The Supplier

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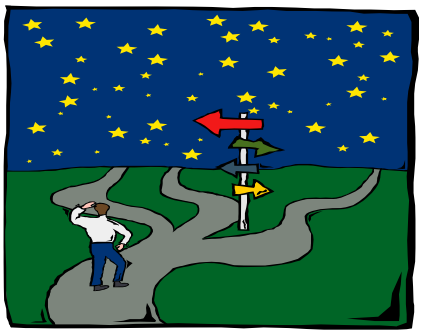
EASA Form 1 Changes

By Craig Seaman, US Airways, Newsletter Committee Chairman

Recently I was confronted by a problem from our receiving inspectors regarding the documentation that was received with some parts. When reviewing the EASA Form 1 that accompanied the part, it was discovered that the address in block 4 did not match the address of the FAA repair station number noted in the dual release statement in block 12.

During the receiving process the inspectors are required to verify the address in block 4 against the maintenance providers list. Because this did not match, the part was placed in quarantine until the discrepancy could be resolved. This can create a real problem if the part is required for installation immediately.

Once this issue was referred to Quality Assurance, the investigation began. Multiple e-mails went back and forth with the vendor to get some clarity as to why the addresses did not match. Finally, it was explained by the vendor that there had been a recent change to the EASA guidance for the completion of the Form 1. This change was responsible for the way they filled out block 4 and block 12. It was explained that the vendor was now required to put the address that was listed on page one of their EASA Form 3 (EASA Certificate) in block 4. This was the case even if they had multiple stand alone FAA 145 certificates. They then referred me to page 2 of their EASA Form 3 (EASA Certificate) where there was a reference to the section of their Maintenance Organization Exposition that listed each of their different repair stations associated with their EASA Certificate.



This created a real problem since their MOE was not readily available for the receiving inspector. This changed the way that EASA Form 1's had been filled out for quite some time.

After several conversations with the FAA and an EASA representative it became perfectly clear that there was no agreement on the correct way to

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fill out the EASA Form 1. The FAA contends that block 4 should contain the address where the maintenance was physically performed. EASA contends that block 4 must contain the address stated on page one of the EASA Form 3. The FAA also stated that if the vendor has a valid FAA 145 Certificate they can issue an FAA Form 8130 that requires block 4 to contain the physical address where the maintenance was performed in lieu of an EASA Form 1 with a dual release. When the vendor was asked to issue an FAA Form 8130 in lieu of the EASA Form with the dual release they stated that the EASA authority would not allow it. Of course this is creating havoc with the receiving process.

In the past, prior to a dual release statement being allowed in block 12 (EASA Form 1) and block 13 (FAA 8130), the vendor would release one 8130 and one Form 1 for each part. Now it seems that there is a difference of opinion on how the forms are to be filled out.

I wanted to bring this issue up with the hope that I could get some feedback on how this issue is being addressed at other carriers. I think there seems to be some considerable difference of opinion between the two authorities. Please feel free to contact me with any input you may regarding any similar experiences.

Level IV Comments and Observations for your Check-Ride

By Dave Allison, Level IV, Delta Air Lines

1. Candidates need to complete as much of their checklist as possible prior to arriving at the facility.

2. Candidates are expected to have completed their Level I/II training requirements prior to going for their level III certification.

3. A written audit plan is not absolutely necessary but the candidate should have some kind of plan and be able discuss it in detail with the Level IV.

4. Level IV's have a checklist that is used to perform the check-ride. There is nothing on the Level IV's checklist that was not covered in your 1A/2A and P&P training classes.

5. The CACS-20 checklist was revised to get the auditor into the work in-process part of the audit. Level IV's want to see the candidate interviewing the technicians, reviewing the manuals, and validating what the technicians are doing and how they are doing it.

6. Proper review of the Ops Spec will give you valuable guidance on how to perform the audit. You need know what the facility is working on. If the Ops Spec drives you to a capabilities list, then you should know what is on it. If the Ops Spec identifies special processes (Welding, NDT, ESD, etc.) you should review the applicable standards and processes and be able to determine how to audit them.

FAA Operation Specification A-101

By Craig Seaman, Newsletter Committee Chairman, US Airways

During the last few years the FAA has continually increased their use of section A-101 when issuing operation specifications at various repair stations in the U.S. and Europe. Due to this increase, I thought it would be a good time to share some of the issues that I have encountered during the last year.

As auditors one of the first things that we usually look at is the Ops Spec for the repair station. It is imperative when doing this review we take a good look at section A-101 (if applicable). This section will list all additional fixed locations that are associated with that particular repair station.

Recently I volunteered to take one of the orphaned audits. Thinking that this was a small facility, I decided that I would be able to squeeze it into a pre-existing trip to France. After committing to the audit, I discovered that the facility had been combined with two other facilities under the same Air Agency Certificate. The Database Committee and the previous Level III were never informed by the vendor as required. This created some what of a problem. In order to do a complete audit of the certificate I would have to visit all three facilities. I now would have to separate this audit from my previous plan and make a second trip to France to have sufficient time to visit all three facilities and do a complete audit. Luckily the three facilities were close together enabling me to cover all three in 4 days with a car.

This situation is becoming more common in Europe. This situation is created when management at one of these facilities fails to fulfill their obligations called out in the CACS 7. They agree to contact the previous C.A.S.E. auditor to make them aware of the change. This has become a point that I emphasize to the management of the facilities during the out-brief.

We all need to make sure when it becomes apparent that an A-101 has been issued and new fixed locations have been added, the Database Committee is made aware of the situation. The Database Committee can give you some guidance on whether the allocation should be kept as one or divided into separate allocations.

Contract Maintenance - United States

Submitted by Bud Morris, USA Jet

The following information is from Federal Aviation Regulations and FAA Order 8900.1

Question: What is the regulatory Basis for Contract maintenance?

Answer: According to 14 CFR, Section 145.201(a)(2), a certificated repair station can arrange for another person to perform the maintenance, preventative maintenance or alterations of any article for which the certificated repair station is rated.

Advisory Circular 145-9, Change 1, defines "contracting" as: "Entering into an agreement between the originating certificated repair station and another person or people to perform maintenance functions on an article. The originating repair station will exercise the privileges of its certificate and assume responsibility for the work performed by the contracted person (s)."

This definition basically requires two steps to satisfy the definition:

1. Entering into an agreement between the contractor repair station and a contracted person (including a business) to perform maintenance functions on an article.
2. The contractor repair station, not the contracted person, will exercise the privileges of its certificate and assume responsibility for the work performed.

When a repair station sends a component to a certificated person - such as the equipment manufacturer's repair station - for maintenance or repair, and the certificated person returns the component to service, this is no longer defined as contracted maintenance.

AC 149-9, Change 1, continues in its description of what is and what is not contract maintenance with the following note: Purchase of maintained parts from another repair station (including exchanges), brokerage and using another certificated repair station to perform work outside the original repair station's ratings are not maintenance functions requiring FAA approval. These are instances where the purchasing repair station is not exercising the privileges of its certificate. When a repair station requests work or sells a previously maintained article (including type-certificate products) it is acting solely as a distributor. Although the purchasing repair station may induct the part through its receiving inspection process, it is merely relying on the work previously performed at another certificated entity and is not exercising the privileges under 145.201(a)(2)