



European Aviation Safety Agency

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Mr Marshall S. Filler
Managing Director & General Counsel
Aeronautical Repair Station Association
121 North Henry Street
Alexandria, VA 22314-2903
US

By email only

Subject: EASA Instructions for Continued Airworthiness
Reference: Additional information on Airbus' handling Vendor CMM

Dear Mr Filler,

In addition to our letter sent to you on 20 May 2008 I would like to bring to your attention a letter from Airbus we received in the meantime, the content of which is quoted below.

This letter reflects your request sent to EASA on 5 March 2008 as well as our answer to you sent on 20 May 2008, which we had copied to Airbus.

"ARSA essentially complains that some of its members have been unable to obtain copies of a CMM of one of our suppliers, and asserts that such CMM is part of the Instructions for Continued Airworthiness of the A320 aircraft.

We have undertaken a review of the cases when Airbus may refer to a Vendor's CMM in the context of one of the Manuals comprising the ICA of one of our aircraft Types.

As we understand the current regulatory obligations in Europe and in the USA, the fact that engines, propellers and APUs are separately type-certified means that their manufacturers' CMMs will normally form part of the ICA irrespective of any reference to these documents in the aeroplane TC Holder's ICA.

Similarly, the CMM of TSO items will be considered as part of the ICA whenever the technical standard supporting the TSO approval prescribes that ICA be available for the item.

For all such appliances, in case an MRO providing services to an operator encountered difficulties to obtain the ICA, Airbus would take action towards the concerned Vendor to rectify the situation.

Other appliances may be checked and serviced on-wing without the use of the Vendor's CMM. Continued airworthiness can be assured without reference to such CMMs, which are not to be considered part of the ICA.

The Liebherr components referred to by ARSA fall into this category, and so do not form part of the ICA for the aeroplane. Some of our suppliers may choose that we incorporate their CMM in the ICA, as the best document to minimize any error that could damage the appliance and require a costly replacement or repair. We will alert such suppliers as to the implication of this choice in terms of their obligation of disclosure of proprietary data to MROs."

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We are of the opinion that this letter even more clarifies the situation on Instructions for Continued Airworthiness.

Best regards,



F. MANUHUTU