

RA 4964 - Continuing Airworthiness Management Records - MRP Part M Subpart C

Rationale

A record of Continuing Airworthiness (CAw) activity carried out on Air Systems and Air System components informs Airworthiness decision making, provides a legal record, and enables Quality Assurance, data exploitation and investigations. Without effective control of CAw management records, the data may be unusable, leading to the CAw of an Air System being prejudiced and Air Safety undermined. Therefore, it is necessary for the Military Continuing Airworthiness Management Organization (Mil CAMO) to manage CAw management records so that they are fit for purpose.

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Regulation 4964(1)

Continuing Airworthiness Record Keeping

4964(1) The Military Continuing Airworthiness Manager (Mil CAM) **shall** ensure CAw records enable the completion and Assurance of the Mil CAMO responsibilities¹.

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Continuing Airworthiness Record Keeping

1. The **►Mil CAM◀** **should** ensure that all CAw activity is recorded and includes, as a minimum:
 - a. Details of the Air System type, the registration mark and the date, together with:
 - (1) Total flight time.
 - (2) Total flight cycles.
 - (3) Total number of landings.
 - (4) Any other Airworthiness data specified by the Type Airworthiness Authority (TAA) **►²◀**.
 - b. The current Air System status, including:
 - (1) Status of Special Instructions (Technical) (SI(T)s)³.
 - (2) Status of Modifications and Repairs⁴.
 - (3) Status of compliance with the Aircraft Maintenance Programme (AMP)⁵.
 - (4) Status of service life limited components, including life remaining.
 - (5) Weight and balance report.
 - (6) Status of deferred Maintenance and operational limitations.
 - (7) Symmetry check report (if required by the Air System Document Set).
 - (8) Status of the Military Airworthiness Review Certificate (MARC) and supporting information.

¹ Refer to RA 4947 – Continuing Airworthiness Management – MRP Part M Subpart G.

² **►Where the Air System is not UK MOD-owned, Type Airworthiness (TAw) management regulatory responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model; refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependent on the agreed delegation of TAw responsibilities TAM may be read in place of TAA as appropriate throughout this RA. ◀**

³ Refer to RA 4962 – Special Instructions (Technical) – MRP Part M Subpart C.

⁴ Refer to RA 4963 – Modifications and Repairs – MRP Part M Subpart C.

⁵ Refer to RA 4961 – Aircraft Maintenance Programme – MRP Part M Subpart C.

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- c. A technical log for each Air System, including:
- (1) Information about each flight, necessary to ensure continued Flight Safety.
 - (2) The document containing the Certification of Air System Release.
 - (3) The current Maintenance statement. If the Air System is declared serviceable this **should** include a declaration that no Maintenance is outstanding and state when the next scheduled Maintenance is due.
 - (4) A copy of the current MARC.
 - (5) List of deferred Maintenance and operational limitations.
 - (6) Any necessary guidance instructions on Maintenance support arrangements.
2. The ►Mil CAM◄ **should** ensure records are maintained of all competence assessments and Authorizations issued⁶.
3. The ►Mil CAM◄ **should** ensure Maintenance records and any associated Technical Information (TI) are retained by the Maintenance organization⁷.
4. The ►Mil CAM◄ **should** ensure records are maintained of any CAw activities and decisions taken in line with its responsibilities►¹◄ or MRP Part M Subpart C (eg Maintenance programme development, Modification and Repair management, SI(T) application, Fault management and Occurrence report management).
5. The ►Mil CAM◄ **should** ensure CAw records:
- a. Are present.
 - b. Can be accessed by those entitled.
 - c. Can be understood⁸.
 - d. Can be trusted as being authentic⁹.
 - e. Can be disposed of when no longer required.
6. In addition to these requirements, Airworthiness documentation **should** indicate, where appropriate, the source of the record, higher authority and associated references and / or TI¹⁰.
7. The ►Mil CAM◄ **should** present the records to the MAA upon request.

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8. CAw record keeping will normally be conducted using a formal method of Airworthiness Information Management (AIM) that has been developed by the TAA¹¹. The CAw aspects of the AIM system are controlled by the Mil CAMO. Where a system used for AIM does not provide the capability to maintain the records required under this Regulation, the Mil CAMO is responsible for the provision of alternative means and identifying the gap to the TAA.

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4964(2) The Mil CAM **shall** ensure procedures are in place for the management and retention of CAw records.

⁶ Refer to RA 4945 – Personnel Requirements – MRP Part M Subpart G.

⁷ Refer to RA 4813(3): Management of Retained Maintenance Records (MRP 145.A.55(c)).

⁸ Be unambiguous, accurate, entered in English and clearly legible.

⁹ Denote the accountable individual and the time and date of approval for each record and be certified with a legally acceptable signature. An Advanced Electronic Signature is considered to be equivalent to a handwritten signature.

¹⁰ Refer to RA 4948 – Documentation – MRP Part M Subpart G.

¹¹ Refer to RA 1223 – Airworthiness Information Management.

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9. **Configuration Control.** CAw records **should** be configuration controlled¹². Responsibility and Accountability for maintaining configuration control of CAw records **should** be specified in the Continuing Airworthiness Management Exposition (CAME).
10. **Retention of records.** The ►Mil CAM◄ **should** ensure ►that all retained◄ CAw records meet the following conditions:
- AIM records **should** be categorized into one of the categories detailed by the TAA in the AIM instructions and retained for at least the minimum retention periods specified for each documentation category.
 - Other CAw records that are classified as “significant Air Safety documentation”¹³, **should** be retained ►in accordance with RA 1225¹³.
 - Quality System¹⁴ records and Military Airworthiness Review Surveyor¹⁵ records **should** be retained for the duration stated in the relevant RA. ◄
 - Records **should** be stored in a manner that ensures protection from damage, alteration and theft.
 - The records **should** remain readable and accessible for the duration of the retention period.
 - Physical separation of live and backup records **should** be maintained.
 - MARCs¹⁶, together with all supporting documents, **should** be classified as significant Air Safety documentation.
11. **Records Audit.** All CAw records that have been mandated for retention **should** be available for Audit purposes.
12. **Quarantine of records.** Whenever the requirement arises¹⁷, the ►Mil CAM◄ **should** quarantine the CAw records:
- The records **should** be made available to Accident investigators on request.
 - Access to quarantined records, including copies and the live information system, **should** be controlled through a means specified by the ►Mil CAM◄, so as not to prejudice any investigation.
 - Release of the records for full read / write access post quarantine **should** be strictly controlled and meet the needs of Accident investigators.
13. **Lost, corrupted or inaccurate records.** The ►Mil CAM◄ **should** manage the actions to be taken in the event that CAw records are lost, corrupted or inaccurate, to mitigate the impact on Air Safety.
14. **Records transfer.** The ►Mil CAM◄ **should** ensure that, where a Maintenance organization terminates its operation, all retained Maintenance records are transferred to the relevant Mil CAMO, which **should** retain the records for the prescribed retention period. Details of the transfer **should** be recorded to show who effected the transfer and who receives the records.
15. **Organization closure.** Where a Mil CAMO terminates its operation, all retained records **should** be transferred to the operating organization, unless determined otherwise by the MAA.
16. **Air System transfer.** Where CAw management of an Air System is transferred to another Mil CAMO, all retained records **should** be transferred to the new Mil CAMO. Details of the transfer **should** be recorded.

¹² Version and amendment controls.

¹³ Refer to RA 1225 – Air Safety Documentation Audit Trail.

¹⁴ ►Refer to RA 4951 – Quality System - MRP Part M Subpart G.

¹⁵ Refer to RA 4972 – Military Airworthiness Review Surveyors - MRP Part M Subpart I. ◄

¹⁶ Refer to RA 4971 – Airworthiness Review and Certification – MRP Part M Subpart I.

¹⁷ For example; in the event of an Air System Accident.

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17. **Records disposal.** The ► **Mil CAM** ◀ **should** ensure a CAw records disposal procedure is included in the CAME.
18. ► **Hard copy records scanning.** Completed hard copy records may be scanned and stored electronically but **should** be subject to certification¹⁸ that the electronic copy is a true, legible and complete facsimile of the original. ◀

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19. ► ◀
20. All aspects of the management of Defence data must also be controlled in accordance with ► **applicable** ◀ civil legislation, wider MOD requirements and AIM instructions.
21. When a Mil CAMO arranges for an organization to retain copies of the CAw records on its behalf, it will nevertheless continue to be responsible for the records specified in this RA.
22. ► **Air System Sale and Disposal.** Where an Air System is sold by the MOD, the CAw records may need to accompany the Air System so its new operator can prove the Air System's Airworthiness. Whether the Air System is sold or otherwise disposed of¹⁹, CAw records from the Air System's time on the UK Military Aircraft Register are still required to be retained as outlined in the Acceptable Means of Compliance above. To achieve this, a suitable MOD organization (Mil CAM, TAA, Sponsor, Command etc, depending what remains in existence following Air System disposal) may store a copy of the CAw records or specify in the sale contract that the MOD retain access to the transferred records for the entire record retention period. ◀

¹⁸ ► Refer to the Manual of Airworthiness Maintenance – Documentation (MAM-D), Part 1 – Governance and Guidance, Chapter 2.3.

¹⁹ Refer to RA 1161 – Military Registration of Air Systems Operating within the Defence Air Environment. ◀