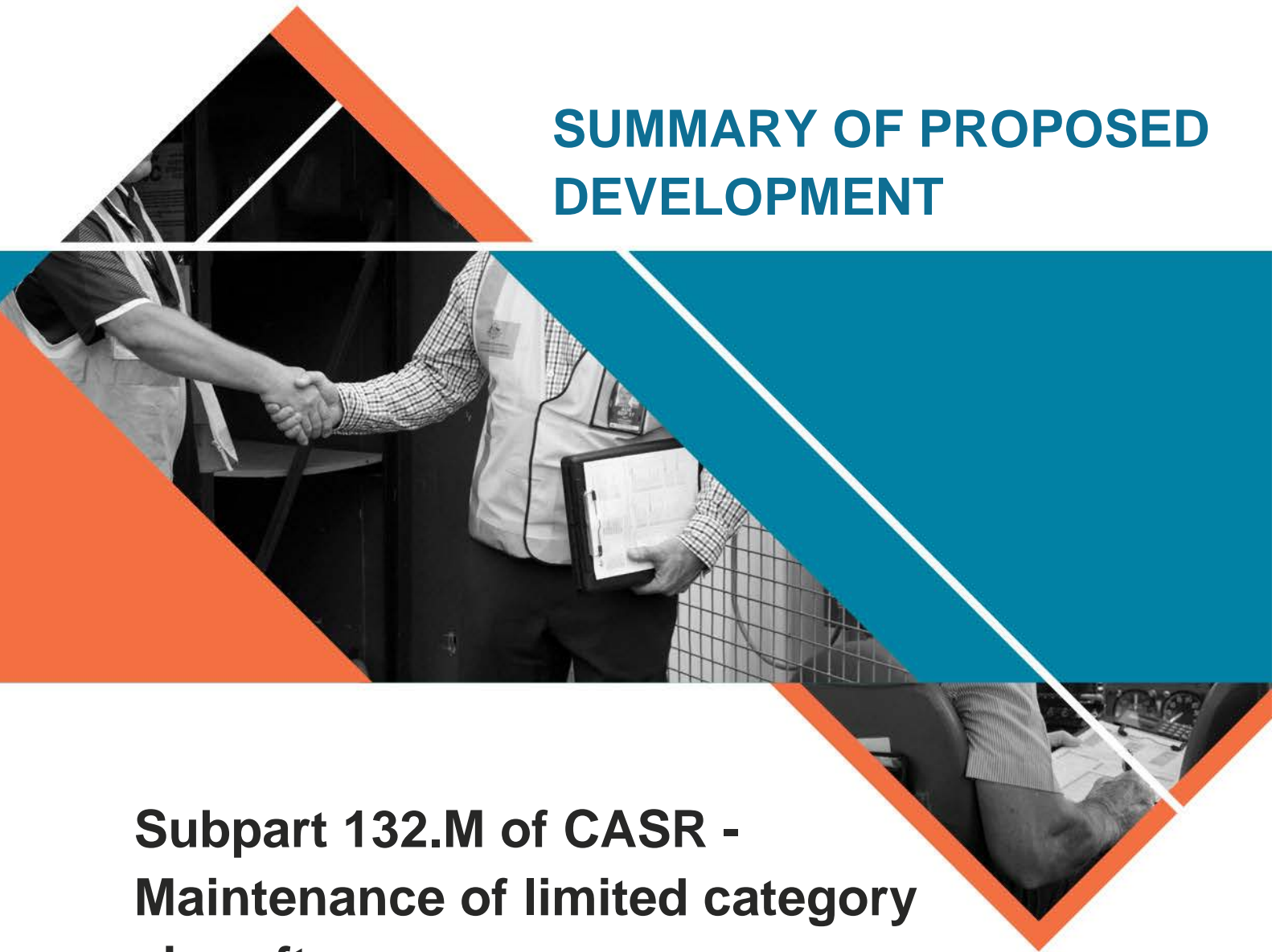




SUMMARY OF PROPOSED DEVELOPMENT



Subpart 132.M of CASR - Maintenance of limited category aircraft

Civil Aviation Legislation (Subpart 132.M) Regulation 2018

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Introduction

Part 132 of the *Civil Aviation Safety Regulations 1998 (CASR)* regulates operation of limited category aircraft.

The underlying principles for Part 132 of CASR are that:

- Part 132 of CASR operations are recreational activities and CASA policy is to transfer administration and oversight of recreational aviation activities to approved self-administering aviation organisations to the maximum practicable extent consistent with acceptable levels of aviation safety for the activity.
- Part 132 of CASR participants are informed of and accept the inherent risks associated with the activity. As a result of this informed acceptance of risk, combined with the often unique nature of the aircraft, Part 132 of CASR safety standards are lower than those required of normal private general aviation operations, and operational limitations appropriate for the aircraft and the specific operation are applied accordingly.
- Part 132 of CASR operations other than adventure flights are regulated with maximum reasonable flexibility for the participants, who are expected to have fully informed themselves of the safety standards associated with the operation.
- Part 132 of CASR adventure flights are regulated to higher standards in certain key areas than other Part 132 of CASR operations to provide higher levels of safety for the participating individuals whose understanding of the safety standards does not extend beyond the safety briefing.

Part 132 of CASR includes provision for a Subpart 132.M of CASR which is the subject of this proposal and will apply these general principles to regulation of continuing airworthiness and maintenance of limited category aircraft.

CASA published a discussion paper DP 1608OS — Maintenance of limited category aircraft from 4 July - 25 September 2017. The discussion paper invited warbird operators, maintainers and their associations, to comment on three proposals which were to either:

- retain the present regulatory structure
 - incorporate maintenance rules for limited category aircraft into Part 42 of CASR
- or
- create a maintenance Subpart 132.M of CASR for limited category aircraft.

A subsequent consultation meeting was held in Sydney on 28 August 2017 between CASA and representatives from:

- Australian Warbirds Association Limited
- Historic Aircraft Restoration Society
- RAAF Museum
- RAN Museum
- Temora Aviation Museum
- Antique Aircraft Association of Australia
- operators of antique, limited category and experimental aircraft.

The meeting recommended that CASA proceed with development of Subpart 132.M of CASR subject to CASA providing full policy details for further consideration and discussion by the

stakeholders.

This consultation draft sets out the full policy proposals for Subpart 132.M of CASR for public consideration and comment.

Overview, applicability and implementation

Under Subpart 132.M of CASR, the relevant administering authority (AA) would administer continuing airworthiness management and maintenance of limited category aircraft.

Policy overview

Most of the current requirements and exemptions contained in the various instruments of exemption, authorisation and directions relating to maintenance of limited category aircraft would be incorporated in Subpart 132.M of CASR.

The main policy variations would be:

- Certifications for completion of maintenance would be based on the maintenance certification and release to service, thereby:
 - eliminating the need for multiple certifications for a maintenance activity
 - making use of the CASA MR form optional.
- CASA-issued maintenance organisation approvals would not be required.
- Authorisation of maintenance certifiers would be administered by the AA.
- Assessment for competency to carry out a task would no longer require approval by CASA of an aircraft or engine training plan.

Applicability

Proposed Subpart 132.M of CASR would apply to:

- Owners, operators and registered operators of limited category aircraft.
- Individuals and organisations carrying out maintenance on limited category aircraft and their components.

Parts 4, 4A and 4B of CAR and Parts 39, 42 and 145 of CASR would not apply to aircraft that are subject to this Subpart.

Implementation

A transition period of six months would apply to allow time for the AA to develop and submit to CASA, procedures for carrying out functions under Subpart 132.M of CASR. At completion of the transition period, maintenance of limited category aircraft would be carried out in accordance with the rules set out in this proposed Subpart and the procedures set out in the manual of the AA.

Savings provisions

Holders of authorisations to certify for maintenance on limited category aircraft, or components for limited category aircraft at the time of making the Subpart, would be treated as if they hold an equivalent authorisation under Subpart 132.M of CASR until the AA has issued an equivalent authorisation.

Administration of limited category maintenance

Maintenance of limited category aircraft and the role of the administering authority

Overview

The AA would be approved to carry out the functions listed in this chapter. The AA would be required to submit to CASA, procedures showing how it would comply with the requirements of Subpart 132.M of CASR, including how it would administer the function impartially and fairly. Once approved by CASA, the procedures would become part of the AA manual and would be binding on the AA and its personnel.

If the AA issues a maintenance direction, the direction would be binding on the person(s) to whom it is issued and failure to comply with any such direction would be a breach of the CASRs.

In accordance with its approved procedures, the AA would be required to perform the following functions:

- Assess applications for certification authorisations.
- Issue or refuse certification authorisations.
- Assess applications for approval to be an assessor for task-based assessment of competency provisions.
- Issue or refuse authorisations to assess a person for task competency.
- Maintain a register of authorisations issued under this Subpart including the scope as varied from time to time under task-based assessment provisions.
- Assess CASA issued airworthiness directives (AD) and equivalent documents issued by a foreign NAA, and where relevant take appropriate action in accordance with Subpart 132.M of CASR.
- Assess and approve/reject maintenance schedules for an aircraft.
- Assess and approve/reject maintenance data for an aircraft.
- Assess major defect reports and, where required, take steps to ensure that maintenance advisories and/or maintenance directions are raised to prevent the defect remaining undetected in any other aircraft under its administration.
- Carry out safety inspections of aircraft or aircraft maintainers as required.
- Where necessary, suspend or cancel a person's approval to carry out maintenance.

Safety inspections by the administering authority

The AA may carry out safety inspections on persons authorised or operating under Subpart 132.M of CASR.

A safety inspection could be in the form of an inspection of an aircraft or component after maintenance, a records inspection or an audit of the maintainer.

The form and extent of any safety inspection would be determined by the AA, taking into consideration the seriousness of the information received or any other relevant factors such as previous incidents.

The AA would be required to consider all reports about improper or unsafe maintenance practices or maintenance related incidents. If reports or other intelligence received indicate that

a maintainer or maintenance organisation is carrying out maintenance that does not comply with this Subpart 132.M of CASR, the AA would be required to carry out a safety inspection of the maintainer or organisation to determine whether remedial action is required.

Responsibility for airworthiness

Under CARs and CASRs the registered operator is responsible for the airworthiness of an aircraft. Similarly, under the FARs, the owner is responsible for airworthiness. For Subpart 132.M of CASR, the same principles will apply.

Responsibilities of the registered operator of a limited category aircraft

Overview

The responsibilities set out in this chapter would be binding on the registered operator (RO) of an aircraft and are based on the existing obligations as set out in Divisions 2 and 3 of Part 4A of CAR. The requirements have been simplified to align with current practice as reflected in Subpart 42.C of CASR. In that regard, there are no new obligations being proposed, and some existing obligations would be deleted or simplified. For example, the proposed section covering maintenance schedules has been reduced from 23 regulations under CAR to a few paragraphs under this proposed Subpart.

Under Subpart 132.M of CASR, the RO would be responsible to ensure that:

- The aircraft is not flown unless it is in an airworthy condition
- A record of aircraft total time in service (accumulated flight time) is kept for the aircraft and updated at the end of a day on which a flight or flights have occurred.
- A maintenance schedule is in place for the aircraft.
- The requirements in the maintenance schedule are complied with.
- Maintenance directions issued by the AA are complied with.
- Maintenance is only certified by a person permitted to do so under Subpart 132.M of CASR.
- If components are fitted to the aircraft, they are serviceable and suitable for the purpose.
- A system of maintenance records (log book) is in place for the aircraft.
- A record of any maintenance carried out is made in the log book.
- An aircraft is not flown after maintenance unless the aircraft has been released to service by an appropriate certification authorisation (CA) holder.
- The maintenance records are kept up-to-date in accordance with the requirements of Subpart 132.M of CASR.
- If an aircraft is found to have a major defect, the aircraft is not permitted to be flown until the defect is rectified and the aircraft released to service
- Major defects are reported to the AA in accordance with Subpart 132.M of CASR.

Note: If the CASA maintenance release is being used as a flight technical log, the RO may raise a new copy of a maintenance release form at any time for that purpose.

Requirements for a maintenance schedule

Overview

A maintenance schedule for a limited category aircraft could be any of the following:

- a. a schedule approved by CASA or the AA
- b. a schedule previously used by a military operator
- c. a schedule published by the aircraft manufacturer
- d. the Subpart 132.M of CASR Schedule.

For option d) above, CASA would develop and publish a Part 132 maintenance schedule based on CASA Schedule 5 and Appendix D of FAR Part 43.

For aircraft engaged in adventure flights, the Subpart 132.M of CASR schedule could be used if approved by the AA.

If a schedule mentioned in a, b or c is adopted, it must provide for inspection of electrical instrument and avionics equipment as set out in the Subpart 132.M of CASR - Maintenance schedule.

For aircraft that have low utilisation, an idle aircraft program that ensures that the aircraft does not deteriorate to an unsafe condition between flights may be applied. Any such program would be developed in consultation with and approved by the AA under option a) or approved by a military operator or the aircraft manufacturer.

Certification authorisation for limited category maintenance

A certification authorisation would be an authorisation for the purpose of Subsection 20AB (2) of the Civil Aviation Act 1988 (The Act) to carry out maintenance.

Certified authorisation (CA) holders would be able to perform the following maintenance activities as defined in their authorisation:

- Carry out or supervise maintenance that is within the scope of their authorisation.
- Make a certification for completion of maintenance.
- Authorise release to service of an aircraft or component upon completion of maintenance.

Eligibility

Subject to AA assessment a person would be eligible for a CA if that person:

- a. holds or has held a Part 66 AME licence
or
- b. holds or has held a maintenance authorisation issued under regulation 33B or subregulation 42ZC(6) of CAR
or
- c. has been assessed by the AA as having particular qualifications or experience that meet or exceed the minimum requirements set out in the Part 132 Manual of Standards (MOS)
or

- d. has held an AME licence issued under regulation 31 of CAR
or
- e. holds or has held a foreign, ICAO compliant AME licence. A person mentioned in a), b) or d) above would be eligible for a CA of like privileges without further showing. Other applicants would be subject to assessment by the AA.

The AA would formally notify a person of their authorisation by letter or certificate, which may be issued via email.

Task-based assessment of competency

Overview

Task-based assessment would be introduced. The current structured training programs would remain acceptable.

The task-based assessment procedure that is proposed for this Subpart is based on US FAR 65.81(a) which has been the standard in the USA for determining competency to perform a maintenance task for 50 years.

This simplified process would replace current Part 1 WHR training and assessment as set out in CAO 104.0. The training programs set out in CAO 104.0 would still be acceptable for use by limited category maintenance organisations if so desired.

Requirement

It would be a requirement that a CA holder who performs or supervises a maintenance task must have either satisfactorily completed the task at an earlier date or performed the task under the supervision of another CA holder who has been authorised by the AA to supervise and assess a person's performance of the maintenance task.

Notes:

1. The person supervising the task may guide and instruct as necessary to ensure that the CA holder fully understands the task requirements.
2. The person supervising may require the CA holder to perform the task multiple times in order to be satisfied that the CA holder has the necessary competence.
3. The person who supervises the task would provide a report to the CA holder and the AA upon the CA holders successful completion of the task.

Privileges of certification authorisation holders

A CA that is issued on the basis of a Part 66 licence currently or previously held, or a previously held CAR 31 licence would have the same or equivalent privileges that would normally apply to that licence.

A CA issued on the basis of a currently or previously held CASA authorisation issued under Regulation 33B or subregulation 42ZC(6) would have the same or equivalent privileges as specified on the relevant CASA issued authorisation.

Any other CA issued by the AA would have the privileges specified on the CA.

Additional privileges of certain certification authorisation holders

The following additional privileges would apply:

- a. A holder of a CA based on a B2 category licence would be entitled to certify for completion of maintenance of avionics equipment without further training or assessment if the equipment is not of a unique nature specific to an aircraft type.
- b. A holder of a CA based on a B1.1 licence would be entitled to certify for maintenance of systems designated as structures, mechanical or electrical for piston powered aircraft.
- c. A holder of a CA based on a B1.2 licence would be entitled to certify for maintenance of systems designated as structures, mechanical or electrical for turbine powered aircraft.
- d. Normal line replaceable unit privileges would apply across the two subcategories.

Note: If a B1 licence holder mentioned in b) or c) above is unfamiliar with an electrical maintenance task, the task-based assessment requirements would apply.

Performance rules for maintenance of limited category aircraft

A maintainer would be responsible to ensure that:

- the RO has authorised all maintenance that is being carried out on an aircraft
- any maintenance carried out is within the scope of their CA
- the person certifying for the maintenance is familiar with the type of task and competent to carry it out
- all maintenance is carried out in accordance with relevant maintenance data

Note: If a tool, jack or other item of required maintenance equipment is unavailable, the maintainer would be required to acquire or fabricate a device that would allow the equivalent maintenance outcome to be achieved.

- if a tool is required to confirm that a dimension, torque, travel, electrical value or other requirement is within specifications, that it is calibrated in accordance with the requirements of this Subpart
- if a defect is found in the course of maintenance, that it is reported to the aircraft owner
- a signed and dated record of completed maintenance is made in the aircraft maintenance records
- a certificate of release to service (CRS) is issued in accordance with the requirements of this Subpart
- if any maintenance that has been required by the RO has not been carried out at the time of issue of the CRS, the details of the required maintenance are noted on the CRS
- if any defects that have been found in the course of maintenance have not been rectified at time of issue of the CRS, the details of the defects are noted on the CRS
- if any matters are required to be reported to the AA, the reports are made in accordance with the procedures of the AA.

Independent inspections of critical control systems

Whenever maintenance is carried out that disturbs any part of a critical control system, inspections of the work would be required to be carried out to determine that the control system has been correctly assembled and rigged, and that the system is functioning correctly.

An inspection would be required to be made by the person who certified for the maintenance and an independent inspection would be required to be carried out by a person who is

authorised to act as pilot-in-command of the aircraft or holds an AME licence or certification authorisation that would permit the holder to carry out the type of maintenance.

A critical control system would be a control system, the correct functioning of which is essential for the safe operation of the aircraft.

Major defects

A person who identifies a major defect, either while either operating or carrying out maintenance on an aircraft that is subject to this Subpart, would be required to report the defect to the RO on the same day.

Note: The RO is required to be notified of a major defect on the same day so that the RO can comply with his/her obligation under this Subpart to ensure that the aircraft is not permitted to be flown until the major defect is rectified

A major defect would be a defect that has caused or could cause a:

- primary structural failure of the aircraft
- flight control system failure in an aircraft
- failure of the crankcase, crankshaft, camshaft or reciprocating components of a piston engine
- failure of a burner housing or any part of the rotating assemblies of a turbine engine
- fire in any part of an aircraft.

Calibration of measuring tools and equipment (tools)

This requirement would not apply to a tool that:

- provides comparative data
- uses a transfer standard (such as a gauge block) to ensure accuracy is within tolerances
- has a self-test function that does not require further confirmation or calibration
- is not required by maintenance data for the aircraft being maintained.

A tool that is required by maintenance data to be used to measure, or confirm that a dimension or function meets specified tolerances, would be required to be checked for accuracy over the required operating range:

- before each use
- or
- in accordance with a schedule developed by the user
- and
- at any time that the tool is suspected of having been damaged or having yielded a result that is outside acceptable safe tolerances.

If a schedule is developed by the user, it must take into account, manufacturers' recommended calibration periods, frequency of usage, storage conditions, and previous calibration results for the tool. The intervals must be realistic and not based solely on avoidance of cost. The AA may at any time, direct a maintainer to change a calibration schedule that it deems to be inadequate.

If the AA determines that a calibration schedule is inaccurate, it may direct the maintainer to confirm all measurements made with the tool since it was last calibrated.

When using a third-party calibration service, the individual or organisation would be required to be satisfied that the calibration provider for the tool has the required capabilities and can provide acceptable traceability to an appropriate recognised standard.

Acceptable standards would be specified in the Part 132 MOS.

Modifications

Modification policies are already established in Subpart 132.M of CASR. Proposed changes are only to standardise terminology across the regulations.

Minor modifications

Minor modifications are any modifications that are not major modifications.

Major modifications

A major repair or modification is one that has an appreciable effect on the weight, balance, structural strength, reliability, operational characteristics, or other characteristics affecting the airworthiness of an aircraft, aircraft engine or propeller. These are changes to an aircraft that could render the previous design analyses and assumptions invalid. They therefore require a formal assessment by a person who is knowledgeable and experienced in aircraft design to ensure no unforeseen unsafe features are introduced.

Aircraft not authorised to carry out adventure flights

For aircraft not authorised to carry out adventure flights, modifications may be made to an aircraft in accordance with acceptable data for the aircraft with the consent of the registered operator of the aircraft. The modification must be recorded in the aircraft's maintenance records to ensure that the current configuration of the aircraft is clearly defined and traceable. The maintenance carried out to incorporate a modification must be certified by a person who holds a certification authorisation with the necessary scope.

Adventure flight aircraft

For aircraft authorised to carry out adventure flights, minor modifications may be carried out as described above. However, major modifications must be approved. Approvals may be granted by:

- The aircraft manufacturer
or
- A military or civil authority for the aircraft
or
- The AA for the aircraft
or
- A Subpart 21.J approved design organisation or 21.M authorised person
or
- CASA.

Use of components and materials

Components and materials used in the maintenance of an aircraft must be:

- Serviceable
and
- Acceptable within the current configuration of the aircraft

Use of alternative components and materials is a modification and must be acceptable or approved under the Part 132 of CASR requirements for modifications as described above.

- For example, alternative fasteners in non-structural areas would be a minor modification and may be done in accordance with acceptable data for the aircraft. Installing a different type of propeller would be a major change, which would need to be approved if it was done on an adventure flight aircraft.

The component or material must be accompanied by documentation that establishes its suitability and serviceability.

If a maintainer is installing a salvaged component, or a component that is not accompanied by a required document, the maintainer would be required to assess the component and be satisfied that it is serviceable and suitable for the intended purpose. The registered operator is ultimately responsible for the airworthiness of their aircraft, and therefore for accepting the use of the component.

If a life-limited salvaged component is to be installed on an aircraft engaged in adventure flight operations, the component would be required to be accompanied by a verifiable record of its utilisation history and remaining service life.

Maintenance of components

Components could only be maintained by an individual or organisation that has been approved by the AA or CASA.

An approved component maintainer would be required to supply an authorisation for release to service to accompany a component on which maintenance has been carried out.

Note: A release to service authorisation issued under these provisions would have no validity for other aircraft under CASR or CAR.

Maintenance of ejection seats and explosive devices

A person would not be permitted to carry out maintenance on ejection seats or explosive devices fitted to an aircraft unless that person has completed a course of training that has been:

- Conducted by the manufacturer of the ejection seat
or
- Approved by the AA.

Maintenance of emergency parachutes

A person would not be permitted to carry out maintenance on emergency parachutes unless that person holds a:

- Packer B qualification granted by the Australian Parachute Federation (APF)
or
- Rigger qualification granted by the APF
or

- Certificate of successful completion of a parachute packer or rigger course of training approved in writing by the AA.

Notes:

1. A holder of a parachute packer qualification may carry out and certify for the packing of a parachute but may not carry out or certify for repairs to a parachute.
2. A holder of a parachute rigger qualification may carry out and certify for packing and repairing a parachute.

Pilot maintenance

Overview

CASA would publish a list of pilot maintenance tasks in the Part 132 MOS. The proposed list would be based on Schedule 8 of CAR and would make provision for additional items to be added subject to advice from the AA.

Requirements

A pilot may carry out pilot maintenance on an aircraft if the pilot is:

- licensed to fly the aircraft as pilot-in-command
and
- authorised by the RO to perform the maintenance
and
- competent to perform the maintenance.

A pilot would be competent to perform a pilot maintenance task if the pilot has:

- previously satisfactorily performed the maintenance
or
- satisfactorily performed the maintenance under the supervision of:
 - A pilot who is competent to perform the maintenance
or
 - A CA holder.

A person other than a pilot may perform pilot maintenance tasks on an aircraft if the person holds a CA issued by the AA.

Maintenance records

Records could be in the form of either electronic or paper records.

Record keeping requirements for a RO and a maintainer would require:

- records to be kept in a manner to prevent loss or damage of records
- electronic records to be backed up on a separate electronic file storage device or service.

Maintenance record requirements would be:

- If a life limited component is fitted to an aircraft, the records must contain details of when the component must be inspected, overhauled or retired from service.
- If maintenance is carried out on the aircraft, a record of the maintenance must be made in the aircraft maintenance records.
- The record of maintenance must be made by the person who carried out or supervised the maintenance.
- A record of any maintenance carried out must contain:
 - The date of completion of the maintenance being carried out.
 - The total time in service of the aircraft at time of carrying out the maintenance.
 - A description of maintenance carried out.
 - Details of any special inspections or tests carried out in accordance with a maintenance direction and the results of the inspection or test.
 - If a modification was carried out, details of the data used for the purpose.
 - Details of component changes including where applicable:
 - o the make and model of the component
 - o part number
 - o serial number
 - o if the component has a specified life, the remaining operating hours or cycles, or calendar time before inspection, overhaul or retirement of the component being installed.

Retention of records

Retention of records by registered operator

If the RO of an aircraft is required under this Subpart to keep any records or documentation relating to the aircraft, the RO must retain the records until:

- the aircraft is sold, at which time the records must be transferred to the new RO
or
- the aircraft is permanently removed from service.

If a person or organisation has created work sheets during maintenance of an aircraft, the worksheets must be retained for a period of 2 years after the date of completion of the maintenance.

Certifications

Completion of maintenance and release to service

Certifications for completion of maintenance and authorisation for release to service would be made in the aircraft or component maintenance records.

Who could make a certification for completion of maintenance and authorise release to service

The person making the certification must:

- Have performed or supervised the maintenance.

- Hold a valid CA that permits the person to make the certification.

Form of a certification for completion of maintenance and authorisation for release to service

A certification for completion of maintenance and authorisation for release to service must:

- Contain a statement that in respect of the maintenance carried out, the aircraft or component is airworthy and that the aircraft or component is released to service.
- Be signed and dated and show the ARN/CA/MA/AEL number of the person making the certification.

Certifying for independent inspections after maintenance of a critical control system

Certifications for completion of the inspections would be required to be made by the person who certified for the maintenance and the person who carried out the independent inspection.

Form of certification for inspection of critical control systems

The certification would be required to include:

- The date the inspection was conducted.
- A description of the maintenance work that has been inspected.
- The name and CA/MA/AEL number or ARN of:
 - the person who certified for the maintenance and the first inspection
 - the person who performed the independent inspection.
- The signature of each person making the certification.

Compliance and enforcement

Compliance and enforcement would be required to be conducted in a fair, impartial and just manner.

Role of the administering authority

The AA would investigate matters related to breaches of this Subpart by aircraft owners, operators and maintainers.

Subject to considerations of fairness and appropriate levels of response and where necessary, the AA would counsel authorisation holders or cancel authorisations as appropriate.

If cancellation of an authorisation is considered, the AA would consult with CASA Sport Aviation Branch and take into consideration any comments offered.

If an individual or organisation continues to commit a breach of regulations despite the best efforts of the AA, the matter would be reported to CASA for further enforcement consideration.

Note: It is anticipated that limited category operations will be transitioned into the future CASR Part 149 regulations, which will cover these administrative requirements.

Role of CASA

CASA would review proposed cancellations of authorisations and provide comment or advice as required.

If a matter is referred to CASA for escalation CASA would consider enforcement action using existing processes CASA participation in certain matters.

When the AA is considering how to deal with ADs in accordance with the provisions of this proposal, CASA would at its discretion, appoint an appropriately qualified officer to participate in the process who would present CASA's views, where necessary, in relation to the matter.

If a member of the AA is dissatisfied with a decision of the AA and is unable to resolve the differences via the approved dispute resolution process, the matter may be referred to CASA for consideration and advice.

CASA would not directly intervene in a dispute unless it was clearly demonstrated that the AA was not acting in accordance with its CASA approved procedures.

Note: It is anticipated that limited category operations will be transitioned into the future CASR Part 149 regulations, which will cover these administrative requirements.

Safety risk analysis

CASA has based the new provisions on existing provisions that exist either under CAR, CASR or the FARs, all of which have been in force for at least 7 years with no indication of underlying unsafe effects. The proposed Subpart would maintain a level of safety that is at least equivalent to existing safety levels while providing for simplification, clarity, transparency and reduction of compliance burden where no measurable safety benefit has been demonstrated.

Closing date for comment

CASA will consider all comments received as part of this consultation process and incorporate changes as appropriate. Comments on the draft Subpart 132.M of CASR policy paper should be submitted through the online response form by close of business 13 July 2018.