

# NOTICE

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

N 8900.336

National Policy

Effective Date:  
11/17/15

Cancellation Date:  
11/17/16

**SUBJ:** Maintenance Annex Guidance, Change 5 Requirements for the  
FAA Form 8130-3 from Production Approval Holders

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**1. Purpose of This Notice.** This notice addresses concerns in the current edition of the Maintenance Annex Guidance between the United States and the European Union (EU) (commonly referred to as the MAG). Specifically, the concern pertains to Section B, Appendix 1, Sample EASA Supplement. The amendment to that section reinforces the requirement that U.S.-based repair stations receive Federal Aviation Administration (FAA) Form 8130-3, Authorized Release Certificate, Airworthiness Approval Tag, for all new parts that will be installed in articles for which a dual release is to be issued.

**2. Audience.** The primary audience for this notice is aviation safety inspectors (ASI) responsible for the oversight of U.S.-based repair stations with European Aviation Safety Agency (EASA)-certificated maintenance providers performing maintenance, preventive maintenance, and/or alterations on articles subject to the FAA/EASA Bilateral Aviation Safety Agreement (BASA). The secondary audience includes Flights Standards District Office (FSDO) managers and Flight Standards (AFS) branches in the regions and in headquarters (HQ).

**3. Where You Can Find This Notice.** You can find this notice on the MyFAA employee Web site at [https://employees.faa.gov/tools\\_resources/orders\\_notices](https://employees.faa.gov/tools_resources/orders_notices). Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the FAA's Web site at <http://fsims.faa.gov>. This notice is available to the public at [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).

**4. Background.** On September 9, 2015, the MAG, Change 5, was signed. Generally, FAA-certificated Air Agencies holding EASA certification must comply with the requirements of a revision within 90 days of the effective date (implementation date December 8, 2015). Change 5 of the MAG introduced a change to Section B, Appendix 1. The amendment to that section reinforces the requirement that U.S.-based repair stations receive FAA Form 8130-3 for all new parts that will be installed in articles for which a dual release is to be issued. Under the current provisions of Title 14 of the Code of Federal Regulations (14 CFR) part 21, a Production Approval Holder (PAH) does not have the authority to issue FAA Form 8130-3. Currently, the FAA or its designee (Designated Manufacturing Inspection Representative (DMIR)/Designated Agency Representative (DAR)/Organization Designation Authority (ODA)) must perform this function. Under the provisions of part 21, Amendment 21-98, Final Rule (published

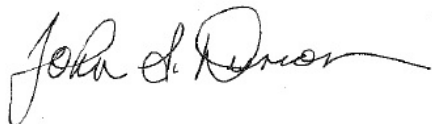
October 1, 2015), the authority for issuance of FAA Form 8130-3 would be expanded to include the PAH. This amendment becomes effective on March 29, 2016.

**5. Discussion.** Since the release of the MAG, Change 5, there have been concerns raised by U.S.-based repair stations regarding the changes to Section B, Appendix 1, paragraph 10, titled Release and Acceptance of Components, and the timelines established by the change. Industry stakeholders have recommended that this change to the MAG be aligned with the change to part 21, Amendment 21-98, which will be in effect on March 29, 2016. The alignment would allow PAHs in the United States to establish a process in their quality system to issue an authorized release using FAA Form 8130-3 for new parts. Other concerns included what provisions could be made regarding components received prior to April 1, 2016. Discussions concluded that new parts currently in inventory that have a document or statement (containing the same technical information as an FAA Form 8130-3) issued by the PAH or a supplier with direct ship authority will remain valid. They also do not need to be replaced by an FAA Form 8130-3, and recertification is not required.

**6. Action.** Based on the effective date of the MAG, Change 5 (December 8, 2015), and the effective date of part 21, Amendment 21-98 (March 29, 2016), it is the joint position of the FAA and EASA that a transition period for the mandatory requirement for the issuance of FAA Form 8130-3 for new parts and required by the MAG, Change 5, will be extended to align with part 21, Amendment 21-98. This will allow those PAHs wishing to supply new parts to repair stations for consumption into EU articles the ability to revise their quality manuals and introduce FAA Form 8130-3 as the Airworthiness Release Certificate. Components released by the PAH, prior to the new implementation date of April 1, 2016, will not be required to be accompanied by FAA Form 8130-3. Only those components released from a PAH's quality system, on or after that date, must be accompanied by FAA Form 8130-3 if intended to be installed on articles subject to the FAA/EASA BASA.

**Note:** New parts currently in inventory must, at a minimum, have a document or statement (containing the same technical information as an FAA Form 8130-3) issued by the PAH or supplier with direct ship authority. The parts currently in inventory and documented with the required information will be grandfathered and remain suitable for installation into EU articles provided the date on the document is prior to April 1, 2016. Annex 1 provisions of the agreement regarding the export of parts remain unchanged (i.e., parts that are exported to a customer under the regulatory jurisdiction of the EU will require the export certification as detailed in the Technical Implementation Procedures for Airworthiness (TIP) independent from the aforementioned grandfathering provision). All other provisions of the MAG, Change 5, will become effective on December 8, 2015.

**7. Disposition.** The information contained in this notice will not be incorporated into FAA Order 8900.1. The information contained within this notice is incorporated into the MAG, Change 5. Direct questions regarding this notice to the Aircraft Maintenance Division, Repair Station Branch (AFS-340), at 202-267-1675.

A handwritten signature in black ink, appearing to read "John S. Duncan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John S. Duncan  
Director, Flight Standards Service