2009 Europe / US International Aviation Safety Conference

Maintenance Session
Repair Station and Maintenance Updates

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Discussion Topics

• Aircraft Maintenance Division Organization
• FAA/EASA Maintenance Agreement
• TSA Update
• Rulemaking updates
  – 145 Repair Stations
  – 147 Aviation Maintenance Technician Schools
  – 121 Aircarrier maintenance training and manual requirements
• Suspected Unapproved Parts (SUPS)
• OIG Audits
Maintenance Agreement - Background

- The Executive Agreement and the Annexes have been signed by the US and the EC.
- Entry into force of this agreement will take place at a later date, after exchange of diplomatic notes.

Safety Agreement between US/EU

- Annex 1: Airworthiness & Environmental Certification
- Annex 2: Maintenance
Maintenance Agreement - Background

• The Maintenance Annex Guidance (MAG) has been agreed upon by the FAA and EASA.
Maintenance Agreement - Current Status

- AC 147.7B containing the MAG has completed formal coordination phase.
- Legal review near completion, FAA and EASA perform joint review of the document.
- Complete Inspector guidance contained in FAA Order 8900.1.
- Adjustments to the training program based on the changes in the MAG.
Maintenance Agreement - Current Status

After entry into force

- Publish AC 145.7B, Inspector guidance material and the training program
- Inspectors trained to the MAG.
- Start the Transition and Transfer of Certificates
Update TSA requirements

• July of 2008 the FAA notified Industry and the appropriate authorities that the U.S. Congress has restricted the FAA from processing applications for foreign repair stations certificate

• Under the 911 Act the FAA can not process new applications for foreign repair station certificates until TSA propagates a final rule regarding security in foreign repair stations
Update TSA requirements

• FAA issued guidance to Inspector workforce and industry regarding applying for and remaining in the queue for a certificate

• TSA and DHS required by congressional statute to develop a regulation requiring inspections of repair stations security

• To date, TSA has performed informal fact finding audits of repair stations both in Europe and Asia.
Rulemaking Projects

• Part 145 Repair Stations Ratings and Quality Assurance
  – **Purpose:** Prescribe a new system of ratings for repair stations and requirements for a quality assurance program
  – **Status:** Federal Register Notice to withdraw NPRM issued May 2009, too many other influences and activities have occurred since initial NPRM
    • Workgroup established (meeting started in Nov. 2008)
    • Awaiting RPR Phase 2 approval
Rulemaking Projects

• Part 147 (ARAC)
  – **Purpose:** To evaluate the curriculum requirements of part 147 and make recommendations that would enable Aviation Maintenance Technician (AMT) schools to meet their clientele more effectively. Address Next Generation of Aircraft (NexGen)
  
  – **Status:** Final recommendations submitted by ARAC to AFS 300 December 2008
Rulemaking Projects

- **Air Carrier Maintenance Manual Requirements**
  
  - **Purpose:** Amend Title 14 CFR 121.369 and 135.427 to require air carriers to include provisions in their maintenance manuals regarding the performance of contract maintenance work. Bridge FAR 121 and 145. Consider OIG recommendations.

  - **Status:** Project under development
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• Suspected Unapproved Parts (SUPS)

- eliminates potential safety risk posed by “unapproved parts” in the U.S. aviation system
- works cooperatively with Federal agencies, to ensure only approved parts and materials are used in manufacturing and repairing aircraft and their components
Suspected Unapproved Parts (SUPS)

Results of LEA Investigations of SUPS as of 2008

- 2468 SUPs reported to the FAA
- 119 Criminal indictments of individuals and corporations by the Office of the Inspector General (OIG),
- 95 Criminal Convictions with a 94.24% conviction rate that resulted in:
  - 143 years of jail time by individuals
  - 363 years of probation time by individuals and corporations
  - $11.3 million in criminal fines
  - $30.3 million in restitution
Suspected Unapproved Parts (SUPS)

- Realignment and Transition
  - Program Office (AVS-20) decentralized 2007
  - AFS and AIR became responsible organizations
  - Continues focus on potential safety risk posed by “unapproved parts” in the U.S. aviation system
Suspected Unapproved Parts (SUPS)

SUPS Program – Changes

- FAA Order 8120.16 replaced Order 8120.10 July 15, 2008

- AC 21-29C, change 1 published July 22, 2008, reflecting new SUP Order 8120.16

- **Main differences** –
  - Roles and responsibility of FAA Regional focal points more defined
  - Distinguishes between application of CFR Part 21 and Part 43
Suspected Unapproved Parts (SUPS)

SUPS Program – Changes

- **Main differences** –
  - Good Parts gone bad!!!!
  - Addresses “inappropriate maintenance” as a Part 43 issue, not necessarily a Unapproved Parts issue.
  - Currently drafting a revision to AC and Order to account for these situations
Suspected Unapproved Parts (SUPS)

SUPS Program – Changes

• Reports sent to FAA Aviation Safety Hotline for processing
• Investigation performed in the field
• POC located in Regional or Directorate Office
• FAA Headquarters is the focal point for coordination of the program within AIR and AFS
Suspected Unapproved Parts (SUPS)

Regional Perspectives in SUP Reporting

Flight Standards Service Regions (8)
Suspected Unapproved Parts (SUPS)

Directorate SUP Reporting

ANM - Transport Airplane Directorate

ANE - Engine and Propeller Directorate

ASW - Rotorcraft Directorate

ACE - Small Airplane Directorate

Includes Alaska & Hawaii

4 AIR Directorates
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Action on recent OIG Audits

• AFS 300 met with OIG has agreement to address the two recent audits and the legacy audits since 2001 using a comprehensive strategic approach

• Redefining “Substantial Maintenance”, to include “Critical Maintenance”, “Critical Components”

• Essential Maintenance - “Maintenance that could result in a failure effect that would endanger the continued safe flight and landing of the airplane if it was not performed properly or if improper parts or materials are used.”
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FAA Next Steps

Essential Maintenance Examples:

– Required Inspection Items as defined by the carrier
– Airplane scheduled maintenance, Airworthiness Directives, or Airworthiness Limitations Items
– Off-airplane maintenance or alteration involving the separation of engine modules, propeller assemblies; major engine repairs or; repairs to any life-limited parts; repairs to landing gear.
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FAA Next Steps

• Renaming the Substantial Maintenance Operation Specification (D091) to reflect Essential Maintenance

• Revising Guidance to define Essential Maintenance and ASI’s role in oversight and data collection of the air carriers use of contract maintenance providers

• Revisions to FAR 145 and 121 will also reflect the carriers responsibility regarding oversight, training etc.
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FAA Next Steps

• Conduct briefings to OIG and ATA on status and direction

• Air Carrier’s Continuing Analysis and Surveillances System (CASS) is the center of its ability to oversee contract maintenance

• Revise guidance on CASS both for ASI and Air Carrier
For More Information

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