



EASA

European Aviation Safety Agency

MDM.056 (RMT.0252)

Instructions for Continuing Airworthiness (ICA)

- Overall Status -

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Date September 2016

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TE.GEN.00409-001



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Background to MDM.056

- 2008/2009 - FAA and EASA conducted independent ICA compliance surveys mainly on “Large Aeroplanes” products which triggered the EASA Rulemaking task MDM.056 (What/When/To Whom).
- Instructions for Continuing Airworthiness, ICA
 - to be produced by DAH
 - as part of the product/part certification,
 - if properly implemented, should ensure that the product/part remains airworthy during its intended life
- Too much room for interpretation



➤ Objective

- Clear(er) requirements (IR, AMC, GM and CSs) and responsibilities for all parties involved in the production of ICA, their approval and their implementation
 - <http://easa.europa.eu/document-library/terms-of-reference/tor-mdm056-rmt0252>
 - Split it in several sub-tasks, depending on their similarity and on the category of stakeholders to be involved
 - ToR issue 5 June 2016



Current Status

Subtask 1

What? When?

➤ Sub-task 1:

- Definition and identification of ICA (to be provided during the certification process), including the determination of the relationship between ICA and maintenance information for TSO/ETSO articles
- Completeness of ICA (during the certification process)
- Certification of ICA by the competent authority (during the certification process)

- Current planning:
 - NPA, 2017/Q1
 - 18 months from NPA to CRD/Opinion, 2018/Q3



Current Status

Subtask 1 - Summary

Definition of ICA (agreed in the group) to be included in regulation (TBD, Part-21 and/or Part-M)

“Instructions for Continued Airworthiness are the instructions and information that are necessary for the continued airworthiness of the aircraft, engine, propeller, parts and appliances, which must be developed and/or referenced by the Design Approval Holder in accordance with the applicable Certification Basis or Standard”



Current Status

Subtask 1 - Summary

Type of information that should be covered by ICA

➤ TBD, under discussion

- EASA does not enforce a specific selection/range of manuals, names and their abbreviations, with the exception of manuals/sections which are defined by regulation, like the Airworthiness Limitations
- In most cases there are more than just one manual produced to provide the required information. To facilitate the compliance finding, an applicant should provide an overview of the publications and manuals produced
- Type of information instead type of manual



Current Status

Subtask 1 - Summary

Responsibility of the DAH for the control of ICA below the product level

- Discussion on the control of CMM (if ICA) still on-going.
- Groups of CMMs:
 - ICA: ALS, referenced in RMP, MRBR, ...same control than any ICA. Only few CMMs
 - Possibly referenced as alternative instructions, No-ICA but requested under contract with suppliers: not controlled. Probably a lot of CMMs. Industry standard?
 - Sometimes not even requested by DAH



Current Status

Subtask 1 - Summary

Where the list of ICA approved/accepted for a particular product, part, etc., will be identified and made known to operators

- Proposal to add AMC to identify one set of complete instructions for continued airworthiness as a direct reference in the TCDS or indirect reference (the check of the completeness of the ICA must be possible)

Completeness of ICA

- Waiting comments to the already mature draft (guidance)
 - *“(21.A.61(a)) The availability of some manual or portion of the instructions for continued airworthiness, dealing with overhaul or other forms of heavy maintenance, may be delayed until after the product has entered into service, but shall be available before any of the products reaches the relevant age or flight-hours/cycles. ”*
 - *“To have the possibility to delay ICA” versus “To satisfy the Agency’s expectation of ICA at time of approval, EIS”*
 - Refer also to proposed CM „*Completeness and Timely Availability of Instructions for Continued Airworthiness*” <http://www.easa.europa.eu/documents/public-consultations/proposed-cm-ica-001>



Current Status

Subtask 1 - Summary

Certification

- TBD, under discussion, to be coordinated with subgroup 4.
 - The meaning of approved/accepted
 - How this is shown (letter, approval, etc.)
 - ALS is part of the type design and needs approval and the rest of ICA are considered compliance documents that are accepted
 - Level of compliance verification required for ICA (non-ALS)?
 - Change process, Part 21 subpart D applicable for ICA changes (non-ALS, stand-alone) and/or technical verification process?



➤ Sub-task 2

To Whom? How?

(affects not only DAHs but also operators, maintenance organisations, CAMOs):

- Availability of ICA (to owners, operators, maintenance organizations, etc.) and format
- Tentative planning:
 - NPA, 2017/Q1
 - 18 months from NPA to CRD/Opinion, 2018/Q3



Current Status

Subtask 2 - Summary

► Under discussion:

- To make the provisions of 21.A.61 (107, 120...) referring to owner and operators also applicable to the lessee if:
 - the lessee is stipulated on the registration document, or;
 - detailed in the leasing contract
- To add that the holder of a TC(RTC) shall make ICA available on request also to the competent authority responsible for verifying conformity with instructions for continued airworthiness



Current Status

Subtask 2 - Summary

➤ Under discussion:

- Guidance material for 21.A.61 (107, 120...) on “Any other person required to comply”
 - Any independent certifying staff performing maintenance on an aircraft or component with a contract
 - Any maintenance organisation already approved to maintain an aircraft or component
 - Any CAMO already approved to manage the continuing airworthiness or only the maintenance programme of an aircraft
 - Any owner/operator of an aircraft who is responsible under M.A.201(a) or (b) and who has not contracted the services of a continuing airworthiness management organisation (CAMO)



Current Status

Subtask 3

➤ **Sub-task 3** (EASA/FAA/TCCA):

- MRB Scheduling Information (guidance on the MRB process)

postponed



Current Status

Subtask 4

DOA

➤ **Sub-task 4** (affects EASA/FAA/TCCA):

➤ Acceptance/approval of ICAs by other than the authority

➤ Tentative planning:

➤ NPA, 2017/Q1

➤ 18 months from NPA to CRD/Opinion, 2018/Q3



Current Status

Subtask 4 - Summary

TBD, under discussion:

- Clarify ICA as part of “type certificate” not only “type design”, 21.A.41?
- Introduction of changes to ICA as changes to type certificate without changing design?
- Classification of ICA (minor, major) for eligible to be changed without changing the design (“stand-alone ICA”)?
- Privilege minor changes to ALS
- Clarify that ICA verification under 21.A.239 is independent from the use of the privilege 21A.263(c)(3)
- Other DOA (not DAH) can do minor changes to ICA?



Current Status

Subtask 4 - Summary

- Depending on discussion above:
 - to include in Part-M (M.A.302, M.A.401) the option to accept/take into account alternate maintenance instructions provided by a DOA (deviation from ICA coming from DOA).
 - Clarify rule/AMC NAA on how AMP can be approved with deviations from ICA



➤ Subtask 5

➤ Certification Maintenance Requirements (CMR)

- Was not identified as an area of common interest for EASA/FAA/TCCA during the first phase
- Was however included in the terms of reference of the rulemaking task to address lack of harmonisation introduced by the issuance of FAA AC 25-19A (dated October 2011)

➤ Tentative planning:

- NPA, 2016/Q2
- 12 months from NPA to CRD/Opinion, 2017/Q2



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Questions ?

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