

Maintaining the standards

■ This issue, Shelley A Ewalt flags up developments in an ancillary sector to that of handling proper.

When an aircraft arrives at an international destination, it may require planned or unplanned maintenance. Maintenance at the destination may be planned in order to take advantage of downtime on the ramp. It may also be necessary because of unforeseen mechanical difficulties. The capability to perform maintenance on either a planned or as-needed basis can be a significant advantage in today's market. While ground handlers try to avoid direct involvement in aircraft maintenance, at times they cannot avoid assisting airline customers and sometimes provide at least *ad hoc* light maintenance. Thus keeping on top of developments is necessary.

In 2008, the US and the EU agreed on a framework for a Bilateral Aviation Safety Agreement that had been under negotiation for many years. The Agreement, effective since May 1, 2011, is unique in that it was reached with the EU and not with individual countries. It allows for the air safety agencies (the FAA and EASA respectively) to reciprocally recognise and accept each other's compliance findings and approvals. The result has been co-operation between the world's two largest aviation markets, while maintaining a high degree of safety, reducing costs and increasing efficiencies. The Agreement provides for reciprocal recognition of EU and US maintenance authorisations as well as reciprocal validation and acceptance of design data, approvals and repairs to aeronautical products.

Specifically, Annex 2 allows the FAA and EASA to accept one another's supervision and approvals relating to maintenance. Now a US FAA-certified repair station (CRS) may obtain, renew, or amend EASA approval to maintain foreign aircraft and parts on the basis of its FAA certification. Correspondingly, an EU EASA-certified Approved Maintenance Organisation (AMO) may obtain, renew, or amend FAA approval to maintain US aircraft and parts without undergoing a separate FAA application and approval process. The specific requirements, processes and limitations were hammered out by a Bilateral Oversight Board co-chaired by the FAA and EASA and resulted in the publication of the Maintenance Annex Guidance, which took effect on November 22, 2011. This document spells out in detail how the FAA and EASA will co-ordinate and how each CRS or AMO must comply.

Prior to the effectiveness of the Agreement, each US-based CRS was

separately authorised by each of the EU's 27 member states to perform maintenance on an aircraft registered in that particular EU country. This meant separate applications, inspections and audits and annual renewals. Each country charged a hefty fee, as much as US\$50,000 for the application and US\$30,000 for the annual renewal. Under the Agreement, a CRS now pays approximately US\$2,000 for initial EASA certification and US\$1,000 for annual renewal. Without even counting the reduction in manpower and paperwork saved by eliminating separate applications and renewals, the cost savings is tremendous. The savings is achieved because the FAA and EASA will reciprocally accept the other's findings and therefore do not duplicate the other's efforts.

In order to qualify, a CRS or AMO must first hold a respective 14 CFR Part 145 or EASA-Part 145 certificate. Each CRS or AMO must agree to grant EASA and the FAA unrestricted access, and must agree to accept findings of investigation and enforcement action. The CRS or AMO must also demonstrate that an EASA or FAA certificate is necessary to maintain or alter aeronautical products registered or designed in the US or EU. This may be a letter of intent, a work order or a contract, with details of the relevant customer.

EASA and FAA were already quite consistent in maintenance procedures and processes. In order to reconcile the areas of difference, the respective FAA Part 43 and 145 and EASA Part-145 regulations which were not in common were identified and spelled out as Special Conditions. A CRS that complies with 14 CFR Parts 43 and 145 and the EASA Special Conditions is deemed compliant with EASA Part-145. Correspondingly, an AMO that complies with EASA Part-145 and FAA Special Conditions is deemed compliant with 14 CFR Parts 43 and 145.

One of the significant Special Conditions requires each CRS to incorporate human factors training into initial and recurrent training programmes. Other Special Conditions require the CRS accountable manager to certify compliance with MAG and Special Conditions and must implement and maintain procedures for quality monitoring systems of all facilities and line stations. Airframe and aircraft-rated facilities also must ensure that Certificates of Airworthiness and Airworthiness Review Certificates are valid prior to the release of a return to service document. Each CRS must also implement

procedures for reporting non-airworthy conditions and procedures for ensuring completeness of, and compliance with, work orders or contracts. Similarly, an AMO must comply with the FAA's Special Conditions for certain significant requirements and procedures.

Nearly 250 CRS organisations held approval for maintenance from an EU member country prior to the Agreement. MAG procedures allowed for those authorisations to be transferred to EASA approval on the date of annual renewal. Presently, it is expected that the affected CRS authorisations will be transferred to EASA authorisation by September 2012.

For organisations with existing CRS approval, the transition to EASA authorisation has greatly reduced costs and increased efficiencies. For organisations considering adding maintenance capabilities to their offering of services to international airlines, the ability to service any EU-based aircraft makes the opportunities even more attractive.



McBreen & Kopko
500 North Broadway
Suite 129
Jericho, New York 11753
Tel. (516) 364-1095
Fax (516) 364-0612
