

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.380

National Policy

Effective Date:
8/26/16

Cancellation Date:
8/26/17

SUBJ: Maintenance Annex Guidance, Change 6, Requirements for
FAA Form 8130-3, "Authorized Release Certificate," for New Parts Not Having
the EASA-Required Documentation

1. Purpose of This Notice. This notice provides aviation safety inspectors (ASI) with information to assist Federal Aviation Administration (FAA)-certificated repair stations (CRS) that also hold European Aviation Safety Agency (EASA) Part-145 approval. This notice is intended to address recent concerns that have been raised by FAA CRS and ASIs regarding the changes contained in the Maintenance Annex Guidance (MAG) Change 6 (MAG CHG 6), Section B, Appendix 1, paragraph 10, Release and Acceptance of Components.

2. Audience. This notice is intended for ASIs responsible for the oversight of U.S.-based repair stations with EASA Part-145 approval when performing maintenance, preventive maintenance, and/or alterations on articles subject to the FAA/EASA Bilateral Aviation Safety Agreement (BASA). The secondary audience includes Flight Standards District Office (FSDO) managers and Flight Standards (AFS) branches and divisions in the regions and in headquarters (HQ).

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee Web site at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the FAA's Web site at <http://fsims.faa.gov>. This notice is available to Air Agencies and the public on the FAA's Web site or at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. Recent revisions to the FAA/EASA MAG CHG 5 and 6 concerning the documentation necessary for installing new parts on aircraft and other articles subject to the MAG have raised questions about a repair station's ability to inspect and approve parts for return to service that are not accompanied by the required documentation as provided for in the MAG. Of particular concern is the current guidance contained in MAG CHG 6, Section B, Appendix 1, subparagraph 10k)(1)(a) and Section C, Appendix 1, subparagraph 7c)(1)(a), which state:

(1) New Components

(a) New components must be traceable to the Production Approval Holder (PAH) and be in a satisfactory condition for installation. An authorized release document, as detailed below, must accompany the new component.

- i) For new components from a U.S.-PAH, release must be documented on an FAA Form 8130-3 as a new part.

NOTE: New parts that were received into inventory prior to October 1, 2016 must, at a minimum, have a document or statement (containing the same technical information as an FAA Form 8130-3) issued by the PAH or supplier with direct ship authority. These parts in inventory, documented with the required information, will be grandfathered and remain suitable for installation into EU articles, provided the certification/release date of these parts is prior to October 1, 2016.

5. Discussion. Nothing in MAG CHG 6 prohibits U.S. repair stations from exercising the privilege to inspect any article for which they are appropriately rated and approve that work for return (release) to service. A repair station rated to perform maintenance on a top assembly is also rated to inspect any component part to determine its eligibility for installation in the next higher assembly.

a. Component Parts. This privilege applies whether the component is new or used. Following an inspection of a new component received without the documentation required by the MAG, a repair station may issue FAA Form 8130-3, Authorized Release Certificate, Airworthiness Approval Tag, as a dual release, provided the procedures for issuance are contained in its Repair Station and Quality Manual and the EASA supplement (EASA special conditions).

b. Inspections. For the purposes of this notice, inspections may be performed on:

(1) New parts received before October 1, 2016, that are not accompanied by FAA Form 8130-3, a dated certificate of conformance, or similar documentation issued by a U.S. PAH or supplier with direct ship authority in accordance with the notes in MAG CHG 6, Section B, Appendix 1, subparagraph 10k)(1)(a) and Section C, Appendix 1, subparagraph 7c)(1)(a); and

(2) New parts received on and after October 1, 2016, that are not accompanied by FAA Form 8130-3.

6. Action. This notice is consistent with the guidance contained in the current edition of FAA Order 8130.21, Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag, paragraph 3-3, Approval for Return to Service—Products and Articles.

a. Inspection Criteria. When inspecting a new component described in this notice, the repair station must develop appropriate inspection criteria to establish that the component was produced by a PAH and is in satisfactory condition for installation. Guidance for making these determinations may be found in the current editions of Advisory Circular (AC) 20-62, Eligibility, Quality, and Identification of Aeronautical Replacement Parts; and AC 20-154, Guide for Developing a Receiving Inspection System for Aircraft Parts and Material.

b. Completing FAA Form 8130-3. FAA Form 8130-3 must be completed using the appropriate terms as provided for in FAA Order 8130.21, paragraph 3-6, Block-By-Block Instructions for Completing FAA Form 8130-3 for Approval for Return to Service, subparagraph 3-6k, Block 11. Status/Work. Additional information may be included in subparagraph 3-6l, Block 12. Remarks, to explain the reason for conducting the inspection (e.g., new part in inventory prior to October 1, 2016, without the required PAH documentation or FAA Form 8130-3; new part received on or after October 1, 2016, without FAA Form 8130-3; or used part without FAA Form 8130-3).

7. Implementation Date of the MAG CHG 6 Parts Documentation Provisions.

a. Effective Date. The effective (i.e., issue) date of MAG CHG 6 was June 1, 2016. Section A, subparagraph 2.3 of the MAG provides that, “Changes to the MAG shall be implemented, as applicable, within 90 days after the effective date of the change.” (Implementation date: September 1, 2016.)

b. Parts Documentation Provisions. However, an October 1, 2016, implementation date for the parts documentation provisions of MAG CHG 6 (Section B, Appendix 1, subparagraph 10k)(1)(a) and Section C, Appendix 1, subparagraph 7c)(1)(a)) was agreed upon by the FAA and EASA. All other provisions contained in MAG CHG 6 are required to be implemented on September 1, 2016. Accordingly, EASA and FAA supplements must be revised to reflect the terms of the above-referenced parts documentation provisions prior to October 1, 2016.

8. Disposition. The information contained in this notice will not be incorporated into FAA Order 8900.1. It will be incorporated into the MAG CHG 7. Direct questions regarding this notice to the Aircraft Maintenance Division, Repair Station Branch (AFS-340), at 202-267-1675.

ORIGINAL SIGNED by

/s/ John Barbagallo
Deputy Director, Flight Standards Service