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April 9, 2007

VIA E-MAIL

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Policy Department
Transport Canada
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Ottawa, Ontario K1A 0N8
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RE: Recording major repairs

Dear Messrs. Sherritt and Whitehead:

The Aeronautical Repair Station Association (ARSA) is writing to request your assistance in formulating a uniform policy with respect to recording major repairs performed in the United States (U.S.) on Canadian aeronautical products.

As part of the Agreement for the Promotion Aviation Safety between the U.S. and Canada, the Federal Aviation Administration (FAA) and the Transport Canada, Civil Aviation Directorate (TCCA) signed a Maintenance Implementation Procedures (MIP) document. The stated goal is to reduce redundant regulatory oversight through mutual acceptance of each agency's inspection and evaluation of the repair stations or aircraft maintenance organizations under their jurisdiction.

The TCCA allows an FAA-certificated repair station to perform maintenance, preventive maintenance, and alterations on Canadian aeronautical products if the repair station complies with the special conditions of the MIP. The special conditions require a U.S. repair station to record a major repair or major modification (alteration) to a Canadian aeronautical product on FAA Form 337 or "an equivalent method acceptable to the TCCA." (see MIP, Chapter III, paragraph 3.0(f) and 3.2.1(d)).

In the U.S., a repair station may record major repairs on a U.S. aeronautical product using one of two methods. It may document them on a Form 337 or it may use a copy of the customer's work order when the work is performed in accordance with a manual or specification acceptable to the Administrator (See 14 CFR Part 43, Appendix B, paragraph (b)).

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When a work order is used, the repair station must provide the aircraft owner with a signed copy and retain a copy for its own records for at least two years from the date of execution. The repair station must also execute a "maintenance release" stating that the article was maintained in accordance with FAA regulations and is approved for return to service with respect to the work performed. The release is then signed by an authorized representative of the repair station. The release must contain information identifying the article, the location of the repair (if an aircraft), and the part manufacturer's name, the name of the part, model, and serial numbers. The work order may include the maintenance release, as long as all the required information is covered.

The work order option only applies to major repairs performed by a repair station. Other persons performing major repairs or modifications on Canadian aeronautical products must use Form 337. Repair stations performing a major modification must also use the form.

ARSA proposes that the TCCA authorize U.S. repair stations to use the work order as "an equivalent method acceptable to the TCCA" when recording major repairs on Canadian aeronautical products. This will reduce the need for U.S. repair stations to produce duplicative records and further the MIP's goal of reducing redundant regulatory oversight.

ARSA looks forward to working with the TCCA on this issue and towards an ultimate resolution.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sarah MacLeod". The signature is fluid and cursive, with the first name "Sarah" and last name "MacLeod" clearly distinguishable.

Sarah MacLeod
Executive Director

cc: Dan Bachelder
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