European Union Aviation Safety Agency

FAQ n.48248

FAQs:

AMP (Aircraft Maintenance Programme), Part-M, Continuing Airworthiness, Regulations

Question:

How is it possible to escalate AMP task intervals?

Answer:

Part-M

General:

Some general expectations for escalation initiatives are described in the following paragraph:

a) It should be ensured that the AMP continues to be valid in light of the operating experience [M.A.302(h) – see FAQ n.47406].

b) It should form part of the analysis of the effectiveness of the AMP (if required by M.A.301(e)),

c) The AMP should include a procedure to manage the escalation of established intervals [AMC M.A.302 point (4) and point (2) of AMC M.B.301(c)].

Supported by a formal reliability programme if required by M.A.302(g) or voluntarily implemented [AMC M.A.302(d) point (6)] or collection and analysis of in-service experience.

'Appendix I to AMC M.A.302 and AMC M.B.301(b)' provides detailed guidelines for the integration of this information into the AMP.

d) If there is a CA(M)O involved, those points also have to be emphasised within the CA(M)E, as specified in Appendix V to AMC1 M.A.704, AMC1 CAMO.A.300 or AMC1 CAO.A.025.

Two different cases:

The escalation of AMP task intervals falls into the alternative instructions proposed by the owner/CA(M)O [M.A.302(e)] and distinguishes in the following cases:

Case 1:

Escalation of safety-related task intervals, which consist of all mandatory tasks (Airworthiness Limitation Section) as well as certain non-mandatory tasks issued by the DAH (Design Approval Holder) such as various MRBR (Maintenance Review Board Report) tasks [see note

below], tasks related to emergency equipment, critical components…

Case 2:

Escalation of non-safety-related task (e.g. non-safety related MRBR task or a task recommended by a Service Letter) intervals

Note:
In cases, where the aircraft type has been subjected to the MRB process, the following MRBR tasks should be considered safety-related:

- *Failure Effect Category (FEC) '5' (evident safety) and '8' (hidden safety) tasks (systems and powerplant)*
- *SSI (Structural Significant Item) tasks*
- *L/HIRF (Lightning / High Intensity Radiated Field) tasks (as applicable)*
- *Stand-alone EWIS tasks (EZAP procedure)*

Escalation approval:

The approval of a task escalations is addressed separately for each case:

Regarding case 1:

1.1 Escalation of mandatory tasks represents a change of the initial type design and therefore must be discussed and agreed between the DAH and the Agency*.
1.2 The AMP revision proposal and the information used to substantiate the escalation of non-mandatory tasks [AMC M.B.301(b)(6)] have to be evaluated by the competent authority [AMC M.B.301(b) point (2)]. Following a positive evaluation, a direct approval of the AMP revision will be issued by the competent authority, as stated in M.A.302(e).

Regarding case 2:

An **indirect approval** of the AMP through a CA(M)O is possible and described in more detail in FAQ n.19061.

** Exception may exist under certain condition for Two Star CMR (Certification Maintenance Requirement) (see AMC 25-19).*

Remarks:

- In all cases, task de-escalation may need to be considered based on the supporting data [AMC M.A.302(g) point (4)].
- Escalation should not be confused with 'permitted variations' to AMP intervals, which applies to a unique aircraft for a unique occasion ['Appendix I to AMC M.A.302 point (4)].

Part-ML

General:

Some general expectations for escalation initiatives are described in the following paragraph:

a) It should be ensured that the AMP continues to be valid in light of the operating experience [[ML.A.302(c)(9) – see FAQ n.47406].

b) The effectives of the AMP should be assessed at least by an annual review [ML.A.302(c)(9)].

c) The AMP may include additional maintenance actions [ML.A.302(c)(3)] supported by collection and analysis of in-service experience.

'GM1 ML.A.302(c)(3)' provides detailed guidelines for the integration of this information into the AMP.

d) If there is a CA(M)O involved, those points also have to be emphasised within the CA(M)E, as specified in Appendix V to AMC M.A.704, AMC1 CAMO.A.300 or AMC1 CAO.A.025.

Two different cases:

The escalation of AMP task intervals falls into the alternative instructions proposed by the owner/CA(M)O [GM1 ML.A.302(c)(2)(b)] and distinguishes in the following cases:

Case 1:

Escalation of safety-related task intervals, which consist of all mandatory tasks (Airworthiness Limitation Section) as well as certain non-mandatory tasks issued by the DAH (Design Approval Holder), tasks related to emergency equipment, critical components…

Case 2:

Escalation of non-safety-related task (e.g. task recommended by a Service Letter) intervals

Escalation approval:

The approval of the escalation is carried out by the CAMO or CAO [ML.A.302(b)(2)]. For declared AMP no approval is needed [ML.A.302(b)(1)].

Remarks:

- In all cases, task de-escalation may need to be considered based on the supporting data.
- Escalation should not be confused with 'permitted variations' to AMP intervals, which applies to a unique aircraft for a unique occasion [GM1 ML.A.302(c)(3)].

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Link: