

## Part 145 Training Questions/Answers

1. The regulation requires a time to be entered on the form 1, but CAAP 42W-2(6) does not designate a field for entering the time.  
*Answer: CAAP-42W-2(6) is being revised and the requirement is either already gone or will be gone at the next revision.*
2. When doing a modification (installing new equipment) and wiring is installed in accordance with a part 21 approved EO, this should not be considered a MITCOM process (is this loom a product). We fully understand that if the wiring loom is constructed to replace a part numbered loom then this would be a MITCOM process.  
*Answer: This is considered FITCOM in the GM (equivalent to MITCOM). If the aircraft OEM (part 21 design organization for new designs) considers the loom to be a part (i.e. issues a part number for the loom) then the wiring loom should be considered a part (product).*
3. Clarification required regarding who can certify for duplicate “critical flight control” inspections.  
*Answer: Regulation 42.335 defines in detail, who may provide an independent verification as required under regulation 42.340. Subregulation 42G (5) of CAR 1988 outlines the requirements for CAR 30 maintenance. The intent under this provision is that the second inspection holder should be appropriately licensed, a pilot for the aircraft, a flight engineer for the aircraft, a person authorised by CASA under CAR 42G (6), or for overseas inspections someone able under paragraph 42ZN(1)(a). Refer CAAP 39-1.*
4. Clarification required for “supervision of maintenance”, is the amount of supervision dependent on the task?  
*Answer: No. The individual performing the maintenance certification is responsible for the correct performance of the maintenance. This individual must either perform the maintenance; or supervise its performance; and must supervise its conduct to the extent necessary to be satisfied that the maintenance is carried out properly. This is more dependent upon the competency of the maintainer, which is reliant upon a knowledge of the capabilities of the maintainer by the supervisor, than the task itself.*  
  

A person (the **supervisor**) is **supervising** the carrying out of maintenance done by another person if the supervisor:

  - (a) is physically present at the place that the maintenance is being carried out; and
  - (b) is observing the maintenance being carried out to the extent necessary to enable the supervisor to form an opinion as to whether the maintenance is being carried out properly; and
  - (c) is available to give advice to, and answer questions about the maintenance from, the person carrying it out.
5. Clarification on using a component removed serviceable from a CAR 30 maintained aircraft and fitted to a Part 42 maintained Aircraft. (in our real life scenario, both aircraft were operated by the same operator)  
*Answer: There are now provisions to permit this. Regulation 42.430 permits the fitment to an aircraft of a part that is removed serviceable from another registered aircraft. The regulation does not discriminate with regard to maintenance legislation applicability for the first aircraft.*
6. Certification on an aircraft that will be going to a foreign state by a “competent person” not a LAME.

*Answer: If working under an AMO, the AMO must authorise the certifier. When in Australian territory the individual authorised to certify MUST be authorised under either paragraph 145.A.30 (k) — be appropriately licensed under Part 66 of CASR; or paragraph 145.A.30 (f) — appropriately qualified, competent and authorised specialist maintenance employee. Outside Australian territory, the authorised certifying employee must be authorised under either paragraph 145.A.30 (k) — be appropriately licensed ICAO Annex 1 licence holder, or paragraph 145.A.30 (f) — appropriately qualified, competent and authorised specialist maintenance employee.*

7. What is the requirement of a “hangar visit plan” 145. A 25(c)

*Answer: CASA agreed that better clarity would be good and will consider for follow-up policy. The requirement is to have some system to show forward planning for hangar utilisation. The intent of the provision is that the AMO (particularly one that has a hangar utilised for base maintenance) be able to demonstrate that the hangar will be utilised without over-commitment or over-crowding that would be contrary to desired safety outcomes. It also will form a basis for forward planning of required manpower and will influence the manpower plan.*

8. If a unit lighting is upgraded to enable NVIS do you need to change the part No., or is a sticker acceptable? (Understanding that the Maintenance Manual will not be relevant for this part of the equipment, can you just document a test and maintenance procedure for this change)

*Answer: The upgrade of unit lighting of any aeronautical product must comply with the approved modification data for that unit. Any approved modification data for an aeronautical product should include some means for identifying the modification status of the product. This may be by means that include a part number change or the addition of a sticker or a requirement for engraving.*

9. When using an AML STC for installation of new equipment, do you still require an EO and other documents to remove the old existing equipment?

*Answer: Considering allowing part 145 to generate the missing data. In this case, and when there is no maintenance data to detail how maintenance is to be carried out, an AMO may generate maintenance data for its own use in accordance with paragraph 145.A.45 (b).*

10. What is the basis for a category C licence for single discipline modification (installation). i.e. where is the crossover? Is cat. C just Maintenance Co-ordinator? Is this a CASA issued Licence?

*Answer: Yes it is a CASA issued licence. Cat C licence holders may not perform maintenance certification for any maintenance. It is only used for the release of aircraft (CRS) following base maintenance (that is large aircraft following a base maintenance check).*

11. Is there a Bi-lateral agreement for Part 145 on aircraft maintenance (An Australian registered aircraft having a scheduled maintenance task carried out in USA by a non –Australian part 145 approved facility?)

*Answer: No; no bi-lateral agreement with USA for aircraft maintenance. Australia does recognise USA 8130 for the release documentation for parts.*

12. When using OEM (i.e. Garmin, Honeywell) repair stations for private work and they don't hold a Australian Part 145 how does this work.

*Answer: Australia does recognise USA 8130 for the release documentation for parts.*

13. Part 66 – 6 months of documented practical experience (Supervisors will not be able to meet this requirement and in effect could lose their licence?)  
*Answer: Supervisors? Do supervisors have any certification (e.g. CRS) duties? Or if they are the individuals supervising maintenance, they would be providing maintenance certification for that maintenance. Any exercise of privileges of the licence —i.e. certification responsibilities will be considered relevant experience for the purposes of 6 months practical experience.*
14. Why hold **current** Maintenance data for everything on the approval? Why not have a validation procedure **prior to use**. (GA avionics have hundreds of manuals that go down to circuit board component repair, unlike an airline which only has 1 or 2 aircraft types)  
*Answer: CASA will consider this recommendation — under consideration for future MOS amendment.*
15. Major defect reporting to CASA is currently within 2 days, in consideration of a Friday 5:00pm report, CASA will not get the report until Monday which falls outside the 2 day requirement. (suggestion – 2 working days)  
*Answer: The Acts Interpretation Act (Part 8, s36) clarifies that where a day requirement falls within a weekend or public holiday, the requirement means the next business day.*
16. Engine overhaul (subcontract) to OEM  
*Answer: FAA Form 8130-3 is acceptable.*
17. AMC 145 A.30 (d) In manpower planning, product Maintenance “check”, maybe should read product maintenance “task”.  
*Answer: CASA will consider this recommendation.*
18. The use of white board for facility planning AMC 145 A 25 (e) Hangar visit plan on a daily basis.  
*Answer: CASA agreed that better clarity would be good and will consider for follow-up policy.*
19. Line maintenance – explanation – maintenance is just maintenance.  
*Answer: Line maintenance is everything except base maintenance. CASA will provide clarity.*
20. Is carrying out rad 47 etc. in a “T” hangar acceptable if it meets the requirements of space, environment, lighting etc.  
*Answer: Yes.*
21. What is the regulatory basis for supplier audit, who is the supplier? Just Sub-Contract? OEM’s?  
*Answer: This needs to be clarified. The definition of supplier is not contained in regulation, MOS, or GM. Part 145 requires audit of maintenance services subcontractors, which are organisations that provide maintenance services to an AMO. Parts suppliers are not approved by CASA. The receipt and acceptability of parts is the responsibility of the AMO.*
22. Clarification of Flight verification and flight test  
*Answer: A CRS may be issued with a comment that it is subject to flight verification.*
23. When creating an Expo Doc, and there is a suggested topic, do you want a negative comment if this does not apply. (“the organisation” does not “whatever”)  
*Answer: No negative statements. Paragraph numbered sections may be reserved if desired; but there is no necessity to follow the suggested numbering if it is not applicable.*

24. What is parts exchange and what is contract Maintenance.

*Answer: Parts exchange is the provision (supply and acceptance of parts). Contract maintenance is maintenance provided by a maintenance services subcontractor, either itself Part 145 approved or not.*

25. TSO and Form fit and function are the same but they are from a different manufacturer and/or part No. Can this be fitted without the need for an EO?

*Answer: No. A design approval is required to establish Eligibility for fitment.*