

RA 4802 - Scope of the MRP Part 145 (MRP 145.A.10) - Approved Maintenance Organizations only

Rationale

Contractor-run Maintenance organizations are required to be competent to maintain military registered Air Systems and / or components. Without a system of assessment and approval, the Maintenance of military registered Air Systems and / or components cannot be assured as being compliant with current Regulations, potentially increasing the Risk to Air Safety and subsequent Risk to Life. MRP Part 145 approval will permit contractor-run Maintenance organizations to maintain military registered Air Systems and / or components within a defined scope, thus providing Aviation Duty Holders and Accountable Managers (Military Flying) assurance of a Maintenance organization's competence and suitability to carry out Contracted Maintenance activities.

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4802(1): Scope of the MRP Part 145 (MRP 145.A.10(a))

Definitions

Definitions Relevant to this RA

1. ► **Coordinating / Certifying Staff.**¹ Staff holding authorization by the Maintenance Organization to endorse the appropriate Certification of Air System Release and / or Component Release. This role may also be known as the Air System and / or Work Order Coordinator within military parlance. ◀

Regulation 4802(1)

Scope of the MRP Part 145 (MRP 145.A.10(a))

- 4802(1) A contractor-run Maintenance Organization **shall** meet the requirements of MRP Part 145 to qualify for the issue or continuation of an approval to maintain military registered Air Systems and / or components.

Acceptable Means of Compliance 4802(1)

Scope of the MRP Part 145 (MRP 145.A.10(a))

2. Nil.

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Scope of the MRP Part 145 (MRP 145.A.10(a))

'Line' and 'base' Maintenance

3. For the purposes of MRP Part 145 approval, the terms 'Line' and 'Base' Maintenance are used to define specific types of Maintenance activity. These terms overlap, but are not aligned to, the military framework of 'forward' and 'depth', since Line and Base Maintenance can be carried out in both the forward and depth domains. It is possible for an organization to be approved to conduct Line Maintenance only, Base Maintenance only or both.

a. Line Maintenance is defined as any Maintenance that is carried out before flight to ensure that the Air System is fit for the intended flight. It may include, but is not limited to:

- (1) Trouble shooting / Fault diagnosis.
- (2) Fault rectification.
- (3) Component replacement with use of external test equipment if required. Component replacement may include components such as engines, propellers and rotors.

¹ ► Refer to RA 4801(1): Certifying Staff. ◀

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(4) Preventive Maintenance and / or checks including visual inspections that will detect obvious unsatisfactory conditions / discrepancies but do not require extensive in depth inspection. It may also include internal structure, Systems and power plant items, which are visible through quick opening access panels / doors.

(5) Minor repairs and Modifications, which do not require extensive disassembly and can be accomplished by simple means.

b. Maintenance tasks falling outside these criteria are considered to be Base Maintenance.

c. For temporary or occasional cases (eg Special Instructions (Technical) (SI(T)s) or Airworthiness Directives (ADs)), the Quality Manager may accept Base Maintenance tasks to be performed by a Line Maintenance Organization provided all regulatory requirements are fulfilled.

d. Air Systems maintained in accordance with (iaw) 'progressive' / 'equalized' Preventive Maintenance type programmes may be individually assessed in relation to this paragraph. In principle, the decision to allow some equalized checks to be carried out by a 'Line Maintenance only' approved organization will be determined by the assessment that all tasks within the particular check can be carried out safely to the required standards at the designated Line Maintenance station.

4. Where the Approved Maintenance Organizations (AMO) uses facilities both inside and outside the UK, such as satellite facilities, subcontractors², line stations etc, such facilities may be included in the approval without being identified on the approval certificate subject to the Maintenance Organization Exposition identifying the facilities and containing procedures to control such facilities and the MAA being satisfied that they form an integral part of the AMO.

Guidance for small AMOs

5. It is recognized that MRP Part 145 approval may be required by 2 quite different types of small AMO, the first being the component Maintenance workshop, eg radio equipment or wheels etc, the second being specialized services, eg welding or Non-Destructive Testing. This part of the Guidance Material provides detail on how these small AMOs may satisfy the intent of MRP Part 145.

6. Where only one person is employed (holding the certifying function and others), this AMO may use the guidance provided in the following sub-paragraphs, limited to the following approval classes: Class B2 – Small Piston Engines; Class C – Components; and Class D1 – Non-Destructive Inspections.

Note:

The following sub-paragraphs only include the relevant clauses of MRP Part 145 for which this guidance applies. When RAs within MRP Part 145 are not listed, then it means that full compliance must be demonstrated.

a. With reference to RA 4806(2)³, the minimum requirement is for one full time person who meets the requirements² for **Coordinating / Certifying Staff** and holds the position of Accountable Manager (Maintenance) (AM(M)), Maintenance Manager and is also certifying staff. No other person may issue a certificate of Air System release and therefore, if absent, no Maintenance may be released during such absence.

² **Subcontracted facilities, personnel and procedures involved with the AMO's Products, Parts and Appliances undergoing Maintenance are effectively subsumed into the AMO in that they will come under the AMO's Quality System and the AMO's Maintenance Approval Organization Scheme (MAOS) approval is extended to include the subcontractor. It therefore follows that those parts of the subcontractor's facilities, personnel and procedures are to meet MRP Part 145 requirements for the duration of that Maintenance. It remains the contracting AMO's responsibility to ensure such requirements are satisfied, as it retains accountability for all actions and outputs of the Subcontracted organization in the Maintenance of the AMO's Products, Parts and Appliances.**

³ Refer to RA 4806(2): Personnel Responsible to the Accountable Manager (Maintenance) (MRP 145.A.30(b)).

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Note:

'Full time' for the purpose of MRP Part 145 means not less than 35 hrs per week except during vacation periods.

b. The quality monitoring function⁴ may be Contracted to an appropriate AMO or to a person with appropriate technical knowledge and extensive experience of Quality Audits employed on a part time basis, with the agreement of the MAA.

c. In the case of an approval based on one person using a Subcontracted quality monitoring arrangement, the requirement⁵ for a record of ► **Coordinating / Certifying Staff** ◀ is satisfied by the submission to and acceptance by the MAA of the MAA MAOS Form 4 - Details of Nominated Personnel. With only one person, the requirement for a separate record of authorization is unnecessary because the Approval Schedule defines the authorization. An appropriate statement to reflect this situation will be included in the exposition.

d. With reference to RA 4815(3)⁴, it is the responsibility of the Contracted Quality monitoring organization or person to make a minimum of 2 visits per 12 months to the AMO being monitored and it is the responsibility of this organization or person to carry out such monitoring on the basis of one visit pre-announced and one visit unannounced to the AMO. It is the responsibility of the AMO to comply with the findings of the Contracted Quality monitoring organization or the person.

Note:

It is to be understood that, if the Contracted Quality monitoring organization or the above mentioned person loses or gives up its approval, then the organization's approval will be suspended.

7. An AMO with up to 10 persons involved in Maintenance may use the following guidance:

a. With reference to RA 4806(2)³, the normal minimum requirement is for the employment on a full-time basis of 2 persons who meet the requirements¹ for ► **Coordinating / Certifying Staff** ◀, whereby one holds the position of 'Maintenance Manager' and the other holds the position of 'Quality Audit Engineer'.

b. Either person can assume the responsibilities of the AM(M), providing that they can comply in full with the applicable elements of RA 4806(1)⁶, but the Maintenance Manager will be the ► **Coordinating / Certifying Staff** ◀ to retain the independence of the Quality Audit Engineer to carry out audits. Nothing prevents either engineer from undertaking Maintenance tasks providing that the Maintenance Manager endorses the Certification of Air System Release and / or Component Release.

c. The Quality Audit Engineer will have similar qualifications and status to the Maintenance Manager for reasons of credibility, unless ► **they have** ◀ a proven track record in Air System Quality Assurance, in which case some reduction in the extent of Maintenance qualifications may be permitted.

d. In cases where the MAA agrees that it is not practical for the organization to nominate a post-holder for the quality monitoring function, this function may be Contracted iaw Paragraph ► **6.b.** ◀

⁴ Refer to RA 4815(3): ► **Quality Management System** ◀ (MRP 145.A.65(c)).

⁵ Refer to RA 4807 – Certifying Staff and Support Staff (MRP 145.A.35).

⁶ Refer to RA 4806(1): Accountable Manager (Maintenance) (MRP 145.A.30(a)).

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