



CANADIAN ASSOCIATION OF AVIATION DISTRIBUTORS
& MAINTENANCE ORGANIZATIONS

c/o 2555 Derry Rd. E.
Mississauga, ON L4T 1A1
(905) 678-1234

Position Paper

Transport Canada Civil Aviation
Ottawa, ON

September 10, 2004

Att'n: Mr. Don Sherritt
Director, Aircraft Maintenance & Manufacturing

***Re: CARAC Special Joint Committee, Part V & Part VII, Sep 13-16, 2004
Safety Management Systems & Fatigue Risk Management***

Ref: NPA's 2004-047 & -049, 2004-059 through -062

Please be advised that our position with respect to SMS and, more particularly, FRM has not changed since our last Position Paper, dated March 2, 2004. We cannot support these NPA's as we feel that they are unjustified, duplicitous, administratively (and perhaps legally?) unworkable, and will place an undue economic burden on an already economically challenged industry.

We are in receipt of a copy of AEA Canada's Position Paper (dated Sep 9/04) and whole-heartedly agree with and support everything which they have stated.

Sincerely yours,
CANADIAN ASSOCIATION OF AVIATION DISTRIBUTORS
& MAINTENANCE ORGANIZATIONS

Jeff Leavens
President

(& President of Leavens Aviation Inc., AMO 2-72)