

## RA 4817 - Privileges of the Organization (MRP 145.A.75)

### Rationale

To ensure conformity to applicable Regulatory Articles (RAs) and adherence to correct Maintenance practices, Military Maintenance Organizations (MMOs) work according to established orders and Approved Maintenance Organizations (AMOs) carry out their scope of work according to their Maintenance Organization Exposition (MOE). Failure to follow these procedures may increase the Risk to Air Safety and associated Risk to Life. This RA sets out the privileged tasks that may be carried out by an MMO, and those that may be carried out by a contractor-run Maintenance Organization subject to initial MAA RA 4800-4849 series (MRP Part 145) approval.

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#### 4817(1): Privileges of the Organization (MRP 145.A.75(a))

### Definitions

#### Definitions Relevant to this RA

1. ► **Coordinating / Certifying Staff.**<sup>1</sup> 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 4817(1)

#### Privileges of the Organization (MRP 145.A.75(a))

- 4817(1) An MMO **shall** be entitled to maintain any Air System and / or Air System component for which it has been established to do so by the relevant Front Line Command (FLC). An AMO **shall** be entitled to carry out the following tasks in accordance with the exposition:
- a. Maintain any Air System and / or Air System component for which it is approved at the locations identified in the approval certificate and in the exposition.
  - b. Arrange for Maintenance of any Air System or Air System component, for which it is approved, at another organization that is working under the Quality System of the AMO. This work scope for the non-approved organization **shall not** include a Base Maintenance check (or equivalent Maintenance package) of an Air System or a complete workshop Maintenance check or overhaul of an engine or engine module.
  - c. Maintain any Air System or Air System component for which it is approved at any location subject to the need for such Maintenance arising either from the un-serviceability of the Air System or from the necessity of supporting occasional Line Maintenance, subject to the conditions specified in the exposition.
  - d. Maintain any Air System and / or Air System component for which it is approved at a location identified as a Line Maintenance location capable of supporting applicable Maintenance and only if the organization exposition both permits such activity and lists such locations.

<sup>1</sup> ► Refer to RA 4801(1): Certifying Staff. ◀

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- e. Issue certificates of Air System / Air System Component Maintenance Release in respect of completion of Maintenance<sup>2</sup>.

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4817(1)**Privileges of the Organization (MRP 145.A.75(a))****Common AMC**

2. Nil.

**Additional AMC - MMOs only**

3. Maintenance activity carried out by an MMO **should** be conducted under the control of the relevant Continuing Airworthiness Manager (CAM)<sup>3</sup>.

**Additional AMC - AMOs only**

4. When Maintenance is carried out under the subcontract control system it means that, for the duration of such Maintenance, the RA 4800-4849 series (MRP Part 145) approval has been temporarily extended to include the subcontractor. It therefore follows that those parts of the subcontractor's facilities, personnel and procedures involved with the AMO's products undergoing Maintenance **should** meet RA 4800-4849 series (MRP Part 145) requirements for the duration of that Maintenance and it remains the organization's responsibility to ensure such requirements are satisfied.

5. The AMO is not required to have complete facilities for Maintenance that it needs to subcontract, but it **should** have its own expertise to determine that the subcontractor meets the necessary standards. However, an organization cannot be approved unless it has the in-house facilities, procedures and expertise to carry out the majority of Maintenance for which it wishes to be approved in terms of the number of class ratings.

6. To be appropriately approved to subcontract, the organization **should** have a procedure for the control of such subcontractors, as follows:

- a. A pre-audit procedure **should** be established whereby the AMO's subcontract control section, which may also be the Quality System<sup>4</sup> independent Audit section, carry out an Audit of the prospective subcontractor to determine whether those services of the subcontractor that it wishes to use meets the intent of RA 4800-4849 series (MRP Part 145).
- b. The AMO **should** assess to what extent it will use the subcontractor's facilities.
- c. Unless the Subcontracted Maintenance work can be fully inspected on receipt by the AMO the organization **should** supervise the inspection and release it from the subcontractor. Such activities **should** be fully described in the AMO's procedure. The AMO **should** consider whether to use its own staff or authorize the subcontractor's staff.
- d. The certification of Air System Maintenance Release or Air System Component Maintenance Release **should** always be endorsed under the AMO's approval reference.
- e. The subcontract control procedure **should** record Audits of the subcontractor, have a corrective action follow up plan and know when subcontractors are being used. The procedure **should** include a clear revocation process for subcontractors who do not meet the AMO's requirements.
- f. The AMO's Quality Audit staff **should** Audit the subcontract control section and sample Audit subcontractors unless this task is already carried out by the Quality Audit staff as stated in Paragraph ► 6.a Where the Quality Audit section and the subcontract control section are one and the same, to maintain independence, the Accountable Manager (Maintenance) (AM(M)) **should** have

<sup>2</sup> Refer to RA 4812 – Certification of Air System and Component Maintenance Release (MRP 145.A.50).

<sup>3</sup> Refer to RA 4947 – Continuing Airworthiness Management – MRP Part M Sub Part G.

<sup>4</sup> Refer to RA 4815(3): Quality ► Management ◄ System (MRP 145.A.65 (c)).

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in place alternative arrangements for the auditing of the Quality Audit section and the sample auditing of subcontractors, these **should** be detailed within the MOE. ◀

g. The contract between the AMO and the subcontractor **should** contain a provision for MAA staff to have right of access to the subcontractor.

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**Common GM**

7. Nil.

**Additional GM - MMOs only**

8. MMOs may conduct relevant Air System and / or Air System component Maintenance at any location determined appropriate by the relevant FLC, subject to the facilities meeting the applicable requirements<sup>5</sup>.

**Additional GM – AMOs only**

9. With reference to RA 4817(1)(b) – Privileges of the Organization (MRP 145.A.75(a)(b)), 'working under the Quality System of the AMO' refers to the case of one organization, not itself, appropriately approved under RA 4800-4849 series (MRP Part 145) that carries out one (or more) of the following services for an AMO:

- a. Air System Line Maintenance.
- b. Minor engine Maintenance.
- c. Maintenance of other Air System components.
- d. A specialized service as a subcontractor.

10. Any AMO that carries out Maintenance for another AMO within its own approval scope is not considered to be subcontracting for the purpose of this Regulation.

11. Maintenance of engines or engine modules other than a complete workshop Maintenance check or overhaul is intended to mean any Maintenance that can be carried out without disassembly of the core engine or, in the case of modular engines, without disassembly of any core module.

12. The fundamental reasons for allowing an AMO to subcontract certain Maintenance tasks are:

- a. To permit the acceptance of specialized Maintenance services, such as, but not limited to, plating, heat treatment, plasma spray, fabrication of specified parts for minor repairs / modifications, etc. without the need for direct approval by the MAA in such cases.
- b. To permit the acceptance of Air System Maintenance up to, but not including, a Base Maintenance check (or equivalent)<sup>6</sup> by organizations not appropriately approved under RA 4800-4849 series (MRP Part 145) when it is unrealistic to expect direct approval by the MAA. The MAA will determine when it is unrealistic but in general it is considered unrealistic if only one or 2 organizations intend to use the Subcontracted organization.
- c. To permit the acceptance of component Maintenance.
- d. To permit the acceptance of engine Maintenance up to, but not including, a workshop Maintenance check or overhaul of an engine or engine module<sup>6</sup> by organizations not appropriately approved under RA4800-4849 series (MRP Part 145) when it is unrealistic to expect direct approval by the MAA. The determination of unrealistic is as per Paragraph ▶ 12.b. ◀

13. The AMO may find it necessary to include several specialist subcontractors to enable it to be approved to completely certify the Maintenance of a particular product. Examples could be specialist welding, electro-plating, painting etc. To authorize the

<sup>5</sup> Refer to RA 4805 – Facility Requirements (MRP 145.A.25).

<sup>6</sup> Refer to RA 4817(1)(b): Privileges of the Organization (MRP 145.A.75(a)(b)).

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use of such subcontractors, the MAA will need to be satisfied that the AMO has the necessary expertise and procedures to control such subcontractors.

14. An AMO working outside the scope of its approval schedule is deemed to be not approved. Such an organization will, in this circumstance, operate only under the subcontract control of another AMO.

15. Authorization to subcontract is indicated by the MAA accepting the MOE containing a specific procedure on the control of subcontractors.

16. In relation to Paragraph ►6.b, ◀ the AMO will generally require its own paperwork, Technical Information (TI) and material / spare parts to be used, but it could permit the use of tools, equipment and personnel from the subcontractor as long as such tools, equipment and personnel meet the requirements of RA 4800-4849 series (MRP Part 145). In the case of subcontractors who provide specialized services, it may, for practical reasons, be necessary to use their specialized services personnel, TI and material, subject to acceptance by the AMO.

17. The certification of Air System Maintenance Release or Air System Component Maintenance Release may be endorsed either at the subcontractor or at the organization facility by staff issued a certification authorization<sup>7</sup>, as appropriate, by the AMO. Such staff would normally come from the AMO but may otherwise be a person from the subcontractor who meets the AMO's ►Coordinating / Certifying Staff◀ standard, which itself is approved by the MAA via the MOE.

18. ► In the circumstances where the subcontract Audit department and the Quality Audit department are one and the same it is acceptable to:

- a. Use competent personnel from a different department in the same organization not responsible for the Quality function / procedure, or,
- b. Contract the independent Audit element of the Quality Management System, including sample auditing of subcontractors to another organization or a qualified competent person. ◀

19. AMOs may conduct temporary Air System and / or Air System component Maintenance at any location determined appropriate by the relevant CAMO, agreed by the Accountable Manager (Maintenance), the MAA notified<sup>8</sup>, subject to facilities meeting the applicable requirements<sup>5</sup> and supported by a procedure within the MOE.

<sup>7</sup> Refer to RA 4806 – Personnel Requirements (MRP 145.A.30).

<sup>8</sup> Via [DSA-MAA-OA-ACC@mod.gov.uk](mailto:DSA-MAA-OA-ACC@mod.gov.uk).