

## REMOTE LOCATION MAINTENANCE PROPOSAL TO CASA

AMROBA has had many complaints from members regarding the ability of a CAR 30 certificate of approval to meet customer's demands to service their aircraft at other than the maintenance organisation's main base facility. There is no standardisation with this process where some certificates issued by CASA have it as a condition of their certificate and some have included it in their CAR 30 written quality control system. Having discussed this with AMROBA Management, we believe that CASA should amend CAR 100.5 to include a similar provision that are in other NAA regulatory systems where there are regulatory provisions that enables a maintenance organisation to do such work.

It has been standard practice throughout the world for aircraft maintenance organisations to have the ability to recover aircraft, carry out in-field maintenance, any maintenance required at the owner's facility that the size and equipment at the facility permits and, especially, inspections such as annual and 100 hourly inspections. Both the EASA and FAA have rules that permit such work to be carried out. On behalf of AMROBA Management Team, the following proposal for an amendment to CAO 100.5 will standardise and harmonise Australia with most other NAA systems.

### AMROBA Proposal

That CASA amend CAO 100.5 to include a provision, based on EASR 145.A.75 (c) (FAR 145.203 has a similar system.), to enable a maintenance organisation to carry out maintenance at any location without the need for any individual approval by CASA. CASA has the power under CAR 30 (3) to place such a condition in the CAO and make it applicable to all maintenance organisations. The outcome based EASR 145.A.75 actually gives back to CAR 30 maintenance organisations similar conditions that existed pre the 1992 changes to the legislative maintenance rules.

**Proposed CAO 100.5 words:** *“Maintain any aircraft or any component for which it is approved at any location subject to the need for such maintenance arising either from the unserviceability of the aircraft or from the necessity of supporting occasional line maintenance, subject to the conditions specified in the written quality control system.”*

This standard approach will enable many GA operators to have their maintenance done on-site like it was in the past thus reducing costs. It would also enable normal business to proceed with interference from government causing additional costs without any safety benefit. An organisation that has a Fixed Base Operations, such as most maintenance organisations, need this flexibility to look after their customers' aircraft. This is not and never has been a safety problem. This is especially important for contract operators such as helicopter aerialwork aircraft who rely on the aircraft being maintained serviceable during the life of the contract. If the ability to provide such service is administratively restrictive then there is a safety problem because aircraft will be operated with unrecorded unserviceabilities. Increased bureaucratic requirements have been identified as a causal problem in the lowering of safety standards on many occasions.

## Regulatory Standards

"**CAR 30(3)** CASA may, for the purpose of ensuring the safety of air navigation, include in a certificate of approval granted under this regulation an endorsement that the certificate is granted subject to a condition set out in the endorsement, in a document issued with the certificate of approval **or in a specified Part or Section of Civil Aviation Orders.**

### **EASR 145.A.75 Privileges of the organisation**

\*\*\*\*\*, the organisation shall be entitled to carry out the following tasks:

(c) Maintain any aircraft or any component for which it is approved at any location subject to the need for such maintenance arising either from the unserviceability of the aircraft or from the necessity of supporting occasional line maintenance, subject to the conditions specified in the exposition;

### **FAR 145.203 Work performed at another location.**

A certificated repair station may temporarily transport material, equipment, and personnel needed to perform maintenance, preventive maintenance, alterations, or certain specialized services on an article for which it is rated to a place other than the repair station's fixed location if the following requirements are met:

- (a) The work is necessary due to a special circumstance, as determined by the FAA; or
- (b) It is necessary to perform such work on a recurring basis, and the repair station's manual includes the procedures for accomplishing maintenance, preventive maintenance, alterations, or specialized services at a place other than the repair station's fixed location.

We recommend this proposal to you for urgent attention – it is a simple fix that will improve safety.