

## ***Subject: Maintenance of Aircraft/Components/Materials***

The following is the text of correspondence sent to CASA Executive that would reduce costs to both CASA and our members without any loss of safety but possibly a reduction in CASA administrative processes.

“It has been brought to my notice by a number of our members that there are various interpretations of when component maintenance requires a CASA issued “maintenance of component and/or material” certificate under CAR 30 and will it be the same under the proposed CASR Part 145.

**Fact:** If an aircraft maintenance organisation does not intend to return a component to service for fitment to an aircraft or another aircraft component by another maintenance organisation then the component maintenance should be covered by the organisation’s “Maintenance of Aircraft” certificate of approval. That was the practice introduced in 1992 that is now being misinterpreted.

Prior to the commencement of the 1992 amendments to CAR 30, Ron Cooper, the then Director of Aviation Safety, personally made an Australia wide tour telling industry that is how the 1992 CAR 30 requirements will be implemented. It is the internationally accepted practice that we agree with. Harmonisation!!!

Because of variations in CASA interpretations of CAR 30 there is apparently confusion of what is covered by the maintenance of aircraft certificate and maintenance that may be carried out under that certificate on parts that are not fitted to an aircraft but held in stock by the maintenance organisation. Lack of corporate (standards) knowledge.

Internationally, NAAs issue certificates to maintenance organisations so that they can issue release documents AFTER they have carried out maintenance on aircraft or components and materials (aeronautical products). This is an ICAO standard as well. Signing a Maintenance Release (M/R)

AFTER maintenance is used to return aircraft to service from a maintenance organisation and the Authorised Release Certificate (ARC) is used to return components and materials (aeronautical products) to service from a maintenance organisation. The ARC is only used when releasing a product to service to another organisation, not internally within the same organisation.

This appears quite clear except that some CASA staff do not realise that an organisation that does not return components and material (products) to service for use by other organisations **does not need** a “Maintenance of Components/Materials” authorisation to issue an ARC as the organisation can utilise an internal system for controlling parts and only needs a CAR 30 “Maintenance of Aircraft” certificate of approval.

As an aircraft maintenance organisation, a part may be removed from an aircraft, labelled to maintain traceability and authenticity, and put in stock. The aircraft maintenance organisation may even carry out maintenance on that component before placing it in stock for use on another aircraft that will be maintained by that aircraft maintenance organisation. As long as the aircraft maintenance organisation does not intend to issue an ARC to return a product to service then the aircraft maintenance organisation only needs a “Maintenance of Aircraft” certificate from CASA. Maintenance of Components/Materials maintenance organisation certificate is ONLY required so that an organisation can issue an ARC to return a component to service for installation on an aircraft or other component by other maintenance organisations. [A return to this policy will] Reduce CASA’s involvement and costs as well.

The following is text from an attached document (March 2004) that I sent to Neville Probert and David Pattie to explain how to continue the internationally accepted practice that Ron Cooper introduced in 1992. Both Neville and David Pattie wanted the background to developing Part 145. This is the international system.

*“Aircraft maintenance using aircraft maintenance records (including aircraft part records internally used by a maintenance organisation), or aeronautical product maintenance using an ARC to return the product to service, is where the difference was made not on any particular task (activity) of maintenance. The only reason independent workshop approvals are used is to enable a more cost effective system by utilising replacement products returned to service by another organisation when carrying out aircraft maintenance otherwise all maintenance could be classified as aircraft maintenance. Replacement reduces aircraft downtime.*”

*I know that this may require a little rethink but you must look at what is actually happening in the industry and how each class of organisation returns the aircraft or product to service. If it is returned to service using the aircraft maintenance records then it will be covered by an "A" (aircraft) rated Part 145 organisation but, if it is returned to service using the ARC, then it is a B, C or D (component) rated Part 145 organisation. It is as simple as that."*

Bruce, I ask you to adopt this as policy in issuing CAR 30 authorisations and return this industry to some form of common sense.

Mark Taylor had it right when he stated that the proposal under CASR Part 145 could be adopted by CASA today under CAR 30. This would simply mean that a condition could be placed on each CAR 30 certificate today requiring the organisation to maintain their own "capability list" within the activity approved under CAR 30 and to notify CASA if they make a change to their capability list.

Failure to go this way will continue to require unnecessary paperwork that does not value add to safety. It is this increasing paperwork that has brought about this misunderstanding of what is aircraft maintenance and when is a "maintenance of component" certificate required.

Immediate adoption of the CASA proposal under CASR Part 145 under the current requirements would also mean that the changeover from CAR 30 to Part 145 would almost be seamless. It would also stop the continued debate on what is aircraft maintenance and what is component maintenance.

Your immediate attention to this on-going problem is requested."

CASA today could implement a system similar to the system used pre 1992 where some larger organisation utilised a "Register of Locations" document that listed what could be carried out at each location. CASA's proposed "Part 145 "Capability List" is an amended version of the previous successful

system operated pre 1992.

Ken Cannane

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