



Summary of Discussions in the Working Group

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Agenda

- What are the issues?
- The approach taken and why

What are the issues

- The specific objective of this proposal is to mitigate the risks linked to a substandard airworthiness review, by;
 - Ensuring an adequate level of safety
 - To revise requirements that have no safety benefits
 - Requirements are to be as clear and simple as possible
 - Feedback obtained showed a lack of clarity

What are the issues

- The Regulations
 - Complicated to read
 - Numerous places to go to – not clear
 - Interpretation problems
 - Misunderstanding
 - Used as an enforcement tool
 - Who is responsible and for what – no clear lines
 - Is the process the same for all aircraft?
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- **It is not all negative**

Personnel

- Can one Airworthiness Review staff take the responsibility for a part of a Review if performed by another Airworthiness Review staff.
- Update the Form 15 to introduce one signature for document review and one for the physical survey.
- ARC signatory & the physical survey – need they be the same person?
- Who should be eligible to sign the ARC?
- Personnel may meet the criteria for ARC signatory but not have practical aircraft experience – ARC Survey implications
- Knowledge of Aircraft Type including emerging Technologies

Sampling

- Inconsistencies in sampling and no guidance on minimum sampling means reduced sampling time to remain 'competitive'.
- Differences in the sample quantities can lead to differences in the processing time of the Airworthiness Review.
- Little evidence of sampling –a tick for compliance with each point in M.A.710 without demonstrating how they sampled to reach conclusion.
- No definition of a full documented review in M.A 710
- Different standards of review – interpretation of minimum sampling?
- Clarify the notion of "sample" in order to avoid differences.
- Define a relevant minimum/maximum number for a sample.

Interpretation of Regulation

- Differing interpretations of Part M and AMC amongst Competent Authorities, Airworthiness Surveyors, and CAMOs
- Lack of definitions for phrases; 'Full Documented Review' or 'Inconclusive Review'
- 'One size fits all' approach of the regulation does not take into account the differing operational 'practicalities' of the operators and ELA aircraft owners
- Transfer of MA.707 & MA.710 to Subpart I, an appreciable benefit to have only one subpart to reference.

Inconclusive

- Definition of 'Inconclusive' – or, is the sentence necessary?
- The wording "inconclusive" seems inappropriate and leads to misunderstanding and discussion between Authority or AR staff.
- Replace "inconclusive" by "un-airworthy condition ".
- In case of inconclusive airworthiness review, the regulation [M.A.710 (h)] could be reviewed to include the necessity for the CAMO to send also the corrective and preventive actions taken to the NAA.

ARC issuance and findings

- Decision on type of finding to be reported.
- Responsibility of AR organisation vs. Competent authority vs. CAMO in the follow up.
- Open findings – can/should an ARC be issued with open findings?
- When is it appropriate to issue an ARC whilst an aircraft is on maintenance? (M.A.710(a) paras 3 & 8.)

ARC issuance and findings

- Condition to maintain the ARS entitlement: Senior ARS?
- Should the ARS report the outcome of the AR when it is not conclusive and could the Competent Authority manage the findings for CofA issuance, ARC issuance or ARC extension?
- As it should be a spot check, should the length of the Airworthiness Review be limited at 15 days maximum?

Approach taken

- Individual proposals were impacting on each other
- Difficult / impossible to reconcile different approaches to the problems
- A new approach needed

Approach taken

- A new structure
 - Remove the constraints of the current structure and wording
- Basic concept
 - Should answer – Who? When? What? Why?
 - All text in one place
 - Easy to understand and concise as possible
 - Modular approach
 - Group challenge
 - Agree as we go

Approach taken

	CAT	Complex	SPO	Non Complex	ELA 1&2
Airworthiness Review Process/Content					
Staff					
General					

Airworthiness Review

- CAMO
- NAA
- Recommendations

- To capture in the process:
 - - Annual review
 - - Import (not to develop, but leave room)
 - - Transfer
 - - Sampling process

Staff

- Competence, assessments and controls:
 - Airworthiness review staff (ARS)
 - Support staff
 - NAA

General

- To include:
 - Definitions, privileges, responsibilities
 - Validity
 - Controlled Environment
 - Extensions
 - Findings
 - Accommodation for Airworthiness Review staff
 - Forms

- Thank You

- Questions