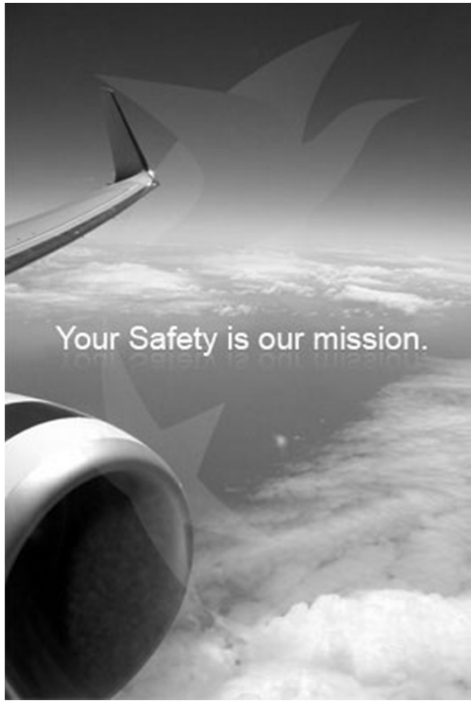

Rulemaking activities linked to maintenance data and maintenance programmes

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Opinion 10/2013
"Maintenance Programmes and Airworthiness Reviews"

Proposal 2: Declaration of the Maintenance Programme (MP) by the owner

- **Currently**, the **MP** is **approved either by the NAA of the State of Registry or by the contracted CAMO** via an indirect approval procedure approved by the competent authority of the CAMO/operator (M.1, paragraph 4).

- **New option for ELA1 aircraft not involved in commercial operations:**

  The owner may issue a **declaration** (no NAA approval) for the MP subject to compliance with the conditions described in M.A.302(h)4.

  This is possible:
  - Regardless of whether the programme is developed by CAMO, maintenance organisation or owner.
  - Regardless of whether the programme is based on the MIP (Minimum Inspection Programme) or on manufacturer's data.
  - Regardless of whether the aircraft is managed by a CAMO or not.

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<u>If the owner elects to issue a declaration for the MP:</u>

- **The owner is fully responsible for its content** and, in particular, for any deviations from the Design Approval Holder's recommendations. No need to justify the deviations.
- The NAA and the contracted CAMO do not have any responsibility related to its content.
- It is not required to send a copy of the MP to the NAA (no further checking of the content by the NAA)
- This MP will be the basis for the adequate planning of maintenance and for the airworthiness reviews and ACAM inspections.
- Nevertheless, the MP will be subject to **periodic reviews**:
  - Annual or at the time of the airworthiness review.
  - NAA notified in case of deficiencies in the content of the MP.
  - The owner shall amend the MP.

Proposal 3: Minimum Inspection Programmes

- Currently, the MP for a particular aircraft registration will use as a basis, and among other aspects, the data issued by the Design Approval Holder (TC holder, STC holder, etc.).

- **New option for ELA1 aircraft (except airships) not involved in commercial operations:**

  The owner may use the "Minimum Inspection Programme" (M.A.302(i) and AMC) as the basis for the declared MP.

  This is possible:
  - Regardless of whether the programme is developed by CAMO, maintenance organisation or owner.
  - Regardless of whether the programme is approved by the NAA or declared by the owner.
  - Regardless of whether the aircraft is managed by a CAMO or not.

  NOTE: The MP still has to be customised to the particular aircraft registration (see M.A.302(h) and the template contained in AMC M.A.302(e))

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Important aspects about the "Minimum Inspection Programmes":

- Separate tables have been created for:
  - ELA1 aeroplanes
  - ELA1 sailplanes and ELA1 powered sailplanes
  - ELA1 balloons
- For aeroplanes and TMG (Touring Motor Gliders): annual/100h interval (with 10% tolerance).
- For sailplanes, powered sailplanes (other than TMG) and balloons: annual interval (with 10% tolerance).
- Weighing per Part-NCO of Annex VII to the future Regulation on Air Operations.
- The manufacturer's maintenance manuals must be used to accomplish the specific maintenance instructions.
- For the customised MP the owner has to take into account, in addition:
  - Specific inspections contained in the DAH data with interval different from 100h and/or annual
  - Other specific recommendations from the DAH
  - Additional inspection required by the DAH for high utilization aircraft

Proposal 4: Template for the customised Maintenance Programme

- Current rules and AMC/GM material do not provide detailed information on how to customise the MP, creating different approaches among Member States.

- **New template for all aircraft except complex motor-powered aircraft:**

  This template is contained in AMC M.A.302(e) and referred to in AMC M.A.302(h). It is a mean to comply with M.A.302(e) and M.A.302(h).

  SEE THE TEMPLATE FOR DETAILED INFORMATION

Extension of TBO intervals

Extension of TBO intervals

Decision 2013/025/R published on 20 September 2013.

Applicable to all type of components installed on non-powered and piston engine aircraft other than complex motor-powered aircraft.

Not applicable to:

- Commercial Air Transport.
- Ab-initio training.
- IFR operations.

Extension of TBO intervals

- One of the problems before the issuance of Decision 2013/025/R was the different approaches of each competent authority when evaluating justifications for deviations. This was reaching the extreme case where some competent authorities would not accept any justification for deviation.

- The intention of the Decision was to give a way of justifying such deviations, improving standardisation across the different Member States.

- As it happens with any other AMC, its content was only a way to comply with the regulation. However, other methods were possible if evaluated and agreed by the competent authority.

- For Commercial Air Transport, Ab-initio training, IFR operations and for complex motor-powered aircraft (not covered by the Decision) it was expected that competent authorities would still have their own policies in order to justify deviations.

Extension of TBO intervals

Implementation issues:

✈A competent authority decided to apply the Decision as if it was a rule. No deviations to the Decision were allowed and a number of aircraft were grounded.

✈Certain competent authorities had doubts as to whether A-rated organisations could perform the extensions and as to whether they could accept justifications for extensions for categories and operations not covered by the Decision.

✈Many competent authorities decided to continue applying their national policies until the issues were further reviewed and clarified.

New Agency Decision (2013/034/R):

✈EASA decided to withdraw the previous Decision 2013/025/R.

✈EASA will further review (with NAAs and stakeholders) its content and the current policies applied by Member States to extend TBOs.

Extension of TBO intervals

Current situation

✈The current rules already require (and have always required) that TBO recommendations have to be considered when developing the maintenance programme. Deviations from those recommendations are possible only if properly justified to the competent authority who is going to approve the maintenance programme.

✈As a consequence, with the current regulations it is not possible to just disregard the TBO recommendations from the Design Approval Holder.

This would need a change to the rules, such as the one proposed by EASA in Opinion 10/2013, where it proposes that, for ELA1 aircraft not used in commercial operations, the owner may self-declare the maintenance programme (without having it approved by the NAA), deviating from the manufacturer's recommendations (or the recommendations made by the contracted CAMO) under his/her own responsibility and without the need to provide justifications. This cannot be implemented until adopted by the European Commission.

✈**In the absence of guidance from EASA for TBO extensions, each Member State is responsible for developing their own policies.**

Other rulemaking activities

Other rulemaking activities

Task MDM.056: Instructions for Continued Airworthiness (ICAs)

- Definition, content and availability.
- Use of ICAs for the maintenance programme and as maintenance data.

NPA2013-07 "Ageing aircraft structures"

- Applicable only to "large aeroplanes".