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RE: Acceptance of Common Release Certificate

Dear Ms. Giles and Messrs. Paskiewicz, Specht, Bushell, Phipps and Leeds:

The Aeronautical Repair Station Association (ARSA)<sup>1</sup> is requesting that the agencies consider mutual acceptance of a *single form* as an approval for return to service document<sup>2</sup> by repair facilities that are certificated by multiple national aviation authorities (NAAs).

Today, proper documentation of maintenance (or alteration) to satisfy various NAAs is a source of unnecessary confusion for component maintenance providers with multiple

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<sup>1</sup> ARSA is the premier association for the international aviation maintenance industry; ARSA members are aircraft operators and aviation repair facilities in locations around the world.

<sup>2</sup> These documents are often described as "authorized release certificates" or "airworthiness approval tags".

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NAA authorizations. These repair facilities strive to issue approval for return to service statements that will suit more than one NAA,<sup>3</sup> as their authorizations and qualifications permit. That aim is driven by industry's strong desire for broad, international, compatibility of components that facilitates commerce, parts pooling, exchanges and similar arrangements involving service providers, distributors and air carriers from many nations.

Unfortunately, in order to achieve multiple NAA acceptance of properly maintained components today, repair facilities are driven to put the same information on multiple pieces of paper. There is clearly no safety benefit from creating such duplicative records; indeed, it could have the opposite effect.<sup>4</sup> It is our intention, through this request, to facilitate a resolution to this problem.

The solution is common acceptance of the standard approval for return to service form that already exists. Slight differences among NAA instructions for completing the form should not get in the way of universal acceptance if the *substantive elements*, required by the rules of each NAA, are contained in that document. Likewise, it should be clarified by each authority that when the use of *its own* form is specified, an equivalent form, issued by another NAA, is acceptable provided the recordkeeping requirements for both agencies are met.

ARSA recognizes that the State of Registry is responsible for continued airworthiness, including associated recordkeeping. Therefore, the acceptance of an equivalent approval for return to service form should also be addressed through ICAO. Nevertheless, your agencies' leadership in aviation safety and harmonization generally would provide momentum for a truly universal approach to maintenance recordkeeping.

#### Historical perspective

The issue of maintenance record suitability is not new. In fact, the Civil Aviation Safety Authority of Australia (CASA), in guidance material pertaining to its "authorised release certificate," provides an excellent summary of a previous effort to address one aspect of the problem. It states that:

For many years there has been confusion over the acceptance of documentation accompanying aeronautical products and attesting to their airworthiness. This was mainly due to the fact that different National Airworthiness Authorities (NAAs) specified differing requirements, often requiring clarification from the approving authority. To overcome this problem the Federal Aviation Administration (FAA), the European Joint

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<sup>3</sup> Such statements are commonly referred to as a "dual release" or "multiple release" records.

<sup>4</sup> For instance, there is greater chance that documents will be lost or misplaced; orphaned forms could then accidentally be associated with and attached to another part, even an unserviceable part.

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Aviation Authorities (JAA) and Transport Canada Civil Aviation (TCCA) formed a working group in July 1999. The purpose of the working group was to set a standard, develop a common form and harmonised instructions for use by the NAAs.

The end result of the discussions by the working group was:

- the development of a 'common release certificate' comprising a standardised format and text;
- requirements specifying that aeronautical products, other than standard parts, are to be supplied under cover of such a document;
- the provision of guidelines for completion of the document; and
- the FAA, JAA, TCCA and major international industry organisations agreed to a standard document entitled 'Authorised Release Certificate'.<sup>5</sup>

The common release certificate cited by CASA does not answer the issue we raise here.

Although each country<sup>6</sup> essentially now has a "single" document for recording proper accomplishment of maintenance or alteration activities, it is not automatically accepted as an equivalent to each NAAs own certificate. That result is particularly ironic in light of the fact that the release certificates are alike in structure and basic content.

We do not believe the difficulty stems from NAAs simply demanding *its* form for its own sake. In fact, it appears that, unless an international maintenance agreement<sup>7</sup> exists between the countries involved, the acceptance of an *identical* release certificate from another NAA<sup>8</sup> that requires a particular form is not expressly addressed in regulation or guidance. Industry is left to comply with each NAA's requirements and, ultimately, issue several identical records containing the same basic information.

Assuming the maintenance was performed using technical data acceptable to all jurisdictions, it would be logical for every NAA to accept *any* other authority's properly completed "common release certificate" if that standard document contains the information required by the basic regulation in each of your respective systems.

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<sup>5</sup> Civil Aviation Advisory Publication (CAAP) 42W-2(4) paragraph 1.1.

<sup>6</sup> For purposes of this letter, we refer collectively to European Union (EU) member states as a "nation" or "country" for simplification of their relationship under a single authority, the European Aviation Safety Agency (EASA).

<sup>7</sup> For example, a bilateral aviation safety agreement with maintenance implementation procedures.

<sup>8</sup> A certificate issued by a repair facility certificated by many NAAs.

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### Example of the problems that arise today

To better illustrate our concern, we offer the following hypothetical scenario:

- Repair station “A”, located in New Zealand is certificated as a maintenance organization/repair station by the Civil Aviation Authority of New Zealand (CAA NZ), by the United States Federal Aviation Administration (FAA) and by the European Aviation Safety Agency (EASA).
- Repair station “A” agrees to repair a component sent by U.S. air carrier “X.” The work order specifies that, after proper completion of maintenance on the component, a dual FAA/EASA release is to be issued.
- Repair station “A,” upon completion of maintenance on the component using the manufacturer repair manual, intends to issue the dual release on FAA Form 8130-3.

In this instance, although repair station “A” is fully certificated by the FAA and EASA it is not operating under an international maintenance agreement<sup>9</sup> between the United States (US) and the European Union (EU) because “A” is located in New Zealand. Since an international agreement does not apply,<sup>10</sup> repair station “A” is forced to review both US and EU regulations in respect to each NAA’s maintenance record requirements.

After review, repair station “A” decides that it cannot issue a dual FAA/EASA release using FAA Form 8130-3 because EASA regulation specifies the use of EASA Form 1. Although it is not a problem in this example since the FAA does not require the use of *its own* form.<sup>11</sup> However, we are attempting to address the instances where separate tags containing the same information are issued because both NAAs demand use of its particular document.

In the end, it should not matter what NAAs release certificate is selected by repair station “A,” so long as it meets the maintenance record requirements of each NAA.

### Comparison of NAA component maintenance release requirements

Table 1 (attached) compares the current differences between authorities in handling authorized release certificates for uninstalled component parts. Of particular note is that the basic rules in the EU and New Zealand call for use of a specific form.

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<sup>9</sup> The US/EU Bilateral Aviation Safety Agreement (BASA) – Maintenance Implementation Procedures (MIP)

<sup>10</sup> The US/EU BASA MIP allows dual release on EASA Form 1 or FAA Form 8130-3.

<sup>11</sup> FAA regulations do not require the use of a form; any record containing the necessary elements of the rule, 14 CFR § 43.9, is suitable.

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A summary of the substantive maintenance record requirements for each NAA are provided in Table 2 (attached).

It is assumed, for those NAAs that require the use of a particular release certificate for off-wing components that the information contained on the common release form serves as an additional requirement. A synopsis of the instructions to complete the form in those countries is therefore listed as well, in Table 2a (attached).

#### Related EASA amendment will not solve the problem

Although it appears that a change to the European rule and related guidance is currently being processed,<sup>12</sup> the adjustments will not remedy the issue addressed in this letter. After the revision, EASA will still require *its* form unless a maintenance bilateral agreement signed by the European Community exists.<sup>13</sup> Such a result conflicts with the stated rationale for adopting the change, which provides that:

**Increased harmonisation of the authorised release certificates** between the different regulatory systems is considered beneficial to ensure common understanding of the use and meaning of the data provided by the authorised release certificate. The adoption of the proposed amendment to EASA Form 1, accompanied by improved completion instructions which increase the understanding of the form, is expected to have a considerable **positive economic impact by preventing unnecessary rejection or blocking of items** certified in accordance with the legal framework. It is also expected to have a **positive effect on safety by reducing the possibility for ambiguous or conflicting information.**<sup>14</sup> (*Emphasis added*)

Table 3 (attached) compares the relevant section of current EASA Acceptable Means of Compliance (AMC) with the upcoming revision to that language.

#### Universal instructions will not automatically resolve the issue

Similar to EASA's amendment, an effort exists between industry and regulatory authorities that is focused on harmonizing the instructions for completing the standard

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<sup>12</sup> Opinion No 06/2008 of the European Aviation Safety Agency of 10 October 2008 for a Commission Regulation amending Commission Regulation (EC) No 2042/2003 and Notice of Proposed Amendment (NPA) No 2007-13.

<sup>13</sup> AMC 145.A.42 identifies what documents are equivalent to EASA Form 1; for purposes of this discussion, that list is essentially limited to organizations operating under a bilateral agreement with the European Union.

<sup>14</sup> EASA Opinion No 06/2008, paragraph 17.

authorized release certificate.<sup>15</sup> Unfortunately, harmonized instructions alone will not solve the problem. That endeavor does, however, drive home the point of our request. That is, if the forms are all but identical, and the instructions for completing the forms are essentially the same, it stands to reason that *any* NAA form following that universal protocol should be automatically accepted by another NAA. Otherwise, any harmonization effort is of little use.

Instead, to attain true compatibility, existing EASA and CAA NZ rules should be revised, as indicated in Table 4, below.

**Table 4: Rule changes necessary for harmonization**

|  | <b>EASA<sup>16</sup></b>   | <b>CAA NZ</b>  |
|--|--|--|
| <b>Rule</b>                                      | EC 2042/2003 Annex II (Part-145)<br>145.A.50(d)  | CAR 43.105(b)  |
| <b>Suggested revision (revised text in bold)</b> | A certificate of release to service shall be issued at the completion of any maintenance on a component whilst off the aircraft. The authorised release certificate or airworthiness approval tag identified as EASA Form 1 in Appendix I to this Part, <b>or equivalent authorized release certificate</b> , constitutes the component certificate of release to service. | (b) If a component is not installed on, or allocated to an aircraft, the person certifying the component for release-to-service must certify the release-to-service on—<br>(1) CAA Form One, <b>or equivalent</b> authorised release certificate if— |

We respectfully ask that EASA and CAA NZ act rapidly to adopt these proposed revisions.

Near term resolution

Recognizing the lengthy and difficult process involved in making rule changes, we suggest an interim solution. Specifically, we ask that EASA and CAA NZ agree, in writing, to recognize FAA, TCCA and CASA standard release certificates as equivalents to its respective version of Form 1 if the certificate is issued as a multiple release document after component maintenance (or alteration) by an authorized maintenance organization in accordance with the technical recordkeeping requirements of all NAAs. The essential technical elements required by all NAAs include:

<sup>15</sup> In large part, the EASA changes mentioned above are geared toward harmonizing instructions for the standard airworthiness release certificate.

<sup>16</sup> Additionally an item (f) should be added to the list of EASA Form 1 equivalents listed in AMC 145.A.42(a)(1):

- 2. An equivalent document to an EASA Form 1 may be:

...

**(f) A corresponding standard authorized release certificate issued by a national aviation authority.**

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- identification of the part and serial number;
- a description of the work performed and reference to the technical data used to perform the maintenance;
- the date the certificate was completed;
- identification of the repair organization; and
- identification and signature of the authorized individual completing the form.

Serving as the framework for such an agreement, we suggest that these common elements, based on the general requirements listed in Table 2 should constitute the appropriate content for automatic EASA, CAA NZ, FAA, TCCA and CASA recognition of the certificate.

We further request that EASA, CAA NZ, FAA, TCCA and CASA clearly state that secondary details, such as the format used to enter the date on the form, will not preclude mutual acceptance of the multiple release certificate.

Both of our requests are intended to eliminate the current circumstances that place form before compliance with the technical requirements for maintenance recordkeeping.

Until such time as EASA, CAA NZ, FAA, TCCA and CASA instructions are the same, universal recognition in this case is essentially acceptance of all respective NAA's present systems for completing standard release certificates following component work.<sup>17</sup>

The presence of such an agreement among regulatory authorities will have a significant positive impact upon the industry and aviation safety.

We appreciate your serious consideration of our request, and we look forward to providing any additional information you may require. Please contact me directly if you wish to further discuss the content of this letter.

Sincerely,



Craig L. Fabian  
Associate Counsel

cc: Julian Hall, EASA  
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<sup>17</sup> Although all NAAs do not require the use of a standard release certificate, it is necessary for the universal acceptance contemplated in this letter.

**Table 1: NAA treatment of authorized release certificates**

|   | <b>FAA</b>   | <b>EASA</b>  | <b>TCCA</b>  | <b>CASA</b>   | <b>CAA NZ</b>   |
|---|--|--|--|---|---|
| <b>Form referred to in:</b>             | Guidance   | Rule   | Guidance   | Guidance  | Rule  |
| <b>Reference:</b>                       | FAA Order 8130.21F   | EC 2042/2003 Annex II (Part-145) 145.A.50(d)   | Airworthiness Manual Chapter 561 - Appendix A  | CAAP 42W-2(4)   | CAR 43.105(b)   |
| <b>Sub-ref.</b>                         | Ch.3, par. 3-1(i)  | -  | -  | Par. 1.3  | -   |
| <b>Name of Form</b>                     | FAA Form 8130-3  | EASA Form 1  | TCCA Form 1 (formerly 24-0078)   | CASA Form 1 (formerly 917)  | CAA Form 1  |
| <b>Requirement to use specific Form</b> | NO   | YES  | NO   | NO  | YES   |
| <b>Relevant language</b>                | When Form 8130-3 is issued for approval for return to service in accordance with this chapter, a copy of the original Form 8130-3 that accompanied each shipment, or product, part, or appliance must comply with the recordkeeping requirements of parts 43, 91, 121, 135, and 145. | A certificate of <b>release to service</b> shall be issued at the completion of any maintenance on a <b>component whilst off the aircraft</b> . The authorised release certificate or airworthiness approval tag identified as <b>EASA Form 1</b> in Appendix I to this Part <b>constitutes the component certificate of release to service.</b> <i>(Emphasis added)</i> | The Authorized Release Certificate (hereinafter referred to as "certificate") is not an official Transport Canada form, but rather a template that may be used by industry organizations for the development of their own certificates. Subject to the conditions outlined in this Appendix, organizations may design their own certificates from scratch, or copy the blank examples and modify them as necessary. Blank samples may also be downloaded from the Transport Canada web site, where they are available in both *.xls and *.pdf formats. | The Civil Aviation Safety Authority (CASA), as well as a number of other NAAs, has adopted the [Authorized Release Certificate or ARC] as an acceptable method for the release or return to service of aeronautical products. Other release documents approved by an NAA, such as release notes, may also be acceptable provided they meet the requirements of regulation 42WA of CAR 1988. | (b) If a <b>component is not installed on, or allocated to an aircraft</b> , the person certifying the component for <b>release-to-service must certify the release-to-service on—</b><br>(1) <b>CAA Form One</b> – authorised release certificate if—<br>(i) rule 43.54 requires the maintenance to be performed under the authority of, and in accordance with the provisions of, a maintenance organisation certificate issued in accordance with Part 145; or<br>(ii) the component is to be exported in accordance with the provisions of a maintenance organisation certificate issued in accordance with Part 145... <i>(Emphasis added)</i> |

Attachment included as part of the Aeronautical Repair Station Association's letter to Ms. Giles and Messrs. Paskiewicz, Bushell, Specht, Phipps and Leeds  
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**Table 2: Maintenance record/release requirements**

|  | <b>FAA</b>  | <b>EASA</b>   | <b>TCCA</b>   | <b>CASA</b>  | <b>CAA NZ</b>  |
|--|---|---|---|--|--|
| <b>Rule/<br/>guidance</b>                                | Title 14, CFR § 43.9  | EC 2042/2003 Annex II (Part-145) 145.A.50 and AMC 145.A.50(b) [requirements for aircraft]   | CAR 571.03, CAR 571.10 and Standard 571.10  | Sub regulation 42WA to Part 4A of the Civil Aviation Regulations 1988 (CAR 1988)   | CAR 43.105 and 43.69   |
| <b>Certifying statement</b>                              | N/A   | “Certifies that the work specified except as otherwise specified was carried out in accordance with Part-145 and in respect to that work the aircraft/aircraft component is considered ready for release to service.” | “The described maintenance has been performed in accordance with the applicable airworthiness requirements (or similar statement) | N/A  | “The maintenance recorded has been carried out in accordance with the requirements of New Zealand Civil Aviation Rule Part 43 and in respect of that maintenance the (aircraft)* (component)* is released to service.” |
| <b>Description of work/<br/>reference technical data</b> | A description (or reference to data acceptable to the Administrator) of work performed.   | Reference to instruction or cross-reference to maintenance manual, service bulletin, work-pack containing full details of maintenance carried out   | Product identification/ description of the work performed   | Component name or description, and part number/ unique identifying number/ /information regarding supplier of the component/serial number or batch number of the component/component status; | Description of component with part and serial number/description of the work performed and the technical data used   |
| <b>Date</b>  | The date of completion of the work performed.   | The date maintenance was carried out.   | The date on which the maintenance was performed   | Enough information to identify the contract, work order or invoice related to the supply of the component  | Date of entry  |
| <b>Name/<br/>signature</b>                               | The name of the person performing the work/signature, certificate number, and kind of certificate held by the person approving the work | Signature of person issuing the release to service (or equivalent).   | Identification of both the signatory and the AMO.   | Authority for approval of maintenance that was carried out (specify NAA) and signed by a proper person.  | Name, license/approval number and signature (or equivalent) of person certifying release to service  |

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**Table 2a: Summation of EASA and CAA NZ “Form 1” content**

| EASA   | CAA NZ  |
|--|---|
| <p>EC No 2042/2003 (<i>changes to these requirements are being processed</i>)</p> <p>Use of EASA Form 1 for maintenance</p>  | <p>Advisory Circular AC00-5</p> <p>Parts Documentation-CAA Form One— Authorised Release Certificate</p>   |
| <p>“Certifies that the work specified except as otherwise specified was carried out in accordance with Part-145 and in respect to that work the aircraft/aircraft component is considered ready for release to service.”<br/>(Ref. AMC 145.A.50(b))</p> <p>Reference work order/contract/invoice</p> <p>Part Number, serial number and name or description of the item and the number of items being released</p> <p>Identify if item was overhauled; inspected/tested; modified; repaired; retreaded; or reassembled</p> <p>Reference to maintenance documentation</p> <p>Indication of what NAA regulations that apply to the completed work.</p> <p>Required release to service statement for all maintenance by Part 145 approved maintenance Organizations (see above)</p> <p>The date of signing the release to service<br/>Name and address of the approved organization releasing the items for service</p> <p>Name and signature of the certifying staff authorised by the Part-145 approved maintenance organization.</p> <p>The Part-145 approved maintenance organization reference number</p> | <p>Reference work order/contract/invoice</p> <p>Part Number, serial number and name or description of the item and the number of items being released</p> <p>Identify if item was overhauled; inspected/tested; modified; repaired</p> <p>Describe work accomplished and reference data used</p> <p>Indication of what NAA regulations apply to the completed work.</p> <p>The date of signing the document<br/>Name and address of certificated maintenance organization</p> <p>Name and signature of the certifying staff authorised by the Part-145 approved maintenance organization.</p> <p>The Part-145 approved maintenance organization certificate/approval number</p> |

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**Table 3: Comparison of Upcoming EASA Changes**

| Current   | Future   |
|---|--|
| <p><b>AMC 145.A.42(a) Acceptance of components</b></p> <p>An equivalent document to an EASA Form 1 may be:</p> <p>(a) a release document issued by an organisation under the terms of a bilateral agreement signed by the European Community;</p> <p>(b) a release document issued by an organisation approved under the terms of a JAA maintenance bilateral agreement until superseded by the corresponding agreement signed by the European Community;</p> <p>(c) a JAA Form One issued prior to 28 September 2004 by a JAR 145 organisation approved by a JAA Full Member State;</p> <p>(d) in the case of new aircraft components that were released from manufacturing prior to the Part-21 compliance date the component should be accompanied by a JAA Form One issued by a JAR 21 organisation approved by a JAA Full Member Authority and within the JAA mutual recognition system;</p> <p>(e) a JAA Form One issued prior to 28 September 2005 by a production organisation approved by a competent authority in accordance with its national regulations;</p> | <p><b>AMC 145.A.42(a) (1) Acceptance of components</b></p> <p>1. An EASA Form 1 is acceptable when issued by an EASA Part-21 Production or Part-145 Maintenance organisation.</p> <p>2. <b>An equivalent document to an EASA Form 1 may be:</b></p> <p><i>[(a) a release document issued by an organisation under the terms of a bilateral agreement signed by the European Community;]</i></p> <p>...</p> <p>3. The following formats of a received EASA Form 1 or equivalent certificate are acceptable:</p> <ul style="list-style-type: none"> <li>• A paper certificate bearing a signature (both originals and copies are accepted);</li> <li>• A paper certificate bearing an electronic signature (printed from electronically stored data) if the signature procedure conforms to Part-M Appendix II or Part 21, Appendix I <b>or, in cases of equivalent certificates, conforms to the requirements of the issuing NAA; (Emphasis added)</b></li> </ul> |
| <p><b>AMC 145.A.42(b) Acceptance of components</b></p> <p>The EASA Form 1 identifies the eligibility and status of an aircraft component. ...</p>   | <p><b>AMC 145.A.42(b) Acceptance of components</b></p> <p>The <b>EASA Form 1 or equivalent</b> identifies the eligibility and status of an aircraft component... <i>(Emphasis added)</i></p>   |