

Title	Part-145 single and multiple releases
NPA Number	NPA 2007-09

UK CAA (UK CAA, European.Affairs@caa.co.uk) has placed **6** reactions on this NPA:

NPA Page(s)	Reaction to	Reaction	Attachments
0	(general reactions)	<p>Page 169/171</p> <p>Paragraph No: 145.A.50(b)2iii and 66.A.20(a)1</p> <p>Comment: The revised requirement only enables a 'Category A' certifier to issue the Final CRS when that person has performed <u>all</u> the line maintenance tasks, which require a CRS. Under the current rules an aircraft may be released to service without the need for a Final CRS where the maintenance could have been certified by 2 separate 'Category A' certifying staff. For example, . Category A person (a) completes all the Daily Inspection tasks and issues a CRS. Category A person (b) carries out a wheel change and issues a CRS. Under the proposed changes the final CRS would not in this case be able to be certified by a 'Category A' person, as they would not have completed <u>all</u> the line maintenance themselves.</p> <p>Justification: Whilst not wanting to extend the privilege of the Category A certifier, by introducing the Final CRS, it appears to apply further restrictions. In order to satisfy the requirement in reality this may lead to situations where only one 'Category A' certifier issues a CRS for work they have not personally completed.</p> <p>Proposed Text (if applicable): Consider separating schedule line maintenance tasks and simply defect rectification tasks, which may then be performed and certified by separate 'Category A' persons, whilst allowing the Final CRS to be issued by the 'Category A' persons performing the scheduled line tasks.</p>	
0	(general reactions)	<p>Page 180/181/183</p> <p>Paragraph No: AMC 145.A.50</p> <p>Comment: A statement is made regarding examples on how to fill in the technical log. These are not accurate examples and do not reflect the requirements of Part 145 GM 145.A.55(a)1 i.e. there is no reference to details of serialised a/c components to ensure traceability. Some of the examples include components which would also require an Independent Inspection in accordance with AMC M.A.402(a). Whilst there may be other alternative means of compliance there should at least be a</p>	

		<p>statement that such issues would also need to be addressed.</p> <p>Justification: Failure to make such references could suggest that EASA believes the examples are sufficient.</p> <p>Proposed Text (if applicable): Either include such detail or include a general statement at the bottom of each page: "* Additional information such as component serial numbers, component documentation references, Independent Inspection maybe required to be specified."</p>	
0	(general reactions)	<p>General</p> <p>The proposals being put forward by the Agency complicate the working practices in a Part 145 organisation leading to unnecessary bureaucracy and no defined safety benefit. They also complicate the relationship and blur the responsibilities between the contracted maintenance organisations and the Subpart G CAMO.</p> <p>The Agency suggests that adoption of the proposal would provide a safer outcome than the system currently in place. The justification for the rule changes as proposed in this CRD is unproven as no information has been presented that indicates the concerns set out in the proposal have actually occurred in practice. This view is shared by a number of other NAAs who like the CAA have been unable to identify any specific safety concern in this area that requires Agency action.</p>	
0	(general reactions)	<p>Page 168, Paragraph No: 145.A.50 b 1 Comment: For B, C and D rated organisations performing work on an aircraft, the CAA does not support the proposal to allow the organisation to issue an aircraft level CRS and believes the current practice where an EASA Form 1 is issued for the work should continue.</p> <p>Justification: An aircraft level CRS issued by an organisation not holding an A rating could be misunderstood and result in important tasks falling within the competence and responsibility of the A rated organisation not being accomplished. The current system is well understood by industry and clearly places the responsibility for the release to service for an aircraft with an A rated organisation.</p>	
0	(general reactions)	<p>Page 168, Paragraph No: 145.A.50 b 2 Comment: The final release to service statement should not be a CRS in accordance with 145.A.50. Justification: The tasks associated with its issue are administrative and do not fall within the definitions of maintenance set out in Article 2 of EC 2042/2003.</p>	
0	(general reactions)	<p>Page 169, Paragraph No: 145.A.50 b 2 iii Comment: The restrictions on category 'A' certifying staff, which precludes them from issuing the final maintenance release if more than one person has been involved in a particular</p>	

maintenance event, is unnecessary.

Justification: The proposal will have a significant economic impact for some aircraft operators. This is because it will require the category B1 or B2 certifying staff to be on hand during nearly every maintenance event involving large aircraft used for commercial air transport. The final release is effectively an administrative task and thus ought not be restricted to only category B or C licensed personnel.