



Barbados Civil Aviation
Department

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AIRWORTHINESS

ADVISORY

CIRCULAR

SMALL
APPROVED MAINTENANCE
ORGANISATIONS

SMALL MAINTENANCE ORGANISATIONS

1. Introduction.....4

2. Small Organisations.....4

3. Organisations with one person involved in maintenance.....4

4. Organisations with one to five persons involved in maintenance.....6

1. Introduction

Questions arise about the application of Civil Aviation (AMO) Regulations requirements to small approved maintenance organizations and how small organizations satisfy requirements that seems more appropriate to large organizations. This Advisory Circular provides guidance on how small organizations may satisfy the intent of AMO Regulations.

2. Small Organisations

2.1 Small organizations would only be involved with a limited number of light aircraft used for commercial air transport, it is therefore a matter of scale. Light aircraft do not demand the same level of resources, facilities or complex maintenance procedures as the large organization.

2.2 The content of this leaflet is limited to organizations carrying out the following maintenance:

2.1.1 Base and line maintenance of aeroplanes of less than 5700 kg. (Piston engines only).

2.1.2 Base and line maintenance of rotorcraft of less than 2730 kg.

2.1.3 The following sections only include the relevant paragraphs of AMO Regulations for which the alternative applies. AMO Regulations paragraphs not listed means full compliance must be demonstrated.

2.1.4 When considering staff numbers the BCAD will review the proposed hours of operation. Organisations must comply with the requirements of **Regulation 23 of AMO Regulations, "Rest and Duty Limitations for Maintenance Staff"**.

3. Organisations maintaining the class of aeroplanes and rotorcraft within the limitations of paragraphs 3 & 4 of General Application & Personnel Licensing Regulations.

3.1. In accordance with the requirements of Standard 4.5, an AMO's functions shall be subdivided under individual managers or combined in any number of ways, dependent upon the size of the AMO.

- As a minimum an AMO shall have, dependent upon the extent of approval, the following:
A base maintenance manager;
A line maintenance manager;
A workshop manager (if applicable); and
A quality manager.
All of whom should report to the accountable manager.

Note: In small AMOs, one or more of the above positions may be combined subject to approval by the DCA. In addition, any of the above positions may be held by a certifying staff member. It is therefore possible for all of the above positions to be held by just one certifying staff member.

- The Accountable Manager shall be responsible for ensuring that all necessary resources are available to accomplish the maintenance required to support the AMO's approval.
- The Base Maintenance Manager shall be responsible for:
Ensuring that all maintenance required to be carried out in the hangar, plus any defect rectification carried out during base maintenance, is carried out to specified design and quality standards; and
Any corrective action resulting from quality compliance monitoring.
- The Line Maintenance Manager shall be responsible for:
Ensuring that all maintenance required to be carried out on the line, including line defect rectification, is performed to the required standards; and
Any corrective action resulting from quality compliance monitoring.
- The Workshop Manager shall be responsible for:
Ensuring that all work on aircraft components is performed to required standards; and
Any corrective action resulting from quality compliance monitoring.
- The Quality Manager shall be responsible for:
Monitoring the AMO's compliance with Regulation 20 (4) of AMO Regulations; and
Requesting remedial action as necessary by the base maintenance manager/line maintenance manager/workshop manager or the accountable manager, as appropriate. In situations where the Quality Manager function, has been combined with other functions, an independent quality monitoring function will be required. With the agreement of the BCAD, this may be contracted to an AMO or to a person with appropriate technical knowledge and formal training, together with extensive experience in quality auditing.

3.2. If the basis of approval is one certifying staff member performing the functions of all the other required managers and using a subcontracted quality monitoring arrangement, the requirement for a record of certifying staff may be addressed by including the information required in Standard 4.6 in the Maintenance Procedures Manual. Similarly the requirement for the issue of an Authorisation document can be addressed by defining the scope of the authorization in the MPM.

3.3. If the independent quality monitoring system has been subcontracted out, it is necessary for the Maintenance Procedures Manual to show that a minimum of two monitoring visits/audits will be conducted in each 12 month period.

The contracted quality monitoring organization or person mentioned in paragraph 3.1 should therefore make a minimum of 2 visits per 12 months and it is the responsibility of this organization or person to carry out such monitoring on the basis of 1 visit pre-announced and 1 visit not announced.

It is the responsibility of the approved maintenance organization to comply with the findings of the contracted quality monitoring organization or person within the time frame specified by them. There must be a feedback system to meet the requirements of Civil Aviation (Air Operator Certification & Administration Regulations, 78 (2) and

these procedures must be included in the Maintenance Procedures Manual.

- 3.4. It must be understood that if the contracted quality monitoring organization or person loses or gives up its approval, then the approved maintenance organisation's approval will be suspended until new arrangements are made that are acceptable to the BCAD.
- 3.5. Initial training requirements for the above personnel must be in accordance with the BCAD requirements and he or she must be qualified in accordance with the General Application and Personnel Licensing Regulations. Continuation training must be defined in the Maintenance Procedures Manual and approved by the DCA. The continuation training must address developments in the product type being maintained, a review of the organisation's problem areas and an update in the understanding of the organisation's procedures, manuals and regulations.

4. Organisations with one to five persons involved in maintenance.

- 4.1 In situations where a small approved maintenance organization employs between one and five persons involved in maintenance, it is acceptable for the Quality Manager and the Maintenance Manager positions to be held by different certifying staff members, thus negating the need for subcontracting out the Quality function. In this situation, in order to maintain the independence of the Quality Manager, the Maintenance Manager shall be the certifying person. Nothing prevents either engineer from undertaking maintenance tasks providing that the Maintenance Manager issues the certificate of release to service.

No maintenance may therefore be released in the absence of the Maintenance Manager.

Note: *The quality function may still be subcontracted out.*

The Quality Manager must have similar engineering qualifications and status to the Maintenance Manager for reasons of credibility in addition to also having undergone approved training in quality procedures and auditing and, have a proven track record in aircraft quality assurance.