NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

National Policy

N 8900.10

Effective Date:
7/23/07

Cancellation Date:
7/23/08

SUBJ: U.S.-Based Repair Station With European Aviation Safety Agency (EASA) Part 145 Approvals

1. Purpose of This Notice. This notice introduces the revised Federal Aviation Administration (FAA) Order 8300.10, Airworthiness Inspector's Handbook, Volume 2, Chapter 168, Evaluate an EASA Supplement to a Repair Station and Quality Control Manual. This chapter contains guidance and information for aviation safety inspectors (ASI) assigned to U.S.-certificated repair stations that perform maintenance, preventive maintenance, and modifications on civil aeronautical products under the regulatory control of the EASA where the agency has issued an EASA Part 145 approval to a U.S.-based repair station.

2. Audience. The primary audience for this notice is Flight Standards District Office (FSDO) ASI's. The secondary audience includes Flight Standards branches and divisions in the regions and in headquarters.

3. Where You Can Find This Notice. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at http://fsims.avr.faa.gov. Operators may find this information on the FAA's Web site at: http://www.faa.gov/library/manuals/examiners_inspectors/8900/.

4. Background. In September 2003, the U.S. Government, the European Commission (EC) and it's EASA representative agreed to continue to abide by the Bilateral Aviation Safety Agreement (BASA) and associated Maintenance Implementation Procedures (MIP) signed between government's of Germany, France and Ireland and the United States until a new agreement with the European community can be reached. This MIP outlines the terms and conditions under which the FAA and the EASA can accept each other's inspections, evaluations and recommendations for certification of repair stations located within the United States for EASA Part 145 approval, and EASA Part 145 Approved Maintenance Organizations (AMO) recommendations for a Title 14 of the Code of Federal Regulations (14 CFR) part 145 certification for findings of compliance, thereby reducing redundant regulatory oversight, without adversely affecting aviation safety. On March 9, 2007 EASA published a revision to the Maintenance Implementation Procedures Guidance material (MIP-G).

5. Discussion. The MIP agreement requires U.S. Air Agencies and EASA AMO's to develop and implement stringent controls and procedures at their repair organizations. These procedures must become a part of the repair station manual as a supplement. The requirements for the supplement are contained in EASA guidance material titled " Maintenance Implementation Procedures – Guidance (MIP-G) revised. The FAA procedure for acceptance of the MIP-G supplement is contained in Appendix A, revised 8300.10, vol. 2, ch. 168. The significant changes

incorporated in EASA MIP-G are work away from Fixed location procedures, contracting, and repair data requirements. In addition, EASA has changed there Web page address to http://www.easa.europa.eu.

6. Disposition. We will permanently incorporate the information in this notice in FSIMS before this notice expires. Direct all questions concerning this notice to the Repair Station Branch, AFS-340, at (202) 267-3368.

ORIGINAL SIGNED BY
Carol Giles for

James J. Ballough
Director, Flight Standards Service

Appendix A. Order 8300.10, Volume 2, Chapter 168

CHAPTER 168 EVALUATE AN EASA SUPPLEMENT TO A REPAIR STATION'S MANUAL/QUALITY CONTROL MANUAL

SECTION 1 BACKGROUND

1 PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODES.

A. Maintenance: 3377, 3771.

B. Avionics: 5377, 5771.

2 OBJECTIVE. This chapter provides guidance for evaluating the European Aviation Safety Agency (EASA) Supplement to a Repair Station's Manual/Quality Control Manual. See Order 8300.10, Volume 2, Chapter 167, Process the Application of a Domestic Repair Station for Approval Under European Aviation Safety Agency Part 145, for the background and history of EASA.

3 GENERAL.

A. Before a repair station may be approved by EASA under EASA Part 145, it must prepare an EASA supplement to its Repair Station's Manual/Quality Control Manual (RSM/QCM). The Federal Aviation Administration (FAA) will review and accept the initial supplement on behalf of EASA. If the repair station revises the supplement, it should submit the revisions to the FAA. Revisions to the supplement are considered accepted by the FAA unless the repair station is notified otherwise by FAA.

B. If this task is performed as part of processing an original application for EASA Part 145 approval, the entire EASA supplement will be submitted. If this task is performed as part of processing a continuation approval process or conducting a review of a revision to the EASA supplement, only the revised portion of the EASA supplement will be submitted.

C. The information contained in the EASA supplement is based on EASA Part 145 special conditions contained in the Maintenance Implementation Procedures (MIP) of a Bilateral Aviation Safety Agreement (BASA). These special conditions state that the repair station must provide a supplement to the RSM/QCM accepted by the FAA on behalf of EASA to include policy and procedures for the following:

1) Cover page.

2) List of Effective Pages.

3) Amendment Procedures.

4) Introduction.

NOTE: It is not necessary to have procedures in the supplement for the above items 1 and 3.

5) The accountable manager's statement commits the repair station to the EASA special conditions.

6) The approval basis and limitation complies with its FAA rating and operations specifications (OpSpecs).

7) Access by EASA and FAA.

8) Work orders and contracts include procedures to ensure completeness of and compliance with the customer or operator work order or contract including any supplied EASA Airworthiness Directives (AD) and other notified mandatory instructions.

9) Approved design engineering data includes procedures to ensure repairs and modifications, as defined by EASA requirements, are accomplished in accordance with (IAW) EASA-approved data.

a) All repair design data developed by U.S. organizations/persons for use on an EU-registered aircraft and related articles are approved by the Executive Director, Decision No. 2004/04/CF, as amended by Executive Decision No. 2007/001/C, except for critical component repair design data developed by organizations/persons which are not the type certificate/Supplemental Type Certificate holder (TC/STC).

NOTE: A critical component is defined as a part identified as critical by the design approval holder during the validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer's maintenance manual or instructions for continued airworthiness (ICA). For each individual repair design, this EASA approval is based on:

b) Major repair data approved by FAA (as substantiated via an FAA letter or properly executed FAA Form 8110-3, Statement of Compliance with Federal Aviation Regulations, FAA Form 8100-9, Statement of Compliance with Airworthiness Standards, or FAA Form 337, Major Repair and Alteration (Airframe, Powerplant, Propeller or Appliance).

c) Minor repair data submitted by the TC/STC holder or appliance design approval holder, or;

d) Minor repair data determined to be acceptable data (under 14 CFR part 43) as determined by a U.S. maintenance organization under FAA's authorized system.

e) An EASA Part 145 maintenance organization located outside the U.S. territory cannot declare that acceptable data under 14 CFR part 43 may be used on an EU-registered aircraft unless that data has been previously used on a N-registered aircraft. Such

data must be approved by EASA or under an EASA Delegated Option Authorization (DOA) for use by an EASA Part 145 maintenance organization located outside the U.S. territory. Reference to these decisions mentioned above shall be made in the release documents issued by the EASA Part 145 approved organization; releasing the relevant EU-registered aircraft or component to service.

10) Repair design data on critical components, developed by organizations/persons which are not the TC/STC holder, shall be submitted to the Agency for approval following the standard application procedure, with an EASA Form 31, Application for Approval of Major Change/Minor Repair Design. Applicants do not need to hold a DOA if the repair data has been approved by the FAA. This should include procedures to ensure EASA ADs are used when provided by the customer.

11) Major Repair/Alteration/Modifications include procedures to ensure completeness of and compliance with the customer or operator work order or contract, including any supplied EASA ADs and other notified mandatory instructions. The procedures should ensure that the operator/customer has obtained EASA approval of the data used.

12) Use of FAA Form 8130-3, Airworthiness Approval Tag, for aircraft components and any other information required by the owner or operator, as appropriate when releasing components after maintenance.

13) For a repair station rated for an aircraft type, procedures to ensure that the aircraft's airworthiness review certificate (ARC) has not expired before releasing or returning the aircraft to service. The ARC is located behind the airworthiness certificate. If the ARC has expired the repair station should notify the owner or operator for additional instructions.

14) Procedures for release or approval for return to service after maintenance that meet the requirements of EASA Part 145, § 145.50 for aircraft.

15) Procedures for reporting to EASA, aircraft design organizations, and the customer or operator unairworthy conditions on civil aeronautical products as required by EASA Part 145.

16) Detailed procedures for operating an independent Quality Monitoring System (QMS).

17) Provision of hangar space for aircraft maintenance.

18) The repair station must specify the items to be contracted for maintenance and have procedures in place to ensure contractors meet the terms of the implementation procedures (that is, using an EASA-approved source), or work under the repair station's contracted provisions of 14 CFR part 145.

19) Training and qualifying personnel in human factors.

20) Air carrier line stations.

21) Work away from a fixed location.

22) A procedure for providing the FAA with a copy of its EASA approval certificate and a copy of the EASA letter of continuation approval should occur each time a continuation approval letter is received.

D. Specific EASA guidance for preparing an EASA supplement to an RSM is contained in EASA Guidance Material for the U.S./European BASA and MIP guidance, referred to as MIP-G. The MIP-G also contains a sample EASA supplement. This document is provided to a repair station in response to a preliminary inquiry regarding initial EASA Part 145 approval. The inspector should thoroughly review this document and use it in conjunction with this chapter in reviewing an applicant's EASA supplement. MIP-G may be obtained from the EASA Web site: http://www.easa.eu.int/doc/Certification/Org_Appro/cert_org_BASA_MIP_guidance.pdf.

RESERVED. Paragraph 4 through 18.

SECTION 2 PROCEDURES

19 PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites:

- Knowledge of the regulatory requirements of 14 CFR parts 43 and 145,
- Knowledge of the requirements of vol. 2, ch. 167 and EASA MIP-G,
- Successful completion of the Airworthiness Inspector Indoctrination course(s) or equivalent,
- Successful completion of the foreign and domestic repair station training course 21058, Certification and Surveillance of Part 145 Stations, and
- Previous experience with certification or surveillance of part 145 repair stations.

B. Coordination. This task requires coordination with:

- The applicant (repair station),
- The applicant's principal maintenance inspector (PMI) or principal avionics inspector (PAI),
- The FAA regional EASA coordinator, and
- FAA regional and district offices, as appropriate.

20 REFERENCES, FORMS, AND JOB AIDS.

A. References (current editions):

- 14 CFR parts 43 and 145,
- FAA Order 8130-21, Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag,
- Order 8300.10, Volume 2, Chapter 161, Introduction to Part 145 Repair Stations,
- 8300.10, Vol. 2, Ch. 162, Procedures for Certificating Part 145 Repair Stations/Satellites Located Within the United States and its Territories,
- 8300.10, Vol. 2, Ch. 164, Evaluate a Part 145 Repair Station and Quality Control Manual or Revision,
- 8300.10, Vol. 2, Ch. 166, Transition of Manufacturer Maintenance Facility (MMF) to a Domestic Repair Station,
- 8300.10, Vol. 2, Ch. 167, Process the Application of a Domestic Repair Station for Approval under European Aviation Safety Agency Part 145,
- 8300.10, Vol. 2, Ch. 169, Support a Maintenance International Standardization Team Visit,
- EASA MIP-G, revised 3-9-07 (Web site: www.easa.europa.eu.) and
- Advisory Circular (AC) 145-5, Repair Station Internal Evaluation Programs.

B. Forms:

- FAA Form 8000-4, Air Agency Certificate,

- FAA Form 8000-4-1, Repair Station Operations Specifications,
- FAA Form 8130-3, Airworthiness Approval Tag,
- EASA Form 9, FAA Status Report on EASA Approved FAR Part 145 Repair Station or Application for EASA Approval, and
- EASA Form 16, European Aviation Safety Agency, USA Repair Station application for initial / continuation / amendment of EASA Part 145 approval in accordance with the FAA/EASA MIP agreement.

C. Job Aid:

- EASA Form 9.

21 PROCEDURES.

A. Receive the Applicant's EASA Part 145 Supplement/Supplement Revision.

1) For an initial application for approval, ensure that the submission includes at least two copies of the EASA supplement and is signed by the applicant's accountable manager.

2) For a continuation or amendment of approval requiring a revision of the EASA supplement or for any revision to the EASA supplement, ensure the submission includes at least two copies of any revision to the EASA supplement. (One copy is to be retained by the Flight Standards District Office, and the second copy is to be returned to the repair station to identify any correction or change requirements the inspector has identified).

B. Review the Applicant's EASA Supplement/Supplement Revision. The EASA supplement/supplement revision must be added to the applicant's 14 CFR part 145 RSM/QCM. The EASA supplement must conform to the organizational structure specified in the sample. If a section of the applicant's RSM/QCM addresses information required in the EASA supplement, the EASA supplement may reference that section of the RSM/QCM by identifying the section, chapter, and page that address the specific area, and including a brief summary. Review the EASA supplement to determine whether it includes the following sections and appropriate information.

NOTE: An inspector is not required to review an applicant's entire EASA supplement if the applicant is only submitting a revision.

1) The cover page should state compliance with the FAA accepted supplement together with the 14 CFR part 145 RSM forms the basis of the EASA Part 145 approval. This supplement forms part of the applicant's obligations for EASA Part 145 approval as specified in the EASA MIP Guidance. The cover page of the EASA Supplement should include the intent of the above statement (see sample cover page contained in MIP-G as revised).

2) Verify that the EASA supplement includes a list of the sections it contains, the page number of each section, and the current revision date of each section. The revision level and date should be indicated on each page.

3) Verify that this section describes the procedures the applicant will use to guarantee that its EASA supplement remains current. Ensure the EASA supplement identifies, by title, the person responsible for amending the EASA supplement and states that the applicant will provide copies of any revision to its EASA supplement to the FAA before implementation.

4) Confirm whether this section addresses the purpose of the EASA supplement. It must indicate that work performed by the applicant is accepted by EASA through compliance with the provisions of a BASA. This section also must indicate that the EASA supplement addresses additional EASA requirements that the applicant must comply with to retain EASA Part 145 approval.

5) Determine if a statement is included that indicates the applicant will comply with the provisions of the EASA supplement and that it is signed by the applicant's accountable manager for and on behalf of the applicant. This section also should include recognition of the consequences of failing to meet applicable requirements or standards. The accountable manager is the person who has corporate authority for ensuring that all maintenance required by an aircraft operator can be financed and performed to the standards required by EASA Part 145. The difference between 14 CFR part 145 and EASA Part 145 accountable manager is that the EASA accountable manager is usually the applicant's chief executive officer or president but also may be the vice president of engineering in an organization where this person sits on the organization's corporate board and has full financial authority. Whenever the accountable manager is replaced, ensure that the statement is signed by the new accountable manager. An acceptable accountable manager's commitment statement is provided below:

> "This supplement, in conjunction with the repair station's accepted RSM/QCM defines the organization and procedures on which EASA approval is based.
>
> These procedures are approved by the undersigned and must be followed, as applicable, when performing maintenance, preventive maintenance, or alterations that are subject to EASA approval.
>
> The repair station's procedures do not override the necessity of complying with any additional requirements formally published by EASA and agreed to by the FAA.
>
> I understand that EASA will issue an approval and list the repair station as an approved source of maintenance for the European Community and EASA-associated countries in a formal EASA publication while EASA is satisfied that the procedures are being followed and work standards are being maintained. I understand that EASA reserves the right to revoke the approval certificate and remove the repair station from the formal EASA publication if EASA considers that procedures are not followed or standards are not upheld."

6) Verify if this section indicates that EASA approval is based on the applicant's compliance with 14 CFR parts 43 and 145, and the EASA special conditions identified in the MIP and described in MIP-G. Ensure that this section indicates that the scope of work the applicant may perform is limited to the scope of work detailed on its part 145 certificate and that

such work may be performed at the location(s) specified on its certificate and FAA OpSpecs/RSM/QCM.

7) Verify whether this section states that the applicant must agree to allow EASA, or FAA staff acting on behalf of EASA, access to the repair station to check compliance with procedures and standards and to investigate any problems.

8) Determine if this section establishes procedures that the applicant will use to ensure that it obtains a clear work order from the customer specifying the work to be completed. Verify that work orders specify the inspections, repairs, alterations, overhauls, ADs, and parts replacements that should be accomplished. Also confirm that this section lists a person, by title, responsible for communicating with the customer in the case of any ambiguity in the work order. The customer ultimately remains responsible for correctly informing the repair station, in a work order, of all required maintenance and alterations it wishes to have performed to comply with EASA Part 145 requirements.

9) Verify that the procedures in the supplement reflect the repair stations understanding of the repair data acceptance process. The EASA approved design engineering data is normally data supplied by the Original Equipment Manufacturer (OEM) or data approved by the National Aviation Authority (NAA) of the TC holder (or equivalent) or data supplied by the customer and approved by the EASA. In all cases the customer is responsible for confirmation that the data is approved.

a) All repair design data developed by U.S. organizations/persons for use on an EU-registered aircraft and related articles are approved by Decision No. 2004/04/CF, as amended by Decision No. 2007/001/C, except for critical component repair design data developed by organizations/persons which are not the TC/STC holder.

NOTE: A critical component is defined as a part identified as critical by the design approval holder during the validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer's maintenance manual or ICAO.

b) For each individual repair design, this EASA approval is based on: major repair data approved by FAA (as substantiated via an FAA letter or properly executed FAA Forms 8110-3, 8100-9, or FAA Form 337), minor repair data submitted by the TC/STC holder or appliance design approval holder, or minor repair data determined to be acceptable data (under part 43) as determined by a U.S. maintenance organization under FAA's authorized system.

c) Regarding the acceptable minor repair design data described in section 1, paragraph 9d, an EASA Part 145 maintenance organization located outside the U.S. territory cannot declare that acceptable data under 14 CFR part 43 may be used on an EU-registered aircraft unless that data has been previously used on a N-registered aircraft. Such data must be approved by EASA or under an EASA DOA for use by an EASA Part 145 maintenance organization located outside the U.S. territory. Reference to the executive decisions No.

2004/04/CF and 2007/001/C mentioned above shall be made in the release documents issued by the EASA 145-approved organization; releasing the relevant EU-registered aircraft or component to service.

d) Repair design data on critical components, developed by organizations/persons which are not the TC/STC holder, shall be submitted to the agency for approval following the standard application procedure, with an EASA Form 31. Applicants do not need to hold a DOA if the repair data has been approved by the FAA.

10) Ensure that this section describes the procedures the applicant will use to verify that it holds a copy of all the EASA ADs at the time the work is being performed that a customer wishes to be accomplished. This section may note that the applicant may require the customer to supply the EASA ADs the customer wishes the repair station to comply with.

11) Ensure that this section describes the procedures the applicant will use when performing major repairs, alterations, or modifications to ensure the customer has obtained or is in the process of obtaining any necessary approvals from the EASA or has confirmed that the repair stations FAA-approved data is acceptable. (For additional information see paragraph 9 of this appendix).

12) Ensure that this section describes the procedures the applicant will use to ensure the release of components after maintenance, up to and including complete powerplants, is performed IAW 14 CFR and paragraphs 7 through 12 of the applicant's EASA supplement. This section must state that, when the maintenance is complete, FAA Form 8130-3, Airworthiness Approval Tag must be issued as a maintenance release by the applicant indicating that the maintenance was performed IAW parts 43 and 145 and EASA requirements.

a) Release to service of components up to and including complete powerplants must be carried out IAW part 43, § 43.9 and/or § 43.11, except that paragraphs 7 through 12 of the EASA supplement must also be taken into account. At the completion of maintenance, FAA Form 8130-3 will be issued as a maintenance release by the repair station.

b) FAA Form 8130-3 should be issued as a dual release as specified in FAA Order 8130.21 and should include the EASA Part 145 release to service certifying statement with the EASA Part 145 approval certificate number in block 13, and specify any overhaul, repairs, alterations, ADs, replacement parts, or Parts Manufacturing Approval (PMA) parts and quote the reference and issue/revision of the approved data used.

NOTE: EASA will not accept parts rebuilt under a manufacturing certificate. A rebuilt part destined for Europe must be returned to service IAW FAA Order 8130.21.

c) An example completed FAA Form 8130-3 must be included by the repair station in the EASA supplement. Instructions should be included in the supplement specifying that blocks 14 through 18 are not to be used by the repair station and that "newly overhauled" components should be signed off in block 20 against the block 19 maintenance releases. Block 19 must have both regulatory requirements blocks checked for a valid dual release.

d) The signature of the person returning the component to service will be in block 20. The FAA repair station certificate number should be in block 21.

e) The status of the component (repaired, inspected, overhauled, etc.) will appear in block 12 with any relevant comments, including detailed references to approved data, ADs, etc., in block 13. For example: "Overhauled in accordance with CMM 111, section X, Rev 2, S/B 23 & FAA AD xyz complied with. Full details held on WO 456."

f) Block 13 shall also contain the following statement: "Certifies that the work specified in block 12/13 was carried out IAW EASA Part 145 and in respect to that work the component is considered ready for release to service under EASA Part 145 Approval Number: "EASA.145"

NOTE: The EASA BASA/MIP procedure only recognizes the dual release FAA Form 8130-3 for component maintenance release.

g) The repair station will retain and keep current a roster that identifies the list of persons authorized to issue FAA Form 8130-3 on behalf of the repair station.

h) The EASA supplement's incoming inspection procedures should include information regarding the acceptability of components authorized for use during maintenance. The following may be referenced to the RSM/QCM by section, chapter, and page if these items are included as part of an incoming inspection procedure and meet the intent of the following: The new components should be traceable to the OEM as specified in the TC holder's parts catalog and be in a satisfactory condition for installation. The new component should be accompanied by a release document issued by the OEM or Production Certificate (PC) holder. The release document should clearly state that it is issued under the approval of the relevant NAA under whose regulatory control the OEM or PC holder works. For U.S. OEMs and PC holders, release should be on the FAA Form 8130-3 as a new part. For all EU states, OEMs, and PC holders, release should be IAW EASA Part 21. For Canadian OEMs and PC holders, release should be on the Transport Canada Form 24-0078, Authorized Release Certificate, as a new part.

NOTE: FAA allows the following to be referenced in the RSM/QCM only to avoid duplication if the incoming system is the same. Only the following new and used components may be fitted during maintenance. Component meaning any component part of an aircraft, up to and including a complete powerplant and any operational or emergency equipment standard parts are exempt from the forgoing provisions, except that such parts should be accompanied by a conformity statement, and be in a satisfactory condition for installation. PMA parts may only be accepted as detailed in EASA Part 21 or any EU/U.S. bilateral agreement. This form can be found on the Transport Canada Civil Aviation (TCCA) Web page: http://www.tc.gc.ca/civilaviation/maintenance/RegsDocs/download.htm.

1. Used components should be traceable to maintenance organizations and repair stations approved by the authority that certified the previous maintenance, and/or in the case of life-limited parts, certify the service life used. The used component should be in a satisfactory

condition for installation and be eligible for installation as stated in the TC holder's parts catalog and be accompanied by an FAA Form 8130-3 issued as a maintenance release.

2. Used components that are not EASA-approved should not be used even if accompanied by an FAA Form 8130-3 (a dual release would be needed to be accepted by EASA).

3. Used components from EASA Part 145 approved maintenance organizations should be accompanied by an EASA Form 1, Authorized Release Certificate, issued as a maintenance release.

NOTE: Components with only an EASA Part 145 return to service should be segregated and identified as not for use on U.S.-registered aircraft because they do not meet part 43 requirements.

13) If the applicant has an airframe or limited airframe rating authorizing them to perform work on an entire aircraft, verify whether this section describes the procedures the applicant will use to ensure that the aircraft's Certificate of Airworthiness is valid (only applicable to repair stations with airframe/aircraft and/or limited airframe rating).

a) While EU aircraft have indefinite certificates of airworthiness, the validity period for certificates of airworthiness is verified by means of an ARC. The EASA operator or owner is responsible for ensuring the Certificate of Airworthiness remains valid but the repair station should ensure that the Certificate of Airworthiness is valid from the expiration date as detailed on the ARC before issuing a release to service as specified in paragraph 3B(16).

b) If the ARC has expired, the customer should be informed before issue of a release to service as specified in paragraph 3B(16).

14) If the applicant has an airframe or limited airframe rating, verify that this section of the RSM/QCM describes the procedures the applicant will use to ensure the release of aircraft is accomplished IAW 14 CFR and paragraphs 7 through 10 and 12 of the EASA supplement. Verify whether this section indicates that when maintenance is complete, the applicant writes a statement in the aircraft maintenance record that certifies that, except as otherwise specified, the work was performed IAW 14 CFR and, with respect to that work, the aircraft is considered ready for release to service.

a) Ensure that this section notes the use of the clause "except as otherwise specified" is intended for use with two types of deviations, those in which all required maintenance was not carried out. The maintenance not carried out must be listed on the part 43, § 43.9 return to service and/or § 43.11. The particular maintenance requirement was only EASA-approved and not FAA-approved. For example, an EASA AD not approved by the FAA.

b) Ensure this section states that where the customer or operator requires his/her paperwork to be signed, the following alternate release to service certification can be made IAW EASA § 145.50: "Certifies that the work specified, except as otherwise specified, was carried out in accordance with EASA Part 145, and in respect to that work the aircraft is considered ready for release to service."

c) In all cases the repair station must issue the certification when all required maintenance has been carried out. However, if it was not possible to complete all maintenance then such details must be endorsed on the release to service and the operator informed.

d) The EASA Part 145 approval certificate number and the 14 CFR part 145 certificate number must be quoted in all cases, whether it is a part 43 return to service or an EASA Part 145 release to service.

NOTE: Paragraph 3B(14) is only applicable to repair stations with airframe and/or limited airframe rating.

15) Ensure that this section describes the procedures the applicant will use to report a serious defect found in EU-regulated aircraft or aircraft components to EASA using FAA Form 8070-1, Service Difficulty Report, or other means, and to the customer within 3 days (72 hours) of discovery. When reporting a defect to EASA, the identity of the customer must be included to allow for followup action.

16) The primary objective of the QMS is to enable the organization to satisfy itself that it can deliver a safe product and that it remains in compliance with 14 CFR part 43, part 145, and the EASA special conditions. There are two elements to the system: an independent audit system and a management control and followup system.

a) The independent audit system is a process of sample audits of all aspects of the repair station's ability to carry out all maintenance to the required standards. It represents an overview of the complete maintenance system and does not replace the need for mechanics to ensure that they carry out maintenance to the required standard, nor does it replace any associated inspection/quality control system. Independence should be established by ensuring that the personnel responsible for the function, procedure, or product being audited do not carry out audits. The audit system should cover the following:

- Procedural audits will monitor compliance with required aircraft/aircraft component standards and adequacy of the maintenance procedures to ensure that such procedures invoke good maintenance practices and airworthy aircraft/aircraft components.
- Product audits sample check of a product means to witness any relevant testing and visually inspect the product and associated documentation. The sample check should not involve repeat disassembly or testing unless the sample check identifies findings requiring such action.

b) It is acceptable to use personnel from one section/department to audit the work and products of another section/department IAW a procedure in paragraph 3B(16) which defines the audit program.

c) The process of sample audits may be carried out once per year as a single exercise or subdivided over a year period IAW an audit program. All applicable 14 CFR part 43 and 145 paragraphs and the EASA special conditions as detailed in the EASA/FAA MIP should be checked at least once per year against each primary product line. Repair stations with

fewer than 10 people may contract the audit function to a person acceptable to EASA who is not employed by the repair station. However, in this case the audit of all applicable 14 CFR part 43 and 145 paragraphs, as well as EASA special conditions as detailed in the EASA/FAA MIP must be carried out twice per year. A primary product line is any one aircraft or engine or avionic or mechanical product line in which the systems and procedures are very similar throughout that product line.

d) The management control followup system, which must not be contracted to outside persons, consists of a system to ensure that all findings/discrepancies resulting from the independent audit system are corrected in a timely manner, and to enable the accountable manager to remain informed of the state of compliance and any safety issues. The accountable manager should hold routine meetings to check the progress on clearing outstanding findings/discrepancies. In the larger repair stations, such meetings may be delegated on a day-to-day basis to the quality manager as long as the accountable manager meets at least once per year with the senior staff involved to review the overall performance.

e) Where the repair station has associated part 121 line stations, the system should describe how these are integrated into the system and should specify the need to audit each line station at least once per year.

NOTE: Inspectors are not required to survey a part 121 line station for compliance with an EASA supplement. If an inspector is responsible for an air carrier with line stations outside the inspector's geographic area, the inspector should request assistance from the office with the geographic responsibility for the line station.

f) Note that when applicable, each line station that is used by an aircraft operated under the regulatory control of an EU operator IAW the conditions of the EASA/FAA MIP should be listed giving its location and the basic maintenance capability at each such location.

g) Any line station process or procedure that differs from the processes or procedures specified in the 14 CFR part 145 RSM/QCM or is not referenced in the manual needs to be specified.

h) The QMS as specified in the EASA supplement paragraph 15 must be extended to include the need for the accepted organization to audit the listed line station locations.

i) One example of the particular product line should be used as the basis of each audit, except in the case of store audits, for which a random selection of parts should be used. A repair station maintaining aircraft, engines, off aircraft and mechanical parts off aircraft would need to carry out three audit sample checks each year with the particular product type changed each year. An example audit program is attached.

j) A report should be raised for each audit carried out describing what was checked and any resulting findings/discrepancies. The report should be sent to the relevant department(s) for rectification action and be given target rectification dates. The relevant

department(s) is (are) required to rectify the findings/discrepancies and inform the quality department.

k) The example schedule in MIP-G (paragraph 15 and appendix 1 of MIP-G.) contains an example of an audit program that can be applied in the aircraft hangars, engine workshops, and component workshops. Not all subjects will apply in all cases, and the example audit program should be used as a starting basis and then altered to fit the particular type of repair station, as needed.

l) A product should be selected in each hangar and each workshop and the example audit program applied at least once per year (twice per year in the case of a repair station with fewer than 10 people and which chooses to contract the audit to an outside person) with procedures that are common throughout the repair station, the procedure need only be audited once per year if there are no problems.

NOTE: An applicant may use the procedures specified in AC 145-5 to develop audit procedures for its QMS; however, the applicant should audit those applicable audit subjects specified in the EASA supplement.

17) If the applicant has an airframe or limited airframe rating, ensure that this section describes the procedures the applicant will use to ensure it has sufficient hangar space available for aircraft operated under the regulatory control of an EU Member State undergoing maintenance and/or alteration. There is a need to ensure hangar space will be available at the time of maintenance and alterations, when the contract is agreed with the customer. This is only applicable to repair stations with airframe and/or limited airframe ratings, except in the case of line maintenance performed by an applicant that is also operating as a part 121 air carrier.

18) Verify that the repair stations contracting procedures include the following. When part of the maintenance is contracted to another organization, the repair station must ensure that the other organization(s) are EASA Part 145 approved for the maintenance they carry out. If maintenance is contracted to a non-EASA approved organization then this is considered to be a noncertificated facility and must be controlled under the provisions described in or such contracted organization(s) must work under the provisions described in 14 CFR § 145.217(a)2(b).

a) All organizations contracted by the repair station must be listed by the repair station stating whether each organization is EASA-approved or under the repair station’s control via 14 CFR part 145.

b) To prevent duplication with the FAA RSM and the EASA supplement it is permissible to make a cross reference to the RSM in the EASA supplement making a clear reference to where they are to be found.

19) The inspector must confirm if the EASA supplement contains procedures for initial and recurrent training programs that address training and qualifications in human factors.

a) Procedures must be in place to detect and rectify maintenance errors that may endanger the safe operation of aircraft. Procedures must also address resources human

performance limitations and shift turnover and how personnel are trained to ensure an understanding of application of human factors principles.

NOTE: Training in maintenance human factors is an essential part of an FAA-approved training program. The repair station's submitted training program and any revision thereto must include human factors elements. The FAA will not prescribe which human factors elements to include, but those elements should focus on aviation maintenance and safety-related issues. If human factors were not included, their exclusion would hinder the training program approval. (See AC 145-10, Repair Station Training Program for additional information.)

b) Human Factors training is a EASA requirement that is mandated by European law. A U.S.-based repair station that also holds an EASA approval must have human factors training that's related to maintenance practices. Human factors training provide an additional margin of safety to the repair station industry. A human factors training program should be related to maintenance practices where possible. The following are suggested human factors elements for inclusion in a repair station training program:

- General/introduction to human factors
- Statistics
- Safety culture/organizational factors
- Human error
- Types of errors in maintenance tasks
- Human reliability
- Human performance and limitation
- Vision
- Hearing
- Stress
- Situational awareness
- Workload management

20) Procedures for line stations located in the United States as part of a part 121 air carrier operation can only be accepted if the air carrier holds a 14 CFR part 145 certificate for at least one of its main maintenance facilities valid for the aircraft type(s) and scope of work relevant to the line station(s) and the line station(s) comply with paragraph 4, as applicable and can show that the quality monitoring system covers the air carrier certificate, the part 145 certificate and the line stations. The EASA supplement must include a procedure which clearly demonstrates that the quality system covers all stated activities.

a) The organization should contact EASA if it wishes to have a line station approved that is located outside both the United States and the EU. All line stations associated with the EASA Part 145 approval need to be listed in the EASA Supplement together with associated aircraft type and primary maintenance capability.

b) Line stations located in the EU Member States are not accepted under this process.

21) Verify that the repair stations procedures reflect that if a repair station is requested to perform maintenance on a EU-registered aircraft or article located outside the continental United States or its territories the repair station may work away from its fixed location in the following cases.

a) If the EASA supplement does not have written procedure for work away from station, for a one time special circumstance, then the repair station must notify EASA in advance of doing the work. The notification must describe the work to be performed, the date of the work, the customer, and certify to the EASA that the repair station will follow all existing procedures in their current RSM and the EASA supplement. EASA will review the application and the organization will be notified in writing with a copy to the FAA either accepting or rejecting the request. If the request is rejected, then the reason for doing so will be specified in the letter.

b) When necessary, subject to FAA OpSpec D100 being issued in place for this work and only to perform emergency or non-routine maintenance, to be defined for this guidance as urgent defect rectification or to provide assistance for an EU-registered aircraft or articles intended for installation (fitment) on EU-registered aircraft. The procedural requirements that the repair station should use are defined in the FAA RSM. It is permissible to prevent duplication to make a cross reference to the RSM procedures in the EASA supplement for this aspect.

NOTE: The above paragraph is not applicable to line stations where paragraph 20 is applicable.

22) EASA's MIP-G references two types of audits: procedural audits and product audits. Verify that a sample of an audit schedule for one product line is included in appendix 1 of the supplement. The audit schedule must show auditing the shops procedures to ensure compliance with 14 CFR parts 43 and 145 as well as the EASA supplement. This audit program can be applied in the aircraft hangars, engine workshops, or component workshops. Not all audit subjects will apply in all cases, and the sample audit program should be used as a starting basis and then altered to fit the particular type of repair station.

23) If the applicant is an air carrier operating line stations under 14 CFR part 121, ensure each line station used by an EU-regulated aircraft is listed in appendix 2 of the supplement includes the location and capabilities of the line stations. The line stations can be accepted under EASA Part 145 only if the air carrier holds a 14 CFR part 145 certificate for all operated aircraft types for at least one of its base maintenance facilities. The applicant's QMS (ref. paragraph 18) must cover the air carrier certificate, 14 CFR part 145 certificate, and the line stations. Ensure that the applicant's QMS includes provisions to audit the listed line station locations.

24) Ensure that the applicant has procedures to guarantee that FAA Form 8130-3, is completed IAW the current revision of Order 8130.21 when being used as a maintenance release. The supplement will have a completed Form 8130-3 with the dual release and instructions on how to complete the form.

C. Amend the EASA Supplement. If an amendment to an EASA supplement includes a change to the facilities or equipment, the inspector must inspect those facilities (see Order 8300.10, vol. 2, ch. 167).

22 TASK OUTCOMES.

A. Complete the PTRS Record.

B. Complete the Task. Completion of this task will result in one of the following actions:

1) Acceptance of the EASA supplement/supplement revision by continuing to process the applicant's request for EASA Part 145 approval IAW vol. 2, ch. 167, if applicable;

2) Repairing and transmitting a cover letter or transmittal document to the repair station that indicates FAA acceptance of the supplement or revision;

3) Returning one copy of the EASA supplement/supplement revision to the applicant after receipt of its EASA Part 145 approval certificate; and

4) Filing a copy of the EASA supplement/supplement revision as follows:

a) For an original EASA supplement, file a copy of the EASA supplement including a copy of the acceptance letter/transmittal document in the certificate holder/applicant's office file; or

b) For a revision, remove the affected pages and insert the revised pages into the current EASA supplement and update the supplement control system. Revisions to the supplement are considered accepted by the FAA unless the repair station is notified otherwise by the FAA.

5) Rejection of the EASA supplement/supplement revision by:

a) Returning all copies of the EASA supplement/supplement revision to the applicant with a letter explaining the deficiencies; and

b) Explaining to the applicant that the EASA supplement/supplement revision must be corrected and resubmitted to proceed with the process of seeking EASA Part 145 approval.

C. Document the Task. File all supporting paperwork in the certificate holder/applicant's office file and update the Vital Information Subsystem.

23 FUTURE ACTIVITIES. In order to maintain the EASA Part 145 approval, surveillance shall be accomplished in conjunction with the annual surveillance in accordance with FAA Order 8300.10, Volume 3, Chapter 97, Inspect Part 145 Repair Stations Within the United States.

RESERVED. Paragraph 24 through 38.