stated to assist achieving overall compliance etc he was considering to sack that Pilot who committed all those breaches -

BUT - CASA staff at that Show Cause Conference stated CASA would not accept the Operator sacking that Pilot.

## Various incorrect CASA actions against Industry

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- a pilot of that above Operator

CASA alleged following a report from Air Traffic Control that the pilot penetrated a small RESTRICTED Area just off the Cairns coast - that Restricted area was only small due "birds nests" on a small Reef

The Pilot stated he did not penetrate that small Restricted area over that Reef as he was aware of it - and that he believed Air Traffic Control made an error judgement looking at their Radar considering the many nautical miles the Radar Screen covered and that the aeroplane he was flying only had a wingspan of about 9 meters –

And that he deliberately flew heading west just south of that Reef Restricted area so the tourist passengers on the right hand seats were able to view that small attractive Reef.

THAT ACCIDENT - that pilot was conducting Aeroplane Type Conversion training for a student near Green Island just off the Coast near Cairns.

That conversion training classed as "Private Work" under CAR 206 in that single-engine Cessna Caravan was not required by the AIP (Aviation Information Publication) CASA Directions under CAR 258(3) to remain within "Gliding Distance of Suitable Landing area" as required by CAR 258(1).

BUT - That sensible pilot did remain within Gliding Distance of Land and Green Island on that conversion training flight - when that Cessna Engine failed that pilot preparing to land on the Green Island Beach noticed people on the Beach so he landed in the sea near that beach - no injuries to him or the student or serious structural damage to the aeroplane.

CASA incorrectly charged him of breaching CAR 258(1) - CASA Ignored CAR 258(3) and the CASA Directions in AIP.

CASA also incorrectly charged him of breaching the Aeroplane Flight Manual word "CAUTION" for using the engine emergency power lever - "Caution" in the flight manual does not mean "Prohibited", just be careful if doing it. ALSO there was a Manufacturer's Service Notice that did not provide Prohibition Use of that emergency power lever, just provided a suggestion that it could also be used on the ground.

That inappropriate and unreasonable CASA action decision to suspend Pilot's qualifications claiming he was unsafe was 13 and 15 months after those alleged breaches.

**CASA** suspended Pilot Licence claiming he commenced flight in a Twin Otter with a known hydraulic catastrophic fire risk and that he failed to enter that claimed Major Defect on the Maintenance Release.

THAT **CASA** suspension claimed was unsafe commencing the flight – but **CASA** being aware within a week of the incident **CASA** did not suspend until 6 months later.

**did not commence the flight**; he only commenced taxiing from the Sydney Terminal having only obtained a Taxi Clearance from the Control Tower to taxi to the Runway.

NOTE – “FLIGHT”

Definition of "Flight" in the **Act** - "the operation of the aircraft from the moment at which the aircraft first moves under its own power for the purpose of taking-off until it comes to rest after landing being airborne"

**Practical reality** - pilot has to apply some power to move to taxi to the Runway, and **during that taxiing the pilot is required to conduct the Pre-Take-off checks** before commencing Take-off; some of the pre-Take-off checks can only be done while taxiing - and if at a Controlled Aerodrome the pilot has to then obtain a Take-Off Clearance if satisfied of the pre-take-off checks - then the pilot enters the runway and applies take-off power for the purpose of moving to take-off.

THAT clearly means the aircraft only first moves under its own power for the purpose of Taxiing and then moves for the purpose of taking-off after the Pilot has conducted all the pre-take-off checks, having obtained a Take-Off Clearance and entered the Runway and then applied power for the purpose of taking-off.

**CASA claimed Major Defect Catastrophic fire risk -**

That hydraulic leak on the Flap Actuator just above the passenger seats in a Twin Otter is not a fire risk or a Major Defect –

Hydraulic fluid like normal Oil is not very inflammable like petrol unless the hydraulic fluid is under very high pressure and spraying close to high powered electrical equipment – RAAF Neptunes had a 3000 psi hydraulic system which required monitoring of their hydraulic system pipe lines next to the 30KVA Radar Components in case of a leak spray as that 3000 psi high pressure spray increase the inflammability

**BUT** – in the Twin Otter the hydraulic system pressure is much lower and there is no significant electrical component next to the Flap Actuator.

**THEREFOE** basically no fire risk in the Twin Otter due some hydraulic leak from the Flap actuator.

Regulation **CAR 47** does not require the pilot to enter a major defect on the Maintenance Release if the pilot believes there is no possibility the aircraft will fly before being repaired.

THEREFORE that **CASA accusation** having claimed the hydraulic leak as a major defect not being entered on the Maintenance Release by the pilot was a breach of Regulations was an **incorrect unreasonable decision** as knew that Twin Otter would not fly before that hydraulic leak was repaired as he handed that Twin Otter to the Engineers as soon as he became aware of that hydraulic leak and taxied back to the Terminal.

## **The Incident**

A passenger pointed out to the Co-Pilot, who was moving along the aisle to the Cockpit, a hydraulic stain on the air-vent – the Co-pilot rubbed that stain on her finger and showed that to when she entered the cockpit. stated to the co-pilot after looking back that they would monitor that area while taxiing and lowering the flap to take-off position.

While taxiing that hydraulic fluid did commence leaking when he selected the flap to take-off position, and then **immediately turned around and taxied back to the Terminal and handed the Twin Otter to the Engineers to fix that hydraulic leak.**

r did not commence the flight – he only did some taxiing and did not enter the runway to commence take-off.

## Various incorrect CASA actions against Industry

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His LAME licence expired on a Saturday –

His renewal application letter was posted on the Friday as he had been away from the Workshop for a number of days conducting maintenance on a regular customer's aeroplane that the customer was not prepared to fly due problems and had requested the Workshop to send an Engineer up to their aerodrome to fix those problems –

He checked with CASA on the Monday to ensure they received the renewal application and were renewing his LAME licence.

CASA stated to him - the Renewal Application arrived after that LAME licence had expired – therefore was not renewable - he would have to sit examination.

THAT incorrect CASA statement placed the LAME out of work and reduced the number of LAMEs the Workshop had which caused inconvenience for the Workshop and the LAME.

### NOTE

Acts Interpretation Act states any item expiring on a Saturday, Sunday, or a Public Holiday actually expires on the first following working day –

THAT clearly means that LAME licence did not practically expire until the Monday.

THEREFOE – the renewal application arrived on the expiry date.

### CASA got that wrong

The Regulation CAR 32A does not prohibit renewal of an expired LAME - only states the LAME "may" apply for renewal before expiry -

CASA POLICY - not to renew expired –

And if renewal application letter not posted 3 days prior to expiry treat that as expired LAME.

THAT CASA Internal Procedures Manual Policy is incorrect.

As a Consultant assisting that LAME and aware of Regulations 32 and 32A I telephoned a CASA Solicitor and explained that CASA would be embarrassed if we took the case to the AAT.

That Solicitor agreed the policy was inappropriate with the Regulations and indicated he would advise CASA Airworthiness to renew that LAME immediately without making the LAME sit an examination

That renewal then did happen within a few days.

- Nth Territory Operator 2001 -2002

## Various incorrect CASA actions against Industry

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CASA issued a Show Cause notice including aim to remove the Metro type Aeroplane from the AOC, having refused to renew the AOC at the validity period date.

COINCIDENCE – The Operator had criticised CASA at a NT Aviation Association Meeting which was attended by a CASA representative – CASA refused to renew that AOC about 3 months later having advised the Operator they were going to conduct more surveillance.

NOTE – Back in the 1980's Operators in Townsville were advised in a friendly term by an Examiner of Airmen not to criticise the Dept, as some Dept policy will fail tests of persons who criticise the Dept

Practically reviewing the various allegations in that Show Cause Notice proved that and their Metro Pilot had not acted unsafe.

Many of the allegations were about the Metro aeroplane – including an allegation that it had a propeller strike with a Runway Marker, and the propeller reverse pitch system was not working, and on one occasion the Metro Pilot took off with one engine not producing correct power.

All the other allegations were either simple technical, not unsafe, and or inappropriate CASA opinions regarding various items which were not unsafe.

**Alleged Metro propeller strike** – the main allegation

CASA accepted a lie complaint from a previous company Metro Co-pilot who stated she had seen the propeller strike a Runway Marker immediately after landing touch-down.

The Pilot checked the wheel and noticed only a small white paint mark on that wheel with no damage, and definitely checked and noticed no marks on the starboard propeller or any marks on the nearby aeroplane fuselage.

Those runway markers were a bit close to the runway centre - The starboard outboard main-wheel actually hit the that Runway Marker – taxiing out the Pilot noticed a few bits of that runway Marker had moved out to the right away from the Runway proving the propeller had not touched that marker – If the propeller had struck that Marker the bits would have moved left towards the Runway centre, and possibly hit the aeroplane fuselage.

That CASA allegation provided by that former co-pilot was incorrect as when a person sitting in the co-pilot seat with the seat harness belts on it is not possible to see below the propeller centre dome – the person cannot see the bottom of the propeller – THEREFORE could not possibly see the propeller hit a Runway Marker.

Due the co-pilots comment - When back in Darwin the Pilot requested an Engineer also to check the propeller, the Engineer verified that propeller had not struck a Runway Marker, and had not suffered any damage.

NOTE – at the Show Cause Conference one CASA FOI agreed he was endorsed on the Metro type aeroplanes and agreed that he knew it was not possible while sitting in the pilot seats to see the bottom of the propeller - BUT – CASA still varied the AOC removing the Metro type aeroplane off the AOC.

**Alleged Propeller Reverse system**

The pilot stated the complaint from the former co-pilot was incorrect as the reverse system was working ok. Mechanically in the Metro Type aeroplane and others with those Garrett Fixed shaft Turbine Engines the reverse system is used to place the propellers in the “Blade Lock” position when shutting the engines down to facilitate the engine starting process – that “Blade Lock” position places the propeller blades in a neutral angle position to ensure there is no aerodynamic propeller drag which would cause engine starting problems – there were no starting problems.

**Engine Power allegation**

That CASA allegation was inappropriate as the pilot checked with an Engineer at the relevant aerodrome to verify the power output was satisfactory – the Engineer was satisfied with the situation

**- Nth Territory Pilot 2001-2002 -**

Approximately 14 months after those allegations about propeller strike, propeller reverse system, and engine power, CASA suspended licence indicating CASA considered he acted unsafe and against the legislation.

Considering the information above that CASA Pilot Suspension was inappropriate and an unreasonable decision.

I conducted an AAT “Stay Hearing” on behalf of and the AAT placed that CASA Suspension on “STAY”

**From:** Peter Rundle [pr.p2v7@bigpond.net.au]  
**Sent:** Friday, 13 June 2008 2:30 PM  
**To:** RRAT, Committee (SEN)  
**Subject:** CASA Industry Surveillance  
Senate,

**CASA** is required to conduct Industry Surveillance - **that is very logical** and definitely part of Effective **CASA** Governance.  
Are **CASA** conducting **comprehensive industry surveillance**?

**Sect 9** of the **Act - CASA's Functions**

**Sect 9(1)(f)** - "conducting comprehensive aviation industry surveillance including assessment of safety-related decisions taken by industry management"

Back in the 1990's **CAA** developed that brilliant **ASSP** (Aviation Safety Surveillance Program) which included very good Check-Lists of Items the **CAA** Inspectors were to use checking and to mark all check-list items as either satisfactory or unsatisfactory.  
THAT **ASSP** process caused consistent surveillance of all Operators, Workshops and Aerodromes.

THAT **ASSP** program for Flying Operations Inspectors included Operator Office Paper Records, surveillance and inspections of aircraft just parked on the Tarmac - and also "Ramp Checks" which was Surveillance of aircraft about to take-off or having just landed.

NOTE - There were some aircraft that **CAA** (including my conducting Ramp Checks) grounded due serious problems we observed during Ramp Checks.

NOTE - one aircraft check we did in Townsville was requested by the local RAAF Senior Air Traffic Control Officer regarding obvious problems with a USA Tower Air Boeing 747 about to charter our Army Soldiers over to South Africa - we observed numerous problems with that Boeing 747 that could have caused it to crash - we grounded it for repairs and then inspected it the next day which permitted it to then take our soldiers to South Africa.

NOTE- Due the VIP Parade in Townsville I advised my Regional Manager we might ground the B747 - he told me we could not ground the B747 and just tell the Army Boss that we would not fly in it and let him decide if he should let his soldiers travel in it.

ALSO that **ASSP** program included Aircraft Maintenance Workshops for Airworthiness Inspectors; and Aerodromes for Airport Inspectors.

**IMPORTANT** - When a breach of legislation was found the **CAA** Inspector issued immediately a NCN (Non-Conformance Notice) to the relevant person; with a copy to take back and enter in the **CAA** computer **ASSP** program and also that Operator's **CAA** File.

THAT **ASSP** program covered the number of surveillance actions of Operators, Workshops and Aerodromes; which was decided by **CAA**.

Since **CAA** was changed to **CASA** they modified those NCN forms to RCA (Request for Corrective Action) forms which were not handed to the Operator or relevant person while the Inspector was conducting some surveillance but posted about a week later only to the Operator.

THEREFORE - no written documentation was handed immediately to the Operator if a Breach of Legislation was observed; which meant the possibility that "breach" could continue and could cause an accident before the written RCA arrived.

ALSO - **NCN** (Non Conformance Notice) was a **logical meaning**, BUT **RCA** (Request for Corrective Action) is **not a logical meaning**.

INDUSTRY - due human nature there has always been some Operators, some Pilots and some Engineers deliberately breaching the legislation.



Back in the 1980's while Managing an Aviation Business in Townsville we lost a Tender due another local Operator severely over-loading their Cessna 402 aeroplane to obtain that Tender we quoted a larger Cessna 404 to carry that Customer load.

**From:** Peter Rundle [pr.p2v7@bigpond.net.au]  
**Sent:** Wednesday, 18 June 2008 2:41 PM  
**To:** RRAT, Committee (SEN)  
**Subject:** Maintenance Engineer training  
Senate,

**LAME** - Licensed Aircraft Maintenance Engineer

**CASA has changed** the Training Process to only an approved Workshop; due location that new process will cause massive increase costs for the persons choosing to be an engineer and the local Workshops - also **that will increase inflation** also that will probably reduce the number of LAMEs in Australia due the cost and or lack of salary for the person undergoing that training.

NOTE - The Military have a Central Training School which assists all Military Squadrons to always be staff manned so the Squadron is immediately ready to go overseas if there is a War - that central school costs is covered by the Defence Budget.

**Civil Aviation do not need that costly central school concept.** That central concept cannot guarantee perfect safety compared to the original LAME training.

**CASA** media claims the new process will assist Australians to obtain engineer jobs overseas.

#### **Original Civil LAME Engineer Training**

Over the past many decades any person deciding his/her career of aircraft maintenance joined a local Workshop as an apprentice.

They obtained Apprenticeship salary; and in most cases the person stilled lived at their local family Home.

That apprenticeship salary improved their life; AND the presence of apprenticeships provided a degree of labour for the Workshops.

They had to undergo 4 years apprenticeship training.

And they had to sit many Aviation Authority Examinations, and finally undergo an interview with the Aviation Authority to obtain the LAME licence.

The Aviation Authority had developed a "Training" Record book which recorded every maintenance item they had undergone training with.

**ADVANTAGE** - Training in a local workshop provided the apprentice with knowledge and skills relating to the various types of aircraft the Workshop maintained as those types were operated in that local area.

Also the **experienced LAMEs are capable of teaching** the apprentice the actual maintenance matters over the 4 year period.

The general quality of all those trained LAMEs providing appropriate maintenance for aircraft owners was very good safe and economical Aviation. There may have been a few accidents due incorrect maintenance; but certainly not very many considering the total number of civil aircraft and the total hours those aircraft flew.

NOTE - Over those decades some Australian trained LAMEs chose to go somewhere overseas to work - natural some persons like to go overseas for awhile

Also there has been a reduced training process due their current experience for ex-Military Aircraft maintenance persons to obtain the Civil LAME Licence, sit aircraft type exam and sit Civil Aviation Legislation Examination - THAT process provided a suitable option life for the ex-military folks who chose to join Civil aviation maintenance when their military career finalised.

**From:** Peter Rundle [pr.p2v7@bigpond.net.au]  
**Sent:** Thursday, 19 June 2008 2:47 PM  
**To:** RRAT, Committee (SEN)  
**Subject:** CASA's actions issue of RCAs  
Senate,

I explained to you in my Email covering "CASA Actions against Industry" that CASA issued RCA's against the Operator when company pilots had actually breached express Regulations requiring the pilots to comply.

One example was that penetration of Controlled Airspace by a pilot - Regulation CAR 100 expressly and **logically** requires the Pilot to obtain and comply with the Air Traffic Control instructions.

**INTERESTING NOTE** - CAA in the 1990's (assume it still applies within CASA) CAA had an appropriate Internal Administration Process requiring CAA staff driving a CAA motor car to sign the Office Paper Form before driving the CAA motor car so that if there were any road traffic breaches CAA could make that staff member pay the fine.

**That Admin process is logical** - and is similar to Sect 28BD of the Act which requires the Operator to only comply with provisions of the Act, Regulations and Orders that apply to the Operator.

**BUT** - the CASA record is of **issuing** the RCAs **against** the Operator many times blaming the Operator for the Operator's staff error.

In that case there were many RCAs covering breaches by company pilots **BUT issued against**.

**At that** when we tried explaining to CASA about those RCAs covering pilot breaches CASA stated he was not interested in the RCA details as he was only interested in the RCA scorecard against.

**QUESTION** - was that statement a CASA policy or a decision by?

**THAT** - statement was **inconsistent** with Sect 28BD of the ACT - and also different to that Aviation Authority internal car driving policy.

**AND** - at that Show Cause Conference CASA advised the that CASA would not accept him sacking that pilot that breached many express pilot Regulations which would have been the Employer ensuring the punishment to staff who breached many various Regulations.

**From:** Peter Rundle [pr.p2v7@bigpond.net.au]  
**Sent:** Sunday, 22 June 2008 2:19 PM  
**To:** RRAT, Committee (SEN)  
**Subject:** Jim Venn Report to DPP  
Senate,

Jim Venn was contracted by CASA to investigate the complaints regarding those CASA actions against and pilot .

I recommend ideally the Jim Venn Report should be handed to the DPP (Department of Public Prosecution) for the DPP to decide if those CASA cases did pervert the course of Justice and decide if those CASA staff involved and or CASA should be prosecuted.

Conducting his investigation in Nth Qld reference Cape York Airlines and Pilot Jim Venn interviewed me as the Consultant of those two folks.

Paying attention to Jim's comments it certainly appeared he agreed that those CASA staff acted incorrectly miss-quoting the relevant Aviation Legislation.

I also mentioned to Jim Venn those other inappropriate CASA actions I explained to you in that other Email.

The relevant Nth Qld CASA staff sent out the Show Cause Notices and then sent Draft Action/information to the CASA Delegate down south - BUT - that Delegate did not attend the Show cause Conference.

NOTE - In Court Cases the Judge attends the entire Case Hearing, that followed by the Judge's appropriate Decision.

CASA controlling that Investigation by using a person Contracted is not appropriate considering there are Ombudsman to listen to other Australian Citizens complain about matters, and the Ombudsman being independent no doubt arrives at reasonable decisions.

CASA have created an internal position of Industry Complaints Commissioner.

Why not have an Aviation Ombudsman appointed to the Government; being independent that would most likely provide the Aviation Industry with a much better system when they have complaints regarding CASA actions and or inappropriate Regulations or Orders.

NOTE - Former CASA Deputy CEO I accepted my advice reference that incorrect CASA action against pilot; and instigated an internal investigation, and from that report he organised CASA to re-issue those qualifications that CASA had inappropriately cancelled.