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CANADA

RE: Line Maintenance Authorization for "Foreign" Air Carriers

Dear Carol, Wilfried and Brian:

The Aeronautical Repair Station Association (ARSA) is requesting the authorities provide a mutually satisfactory methodology for listing the air carriers for which certificated repair stations perform line maintenance in the United States.

The Federal Aviation Administration (FAA), Transport Canada Civil Aviation (TCCA), and European Aviation Safety Agency (EASA) each handle line maintenance in slightly different manners. Each authority also has slightly different agreements among and between each other for reconciling or accounting for those regulatory differences.

For repair stations that are under all three authorities it is important to recognize how each wishes the other to account for those differences. Therefore, it is important to establish an understanding of how each authority wishes the repair station with line maintenance authorization or rating to reflect its performance of work for air carriers under the other authorities' jurisdiction.

#### FAA Requirements

For repair stations that hold a part 145 certificate from the FAA, line maintenance is not a rating, rather it is an authorization placed on the Operations

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Specifications under 14 CFR § 145.205(d)(3). The FAA usually issues a rating for either limited or class airframe prior to authorizing performance of line maintenance, with a privilege/limitation to perform line maintenance.

The method by which the FAA handles this authority is to add each air carrier for whom the repair stations performs line maintenance to the repair station's Operation Specifications under paragraph D107 "Line Station Authorization." In addition to the carriers, the information includes the aircraft type, line station locations, and any limitations. Unfortunately, the FAA does not list foreign air carriers or locations where work is performed solely for foreign air carriers in paragraph D107.

#### TCCA Requirements

For Approved Maintenance Organizations (AMO) under the TCCA regulation, each is given an aircraft rating with an authorization for each aircraft type being maintained under Canadian Aviation Regulation (CAR) 573.02. These limitations are listed.

The TCCA limits the scope of work for line maintenance on the Certificate of Approval in line with each aircraft rating held. The Certificate of Approval lists each aircraft category rating and any limitations for each aircraft, for example "Non-specialized", "Check Limited", and/or "Line Maintenance" with the effective date.

The authority does not require the specific air carriers to be listed by the repair station; rather, TCCA expects its air carriers to maintain a listing of its authorized maintenance providers.

#### EASA Requirements

Under Part 145.A.75, EASA issues the AMO a Category "A" class rating approval for either Base or Line Maintenance or both. The rating is placed on the Approval Certificate under the Approval Schedule with the aircraft rating, the limitations, and whether it covers base or line maintenance, or both.

#### The Bilateral Between the U.S. and Canada

In the bilateral between the U.S. and Canada, each country accepts the certification of the other. The mutual agreement is to accept the ratings given by either the FAA or TCCA to the certificated repair station.

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A U.S. repair station must comply with the bilateral by holding a valid FAA repair station certificate; the work accomplished cannot exceed the scope of ratings and limitations contained in the repair station certificate. Also, the repair station cannot exceed the authorized functions on the referenced capabilities list or Operations Specifications.

In turn, a Canadian repair station must hold a valid TCCA AMO certificate. As a TCCA AMO, the work accomplished cannot exceed the scope of the ratings and limitations contained in TCCA-issued certificate and the referenced Maintenance Procedures Manual.

#### The Bilateral Between Canada and Europe

Through the Administrative Arrangement on Maintenance between TCCA and EASA, both have agreed that the rules, standards, practices, and regulatory systems are equivalent. Therefore, there is a mutual agreement to permit the acceptance of each other's maintenance certification system.

#### The MIP-G Requirements between the U.S. and Europe

Under the MIP-G, a U.S. repair station must hold a valid repair station certificate to be eligible to receive an EASA approval to maintain EU-operated aircraft. To receive an EASA approval for line maintenance, the repair station must show a specific need for the line station. The line station cannot exceed the scope of work and limitations of the FAA-issued repair station certificate. Also, all line stations should be listed in the EASA supplement, giving the location and the basic capability at each location.

#### The Issue

The specific issue that concerns our members is the fact that unlike Europe and Canada, the FAA does not issue a "line maintenance" rating and the authority set forth in paragraph D107 is limited to the listed air carriers. Therefore, if a U.S. repair station works on a Canadian or EU registered aircraft at a location not listed in the FAA-issued repair station certificate (which includes the Operations Specifications), it is technically working outside its ratings and authority.

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Potential Solutions

1. The FAA could use D107 to list the fact that the repair station has line maintenance authorization, the aircraft type, any limitations and the locations to which that authority extends. As part of the authority, the repair station would be required to keep a list of each air carrier that authorized it to perform line maintenance on its behalf; the list would be referenced in D107, similar to the capability list.

By removing the specific carriers, it would eliminate the doubt that the repair station had authority under its certificate to work on the bilateral partner's aircraft. This method would also allow all Aviation Safety Inspectors to know that the repair station had authorization, the locations and type of aircraft of the authority.

2. TCCA and EASA could issue written guidance that acknowledges an FAA certificate with Operations Specifications paragraph D107 line maintenance authority indicates the appropriate rating. Therefore, the authorities accept locations and air carriers not specifically listed in the paragraph provided those air carriers and locations are listed in the required supplemental manual.

I realize that this may not be a high priority item for the agencies; however, in these times of "strict" regulatory compliance, I urge you to address this issue in a timely manner.

As always, if there is anything the Association can do to help the process, do not hesitate to contact us.

Your Servant,

A handwritten signature in blue ink, appearing to read "Sarah MacLeod". The signature is fluid and cursive, with a large loop at the end.

Sarah MacLeod  
Executive Director

cc: Steven W. Douglas  
Dan Bachelder  
Julian Hall

Jackie L. Black