

1. Concerning (D091) paragraph (f) and (h), how is an operator required to communicate the capabilities of their Essential Maintenance providers to those providers? In other words, how will the provider know they are on the operators list?
2. Paragraph (e) 2. mentions “unexpected requirement” for unscheduled maintenance, would this encompass a diversion **NOT** along the certificate holders route and if so, does the quoted 14 CFR §121.105 and §121.123 apply and please provide an interpretation?
3. Will the operator need a control in place if the FAA fails to meet the 180 day audit requirement?
4. Must the listing in the air carriers manual be titled “Maintenance Provider List” (MPL) as referenced in the notice 8900-103, versus current “Approved Vendor List” (AVL)?
5. What about “on-call” Line Maintenance providers that perform occasional maintenance, must they be listed (if individual only, not a company) in the required Maintenance Provider List?
6. If the contract maintenance provider does not have a 145 certificate, but employs A&P’s, does the carrier list the company name and location or do they need to include every individual A&P technician?
7. If operator has a Line Maintenance contract with one provider that has multiple (service) locations, does each location (address) have to be listed in the required Maintenance Provider List?
8. Does a computer system (list) meet the intent of the “manual requirement” portion of the Ops Spec? Does A025 apply to Maintenance?
9. Is the requirement that all EM providers with RII personnel, to pass the FAMS requirements of the respective operator? In other words is EM provider training still accepted?
10. Is it the intent of the FAA to allow the carriers to grandfather in the vendor already on the D91 or is the intent that if the carrier has not performed an audit within the past 180 days that we be required to re-audit all these vendors?
11. Is painting of aircraft that takes longer than 72 hours considered heavy maintenance?
12. Are APUs included in the definition for engines or Components?
13. Are subcontracted touch labor that works and signs under the air carrier certificate a maintenance provider?

14. When referencing the maintenance category in the operators Maintenance Provider List, do we need to include the number (such as 1.b. – Line Maintenance or 4. – Component Work), when talking about a category type, the category number is referenced in the 8900-103 (pg 3, para 6.c.)?
15. In some instances foreign nationals are not permitted to become employees of a foreign (US) operator when working in their native country. These individuals are essentially treated as employees by the US operator working directly under the operators CAMP (for example, provided the operators employee ID numbers, training programs, tooling, parts, data and direct access to the operators systems and support network, directly releasing articles to service under the operators certificate) but are paid and employed through a personnel service within the country.

Are these individuals treated as employees of the operator or are they subject to the requirements of the D091 rules as Contract Maintenance providers?

16. Appendix A of N8900.102 Sample Op Spec paragraph “e” references; “...as an entity...” does this imply that the maintenance provider must be a business or can this be an individual?
17. Same reference as in question number 2 above, goes on to state; “onsite audit designed to determine that each organization proposed Essential Maintenance provider has an adequate organization and provides competent personnel and adequate facilities and equipment...”
 - a. Does the “phrase adequate organization” require a separate Inspection Unit to perform the RII and a Chief Inspector as is required by 14CFR 119 and 121 requirements?
 - b. Does the operator have the authority and responsibility to determine the adequacy of the facilities required of the Maintenance Provider based upon the operator’s delegated work scope?
18. Same reference Appendix A paragraph h; “...description of the maintenance provider’s authorization to accomplish work.”

- a. Is the term authorization intended to imply an FAA Foreign or Domestic Repair Station or Air Carrier Certificate and rating or limitation issued to the maintenance provider in addition to the D091 listing by the operator?
19. It has been suggested that the RII work and the RII Inspection of that work are delegated as a combined authorization. Does the operator retain the authority to accomplish RII Inspection using its employees of the RII work performed by the Maintenance Provider after the Maintenance Provider is listed on the Operators D091 and return the aircraft to service?

The following three questions provide INPUT PRECEDING the question(s):

N8900.103 paragraph 5b (4th bullet) states in the Standardized Air Carrier Maintenance Provider List “Includes the specific Required Inspection Item(s) (RII) that each Essential Maintenance Provider is authorized to accomplish”.

121.371 (d) states “Each certificate holder shall maintain, or shall determine that each person with whom it arranges to perform its required inspections maintains, a current listing of persons who have been trained, qualified, and authorized to conduct required inspections. The persons must be identified by name, occupational title, and the inspections that they are authorized to perform. The certificate holder (or person with whom it arranges to perform its required inspections) shall give written information to each person so authorized describing the extent of his responsibilities, authorities, and inspectional limitations. The list shall be made available for inspection by the Administrator upon request.”

20. How does the FAA expect the “Approved Vendor List” to contain each RII the Essential Maintenance Provider is authorized to perform, when the rule requires the authorization to be granted at the individual level?

The new requirements are directing an on-site audit of “all” maintenance providers. A maintenance provider may be an individual A&P mechanic. There may be no facility, organization, equipment to be audited. An on-site visit is a waste of resources in travel cost and auditor time. Further, if a personnel agency provide 10 mechanics in a station

to support the operation, all 10 of those individuals would be considered individual maintenance providers and would need to be “audited” and listed individually on the maintenance provider list. Further, the FAA would be required to accomplish an EPI for each of those individuals and the answer too many of the questions will be “no”.

This provision should be clarified to require the on-site audit in cases where the elements to be audited are actually present i.e. facilities, organization, equipment, etc. Further, if individual A&P mechanics are trained, qualified and authorized in accordance with the operator’s manual system, then their authorization as recorded in the operator record keeping system should be sufficient without listing them as a maintenance provider.

Some maintenance providers are individuals and not part of an organization. They have no facilities, organization, equipment, etc. to audit. A required on-site audit is a waste of QA resources. Further, if there were 6 independent A&P mechanics on-call at that station, all trained qualified and authorized by the carrier, each would be considered a separate maintenance provider requiring listing in the maintenance provider list.

21. Can their listing on the authorization list not be considered adequate rather than additionally listing them on the maintenance provider list?
- Will the FAA be expected to accomplish an EPI of each mechanic? What will the FAA do when many of the answers to the EPI are “no”?
 - Can on-site audits be limited to **certificated organizations** providing maintenance services?

N8900.103, 5.a (1) states that a maintenance provider is a “person” with whom the air carrier has made arrangements for the accomplishment of any of its maintenance, preventive maintenance or alterations. N8900.103, 5.a (2) states “contract maintenance” means any maintenance, preventive maintenance, or alterations accomplished by a maintenance provider.

22. There is no mention of a contract, verbal or written, included as a requirement in the definition to distinguish between an employee and vendor/contractor. Does a mechanic hired by the airline as an employee not qualify as a maintenance provider?