Foreign Part-145 approvals - Aircraft line maintenance

UG.CAO.00134-003

<table>
<thead>
<tr>
<th>Name</th>
<th>Validation</th>
<th>Date</th>
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<tbody>
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</tbody>
</table>
Reference documents

a) Contextual documents

Applicable requirements are listed in the form “FO.CAO.00136-XXX - Foreign Part-145 approvals – Documentation Index”.

b) Internal documents

Applicable document are listed in the form “FO.CAO.00136-XXX - Foreign Part-145 approvals – Documentation Index”.

Log of issues

<table>
<thead>
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<th>Issue</th>
<th>Issue date</th>
<th>Change description</th>
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<tbody>
<tr>
<td>001</td>
<td>13/11/2013</td>
<td>First issue. This document is aimed to provide the applicant with guidance material supporting the application/approval, and as such has been reviewed by Regulations Continuing Airworthiness Section (F.S.1.2).</td>
</tr>
<tr>
<td>002</td>
<td>01/09/2014</td>
<td>Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure.</td>
</tr>
<tr>
<td>003</td>
<td>22/10/2015</td>
<td>Endorsement of comments received from stakeholders.</td>
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Abbreviations

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<th>Description</th>
</tr>
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<tr>
<td>AMC</td>
<td>ACCEPTABLE MEANS OF COMPLIANCE</td>
</tr>
<tr>
<td>AMO</td>
<td>APPROVED MAINTENANCE ORGANISATION</td>
</tr>
<tr>
<td>AMTO</td>
<td>APPROVED MAINTENANCE TRAINING ORGANISATION</td>
</tr>
<tr>
<td>AOG</td>
<td>AIRCRAFT ON GROUND</td>
</tr>
<tr>
<td>BIPM</td>
<td>INTERNATIONAL BUREAU OF WEIGHTS AND MEASUREMENTS</td>
</tr>
<tr>
<td>CAO</td>
<td>CONTINUING AIRWORTHINESS ORGANISATION</td>
</tr>
<tr>
<td>CAP</td>
<td>CORRECTIVE ACTION PLAN</td>
</tr>
<tr>
<td>CIPM</td>
<td>INTERNATIONAL COMMITTEE ON WEIGHTS AND MEASUREMENTS</td>
</tr>
<tr>
<td>C/S</td>
<td>CERTIFYING STAFF</td>
</tr>
<tr>
<td>CC/S</td>
<td>COMPONENT CERTIFYING STAFF</td>
</tr>
<tr>
<td>EASA</td>
<td>EUROPEAN AVIATION SAFETY AGENCY</td>
</tr>
<tr>
<td>EU</td>
<td>EUROPEAN UNION</td>
</tr>
<tr>
<td>GM</td>
<td>GUIDANCE MATERIAL</td>
</tr>
<tr>
<td>ILAC</td>
<td>INTERNATIONAL LABORATORY ACCREDITATION COOPERATION</td>
</tr>
<tr>
<td>IORS</td>
<td>INTERNAL OCCURRENCE REPORTING SYSTEM</td>
</tr>
<tr>
<td>MOA</td>
<td>MAINTENANCE ORGANISATION APPROVAL</td>
</tr>
<tr>
<td>MOAP</td>
<td>MAINTENANCE ORGANISATION APPROVAL PROCEDURES</td>
</tr>
<tr>
<td>MOC</td>
<td>MAINTENANCE OVERSIGHT COORDINATOR</td>
</tr>
<tr>
<td>MOE</td>
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<td>MOR</td>
<td>MANDATORY OCCURRENCE REPORTING</td>
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<td>MRA</td>
<td>MUTUAL RECOGNITION ARRANGEMENT</td>
</tr>
<tr>
<td>NAA</td>
<td>NATIONAL AVIATION AUTHORITY</td>
</tr>
<tr>
<td>NRAB</td>
<td>NATIONAL RECOGNISED ACCREDITATION BODY</td>
</tr>
<tr>
<td>OEM</td>
<td>ORIGINAL EQUIPMENT MANUFACTURER</td>
</tr>
<tr>
<td>PPB</td>
<td>PRINCIPAL PLACE OF BUSINESS</td>
</tr>
<tr>
<td>QE</td>
<td>QUALIFIED ENTITY</td>
</tr>
<tr>
<td>RAB</td>
<td>REGIONAL ACCREDITATION BODY</td>
</tr>
<tr>
<td>S/S</td>
<td>SUPPORT STAFF</td>
</tr>
<tr>
<td>STCH</td>
<td>SUPPLEMENTAL TYPE CERTIFICATE HOLDER</td>
</tr>
<tr>
<td>TCH</td>
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</tr>
<tr>
<td>WH</td>
<td>WORKING HOURS</td>
</tr>
<tr>
<td>WHOC</td>
<td>WORKING HOURS EASA OVERSIGHT COORDINATOR</td>
</tr>
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</table>
0.3. Scope and applicability

EASA is the Competent Authority for maintenance organisations having their principal place of business located outside the EU, as established by EASA Part 145.1 “General” and is therefore responsible for the final approval of these maintenance organisations and for establishing procedures detailing how EASA Part-145 applications and approvals are managed.

This user Guide is applicable to EASA Part-145 applicant and EASA Part-145 AMOs’ (hereafter referred as maintenance organisations) having their principal place of business located outside the EU Member States and which are not certified under the provisions of a bilateral agreement signed with the EU.

The provisions of this user guide are complementary to the requirements of Part-145 regulation “as amended” and does not supersede or replace the associated regulatory requirements.

0.4. Purpose

This user guide is designed to be used by maintenance organisations and the assigned inspector when implementing and checking:

- the privileges and limitations associated to a scope of approval for line maintenance;
- the complexity and level of aircraft maintenance that can be performed under its line maintenance scope of approval;
- maintenance away from the approved location(s) as per 145.A.75.(c);
- availability of the B2 certifying staff.

0.5. Entry into force

This User Guide comes into effect 90 days after publication on the EASA website.

0.6. Associated instructions

EASA has developed associated instructions (user guides, Forms, templates and work instructions), that detail specific matters, which have to be considered as an integral part of this procedure.

A complete listing of these documents, together with their applicability to the maintenance organisation or NAA / QE / EASA, is addressed in the current revision of the “Foreign Part-145 approvals – documentation Index”, FO.CAO.00136-XXX (XXX identifies the revision number). Documents which are applicable to both NAA/QE/EASA and maintenance organisation are made available on the EASA Web Site (http://easa.europa.eu) - Continuing Airworthiness Organisations page.

Each time a cross reference is provided to another document or another chapter / paragraph of the same document, this reference is identified with grey text.

0.7. Communication

All documents and correspondences between the maintenance organisation, the overseeing authority and EASA shall be in the English language unless otherwise agreed by EASA.
1. Privileges and limitations of line maintenance
1.1. Definition of aircraft line maintenance scope of work.

The definition of aircraft line maintenance is provided in AMC 145.A.10, together with a list of activities which “may” be considered as line maintenance.

The word “may” is used because it is not possible to establish a provision giving a strict border line between line and base maintenance, having general applicability to all cases.

1.2. Organisation responsibilities.

Based on the above the maintenance organisation shall ensure prior to any intended maintenance event\(^1\) that the activity can be carried out under its line maintenance scope of approval (refers to AMC. 145.A.10) and does not fall under chapter 1.5 “Example of maintenance activity considered to be base maintenance” of this user guide.

This assessment may not need to take place each time, but be based on already established MOE procedures (i.e. the fact that a daily check is a line maintenance task is obvious and does not need to be assessed each time).

Even if this assessment confirms that the activity is line maintenance, the maintenance organisation shall also verify if this activity requires other means than the ones already in use at a Line station (e.g.: use of a hangar, platforms, stands, etc.).

The following chapters provide a guidance on when and how to assess the maintenance activity.

1.3. When to assess the maintenance activity.

The maintenance organisation’s assessment to decide if any maintenance event falls within the definition of line or base maintenance, may be needed in two different moments/situations:

- for an initial/change of approval, when evaluating the scope of work the maintenance organisation is applying for;
- for an already approved maintenance organisation, when evaluating if a maintenance requested by the customer (e.g.: a new SB requested by the customer, a defect rectification, a work package requested by the customer, etc.) falls within the approved line maintenance scope of work.

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\(^1\) Maintenance event is intended to be the condition/period when an aircraft is under the responsibility of a maintenance organisation for the purpose of undergoing one or a series of maintenance tasks which is/are identified in a “clear work order” formally issued by the Customer/Operator.
1.4. Assessment of the intended scope of work (initial/change of approval)

It is the responsibility of the maintenance organisation to demonstrate to the competent authority that the intended scope of work may be carried out in a line maintenance environment, under its line maintenance scope of approval.

The main criteria for this assessment is to consider the level of maintenance to be carried out under the line maintenance scope of approval, where the following general criteria apply:

A. **Trouble shooting, Defect Rectification**, are those unscheduled tasks required for the daily operation of an Aircraft and not falling in chapter 1.5 “Example of maintenance activity considered to be base maintenance”;

B. **Minor scheduled line maintenance**, are those scheduled tasks not exceeding the weekly check as specified in the aircraft maintenance programme;

C. **Scheduled checks**, are those scheduled tasks which exceed the weekly check (or equivalent as determined by the competent authority). -In this case, the organization needs to analyze each of the routine tasks intended to be included in the line maintenance scope of work and identify a clear limit. This assessment needs to be performed having as reference the TCH data such as the aircraft maintenance planning document (MPD) and/or the maintenance programme of a potential/reference Customer operator. The outcome of this exercise is to identify the intended limitation of the line maintenance scope of approval, in terms of scheduled maintenance checks. In particular, the following is expected:

1. Depending on the aircraft maintenance programme logic (i.e. MSG 2, MSG 3, etc.) a clear limitation to the line maintenance scope of work may be normally expressed in one of the following ways:
   - “up to and excluding X check” (i.e. X= 2A, 3A, etc.) for a MPD, where letter checks are identified;
   - “up to and excluding “X FH /Y FC / Z calendar time”, for a MDP, where progressive task intervals are defined in terms of FH/FC/calendar time (i.e. X=3000FH, Y=750 FC, Z=12 months, etc.);

2. the identified limit, to be indicated in the MOE 1.9, shall be such that all the related routine/scheduled tasks are excluding any of the tasks listed in Chapter 1.5 “Example of maintenance activity considered to be base maintenance”;

3. a “decision making process” needs to be established in the MOE (normally chapter 2.28 production planning procedure) in order to assess:
   - the need to access the hangar (even if the activity is permitted under a line maintenance scope of approval), considering in particular the type of aircraft, the maintenance event type/complexity, the environmental and weather conditions;
   - any work order / work package received from the customer operator to ensure it may be fully performed under a line maintenance scope of approval, taking into account additional works...
An agency of the European Union

to the original work package that may be added, leading out to the line maintenance scope of work, such as:

- addition of previously deferred maintenance tasks;
- defects raising from the routine tasks (these defects are not known in advance, however, the related risk in terms of number and level of defects needs to be taken into account and estimated in advance);

Example of “decision making process”

A 2A maintenance check on a B737 classic aircraft type is normally considered “line maintenance” when the routine tasks are assessed as per the manufacturer MPD/operator AMP. Therefore a maintenance organisation may be approved to perform this check under a line maintenance scope of work. However, a work order to perform the “2A check”, where the customer operator would request the performance of works in addition to the “2A” routine tasks, such as the addition of ADs, SBs, deferred tasks, will need to be carefully assessed by the maintenance organisation with the use of the “decision making process”.

This type of maintenance check may easily fall within the examples given in the following chapter 1.5 “Example of maintenance activity considered to be base maintenance” having the result to be considered as base maintenance and being outside the maintenance organisation scope of work.

In such a case, the outcome of the “decision making process”, may be for example:

- the impossibility to accept such work order from the customer operator, being outside the scope of work of the maintenance organisation, or;

- to agree with the customer operator a revised work order, to remove the works which have been identified as base maintenance tasks (e.g. removal of a S-B which was requiring extensive disassembly and modification of flight controls, etc.).

1.5. Example of maintenance activity considered to be base maintenance.

When any of the following task is required to be carried out (regardless if contained in a scheduled maintenance check or arising from a defect rectification/AOG situation), a base maintenance scope of approval is needed:

- High number of different type of tasks to be carried out, even if taken singularly those tasks may still fall under the definition of line maintenance (i.e. a combination of routine task cards, non-routine task cards issued following defects discovered during the check, out of phase tasks, deferred items from previous maintenance, minor repairs, minor modifications, component replacement, etc.). Such case is clearly requiring a base maintenance production planning support and/or base maintenance release to service process (category C/C/S supported by B1/B2 support staff) in order to ensure that all the maintenance ordered has been carried out before issuing the CRS;

- Replacement of any major component where the related maintenance procedures clearly address the need of an hangar environment requiring special ground support equipment and/or structured production planning and/or complex and lengthy maintenance, such as for example a full landing gear replacement, simultaneous replacement of two engines, etc.;

- Any scheduled maintenance task (i.e. routine task from the MP) which requires extensive disassembly of the aircraft and/or extensive in depth inspection;
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- Major repairs and/or major modifications;
- Troubleshooting and/or Defect Rectification requiring special ground support usually relevant to base maintenance (e.g.: special equipment, structured production planning, complex and lengthy maintenance).
- A scheduled maintenance event, which in the planning phase has been already identified as significant in terms of duration and/or man-hours (i.e. an A/C down time above 72 hours or four shifts whichever is less).
- A work package requiring a complex team composition in terms of high Number & Categories (avionic, structure, cabin, NDT qualification and skills, etc.) of staff involved per shift.
- The management of the event by B1 and B2 support staff and the release by a C certifying staff.

Note: The maintenance organisation remains responsible to ensure that even if each individual work order is falling under the line maintenance activity, a maintenance event which is cumulating several of these work orders remains within the line maintenance scope of activity.

1.6. Assessment of maintenance task by an already approved maintenance organisation

For an approved maintenance organisation, it remains its responsibility to assess if any maintenance requested by the customer falls within the approved line maintenance scope of work. This assessment is expected to be performed based on the “decision making process” described in the chapter 1.4 “Assessment of the intended scope of work (initial/change of approval)”, paragraph C.3.
2. Maintenance away from the approved location(s) as per 145.A.75.(c).
2.1. Definition and applicability

145. A.75 (c) allows a maintenance organisation to “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”. The privilege to perform maintenance in a non-approved location is limited to the following cases:

1. **To support an unserviceable aircraft:** It shall be understood that this privilege is intended to be used only for the need of aircraft maintenance in the case of an unscheduled/unexpected event, such as an AOG requiring defect rectification and for which the operator issues a work order.

2. **Occasional line maintenance** due to the need of supporting the A/C operation in a non-approved location for maintenance (i.e. one-time flight, short term or seasonal contract, flight schedule change, etc.). The use of this privilege is limited to those cases where the maintenance organisation has a maintenance contract with the EU customer operator requesting such maintenance outside the approved location.

3. **Additional scenarios may be considered by the allocated inspector on a case by case basis.** The following table and chapters 2.1.1/ 2.1.2 below summarise the acceptable cases of working outside the approved locations as per point 1 and 2 above and depending on the rating(s) hold by the maintenance organisation.

<table>
<thead>
<tr>
<th>Maintenance outside the approved location</th>
<th>Ax Line</th>
<th>Bx</th>
<th>Cx</th>
<th>D1</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Support of an unserviceable aircraft due to an unscheduled event (AOG).</td>
<td>X</td>
<td>X</td>
<td>L*</td>
<td>X</td>
</tr>
<tr>
<td>2. Occasional line maintenance.</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Limitations apply as described in the following chapter 2.1.2

### 2.1.1. **Ax rated maintenance organisation.**

Maintenance performed outside the approved locations under Ax-Aircraft rating shall be limited to the cases mentioned in the previous chapter 2.1 (point 1 and 2), where the maintenance organisation has a work order or maintenance contract with an EU customer/operator (A/C covered by the basic Regulation) requesting such maintenance outside the approved location. The completion of the maintenance is to be done by issuing an aircraft certificate of release to service according to EASA Part 145.A.50.

### 2.1.2. **Bx, Cx, D1 rated maintenance organisation.**

Maintenance performed outside the approved locations under Cx-components, B1-engines, B3-APUs, D1 ratings shall be limited to the cases mentioned in the previous chapter 2.1 (point 1 only) and therefore to activities carried out “on-wing” to support an aircraft unserviceable due to an unscheduled event, such as an AOG condition. The completion of the maintenance is to be done by issuing an EASA Form 1 according to 145.A.50. In addition, the following additional limitations apply:

- with regards to Bx, Cx, D1 rated maintenance organisations, a control procedure shall be in place to describe the coordination/share of responsibilities between the Bx, Cx, D1, as applicable, and the Ax rated maintenance organisation responsible for issuing the aircraft CRS;
• with regards to Bx and Cx rating a control procedure shall be in place in the MOE to allow performance of maintenance, as applicable, on an installed component/engine/APU (“on-wing”);
• with regards to Cx rating, this privilege is limited to those components which are not readily transportable (thrust reverser, radome, LDG strut, etc.).

Note: any aircraft maintenance performed within the EU territories must be exclusively released by Certifying Staff qualified to EASA Part-66.

2.2. Condition to be specified in the exposition.

When the maintenance organisation wishes to use the privileges described in the previous chapter, the MOE 1.9 (scope of work) shall make reference to the fact that the maintenance organisation may perform works away from the approved locations, subject to the condition specified in MOE 2.24 (specific maintenance procedure). The MOE 2.24 shall detail the applicability and conditions, based on the criteria identified in this user guide. It must be noted that the fact that a maintenance organisation has been granted this privilege shall not be understood as if any maintenance task could be performed at any location, or that such locations become “approved locations”.

The MOE procedures are intended to specify:
• which maintenance tasks are going to be performed under such privilege;
• how the maintenance organisation is going to ensure that the EASA Part-145 requirements are met in each case (in particular with regards to adequate facilities, sufficient staff, appropriate certifying staff, availability of tooling and equipment, availability of current maintenance data, adequate planning, release to service procedures, etc.);
• how the maintenance organisation’s quality system is going to monitor compliance with the above requirements.

2.2.1. Support an unserviceable aircraft

The procedure, shall be based on the following criteria:

a) The Scope of work shall be limited to:
   • aircraft type or components or engines or NDT methods listed in the MOE 1.9 scope of work and;
   • maintenance activities strictly necessary to recover the aircraft unserviceability condition as limited by the MOE 1.9 maintenance level;

b) A process shall be in place, under the responsibility of the Quality Manager, to show:
   • how the Maintenance Manager ensures that the necessary facilities, certifying staff, tools, equipment, material, maintenance data will be made available as necessary and how the maintenance records will be managed;
   • the involvement of the Quality System and its approval for any work away from the approved location, based on a desktop review;
   • that the assigned inspector is notified of any such approval within 7 days (activity report). In addition, that a list of all the CRS issued under this procedure will be made available to EASA upon request;

c) The notification shall be formalized using a Form, to be enclosed in the MOE Part 5, including the following minimum information:
2.2.2. Occasional line maintenance

The procedure(s) related to the “Occasional Maintenance” are approved by the competent authority based upon the ability of the Quality System to deal adequately with the EASA Part-145 requirements. Therefore this privilege cannot be therefore demonstrated at the time of the initial approval. In any case this procedure cannot be detailed in the MOE and therefore approved by the competent before the first 2 year surveillance cycle has been completed.

The procedure, shall be based on the following criteria:

a) Scope of work shall be limited to:
   - aircraft type listed in the MOE 1.9 scope of work and;
   - routine tasks up to and including weekly check (or MOE 1.9 maintenance level whichever is less);
   - trouble shooting and defect rectification.

b) A process shall be in place, under the responsibility of the Quality Manager, to show:
   - how the maintenance Manager ensures that the necessary facilities, certifying staff, tools, equipment, material, maintenance data will be made available as necessary and how the maintenance records will be managed;
   - The involvement of the Quality system and its approval for the occasional line maintenance, based on the following criteria:

<table>
<thead>
<tr>
<th>Use of the non-approved location (consecutive calendar days)</th>
<th>Approval</th>
</tr>
</thead>
<tbody>
<tr>
<td>equal or less than 10</td>
<td>Issued by the Quality manager based either on an on-site audit or a desktop review.</td>
</tr>
<tr>
<td>between 10 and 40</td>
<td>Issued by the Quality manager based on an on-site audit.</td>
</tr>
</tbody>
</table>

   Note: When the duration expected for the maintenance is more than 40 days, the approval of a new line station shall be requested to EASA, to be listed in the MOE 5.3 (list of line maintenance locations as per 145.A.75 (d)).

   - that a list of all the CRS issued under this procedure shall be made available to EASA upon request;

   c) that, when the privilege is used for more than 10 days (second case in the table above), the assigned inspector is notified of such approval within 7 days from the date of the beginning of the operation; the notification shall be formalized using a Form, to be enclosed in the MOE Part 5, including the following minimum information:
- Customer(s) operator requesting the occasional line maintenance;
- Aircraft type(s);
- Scope of the requested line maintenance;
- Location;
- Number and category of certifying staff assigned to support this activity;
- Quality Manager signature.

d) The repetitive use of the privilege for the same customer at the same location is not permitted. In this case the approval of a new line station shall be requested to EASA.
3. Line station without a permanent cat. B2 staff
Part 145.A.30 (g) requires that any maintenance organisation maintaining aircraft, have, in the case of aircraft line maintenance, appropriate aircraft rated certifying staff qualified as category B1, B2, B3 as appropriate....”.

As a consequence, maintenance organisations shall demonstrate that appropriate aircraft rated B1 and B2 certifying staff are available in the maintenance organisation, for each aircraft type intended to be included in the approved scope of work.

However, when the maintenance organisation is operating various line stations, it is not necessary that B2 C/S is permanently available at each line station, provided that in the line station (s) where the B2 C/S is not available one of the following condition may be met:

**Option a)** The line maintenance contract(s) in place (i.e. IATA SGHA-standard ground handling agreement), clearly specify that the contract(s) is/are limited to defect rectification not requiring B2 privileges to allow the aircraft release to service.

*In this case the maintenance organisation does not need to provide any evidence that B2 certifying staff is permanently available at the line station for such a contract.*

**Option b)** The line maintenance contract(s) in place do(es) not have limitations.

*In this case, the situation needs to be evaluated depending on the volume of work performed at the line station (i.e. number and type of contracts in place, flight schedules, on-call maintenance, etc.), taking into account the probability of having a defect which can be only solved exercising the privileges of cat. B2 certifying staff. As a general criteria, it may be considered acceptable not to have a cat. B2 certifying staff permanently on site provided that he can be made available in case of need within a reasonable timeframe to support the operation (maximum travel time 2 hours)*

*Such B2 certifying staff can be either one of the maintenance organisation’s B2 certifying staff or a contracted “on call” B2 certifying staff from another maintenance organisation. This B2 certifying staff could be sufficient to support more than one line station within the limits of AMC 145.A.30 (d) 1.*

*In this case, since the B2 certifying staff is going to sign on behalf of the contracting maintenance organisation, he/she must be appropriately trained, assessed and authorized (issued a certifying staff authorization). This is not necessary if the defect is rectified and released by the contracted maintenance organisation under their own privileges.*

In the case the maintenance organisation is operating line station(s) where B2 certifying staff is not permanently available, the MOE chapter L2.3 “line maintenance control of defects and repetitive defects” shall include a procedure on how to deal with defects requiring B2 certifying staff (refer to “Foreign Part 145 – aircraft line maintenance”, UG.CAO.00134-XXX).