



121 North Henry Street
Alexandria, VA 22314-2903
T: 703 739 9543 F: 703 739 9488
arsa@arsa.org www.arsa.org

May 22, 2007

Mr. David E. Cann
Manager, AFS—300
Aircraft Maintenance Division
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D.C. 20591-0004

VIA E-Mail

RE: U.S. – Canadian MIP and AC 43-10B

Dear Mr. Cann:

The Aeronautical Repair Station Association (ARSA) has prepared recommended changes to the existing MIP and documented inconsistencies in the U.S. – Canadian MIP and AC 43-10B.

Recommended Changes to the Existing MIP

1. Based on an interpretation from the TCCA regarding major repairs, ARSA recommends that MIP Chapter III, paragraph 3.0(f) and paragraph 3.2(d) be revised to read as follows:

“3.0(f) Major repairs or major modifications performed on Canadian aeronautical products must be recorded in accordance with 14 CFR Part 43, Appendix B or the procedures in the repair station’s manual and must be provided to the owner or operator for reporting to the TCCA in accordance with Standard 571, Appendix L.”

“3.2(d) Procedures to ensure major repairs or major modifications are recorded in accordance with the repair station’s manual and provided to the operator for reporting to the TCCA in accordance with the operator’s approved procedures.”
2. For consistency with Chapter III, paragraph 3.2.1, paragraph 3.6.1 should be revised to read as follows:

“3.6.1 In addition to the other requirements in this MIP, an AMO performing maintenance, preventive maintenance, or alterations on aircraft for 14 CFR part 121 or 135 air carriers shall have:”
3. The TCCA has requested that provisions be added to the MIP that allow Part 121 or 135 air carriers to perform maintenance, preventive maintenance and alterations for Canadian air carriers. This would be similar to the provisions of 14 CFR

§121.379 or §135.437 that allow Part 121 or 135 certificate holders to perform maintenance for other certificate holders. The TCCA has stated they desire to recognize all organizations authorized to perform maintenance in the U.S. and recognizes that a reciprocal agreement is not required because only an AMO may perform maintenance in Canada.

U.S. – Canadian MIP and AC 43-10B Inconsistencies

The following changes should be implemented as soon as practicable rather than waiting for the revisions to the MIP to be implemented. Subsequent to additional changes to the MIP, the AC must be reviewed and revised appropriately.

1. AC 43-10B, Part 2, Chapter 4, paragraph 401. This paragraph is inconsistent with the current MIP and should read as follows:

“401. To be able to perform maintenance, preventive maintenance, and alterations on Canadian aeronautical products, repair stations must meet the applicable requirements contained in CAR Part 571 and CAR Part 573. This may require revision to a repair station manual to incorporate a supplement to accommodate these requirements. The supplement may contain procedures unique to the Canadian aeronautical products, specific training requirements, and reporting requirements. This supplement may need approval by the FAA. The special conditions in chapter 3 of the MIP specify these unique requirements.”

2. AC 43-10B, Part 3, Chapter 3, paragraph 301. This paragraph states that it applies to work performed for “air carriers” when the MIP states that it applies to work performed “on aircraft” operated by air carriers (MIP Chapter III, paragraphs 3.1(d) and 3.2.1). The paragraph should be revised as follows:

“301. A repair station that performs maintenance on aircraft for Canadian air carriers operating in commercial air service under CAR Part IV or CAR Part VII must include in its manual a supplement that describes the procedures specified in the MIP, or explains where in the repair station manual those procedures are described, and is approved by the FAA.”

3. Appendix 4 to the AC is not the signed MIP. This is causing confusion with PMIs and ASIs. The AC should be revised to include the current MIP. Some examples of the variations of text include, but are not limited to:

- a. The definition sections are not the same;
- b. Chapter II, paragraph 2.0(c) – additional acronyms are used in the AC;
- c. Chapter II, paragraph 2.1(b) – the AC references the wrong paragraph, it should refer to 3.1 not 3.0;

- d. Chapter III, paragraph 3.0(a) – words missing/different in the AC;
- e. Chapter III, paragraph 3.0(b) – words missing/different in the AC;
- f. Chapter III, paragraph 3.0(c) – words missing/different in the AC;
- g. Chapter III, paragraph 3.0(d) – words missing/different in the AC;
- h. Chapter III, paragraph 3.1 – paragraphs are numbered differently in the AC;
- i. The AC Appendix 4 uses the term Alteration and the MIP uses the term Modifications;
- j. The AC Appendix 4 uses acronyms where the MIP uses the words;
- k. Chapter III, paragraph 3.3 – words added in the AC;
- l. The MIP was signed by Jim Ballough not Nicolas Sabatini.

We trust this information will assist in the annual meeting with the TCCA on the MIP. Should you require any additional information or have any questions, please contact Paul Hawthorne, ARSA's Vice President of Quality as Sarah and I will be out of the country from May 28 through June 15th.

Sincerely,

A handwritten signature in blue ink that reads "Marshall S. Filler". The signature is written in a cursive, flowing style.

Marshall S. Filler
Managing Director and General Counsel
Aeronautical Repair Station Association

cc: Rick Domingo