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Sarah MacLeod  
Executive Director, Aeronautical Repair Station Association  
121 North Henry Street  
Alexandria, VA 22314-2903  
United States

Dear Ms. MacLeod:

Thank you for your letter regarding the application of the Maintenance Implementation Procedures (MIP) between the Federal Aviation Administration (FAA) and the Transport Canada, Civil Aviation Directorate (TCCA) in relation to the recording of major repairs on Canadian aircraft.

As you point out, the MIP recognizes that major repairs may be reported either on a Form 337, or by other means acceptable to Transport Canada. There is no direct equivalent of the Form 337 in Canadian regulations. Therefore, persons performing major repairs or modifications are simply required to record the details in the aircraft technical record, along with the necessary maintenance release, and report the change to the Minister in general terms (that is, they do not need to transmit a copy of the actual release certification). One acceptable means of reporting is to provide the client (e.g., the aircraft operator) with the information, and have the client submit the report.

Also, the Canadian major repair-reporting requirement applies to complete aircraft only. It does not apply to products other than aircraft. Therefore, if an uninstalled component is subject to a major repair, it need only be recorded in the documentation for that component (e.g., the tag). Later, when the component is installed in the aircraft, the installer will be required to determine if the repair is a major repair to the aircraft and, if so, report the repair to TCCA. A future amendment to the regulations will transfer this responsibility to the aircraft operator. The operator will then have the option of reporting directly, or requesting the maintenance organization to submit the report on its behalf.

In sum, I confirm that TCCA agrees with ARSA's position that if a U.S. repair station, operating in accordance with the MIP, were to follow an FAA accepted procedure in its manual that provides the owner of the aircraft with a copy of the work order, and retains a copy in its records for two years that would constitute "other means acceptable to TCCA" under the MIP.

Please feel free to communicate TCCA's position to your members.

Kind Regards,

Brian Whitehead  
Chief, Policy Development  
Aircraft Maintenance & Manufacturing

Chef, Élaboration des politiques  
Maintenance et construction des aéronefs

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