June 12, 2017

Delivered by email; read receipt requested: griffin.ctr.moar@FAA.gov

Griffin Moar
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RE: Industry Comments
Draft Advisory Circular 43-ARTS, Use of FAA Form 8130-3 for Approval for Return to Service Under Part 43

Dear Mr. Moar:

The undersigned companies and organizations represent a cross section of the aviation industry, covering a range of interests including commercial air carriers, aviation service providers, design and production approval holders and repair stations.

We appreciate the extra time the agency provided for comments on Draft Advisory Circular 43-ARTS as it significantly revises the agency's interpretation of the requirements for using FAA Form 8130-3.

The undersigned believes that the Draft AC cannot be issued as drafted; it does not mirror the maintenance recordkeeping regulations and conflicts with existing agency policy. Release of the draft AC without a complete rewrite will, among other things, cause both industry and the FAA to expend considerable resources to ensure continued compliance with section 43.9 and international commitments.

To align the information contained in the Draft AC 43-ARTS and the regulations, a redraft is submitted for the agency's consideration (see enclosure). The redraft is actually written as a potential replacement for AC 43-9C, which does not reflect current information even though it was recently updated. More importantly, however, the current version of AC 43-9 does not address section 43.9 requirements. Rather, the majority of that document focuses on part 91 and other owner/operator requirements. Therefore, the agency is urged to use the attachment as a replacement for AC 43-9 and to issue separate advisory circulars that address the requirements of 43.11 inspection records and part 91 owner/operator records.

Alternatively, the undersign urges the FAA to contemplate issuance of the attached draft advisory circular under another number and name since it focuses solely on compliance with section 43.9 and includes an explanation of how the FAA Form 8130-3 may be used to show compliance with some or all of that rule by repair stations, repairmen and mechanics.

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Draft Advisory Circular 43-ARTS, Use of FAA Form 8130-3 for Approval for Return to Service Under Part 43

In reviewing the attached draft advisory circular, you will notice a few spots where text is highlighted in yellow. These references will be updated as all of the guidance described in this letter is developed.

Sincerely,

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RE: Industry Comments
Draft Advisory Circular 43-ARTS, Use of FAA Form 8130-3 for Approval for Return to Service Under Part 43

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Enclosure: AC-TBD: COMPLETING TITLE 14 CFR SECTION 43.9 MAINTENANCE RECORDS BY MECHANICS, REPAIRMEN AND REPAIR STATIONS

cc: Tim Shaver, AFS-300 tim.shaver@faa.gov

U.S. Department
of Transportation
Federal Aviation Administration

Advisory Circular

Subject: COMPLETING TITLE 14 CFR SECTION 43.9 MAINTENANCE RECORDS BY MECHANICS, REPAIRMEN AND REPAIR STATIONS

Date: DRAFT
Initiated by: AFS-340

AC No: 43-TBD
Change:

GENERAL

1. What is the purpose of the Advisory Circular (AC)?

(a) This AC provides mechanic, repairmen and repair stations authorized to approve maintenance, preventive maintenance and alterations for return to service under Title 14 of the Code of Regulations (14 CFR) part 43 with acceptable methods for—

- Showing compliance with the maintenance record requirements in section 43.9.
- Correcting or reissuing maintenance records.
- Using the FAA Form 8130-3 to establish compliance with section 43.9.
- Using the FAA Form 8130-3 to establish compliance with another Civil Aviation Authority's (CAA) requirements.

(b) Like all advisory material, this AC is not in itself mandatory and does not constitute a regulation. It provides a means, but not the only means to comply with specific regulatory requirements. When this AC uses mandatory language (e.g., "must" or "may not") it is quoting or paraphrasing a regulatory requirement or prohibition. When this AC uses permissive language (e.g., "should" or "may"), it describes an acceptable means. Because the method of compliance that is presented in this AC is not mandatory, the term "should" applies only if you choose to follow this particular method to achieve regulatory compliance. Instead of following this method, you may elect an alternate, provided it is compliant with the applicable regulations.

2. To whom does this AC apply?

(a) Mechanics and repairmen certificated under part 65 and repair stations certificated under part 145 that perform maintenance, preventive maintenance, rebuilding and alterations on:

- Aircraft having a U.S. airworthiness certificate;
- Foreign-registered civil aircraft used in common carriage or carriage of mail under the provisions of part 121 or 135 of this chapter; and
- Airframe, aircraft engines, propellers, appliances, and component parts of such aircraft.

(b) To persons that are authorized to perform maintenance on aircraft with foreign certificates of airworthiness issued by a foreign CAA.

3. What is excluded from this AC?

(a) This AC does not include the requirements related to performing and creating records for inspections under parts 91 and 125 and section 135.411(a)(1) or section 135.419 (see, sections 43.9(c) and 43.11).

(b) This AC does not include information on compliance with section 43.9(b). That section sets forth the maintenance record requirements applicable to holders of air carrier operating certificates or operating certificates issued under part 121 or 135 that are required by their approved operations

specifications to provide for a continuous airworthiness maintenance program. Those certificate holders are required to make records of the maintenance, preventive maintenance, rebuilding, and alteration, on aircraft, airframes, aircraft engines, propellers, appliances, or component parts which they operate in accordance with the applicable provisions of part 121 or 135.

(c) This AC does not include information on the records that must be kept by owners or operators under part 91.

4. What are the related 14 CFR parts?

(a) PART 1—DEFINITIONS AND ABBREVIATIONS

(b) PART 43—MAINTENANCE, PREVENTIVE MAINTENANCE, REBUILDING, AND ALTERATION

(c) PART 91—GENERAL OPERATING AND FLIGHT RULES

(d) PART 121—OPERATING REQUIREMENTS: DOMESTIC, FLAG, AND SUPPLEMENTAL OPERATIONS

(e) PART 125—CERTIFICATION AND OPERATIONS: AIRPLANES HAVING A SEATING CAPACITY OF 20 OR MORE PASSENGERS OR A MAXIMUM PAYLOAD CAPACITY OF 6,000 POUNDS OR MORE; AND RULES GOVERNING PERSONS ON BOARD SUCH AIRCRAFT

(f) PART 129—OPERATIONS: FOREIGN AIR CARRIERS AND FOREIGN OPERATORS OF U.S.-REGISTERED AIRCRAFT ENGAGED IN COMMON CARRIAGE

(g) PART 135—OPERATING REQUIREMENTS: COMMUTER AND ON DEMAND OPERATIONS AND RULES GOVERNING PERSONS ON BOARD SUCH AIRCRAFT

(h) PART 145—REPAIR STATIONS

5. What additional guidance material is available?

(a) List to be compiled after the final version of this AC is complete
(b) Completing a Form 337
(c) Completing section 43.11 inspection records

6. Why are maintenance records necessary?

(a) A Federal Aviation Administration (FAA)-issued standard airworthiness certificate is effective (unless sooner surrendered, suspended, revoked, or a termination date is otherwise established by the FAA) as long as required maintenance, preventive maintenance, and alterations are performed. The aircraft includes the airframe as well as the installed aircraft engines, propellers (products), appliances and articles.

(b) Maintenance preventive maintenance, and: alterations requirements for each aircraft and its installed products, appliances and articles depend upon the type and frequency of operations. Each owner and/or operator must comply with the general requirements for maintenance, preventive maintenance and alterations of part 91 (see sections 91.1(d) and 91.7), and for certain operations, the additional requirements of parts 121, 125, 129, and 135.

(c) The maintenance records associated with a civil aviation aircraft, its installed products, appliances and articles are essential to making determinations of the aircraft's airworthiness.

(d) Owners and operators depend upon qualified maintenance providers to perform the required maintenance, preventive maintenance, and alterations.

(e) Persons performing maintenance, preventive maintenance, and alterations tasks must create records in accordance with parts 43, which in turn are used to establish compliance with 91, 121, 135 and 145, as applicable.

(f) Maintenance records allow other certificate holders, owner/operators and the FAA to determine that appropriate maintenance, preventive maintenance and alterations have been performed. The performance of these actions will be used to determine the validity of the certificate of airworthiness. Maintenance records provide tangible evidence that the work on the aircraft and its installed products and articles was performed appropriately and correctly.

(g) Insufficient or non-existent records can render a standard airworthiness certificate invalid. The more concise and complete the maintenance record, the more compliance, continued airworthiness and safety are assured.

7. What are the general requirements of section 43.9?

(a) Part 43 provides general requirements for all maintenance providers working on aircraft with a U.S. certificate of airworthiness or on products, appliances and articles that will be installed on such aircraft (see, section 43.1). It sets forth who may perform the maintenance, preventive maintenance, alteration or rebuilding (see, section 43.3), the records that must be created (see, sections 43.9, 43.11 and Appendix B to part 43) and confirmed (see, section 43.5) before an authorized person may approve the work for approved for return to service (see, 145).

(b) Section 43.9 applies to persons performing maintenance, preventive maintenance, rebuilding and alterations activities. It does not apply to persons performing inspections in accordance with parts 91 and 125 and section 135.411(a)(1) or section 135.419 (see, sections 43.9(c) and 43.11).

(c) Maintenance is defined in section 1.1 as inspection, overhaul, repair, preservation, and the replacement of parts, but excludes preventive maintenance.

(d) Preventive maintenance is defined in section 1.1 as simple or minor preservation operations and the replacement of small standard parts not involving complex assembly operations.

(1) The definition of preventive maintenance in section 1.1 is further limited by the tasks specifically delineated in appendix A paragraph (c) to part 43.

(2) Sections 43.3(g), (h) and (i) set forth the conditions under which pilots can perform preventive maintenance and certain maintenance tasks; the records required by section 43.9 must be created. Pilots may only approve for return to service the preventive maintenance and limited maintenance tasks that they have accomplished.

(e) Rebuilding is an activity that may only be undertaken by a production approval holder or its licensee (see, sections 43.3(j), 43.2(b) and 91.421).

(1) While rebuilding activities are covered under part 21, the record requirements are contained in section 43.9.

(2) Additionally, for reciprocating engines, the new record containing the information required by section 91.421(b) must be furnished, including:

- ✓ A signed statement of the date the engine was rebuilt (see, section 91.421(b)(1)).
- ✓ Each change made as required by airworthiness directives (see, section 91.421(b)(2)).
- ✓ Each change made in compliance with manufacturer's service bulletins, if the entry is specifically requested in that bulletin (see, section 91.421(b)(3)).

8. What does section 43.9(a) require?

(a) Section 43.9(a) requires that certain information be entered in the maintenance record of the aircraft, airframe, aircraft engine, propeller, appliance, or component part after maintenance, preventive maintenance, rebuilding or alteration has been performed.

(1) While the rule does not specifically require the record contain the part and/or serial number and/or other identification data of the aircraft, airframe, aircraft engine, propeller, appliance, or component part, it is important for ensuring the other information required by section 43.9 is directly associated with the particular aircraft, airframe, aircraft engine, propeller, appliance, or component part worked on.

(2) The agency does not dictate where or how a maintenance record must be created or kept.

- ✓ When work is performed on a product (aircraft, aircraft engine or propeller), there may be a logbook or other document that has been created by the owner or operator. In that case, the information required by section 43.9 may be entered or attached to that document.
- ✓ Similarly, there may be logbooks or other documents for time controlled items, such as life-limited parts or items that require periodic overhaul because of continued airworthiness maintenance program dictates. The information required by section 43.9 may be entered or attached to that document.

(3) No matter how the record is created and provided to the owner or operator of the aircraft, aircraft engine, propeller, appliance or component part, it is always important:

- ✓ To ensure it complies with 43.9 and any additional specific requirements of the owner or operator.
- ✓ For the maintenance provider to keep a copy of any record it makes. Indeed, part 145 certificate holders must retain records of the work it performs as required by section 145.219.

(b) The information that must be included in a section 43.9(a) record includes:

(1) A description (or reference to data acceptable to the Administrator) of work performed (see, section 43.9(a)(1)).

- The account should be in sufficient detail to permit a person unfamiliar with the work (but familiar with the industry and the regulatory requirements) to understand what was done.
- An acceptable description *summarizes* the extent and nature of the damage, the general maintenance, preventive maintenance, rebuilding or alteration actions taken, including the replacement of parts and materials.
- An extensive work scope can result in a voluminous record; it is therefore acceptable to reference maintenance information and other data acceptable to or approved by the FAA in lieu of making a detailed entry. Section 43.13(a) describes the types of information acceptable for reference. While the revision number of the manufacturer's documents are not required to be included, it is advantageous to do so in case questions about the methods, techniques and practices are raised at another date.
- In any event, either the description or the references should be clear and accurately reflect what was done, how it was done and who performed the various tasks (section 43.9(a)(3) requires the names of all persons performing work).

NOTE: Each person performing maintenance, preventive maintenance, rebuilding or alteration tasks is responsible only for the work scope performed. Persons that approve work for return to service are responsible for ensuring the described work is performed properly and satisfactorily. A maintenance

provider may become responsible for the airworthiness of an article, appliance, product or product by the extent and nature of the work performed. However, the owner/operator is ultimately responsible for operating an airworthy aircraft, thus the description of the work by a maintenance provider is directly related to the owner/operator's ability to determine airworthiness of the aircraft. A comprehensive, complete and accurate description of work performed is essential to compliance and airworthiness determinations.

(2) The date of completion of the work (see, section 43.9(a)(2)). This is normally the date upon which the last step in the work scope is accomplished and the work is approved for return to service. An extensive work scope may include many dates and even times, but the maintenance record needs to reflect the date a person found that all the work was performed satisfactory (see, paragraph (a)(4) below).

(3) The name(s) of the person(s) performing work if other than the person issuing the approval for return to service (see, section 43.9(a)(3)).

- A complete maintenance record will include the names of all persons (a term defined by section 1.1) that performed maintenance, preventive maintenance, rebuilding or alteration tasks.
- In the cases where more than one person, i.e., individuals or companies, perform maintenance tasks, the name of each person must be included in the maintenance record. Examples include:
  - ✓ Individuals being supervised by a mechanic.
  - ✓ Other certificated mechanic assisting the individual that will approve the work for return to service.
  - ✓ Individuals in a repair station that perform specific tasks or actions.
  - ✓ Contractors of a repair station or mechanic.

(4) The approval for return to service is issued under sections 43.5, 43.7 and 43.9(a)(4); if the work performed is satisfactory, the record must contain—

- An authorized person's signature—
  - ✓ For repair stations, the person is authorized to issue approvals for return to service on behalf of the part 145 certificate holder under sections 145.157 and 145.161.
  - ✓ For mechanics, the signature must be of the individual certificated as a mechanic under part 65 with an airframe and/or powerplant rating.
- The certificate number—
  - ✓ Mechanics must use their individual certificate number.
  - ✓ Repair stations and repairmen must use the air agency certificate number. While it is true the individual authorized under sections 145.157 and 145.161 must hold a part 65 certificate, the person approving the work scope for return to service is the part 145 repair station.
- Kind of certificate held by the authorized person.
  - ✓ Repair stations are issued air agency certificates, although the specific type of air agency certificate is a repair station. When an authorized repairman is signing the record, s/he will use the repair station, i.e., the repair station certificate. It is acceptable to use abbreviations or initials such as RS or ARS or AMO to depict a part 145 air agency certificate.

- ✓ Individual mechanics with appropriate airframe and/or powerplant ratings are authorized to approved work on civil aviation products and articles for return to service. The type of certificate is mechanic, the ratings are airframe and/or powerplant and/or inspection authorization. It is acceptable to use abbreviations or initials, such as A&P or A&P/IA to depict a mechanic certificate and rating.

(5) The signature constitutes an approval for return to service only for the work performed. The person (see, section 1.1) approving the work scope for return to service is responsible for:

- Accomplishing the review required by section 43.5 to determine whether the work scope was performed satisfactorily. In the case of a repair station, it will accomplish this step through performing its final inspection under section 145.213.
- Being appropriately authorized under section 43.7. Mechanics, repairmen and repair stations are authorized to issue approvals for return to service within their respective duties, responsibilities, privileges and limitations under part 65 or 145 as appropriate (see, sections 43.7(b)-(c)).
- Entering a signature on the maintenance record, which constitutes the approval for return to service only for the work performed and described under paragraph 8.(b)(1) above.
- Place the appropriate certificate number and type of certificate held in the maintenance document. When the approval for return to service is being issued by a certificated individual for a certificated company, such as a repair station, it is the repair station's certificate that should be referenced as described in paragraph 8.(a)(4) above.

(c) Before the maintenance record is complete, the person issuing the approval for return to service must determining whether the work constituted a major repair or alteration. If so, the engineering data supporting the action must be approved and additional maintenance records must be completed and signed. Advisory material on completing records for major repairs and alterations may be found in paragraph 5 above.

9. What are the other requirements of section 43.9?

(a) Section 43.9(b) sets forth the fact that persons holding air carrier operating certificates or operating certificates issued under part 121 or 135 with continuous airworthiness maintenance program must following the applicable portions of part 121 or 135 when making maintenance records.

(b) Section 43.9(c) makes clear that the inspection records required by section 43.11 are not maintenance records covered by section 43.9. Inspections "find" discrepancies and other unairworthy conditions; maintenance and alterations correct those conditions. While maintenance includes inspections, the records required by section 43.11 are for those "look and see" actions mandated by 91, part 125, section 135.411(a)(1), or section 135.419.

- Section 43.11 covers persons approving or disapproving for return to service an aircraft, airframe, aircraft engine, propeller, appliance, or component part after *any* inspection performed in accordance with part 91, part 125, section 135.411(a)(1), or section 135.419.
- Part 91 requires compliance with airworthiness directive (AD)-mandated inspections (see section 91.403(a)) and airworthiness limitation inspections (see section 91.403(c)). Therefore, accomplishment of such actions on *any* aircraft engines, propellers, appliances and component parts are covered section 43.11 requirements.
- Other part 91, part 125 and section 135.411(a)(1), or section 135.419 inspections are for an aircraft and its installed products, appliances and articles. The inspection requirements will be dictated by the owner/operator's chosen program. It may be as simple as an annual inspection or be phased; the requirements are found in section 91.409.

(c) Section 43.9(d) states the additional maintenance records that are required when the work performed results in a major repair or a major alteration. In those cases, appendix B to part 43 dictates the form and manner of recording those major repairs and alterations. Advisory material on completing records for major repairs and alterations may be found in AC 43.9-1F *Instructions for Completion of FAA Form 337*.

10. Can the FAA Form 8130-3 be used to comply with section 43.9(a)?

(a) Persons authorized to approve maintenance, preventive maintenance and alterations activities for return to service under section 43.7 may use the FAA Form 8130-3 to show compliance with section 43.9(a)(4).

(b) However, the FAA Form 8130-3 may not include all the information required by section 43.9. For example, a full description of work performed may not fit in Block 12 nor may the names of all persons performing any maintenance, preventive maintenance or alteration actions or steps as required under section 43.9(a)(3). In cases where extra pages are needed to comply with section 43.9, they may be cross-referenced to the FAA Form 8130-3 and attached.

(c) The method of completing the FAA Form 8130-3 must ensure the information required by section 43.9 is included and provided to the owner or operator of the aircraft, aircraft engine, propeller, appliance or component part.

(d) Please reference Appendix A for instructions on how to complete the FAA Form 8130-3.

11. How can a maintenance record be corrected or re-issued?

(a) A maintenance record may be corrected by the same certificate holder that issued the document by crossing-out the incorrect information on the original record, initialing the crossed-out area and entering the proper information. The date that the correction was made should be noted on the original record. Additionally, it is a good idea for the maintenance provider to take a copy of the corrected record.

(b) When maintenance records are received with obviously incorrect information, the discrepancies may be noted on the record. The discrepancies must be obvious from a visual inspection of the part or the documentation sent or received with the part or other tangible and verifiable information. The record need not be corrected by the issuer for the receiver or person using the information to make an airworthiness determination, such as eligibility for installation.

(c) If the record was made on an FAA Form 8130-3, the originator may issue another Form to correct typographical errors.

(d) The request for a corrected maintenance record, including the FAA Form 8130-3, may be honored without re-verification of the product or article condition provided there is a clear correlation between the original maintenance record, the product or article and the reissued record.

(e) If a new FAA Form 8130-3 is issued to correct a previous one, the new FAA Form 8130-3 will reference the FAA Form 8130-3 being corrected. Use of the following statement in Block 12 will make clear the corrections being made: "This FAA Form 8130-3 corrects the error(s) in Block(s) [enter block number(s) corrected] of the FAA Form 8130-3 [enter form unique identifier or tracking number] dated [enter issuance date]."

(f) The date associated with the original approval for return to service should not change since no further work was performed and the completion date for the work did not change by the reissuance of a corrected maintenance record.

(g) Electronically maintained records may be reissued; in all cases where a record is reissued, it will note that fact in plain view on the face of the reissued record(s) and a copy of the reissued record with the note on its face will be maintained by the originator.

(h) Copies of records may be provided by the originator, if the record is from a copy, that fact will be noted in plain view on the face of the copy—the number of copies made will be noted on the record copied.

(i) Both the original record and any corrected or reissued record must be retained in compliance with any required retention period.

(j) If the originator is no longer available (deceased, terminated, or otherwise unavailable) to reissue the form, an authorized person with access to the originator's copy may reissue the form.

12. May maintenance records be recreated if lost or destroyed or irreparably damaged?

(a) If maintenance records are lost or destroyed or irreparably damaged and there are no copies available, each person responsible for originally creating the record would be required to make a true and correct replica of the information. It is extremely doubtful that such information could be replicated from memory.

(b) If there are documents that can be used to recreate the true and correct replica that would establish compliance with the section 43.9 requirements, the agency may find the recreation acceptable.

13. May maintenance records be handled electronically?

(a) Persons wishing to provide regulatory information electronically must comply with the safety and security of those records as explained in AC 120-78A Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals.

(b) FAA Form 8130-3 may be computer-generated, but must duplicate the format of the original Government-printed form.

- The overall form must not be changed, nor may any of the original words be deleted.
- The size of blocks may vary slightly, but all blocks must remain in their original location.
- The form may be reduced in size, but not to the extent it is no longer easily readable and readily recognizable.
- Required text may be preprinted.
- The information entered may be either computer-printed or handwritten; it must be easy to read, with limited use of abbreviations.
- All entries must be made in permanent ink and in English.

14. What are the requirements for completing a Form 8130-3 by a domestic repair station with an European Aviation Safety Agency (EASA) Part 145 approval?

(a) To meet the terms and conditions of the Maintenance Annex Guidance (MAG) under the Bilateral Aviation Safety Agreement (BASA), the FAA Form 8130-3 must be completed as required by the MAG.

(b) When the FAA Form 8130-3 is completed in accordance with both the FAA and EASA requirements, it is considered a "dual release". The work on a product or article approved for return to service with a dual release FAA Form 8130-3 may be eligible for installation on aircraft with either an U.S. or EU certificate of airworthiness.

(c) Only facilities that are both FAA- and EASA-approved and located in the United States or an EU Member State can issue a dual release certificate.

(d) The MAG also provides guidance for the use of FAA Form 8130-3 as a "single-release" for special cases. Refer to MAG section B, appendix 1, for the United States; and MAG section C, appendix 1, for the EU.

15. Do any other CAAs require the completion of an FAA Form 8130-3?

Yes, most CAAs require or recognize the FAA Form 8130-3 when properly completed by appropriately authorized repair stations.

For a complete listing of the bilateral aviation agreements and corresponding maintenance implementation procedures, please search for "bilateral" on the faa.gov website if this link does not work.

AC-TBD: COMPLETING TITLE 14 CFR SECTION 43.9 MAINTENANCE RECORDS BY REPAIR STATIONS AND MECHANICS

APPENDIX A. BLOCK-BY-BLOCK INSTRUCTIONS FOR COMPLETING FAA FORM 8130-3 FOR AN APPROVAL FOR RETURN TO SERVICE.

A.1 **Block 1. Approving Civil Aviation Authority/Country.** FAA/United States. (Preprinted.)

A.2 **Block 2. Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag.** (Preprinted.)

A.3 **Block 3. FAA Form Tracking Number.** Unique identification is required to provide an assurance that the particular Form is associated with the product or article upon which the work was performed. For repair stations, a work order or other unique tracking number is used.

For individual mechanics certificated under part 65, a system for tracking the Form to a repair order, purchase order, or other document that creates a correlation between the maintenance record and the article that underwent maintenance, preventive maintenance or alteration is acceptable.

A.4 **Block 4. Organization Name and Address.** For repair stations, enter the full name and physical address (no post office box numbers) of the organization from which the form is being issued. A logo or other identification of the organization is permitted if it can be contained within the Block.

Mechanics certificated under part 65 need to use their individual name and the address on the certificate issued by the FAA.

A.5 **Block 5. Work Order/Contract/Invoice Number.** Enter the work order, contract and/or invoice number related to maintenance release authorization number—the information may be the same as entered in Block 3. If a work order/contract/invoice number is not available, enter "N/A."

A.6 **Block 6. Item.** Provide the item number for each part referenced in Blocks 7 through 11. Multiple items should be numbered in sequence, although not necessarily beginning with the number one (e.g., 0040, 0050, 0062, 0063). Multiple item numbers may be used for the same part number (e.g., same item with different serial numbers). If a separate listing is used, enter "List Attached."

A.7 **Block 7. Description.** Enter the nomenclature or description of each product or article referenced in Block 6 and 8 through 11. Preference should be given to the term used in the instructions for continued airworthiness (ICA) or maintenance data (e.g., Illustrated Parts Catalog, Aircraft Maintenance Manual, or Service Bulletin (SB)). If a separate listing is used, enter "List Attached."

A.8 **Block 8. Part Number.** Enter each part number of the corresponding product or article referenced in Blocks 6 and 7 and 9 through 11. In case of an aircraft engine or propeller, the model designation may be used. If the article being worked is a subassembly that does not have a part number of its own, enter the next higher assembly number followed by the word "subassembly." If a separate listing is used, enter "List Attached."

A.9 **Block 9. Quantity.** Enter the quantity of each product or article referenced in Blocks 6 through 8 and 10 and 11. If a separate listing is used, enter "List Attached."

A.10 **Block 10. Serial Number.** If 14 CFR part 45 requires a serial number to identify the product or article, enter it here. Additionally, any other serial number may be entered. If no serial number is entered in this Block, enter "N/A." If a specific batch or lot number is used, refer to the instructions for Block 12. If a separate listing is used, enter "List Attached."

A.11 **Block 11. Status/Work.** The block can be completed with one of three possibilities: "Used", "Maintained" or "Altered". If the article is new, and an inspection was conducted to determine its current condition, the word "maintained" should be placed in the Block to indicate that

maintenance, i.e., the inspection, was performed. The description of work performed will be placed in Block 12 to establish compliance with section 43.9(a)(1).

A.12 Block 12. Remarks

This area is used to describe the work performed as required by section 43.9(a)(1) and (3). It will also be used to meet any other requirements that may apply to the maintenance, preventive maintenance or alteration performed, for example—

Examples of information that would be pertinent to determining the nature and extent of work performed includes:

(1) Compliance with Airworthiness Directives (ADs) or Service Bulletins (SBs).

(2) Specific repairs accomplished.

(3) Specific modifications accomplished.

(4) Replacement articles or materials installed or used.

(5) Life-limited parts status (total time, total cycles, etc.) as required by section 43.10.

(6) If a specific batch or lot number is used to control or trace a product or article referenced in Blocks 6 through 11, enter the batch or lot number in this Block for each item.

(7) Deviations from the customer work order.

(8) Information needed to support shipment with shortages or re-assembly after delivery.

(9) Release statements to satisfy another Civil Aviation Authority (CAA) maintenance record requirement. If a specific CAA's required statement is included, ensure the relevant boxes in Block 14a are checked.

(10) Names of persons performing maintenance functions included in the overall scope of work, see section 43.9(a)(3).

(11) Specific reference(s) to other documents such as work orders, shop travelers, or FAA Form 337, Major Repair and Alteration (Airframe, Powerplant, Propeller, or Appliance) used to comply with section 43.9. These documents should cross-reference to the unique identification number in Block 3 or Block 5.

A.13 Blocks 13a through 13e. Shade, darken, or otherwise mark to preclude inadvertent or unauthorized use.

A.14 Block 14a. 14 CFR 43.9 Return to Service.

Mark this box if the form is used to comply with 14 CFR part 43.

If the work was performed under the authority of a part 65 mechanic certificate, this is the only box that should be marked.

Block 14b. Other regulation specified in Block 12.

Mark this box if the form is being used to comply with another CAA's requirements. If this box is marked, the regulations of and the certificate number of the other CAA(s) must be identified in Block 12.

For information on how to complete a "single-release" as a repair station with another CAA certificate, such as EASA part 145, reference the latest version of the Maintenance Annex Guide (MAG), found here.

For a dual release under a bilateral and its corresponding implementation procedures, both boxes in Block 14a ("14 CFR 43.9 Return to Service" and "Other regulations specified in Block 12") will be checked.

Additionally, Block 12 will contain a statement such as the following: "Certifies that the work specified in Block 11/12 was carried out in accordance with EASA Part-145 and, in respect to that work, the [product/article] is considered ready for release to service under EASA Part-145 approval no. [insert number: EASA 145-XXX]." Also, the data used to complete the work must be clearly stated in Block 12, or in an attachment identified in Block 12. Attachments need to identify the corresponding FAA Form 8130-3 identification in Block 3 or 5.

For information on how to complete a "dual-release" as a repair station with another CAA certificate, such as EASA part 145, reference the latest version of the Maintenance Annex Guide (MAG), found here.

Block 14b. Authorized Signature. Complete with the signature of the authorized person.

For repair stations, the person is authorized to issue approvals for return to service on behalf of the part 145 certificate holder must meet section 145.157 and be placed on the section 145.161.

For mechanics, the signature must be of the individual certificated as a mechanic under part 65 with an airframe and/or powerplant rating.

If the result of the work performed is a major repair or alteration, the associated FAA Form 337 should be referenced in Block 12 and attached to the Form. The FAA Form 337 must be signed by an mechanic under part 65 with an airframe and powerplant rating and inspection authorization.

A.15 **Block 14c. Approval/Certificate No.** Enter the Air Agency or Air Carrier Certificate or Mechanic number.

A.16 **Block 14d. Name (Typed or Printed).** Enter the typed or printed name of the authorized person whose signature appears in Block 14b.

A.17 **Block 14e. Date (dd/mmm/yyyy).** The date must be in the format indicated, although the use or omission of slashes, hyphens or spaces does not matter.

The date needs to be the day the work described in Block 12 was completed and approved for return to service (see, paragraph 8.a.(2) above and section 43.9(a)(2)).

The date *does not* relate to the day the form was printed or the article was shipped—it must be the day that establishes compliance with the stated regulation.