

# **CURAÇAO CIVIL AVIATION REGULATIONS**

## **PART 6 — APPROVED MAINTENANCE ORGANISATION**









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## Part 6— Approved Maintenance Organisation

### 6.1 GENERAL

#### 6.1.1.1 APPLICABILITY

- (a) Part 6 prescribes the requirements for issuing approvals to organisations for the maintenance, preventive maintenance, and alterations of aircraft and aeronautical products and prescribes the general operating rules for an Approved Maintenance Organisation (AMO).

#### 6.1.1.2 DEFINITIONS

- (a) Definitions are contained in Part 1.

#### 6.1.1.3 ABBREVIATIONS

- (a) The following abbreviations are used in Part 6.
  - (1) **AAT** – Approved Airworthiness Tag
  - (2) **AMO** – Approved Maintenance Organisation.
  - (3) **AMT** – Aviation Maintenance Technician
  - (4) **NDT** – Non-Destructive Testing
  - (5) **PAH** - Production Approval Holder
  - (6) **TSO** – Technical Standard Order

#### 6.1.1.4 EXEMPTION AUTHORITY

- (a) The Authority may, upon consideration of the circumstances of a particular maintenance organisation, issue an exemption providing relief from specified sections of this Part, provided that the Authority finds that the circumstances presented warrant the exemption and that a level of safety will be maintained equal to that provided by the rule from which the exemption is sought.
- (b) An exemption may be terminated or amended at any time by the Authority.
- (c) A request for exemption must be made in accordance with the requirements in Part 1.
- (d) Each approved maintenance organisation that receives an exemption must have a means of notifying the appropriate management, certifying staff, and personnel of the exemption.



## **6.2 CERTIFICATION OF A MAINTENANCE ORGANISATION AND CONTINUED VALIDITY**

### **6.2.1.1 APPLICABILITY**

- (a) This section prescribes the requirements for the certification of a maintenance organisation and continued validity of the certificate.

### **6.2.1.2 GENERAL**

- (a) No person may operate as a certificated approved maintenance organisation without, or in violation of, an approved maintenance organisation certificate, ratings or operations specifications issued under this part.
- (b) The certificate and operations specifications issued to an approved maintenance organisation must be available on the premises for inspection by the public and the Authority.
- (c) The approval of an AMO by a State shall be dependent upon the applicant demonstrating compliance with the requirements of this part and the safety management requirements of Part 1.

### **6.2.1.3 APPROVED MAINTENANCE ORGANISATION CERTIFICATE**

- (a) The AMO certificate will consist of two documents:
  - (1) A one page certificate signed by the Authority; and
  - (2) A multi-page operations specifications signed by the Accountable Manager and the Authority containing the terms, conditions, and authorisations.
- (b) No person may operate as an approved maintenance organisation without, or in violation of, an approved maintenance organisation certificate issued under this Part.
- (c) An approved maintenance organisation may perform maintenance, preventive maintenance, or alterations on an aircraft, airframe, aircraft engine, propeller, appliance, component, or part thereof only for which it is rated and within the terms, conditions, and authorisations placed in its operations specifications.
- (d) The AMO certificate will contain the following items:
  - (1) The certificate number specifically assigned to the AMO;
  - (2) The name and location (main place of business) of the AMO;
  - (3) The date of issue and period of validity;
  - (4) The ratings issued to the AMO; and
  - (5) Authority signature.
- (e) The AMO operations specifications will contain:
  - (1) The certificate number specifically assigned to the AMO;
  - (2) The class or limited ratings issued in detail, including special approvals and limitations issued;
  - (3) The date issued or revised;

- (4) Accountable manager and Authority signatures; and
- (f) The certificate issued to each certificated maintenance organisation must be available in the premises for inspection by the public and the Authority.

#### 6.2.1.4 ADVERTISING

- (a) No approved maintenance organisation may advertise as a certificated approved maintenance organisation until an approved maintenance organisation certificate has been issued to that facility.
- (b) No certificated approved maintenance organisation may make any statement, either in writing or orally, about itself that is false or is designed to mislead any person.
- (c) Whenever the advertising of an approved maintenance organisation indicates that it is certificated, the advertisement must clearly state the approved maintenance organisation's certificate number.

#### 6.2.1.5 APPLICATION FOR AN AMO CERTIFICATE

- (a) The Authority will require an applicant for approval of a maintenance organisation to submit the following:
  - (1) An application in a form and a manner prescribed by the Authority. This form is obtainable at the Authority;
  - (2) Its Maintenance Procedures Manual in duplicate;
  - (3) A list of the maintenance functions to be performed for it, under contract, by another AMO;
  - (4) A list of all AMO certificates and ratings pertinent to those certificates issued by any contracting State other than Curaçao;
  - (5) Documentation of the maintenance organisation's Quality System;
  - (6) Proof of registration with the Chamber of Commerce; and
  - (7) Any additional information the Authority requires the applicant to submit.
- (b) An application for the amendment of an existing AMO certificate shall be made on a form and in a manner prescribed by the Authority. If applicable, the AMO shall submit the required amendment to the Maintenance Procedures Manual to the Authority for approval.

*Note 1: "In a form" and "in a manner" mean that a form issued by the Authority should be completed by the accountable manager, or the manager's nominee designated in accordance with 6.2.1.5(a).*

*Note 2: The contents of the maintenance procedures manual is contained in 6.5.1.1.*

*Note 3: ICAO Doc. 9642, Part 4, 2.9 states that it is accepted practice to permit AMOs to subcontract work to non-approved maintenance organisations if the contracting AMO is (1) approved for the work to be subcontracted and has the ability to assess the competency of the subcontractor, (2) retains the responsibility for the quality control and release of subcontracted activities, and (3) there exist procedures to control subcontracted activities together with terms of reference for the personnel responsible for their management.*

#### 6.2.1.6 ISSUANCE OF AN AMO CERTIFICATE

- (a) An applicant may be issued an AMO certificate if, after investigation, the Authority finds that the applicant:
  - (1) Meets the applicable regulations and standards for an AMO certificate;
  - (2) Is properly and adequately equipped for the performance of maintenance of aircraft or aeronautical product for which it seeks approval; and
  - (3) The applicant comply with the applicable AMO Certificate fee as per “Luchtvaart Tarieven”, if applicable.

#### 6.2.1.7 DURATION AND RENEWAL OF AMO CERTIFICATE

- (a) A certificate or rating issued to an approved maintenance organisation located either inside or outside the Curaçao is effective from the date of issue until:
  - (1) The 12th month after the date on which it was initially issued, subject to satisfactory compliance with the requirements of this Part; or
  - (2) The 24th month after the date on which it was renewed, subject to satisfactory compliance with the requirements of this Part; or
  - (3) The approved maintenance organisation surrenders the certificate, or
  - (4) The Authority suspends or revokes the certificate.
- (b) The holder of a certificate that expires or is surrendered, suspended, or revoked by the Authority must return the certificate and operations specifications to the Authority within 5 working days of expiration, surrender or receipt from the Authority of notice of suspension or revocation.
- (c) A certificated approved maintenance organisation that applies for a renewal of its approved maintenance organisation certificate for aircraft registered in Curaçao must submit its request for renewal no later than 90 days before the approved maintenance organisation’s current certificate expires. If a request for renewal is not made within this period, the approved maintenance organisation must follow the application procedures for initial issuance as prescribed by the Authority.

#### 6.2.1.8 CONTINUED VALIDITY OF APPROVAL

- (a) Unless the approval has previously been surrendered, superseded, suspended, revoked or expired by virtue of exceeding any expiration date that may be specified in the approval certificate, the continued validity of approval is dependent upon:
  - (1) The AMO remaining in compliance with this Part;
  - (2) The Authority being granted access to the organisation’s facilities to determine continued compliance with this regulation; and
  - (3) The payment of any charges prescribed by the Authority.

**6.2.1.9 INSPECTION**

- (a) The Authority may, at any time, inspect an AMO holder on the AMO holder's premises to determine the AMO compliance with this Part.
- (b) Inspections will be conducted at least annually.
- (c) After an inspection is made, the certificate holder will be notified, in writing, of any deficiencies found during the inspection.
- (d) Inspection will also be performed on the applicant for, or the holder of an AMO certificate held outside the authorising Authority. This inspection may be delegated to the Authority of the State where the AMO is located, provided an arrangement exists.

**6.2.1.10 SUSPENSION OR REVOCATION**

- (a) The Authority may suspend or revoke an AMO certificate if it is established that a certificate holder has not met, or no longer meets the requirements of Part 6.

**6.2.1.11 CHANGES TO THE AMO AND CERTIFICATE AMENDMENTS**

- (a) To enable the Authority to determine continued compliance with this Part, the AMO shall provide written notification to the Authority either prior to, or within a time period determined by the Authority to be as soon as practicable after, any of the following changes:
  - (1) The name of the organisation;
  - (2) The location of the organisation;
  - (3) The housing, facilities, equipment, tools, material, procedures, work scope and certifying staff that could affect the AMO rating or ratings;
  - (4) The ratings held by the AMO, whether granted by the Authority or held through an AMO certification issued by another contracting State;

*Note: See subsection 6.2.1.5(a).*

- (5) Additional locations of the organisation;
  - (6) Items in the Maintenance Procedures Manual,
  - (7) The accountable manager; or
  - (8) The list of management personnel identified as described in the Maintenance Procedures Manual.
- (b) The Authority will amend the AMO certificate if the AMO notifies the Authority of a change in:
  - (1) Location or housing and facilities;
  - (2) Additional locations of the organisation;
  - (3) Rating, including deletions;
  - (4) Items in the Maintenance Procedures Manual
  - (5) Name of the organisation with same ownership; or
  - (6) Ownership.

- (c) The Authority may amend the AMO certificate if the AMO notifies the Authority of a change in:
  - (1) The accountable manager; or
  - (2) The list of management personnel identified as described in the Maintenance Procedure Manual.
  - (3) Items in the Maintenance Procedures Manual,
- (d) When the Authority issues an amendment to an AMO certificate because of new ownership of the AMO, the Authority will assign a new certificate number to the amended AMO certificate.
- (e) The Authority may:
  - (1) Prescribe, in writing, the conditions under which the AMO may continue to operate during any period of implementation of the changes noted in subparagraph (a); and
  - (2) Hold the AMO certificate in abeyance if the Authority determines that approval of the AMO certificate should be delayed; the Authority will notify the AMO certificate holder, in writing, of the reasons for any such delay.
- (f) If changes are made by the AMO to the items listed in subparagraph (a) without notification to the Authority and amendment of the AMO certificate by the Authority, the AMO certificate may be suspended, or revoked, by the Authority.

#### 6.2.1.12 RATINGS OF THE AMO

- (a) The following ratings are issued under this Subpart:
  - (1) Airframe ratings.
    - (i) Class 1: Composite construction of small aircraft.
    - (ii) Class 2: Composite construction of large aircraft.
    - (iii) Class 3: All-metal construction of small aircraft.
    - (iv) Class 4: All-metal construction of large aircraft.
  - (2) Powerplant ratings.
    - (i) Class 1: Piston engines of 400 horsepower or less.
    - (ii) Class 2: Piston engines of more than 400 horsepower.
    - (iii) Class 3: Turbine engines.
  - (3) Propeller ratings.
    - (i) Class 1: Fixed-pitch and ground-adjustable propellers of wood, metal or composite construction.
    - (ii) Class 2: Other propellers, by make.
  - (4) Avionics/radio ratings.

- (i) Class 1: Communication equipment: Radio transmitting equipment or receiving equipment, or both, used in aircraft to send or receive communications, regardless of carrier frequency or type of modulation used; including auxiliary and related aircraft interphone systems, amplifier systems, electrical or electronic inter-crew signaling devices, and similar equipment; but not including equipment used for navigation of the aircraft or as an aid to navigation, equipment for measuring altitude or terrain clearance, other measuring equipment operated on radio or radar principles, or mechanical, electrical, gyroscopic, or electronic instruments that are a part of communications radio equipment.
  - (ii) Class 2: Navigational equipment: A radio system used in aircraft for en-route, approach navigation, to include the flight director system, except equipment operated on radar or pulsed radio frequency principles, but not including equipment for measuring altitude or terrain clearance or other distance measuring equipment operated on pulsed radio frequency principles.
  - (iii) Class 3: Pulsed equipment: Any aircraft electronic system operated on pulsed radio frequency principles.
- (5) Instrument ratings.
- (i) Class 1: Mechanical: Any diaphragm, bourdon tube, aneroid, optical, or mechanically driven centrifugal instrument that is used on aircraft or to operate aircraft, including tachometers, airspeed indicators, pressure gauges, drift sights, magnetic compasses, altimeters, or similar mechanical instruments.
  - (ii) Class 2: Electrical: Any self-synchronous and electrical indicating instruments and systems, including remote indicating instruments, cylinder head temperature gauges, or similar electrical instruments.
  - (iii) Class 3: Gyroscopic: Any instrument or system using gyroscopic principles and motivated by air pressure or electrical energy, including automatic pilot control units, turn and bank indicators, directional gyros, and their parts, and flux gate and gyrosyn compasses.
  - (iv) Class 4: Electronic: Any instruments whose operation depends on electron tubes, transistors, electronic displays, or similar devices including capacitance type quantity gauges, system amplifiers, and engine analysers.
- (6) Accessory ratings.
- (i) Class 1: Mechanical. The accessories that depend on friction, hydraulics, mechanical linkage, or pneumatic pressure for operation, including aircraft brakes, mechanically driven pumps, carburetors, aircraft wheel assemblies, shock absorber struts and hydraulic servo units.
  - (ii) Class 2: Electrical. The accessories that depend on electrical energy for operation, and generators, including starters, voltage regulators, electric motors, electrically driven fuel pumps, magnetos, or similar electrical accessories
  - (iii) Class 3: Electronic. The accessories that depend on the use of an electron tube transistors, or similar device, including supercharger, temperature, air conditioning controls, or similar electronic controls.

### 6.2.1.13 AMO LIMITED RATINGS

- (a) Whenever the Authority finds it appropriate, it may issue a limited rating to an AMO that maintains or alters only a particular type of airframe, powerplant, propeller, radio, instrument, or accessory, or parts thereof, or performs only specialised maintenance requiring equipment and skills not ordinarily found in an AMO. Such a rating may be limited to a specific model aircraft, engine, or constituent part, or to any number of parts made by a particular manufacturer.
- (b) Limited ratings are issued for:
  - (1) Airframes of a particular make and model;
  - (2) Powerplants of a particular make and model;
  - (3) Propellers of a particular make and model;
  - (4) Radio equipment of a particular make and model;
  - (5) Instruments of a particular make and model;
  - (6) Accessories of a particular make and model;
  - (7) Landing gear components;
  - (8) Floats, by make;
  - (9) Nondestructive inspection, testing, and processing;
  - (10) Emergency equipment;
  - (11) Rotor blades, by make and model;
  - (12) Aircraft fabric works; and
  - (13) Any other purpose for which the Authority finds the applicant's request appropriate.
- (c) Specialised service ratings. A specialised service rating may be issued to a maintenance organisation to perform specific maintenance or processes. The operating specifications of the approved maintenance organisation must identify the specification used in performing that specialised service. The specification may be:
  - (1) A civil or military specification that is currently used by industry and approved by the Authority; or
  - (2) A specification developed by the approved maintenance organisation and approved by the Authority.

### 6.2.1.14 QUALITY SYSTEM

- (a) The AMO shall establish a quality system and designate a quality manager to monitor compliance with, and adequacy of, procedures required to ensure safe maintenance practices and airworthy aircraft. Compliance monitoring shall include a feedback system to the accountable manager to ensure corrective action as necessary.
- (b) The quality system, and the quality manager, shall be acceptable to the Authority.
- (c) Each AMO shall ensure that the quality system includes a quality assurance programme that contains procedures designed to monitor compliance with required aircraft and aircraft component standards and adequacy of the procedures to ensure that such procedures invoke good maintenance practices and airworthy aircraft and aircraft components.

- (d) The quality assurance system shall include a procedure to initially qualify and periodically perform audits on persons performing work on behalf of the AMO.
- (e) The quality system shall include a feedback system to the designated management person or group of persons directly responsible for the quality system and ultimately to the accountable manager that ensures, as necessary, proper and timely corrective action is taken in response to reports resulting from the independent audits.
- (f) The AMO's quality system shall be sufficient to review all maintenance procedures, as described in the Maintenance Control Manual and the Maintenance Procedures Manual, in accordance with an approved programme once a year.
- (g) The AMO's quality system shall indicate when audits are due, when completed, and establish a system of audit reports, which can be seen by visiting Authority staff on request. The audit system shall clearly establish a means by which audit reports containing observations about non-compliance or poor standards are communicated to the accountable manager.
- (h) If the AMO is a small organisation, the independent audit part of the quality system may be contracted to another organisation approved under this part or a person with appropriate technical knowledge and proven satisfactory audit experience such as ISO 9000 qualification.
- (i) Where the AMO is part of an AOC under Part 9, the AOC holder's quality management system may be combined with the requirements of an AMO and submitted for acceptance to the Authority.
- (j) Each AMO shall describe the quality system in relevant documentation as outlined in IS: 6.2.1.12.

*Note: Where the AMO is part of an AOC under Part 9, see IS: 9.2.2.3 for examples of a combined quality system.*

#### **6.2.1.15 LOCATION OF THE AMO**

- (a) Principal place of business. An applicant for, or holder of, a certificated AMO under this Part shall establish and maintain a principal place of business office that is physically located at the address shown on its certificate.
- (b) Additional fixed locations. An AMO may have additional fixed locations without certificating each facility as a stand-alone AMO, which may be approved by the Authority provided that:
  - (1) All of the facilities are localised and within a defined area, and
  - (2) All locations operate under the approval of the AMO certificate and operations specifications.
- (c) Foreign locations of AMOs. An AMO approved by the Authority may be located in a country outside Curaçao and is subject to all the applicable requirements of this Part.

#### **6.2.1.16 CONDITIONS FOR THE USE OF STAFF NOT QUALIFIED IN ACCORDANCE WITH PART-2 AND REFERRED TO SUBPART 6.4.1.1(1)**

1. Certifying staff in compliance with all the following conditions are deemed to meet the intent of subpart 6.4.1.1(l)(1) and (2):



- (a) The person shall hold a licence or a certifying staff authorisation issued under national regulations in full compliance with ICAO Annex 1.
- (b) The scope of work of the person shall not exceed the scope of work defined by the national licence or the certifying staff authorisation, whatever is the most restrictive.
- (c) The person shall demonstrate he/she received the training on human factors and aviation legislation referred to in modules 9 and 10 of Appendix I to Part-2.
- (d) The person shall demonstrate 5 years maintenance experience for line maintenance certifying staff and 8 years for base maintenance certifying staff. However, those persons whose authorised tasks do not exceed those of a Part-2 category A certifying staff, need to demonstrate 3 years maintenance experience only.
- (e) Line maintenance certifying staff and base maintenance support staff shall demonstrate he/she received type training and passed examination at the category B1, B2 or B3 level, as applicable, referred to in Appendix III to Part -2 for each aircraft type in the scope of work referred to in paragraph (b). Those persons whose scope of work does not exceed those of a category A certifying staff may however receive task training in lieu of a complete type training.
- (f) Base maintenance certifying staff shall demonstrate he/she received type training and passed examination at the category C level referred to in Appendix III to Part-2 for each aircraft type in the scope of work referred to paragraph (b), except that for the first aircraft type, training and examination shall be at the category B1, B2 or B3 level of Appendix III.

## **6.3 HOUSING, FACILITIES, EQUIPMENT, MATERIALS AND DATA**

### **6.3.1.1 GENERAL**

- (a) A certificated approved maintenance organisation must provide, housing, facilities, equipment, materials, and data in quantity and quality that meet the standards required for the issuance of the certificate and ratings that the approved maintenance organisation holds.

### **6.3.1.2 HOUSING AND FACILITY REQUIREMENTS**

- (a) Housing for the facilities, equipment, materials, and personnel shall be provided appropriate for all planned work ensuring, in particular, protection from weather.
- (b) All work environments shall be appropriate for the task carried out and shall not impair the effectiveness of personnel.
- (c) Office accommodation shall be appropriate for the management of planned work including, in particular, the management of quality, planning, and technical records.
- (d) Specialised workshops and bays shall be segregated, as appropriate, to insure that environmental and work area contamination is unlikely to occur.
- (e) Storage facilities shall be provided for parts, equipment, tools, and material.
- (f) Storage conditions shall provide security for serviceable parts, segregation of serviceable from unserviceable parts, and prevent deterioration of and damage to stored items.

- (g) An AMO with an airframe rating shall provide suitable permanent housing to enclose the largest type and model of aircraft listed on its operations specifications.
- (h) An AMO may perform maintenance, preventive maintenance, or alterations on articles outside of its housing if it provides suitable facilities that are acceptable to the Authority.
- (i) See IS: 6.3.1.2 for detailed requirements pertaining to housing and facilities.

### **6.3.1.3 EQUIPMENT, TOOLS, AND MATERIAL**

- (a) The AMO shall have available the necessary equipment, tools, and material to perform the approved scope of work and these items shall be under full control of the AMO. The availability of equipment and tools means permanent availability except in the case of any tool or equipment that is so rarely needed that its permanent availability is not necessary.
- (b) The Authority may exempt an AMO from possessing specific tools and equipment for maintenance or repair of an aircraft or aeronautical product specified in the AMO's approval, if these items can be acquired temporarily, by prior arrangement, and be under full control of the AMO when needed to perform required maintenance or repairs.
- (c) The AMO shall use the equipment, tools, and material that are recommended by the manufacturer of the article or must be at least equivalent to those recommended by the manufacturer and acceptable to the Authority.
- (d) The AMO shall control all applicable tools, equipment, and test equipment used for product acceptance and/or for making a finding of airworthiness.
- (e) The AMO shall ensure that all applicable tools, equipment, and test equipment used for product acceptance and/or for making a finding of airworthiness are calibrated to ensure correct calibration to a standard acceptable to the Authority and traceable to the Curaçao National Standards.
- (f) The AMO shall keep all records of calibrations and the standards used for calibration.
- (g) The IS: 6.3.1.3 contains detailed requirements pertaining to tools, equipment, and test equipment.

## **6.4 ADMINISTRATION**

### **6.4.1.1 PERSONNEL REQUIREMENTS**

- (a) A management person or group of persons acceptable to the Civil Aviation Authority, whose responsibilities include ensuring that the AMO is in compliance with these regulations, shall be nominated.
- (b) The person or persons nominated as manager shall represent the maintenance management structure of the AMO, and be responsible for all functions specified in Part 6.
- (c) Nominated managers shall be directly responsible to an accountable manager who shall be acceptable to the Civil Aviation Authority.
- (d) The AMO shall employ sufficient personnel to plan, perform, supervise and inspect and release the work in accordance with the approval.

- (e) The competence of personnel involved in maintenance shall be established in accordance with a procedure and to a standard acceptable to the Civil Aviation Authority.
- (f) Each supervisor in the AMO certifying staff shall hold an AMT licence issued in accordance with Part 2, Personnel Licensing.
- (g) The person signing maintenance release or an approval for return to service shall be qualified in accordance with Part 2, as appropriate to the work performed and shall be acceptable to the Civil Aviation Authority.
- (h) The maintenance personnel and the certifying staff shall meet the qualification requirements and receive initial, recurrent, and specialised training to their assigned tasks and responsibilities in accordance with a programme acceptable to the Civil Aviation Authority. The training programme established by the AMO shall include training in knowledge and skills related to human factors and human performance, including co-ordination with other maintenance personnel and flight crew. For continuation training refer to Subparagraph 6.4.1.7.
- (i) Any organisation maintaining aircraft, except where stated otherwise in paragraph (l) shall in the case of aircraft line maintenance, have appropriate aircraft rated certifying staff qualified as category B1, B2, B3, as appropriate, in accordance with Part-2 and subpart 6.4.1.7.

In addition such organisations may also use appropriately task trained certifying staff holding the privileges described in subpart 2.6.1.6(a)(1) and 2.6.1.6(a)(3)(ii) and qualified in accordance with Part-2 and subpart 6.4.1.7 to carry out minor scheduled line maintenance and simple defect rectification. The availability of such certifying staff shall not replace the need for category B1, B2, B3 certifying staff, as appropriate.

- (j) Any organisation maintaining aircraft, except where stated otherwise in paragraph (l) shall:
  - 1. in the case of base maintenance of large aircraft, have appropriate aircraft type rated certifying staff qualified as category C in accordance with Part-2 and subpart 6.4.1.7. In addition the organisation shall have sufficient aircraft type rated staff qualified as category B1, B2 as appropriate in accordance with Part-2 and subpart 6.4.1.7 to support the category C certifying staff:
    - (i) B1 and B2 support staff shall ensure that all relevant tasks or inspections have been carried out to the required standard before the category C certifying staff issues the certificate of release to service.
    - (ii) The organisation shall maintain a register of any such B1 and B2 support staff.
    - (iii) The category C certifying staff shall ensure that compliance with paragraph (i) has been met and that all work required by the customer has been accomplished during the particular base maintenance check or work package, and shall also assess the impact of any work not carried out with a view to either requiring its accomplishment or agreeing with the operator to defer such work to another specified check or time limit.
  - 2. in the case of base maintenance of aircraft other than large aircraft have either:
    - (i) appropriate aircraft rated certifying staff qualified as category B1, B2, B3, as appropriate, in accordance with Part-2 and subpart 6.4.1.7; or
    - (ii) appropriate aircraft rated certifying staff qualified in category C assisted by support staff as specified in subpart 6.4.1.7(a)(i).

- (k) Component certifying staff shall comply with Part-2.

- (l) By derogation to paragraphs (i) and (j), in relation to the obligation to comply with Part-2, the organisation may use certifying staff qualified in accordance with the following provisions:
  - (1) For organisation facilities located outside Curaçao certifying staff may be qualified in accordance with the national aviation regulations of the State in which the organisation facility is registered subject to the conditions specified in subpart 6.2.1.16.
  - (2) For line maintenance carried out at a line station of an organisation which is located outside Curaçao, the certifying staff may be qualified in accordance with the national aviation regulations of the State in which the line station is based, subject to the conditions specified in subpart 6.2.1.16
  - (3) In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff are available, the organisation contracted to provide maintenance support may issue a one-off certification authorisation:
    - (i) to one of its employees holding equivalent type authorisations on aircraft of similar technology, construction and systems; or
    - (ii) to any person with not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.

All such cases as specified in this subparagraph shall be reported to the authority within three days of the issuance of such certification authorisation. The organisation issuing the one-off authorisation shall ensure that any such maintenance that could affect flight safety is re-checked by an appropriately approved organisation.
- (m) See IS: 6.4.1.1 for detailed personnel requirements.

#### **6.4.1.2 INDOCTRINATION, INITIAL, RECURRENT, SPECIALISED AND REMEDIAL TRAINING**

- (a) An AMO shall have an employee training programme approved by the Authority that consists of indoctrination, initial, recurrent training, specialised and remedial training.
- (b) An AMO shall develop and update its training programme based on the job tasks associated with its scope of operating authority and capabilities.
- (c) The training programme shall ensure that each employee assigned to perform maintenance, preventive maintenance, or alterations, and inspection functions is capable of performing the assigned task.
- (d) An AMO shall submit revisions of its training programme to the Authority for approval.
- (e) An AMO shall document, in a form and manner acceptable to the Authority, the individual employee training required under this section. These training records must be retained for a minimum of two years.
- (f) An AMO training programme shall meet the detailed requirements contained in the IS: 6.4.1.2

#### 6.4.1.3 DANGEROUS GOODS TRAINING PROGRAMME

- (a) An AMO shall have a dangerous goods training programme for its employees, whether full time, part time, or temporary or contracted, who are engaged in the following activities:
  - (1) Loading, unloading or handling of dangerous goods;
  - (2) Design, manufacture, fabrication, inspection, marking, maintenance, reconditions, repairs or tests of a package, container or packaging component that is represented, marked, certified, or sold as qualified for use in transporting dangerous goods;
  - (3) Preparation of hazardous materials for transport;
  - (4) Responsibility for the safety of transportation of dangerous goods;
  - (5) Operation of a vehicle used to transport dangerous goods, or
  - (6) Supervision of any of the above listed items.
- (b) An AMO employee shall not perform or directly supervise a job function listed in item (a) above unless he or she has received the approved dangerous goods training.
- (c) The AMO training shall ensure that its dangerous goods training :
  - (1) Ensures that each employee performing or directly supervising any of the job functions specified in item (a) above is trained to comply with all applicable procedures; and
  - (2) Enables the trained person to recognise items that contain, or may contain, dangerous goods regulated under these regulations.
- (d) The dangerous goods training of the AMO shall be approved by the Authority and shall contain the items in IS: 6.4.1.3.
- (e) An AMO shall document, in a form and manner acceptable to the Authority, the individual employee training required under this section. These training records shall be retained for a minimum of two years.

#### 6.4.1.4 REST AND DUTY LIMITATIONS FOR PERSONS PERFORMING MAINTENANCE FUNCTIONS IN AN AMO

- (a) No person may assign, nor shall any person perform maintenance functions for aircraft, unless that person has had a minimum rest period of 8 hours prior to the beginning of duty.
- (b) No person may schedule a person performing maintenance functions for aircraft for more than 12 consecutive hours of duty.
- (c) In situations involving unscheduled aircraft unserviceability, persons performing maintenance functions for aircraft may be continued on duty for:
  - (1) Up to 16 consecutive hours; or
  - (2) 20 hours in 24 consecutive hours.
- (d) Following unscheduled duty periods, the person performing maintenance functions for aircraft shall have a mandatory rest period of 10 hours.
- (e) The AMO shall relieve the person performing maintenance functions from all duties for 24 consecutive hours during any 7 consecutive day's period.

#### 6.4.1.5 RECORDS OF MANAGEMENT, SUPERVISORY, INSPECTION AND CERTIFYING STAFF

- (a) The AMO shall maintain a roster of all management, supervisory, inspection and certifying staff, which includes details of the scope of their authorisation.
- (b) Certifying staff shall be notified in writing of the scope of their authorisation.
  - (1) The authorisation document shall be in a style that makes its scope clear to certifying staff and any authorised person that may be required to examine the document. Where codes are used to define scope, an interpretation document shall be readily available.
  - (2) Certifying staff are not required to carry the authorisation document at all times but shall produce it within a reasonable time of a request from an authorised person.
- (c) See IS: 6.4.1.5 for detailed requirements pertaining to records of management, supervisory, inspection and certifying staff.

#### 6.4.1.6 SAFETY MANAGEMENT

- (a) An AMO shall implement a safety management system acceptable to the Authority as outlined in Part 1: 1.6.

#### 6.4.1.7 CERTIFYING STAFF AND SUPPORT STAFF

- (a) In addition to the appropriate requirements of 6.4.1.1(i) and (j), the organisation shall ensure that certifying staff and support staff have an adequate understanding of the relevant aircraft and/or components to be maintained together with the associated organisation procedures. In the case of certifying staff, this shall be accomplished before the issue or re-issue of the certification authorization:
  - (i) "Support staff" means those staff holding a Part-2 aircraft maintenance licence in category B1, B2 and/or B3 with the appropriate aircraft ratings, working in a base maintenance environment while not necessarily holding certification privileges.
  - (ii) "Relevant aircraft and/or components", means those aircraft or components specified the particular certification authorisation.
  - (iii) "Certification authorisation" means the authorisation issued to certifying staff by the organisation and which specifies the fact that they may sign certificates of release to service within the limitations stated in such authorisation on behalf of the approved organisation.
- (b) Excepting those cases listed in subpart 6.4.1.1(l) and 2.6.1.6(a)3(ii)(Part-2) the organisation may only issue a certification authorisation to certifying staff in relation to the basic categories or subcategories and any type rating listed on the aircraft maintenance licence as required by Part-2, subject to the licence remaining valid throughout the validity period of the authorisation and the certifying staff remaining in compliance with Part-2.
- (c) The organisation shall ensure that all certifying staff and support staff are involved in at least 6 months of relevant aircraft or component maintenance experience in any consecutive 2-year period.

For the purpose of this paragraph “involved in actual relevant aircraft or component maintenance” means that the person has worked in an aircraft or component maintenance environment and has either exercised the privileges of the certification authorisation and/or has actually carried out maintenance on at least some of the aircraft type or aircraft group systems specified in the particular certification authorization

- (d) The organisation shall ensure that all certifying staff and support staff receive sufficient continuation training in each two year period to ensure that such staff have up-to-date knowledge of relevant technology and organisation procedures.
- (e) The organisation shall establish a programme for continuation training for certifying staff and support staff, including a procedure to ensure compliance with the relevant paragraphs of 6.4.1.7 as the basis for issuing certification authorisations under this Part to certifying staff, and a procedure to ensure compliance with Part 2.
- (f) Except where any of the unforeseen cases of 6.4.1.1(l)(5) apply, the organisation shall assess all prospective certifying staff for their competence, qualification and capability to carry out their intended certifying duties in accordance with a procedure as specified in the procedure manual prior to the issue or re-issue of a certification authorisation under this Part.
- (g) When the conditions of paragraphs (a), (b), (d), (f) and, where applicable, paragraph (c) have been fulfilled by the certifying staff, the organisation shall issue a certification authorisation that clearly specifies the scope and limits of such authorisation. Continued validity of the certification authorisation is dependent upon continued compliance with paragraphs (a), (b), (d), and where applicable, paragraph (c).
- (h) The certification authorisation must be in a style that makes its scope clear to the certifying staff and any authorised person who may require to examine the authorisation. Where codes are used to define scope, the organisation shall make a code translation readily available. ‘Authorised person’ means the officials of the Authority who has responsibility for the oversight of the maintained aircraft or component.
- (i) The person responsible for the quality system shall also remain responsible on behalf of the organisation for issuing certification authorisations to certifying staff. Such person may nominate other persons to actually issue or revoke the certification authorisations in accordance with a procedure as specified in the procedure manual.
- (j) The organisation shall maintain a record of all certifying staff and support staff, which shall contain:
  - 1. the details of any aircraft maintenance licence held under Part-2 and
  - 2. all relevant training completed; and
  - 3. the scope of the certification authorisations issued, where relevant; and
  - 4. particulars of staff with limited or one-off certification authorisations.

The organisation shall retain the record for at least three years after the staff referred to in this paragraph have ceased employment with the organisation or as soon as the authorisation has been withdrawn. In addition, upon request, the maintenance organisation shall furnish the staff referred to in this paragraph with a copy of their personal record on leaving the organisation.

The staff referred to in this paragraph shall be given access on request to their personal records as detailed above.

- (k) The organisation shall provide certifying staff with a copy of their certification authorisation in either a documented or electronic format.
- (l) Certifying staff shall produce their certification authorisation to any authorised person within 24 hours.
- (m) The minimum age for certifying staff and support staff is 21 years.
- (n) The holder of a category A aircraft maintenance licence may only exercise certification privileges on a specific aircraft type following the satisfactory completion of the relevant category A aircraft task training carried out by an organisation appropriately approved in accordance with Part 6 or Part 3. This training shall include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment carried out by the organisation.
- (o) The holder of a category B2 aircraft maintenance licence may only exercise the certification privileges described in subpart 2.6.1.6(a)(3)(ii) of Part-2 following the satisfactory completion of (i) the relevant category A aircraft task training and (ii) 6 months of documented practical experience covering the scope of the authorisation that will be issued. The task training shall include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment. Task training and examination/assessment shall be carried out by the maintenance organisation issuing the certifying staff authorisation. The practical experience shall be also obtained within such maintenance organisation.

## **6.5 AMO OPERATING RULES**

### **6.5.1.1 AMO PROCEDURES MANUAL**

*Note: The purpose of the AMO Procedures Manual is to set forth the procedures, the means, and methods of the AMO. Compliance with its contents will assure compliance with the Part 6 requirements, which is a pre-requisite to obtaining and retaining an AMO certificate.*

- (a) Each AMO shall have an AMO Procedures Manual.
- (b) The AMO Procedures Manual shall:
  - (1) Provide clear guidance to personnel on how the activities included in the airworthiness authority approval are managed, on their personal responsibilities and on how compliance with the appropriate continuing airworthiness requirements is achieved;
  - (2) Include a statement of the organisation's policies and objectives.
- (c) If AMO is also the AOC, the AMO's procedures manual and the AOC's maintenance control manual may be combined.
- (d) The AMO Procedures Manual and any subsequent amendments shall be approved by the Authority prior to use.
- (e) The AMO Procedures Manual and any other manual it identifies must:
  - (1) Include instructions and information necessary to allow the personnel concerned to perform their duties and responsibilities with a high degree of safety;



- (2) Be in a form that is easy to revise and contain a system which allows personnel to determine current revision status;
- (3) Have the date of the last revision printed on each page containing the revision;
- (4) Not be contrary to any applicable Curaçao regulation or the AMO's specific operating provisions; and
- (5) Include a reference to appropriate civil aviation regulations.

#### **6.5.1.2 MAINTENANCE INSPECTION PROCEDURES AND QUALITY ASSURANCE SYSTEMS**

- (a) The AMO shall establish procedures, acceptable to the Authority, which ensure good maintenance practices and compliance with all relevant requirements of this Part.
- (b) The AMO shall ensure compliance with this paragraph by either:
  - (1) Establishing an independent quality assurance system to monitor compliance with and adequacy of the procedures; or
  - (2) Establishing a system of inspection to ensure that all maintenance is properly performed.
- (c) AMO's using an independent quality assurance system shall include the audit procedures listed in the AMO Procedures Manual at IS 6.5.1.1.

#### **6.5.1.3 CAPABILITY LIST**

- (a) Each approved maintenance organisation must prepare and retain a current capability list approved by the Authority. The approved maintenance organisation may not perform maintenance, preventive maintenance, or alterations, on an article until the article has been listed on the capability list in accordance with this Part.
- (b) The capability list must identify each article by make and model, part number, or other nomenclature designated by the article's manufacturer.
- (c) An article may be listed on the capability list only if the article is within the scope of the ratings and classes of the approved maintenance organisation's certificate, and only after the approved maintenance organisation has performed a self-evaluation in accordance with 6.5.1.1(d)(18). The approved maintenance organisation must perform the self-evaluation described in this paragraph to determine that the maintenance organisation has all of the facilities, equipment, material, technical data, processes, housing, and trained personnel in place to perform the work on the article as required by this part. If the approved maintenance organisation makes that determination, it may list the article on the capability list.
- (d) The document of the evaluation described in paragraph (c) of this section must be signed by the accountable manager and must be retained on file by the approved maintenance organisation.
- (e) Upon listing an additional article on its capability list, the maintenance organisation must send a copy of the list to the Authority having jurisdiction over the approved maintenance organisation.
- (f) The capability list(s) must be available in the premises for inspection by the public and the Authority.
- (g) The self-evaluations must be available in the premises for inspection by the Authority.

- (h) The AMO shall retain the capability list(s) and self-evaluation(s) for two years from the date accepted by the accountable manager.

#### **6.5.1.4 CONTRACT MAINTENANCE**

- (a) The AMO must be approved for the work which is to be subcontracted and have the capability to assess the competence of the subcontractor.
- (b) An AMO may contract a maintenance function pertaining to an article to an outside source provided:
  - (1) The Authority approved the maintenance function to be contracted to the outside source; and
  - (2) The AMO maintains and makes available to the Authority in a format acceptable to the Authority, the following information:
    - (i) The maintenance functions contracted to each outside facility, and
    - (ii) The name of each outside facility to whom the AMO contracts maintenance functions and the type of certificate and ratings, if any, held by each facility.
- (c) An AMO may contract a maintenance function pertaining to an article to a unlicensed person provided:
  - (1) The unlicensed person follows a quality control system equivalent to the system followed by the AMO;
    - (i) The AMO remains directly in charge of the work performed by the unlicensed person; and
    - (ii) The AMO verifies, by test and/or inspection, that the work has been performed satisfactorily by the unlicensed person and that the article is airworthy before approving it for return to service.
- (d) The AMO, before approval for return to service, shall verify by test or inspection that the work has been performed satisfactorily following contract maintenance, preventive maintenance, or alterations in accordance with approved methods.

*Note 1: An AMO that carries out maintenance for another AMO within its own approval scope is not considered to be subcontracting for the purpose of this paragraph.*

*Note 2: A list of contractors used by the AMO is approved by the Authority through the AMO Procedures Manual.*

#### **6.5.1.5 PRIVILEGES OF THE APPROVED MAINTENANCE ORGANISATION**

- (a) The AMO shall carry out the following tasks as permitted by and in accordance with the AMO Procedures Manual:
  - (1) Maintain or alter any aircraft or aeronautical product for which it is rated at the location identified in the approval certificate;

- (2) Maintain any aircraft for which it is rated at any location subject to the need for such maintenance arising from unserviceability of the aircraft;
  - (3) Perform the activities in support of a specific AOC holder where that AOC has requested the services of the AMO at locations other than the location identified on the AMO certificate and the AMO has been rated to maintain the aircraft of that specific AOC holder at the requested location in the AMO operating provisions approved by the Authority; and
  - (4) Issue an approval for return to service or a maintenance release in respect of subparagraphs (a) (1), (2), and (3) of this subsection upon completion of maintenance in accordance with limitations applicable to the AMO.
- (b) The AMO may maintain or alter any article for which it is rated at a place other than the AMO, if:
- (1) The function would be performed in the same manner as when performed at the AMO and in accordance with this Subpart;
  - (2) All necessary personnel, equipment, material, and technical and/or approved standards are available at the place where the work is to be done; and
  - (3) The AMO Procedures Manual sets forth approved procedures governing work to be performed at a place other than the AMO.
- (c) The AMO may contract out maintenance, preventative maintenance, or alteration, other than a complete type certificated product, in accordance with 6.5.1.4.

#### **6.5.1.6 LIMITATIONS ON THE AMO**

- (a) The AMO shall maintain an aircraft or aeronautical product for which it is approved only when all necessary housing, facilities, equipment, tools, material, approved technical data and certifying staff are available.
- (b) An AMO may not contract out the maintenance, preventive maintenance, or alteration of a complete type-certificated product.
- (c) An AMO may not provide approval for return to service of a product following contract maintenance, preventive maintenance, or alterations without verifying by test or inspection that the work has been performed satisfactorily in accordance with approved methods.

#### **6.5.1.7 CERTIFICATION OF RELEASE TO SERVICE OF AN AIRCRAFT, PART, COMPONENT OR ASSEMBLY**

- (a) A certification of release to service shall be issued by appropriately authorised certifying staff when satisfied that all required maintenance of the aircraft has been properly carried out by the AMO in accordance with the AMO Procedures Manual.
- (b) A certification of release is required at the completion of any maintenance on an aircraft part, component or assembly when off the aircraft.
- (c) The release to service to be used for release of an aircraft or aeronautical part, component or assembly shall adhere to the following items.
- (d) The certification of release to service shall contain the following statement: “Certifies that the work specified was carried out in accordance with current regulations and in respect to that work the aircraft/aircraft component is considered approved for release to service.”

- (e) The certification of release to service shall reference the data specified in the manufacturer's maintenance instructions or instructions for continued airworthiness.
- (f) Where instructions include a requirement to insure that a dimension or test figure is within a specific tolerance as opposed to a general tolerance, the dimension or test figure shall be recorded unless the instruction permits the use of GO/NO gauges. It is not normally sufficient to state that the dimension or the test figure is within tolerance.
- (g) The date such maintenance was carried out shall include when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/landings etc., as appropriate.
- (h) When extensive maintenance has been carried out, it is acceptable for the certification of release to service to summarise the maintenance as long as there is a cross-reference to the work package containing full details of maintenance carried out. Dimensional information shall be retained in the work package record.
- (i) The person issuing the release to service shall use a full signature and preferably a certification stamp except in the case where a computer release to service system is used. In this latter case, the Authority will need to be satisfied that only the particular person can electronically issue the release to service.
- (j) When a part of component is released to service, the AMO shall complete a Form AAT as can be obtained at the CCAA.
- (k) One such method of compliance with item (c)(6) is the use of a magnetic or optical personal card in conjunction with a personal identity number (PIN) which is keyed into the computer and known only to the individual.
- (l) An aeronautical product which has been maintained off the aircraft requires the issue of a certification of release to service (Model CAA Form AAT) for such maintenance and another certification of release to service of the aircraft in regard to maintenance being properly accomplished on the aircraft. The release to service of the aircraft will typically be made by the AMO in the aircraft technical log maintenance records section.

#### **6.5.1.8 MAINTENANCE RECORDS**

- (a) The AMO shall record, in a form acceptable to the Authority, all details for maintenance work performed.
- (b) The AMO shall provide a copy of each certification of release to service to the aircraft operator, together with a copy of any specific airworthiness data used for repairs/alterations performed.
- (c) The AMO shall retain a copy of all detailed maintenance records and any associated airworthiness data for two years from the date the aircraft or aeronautical product to which the work relates was released from the AMO.
- (d) Each person who maintains, performs preventive maintenance, rebuilds, or modifies an aircraft/aeronautical product shall make an entry in the maintenance record of that equipment:
  - (1) A description and reference to data acceptable to the Authority of work performed.
  - (2) The date of completion of the work performed.
  - (3) The name of the person performing the work if other than the person specified in this subsection.

- (4) If the work performed on the aircraft/aeronautical product has been performed satisfactorily, the signature, certificate number, and kind of certificate held by the person approving the work.
  - (5) The authorised signature, the AMO certificate number, and kind of licence held by the person approving or disapproving for return to service the aircraft, airframe, aircraft engine, propeller, appliance, component part, or portions thereof.
  - (6) The signature constitutes the approval for return to service only for the work performed.
  - (7) In addition to the entry required by this paragraph, major repairs and major alterations shall be entered on a form, and the form disposed of by the person performing the work, in the manner prescribed by the Authority in Part 5: 5.7.1.1.
- (e) No person shall describe in any required maintenance entry or form an aircraft or aeronautical component as being overhauled unless:
- (1) Using methods, techniques, and practices acceptable to the Authority, it has been disassembled, cleaned, inspected as permitted, repaired as necessary, and reassembled; and
  - (2) It has been tested in accordance with approved standards and technical data, or in accordance with current standards and technical data acceptable to the Authority, which have been developed and documented by the holder of the type certificate, supplemental type certificate, or a material, part, process, or appliance approval under a TSO.
- (f) No person may describe in any required maintenance entry or form, an aircraft or other aeronautical product as being rebuilt unless it has been:
- (1) Disassembled, cleaned, inspected as permitted;
  - (2) Repaired as necessary; and
  - (3) Reassembled and tested to the same tolerances and limits as a new item, using either new parts or used parts that either conform to new part tolerances and limits, or to approved oversized or undersized dimensions.
- (g) No person may approve for return to service any aircraft or aeronautical product that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless:
- (1) The appropriate maintenance record entry has been made; and
  - (2) The repair or alteration form authorised by or furnished by the Authority has been executed in a manner prescribed by the Authority;
- (h) If a repair or alteration results in any change in the aircraft operating limitations or flight data contained in the approved aircraft flight manual, those operating limitations or flight data shall be appropriately revised and set forth as prescribed by the Authority.
- (i) Maintenance record entries for inspections. The person approving or disapproving for return to service an aircraft/aeronautical product, after any inspection performed in accordance with this regulation, shall make an entry in the maintenance record of that equipment containing the following information:
- (1) The type of inspection and a brief description of the extent of the inspection;
  - (2) The date of the inspection and aircraft total time in service;

- (3) The authorised signature, the AMO certificate number, and kind of licence held by the person approving or disapproving for return to service the aircraft, airframe, aircraft engine, propeller, appliance, component part, or portions thereof;
  - (4) If the aircraft is found to be airworthy and approved for return to service, the following or a similarly worded statement—I certify that this aircraft has been inspected in accordance with (insert type) inspection and was determined to be in airworthy condition;
  - (5) If the aircraft is not approved for return to service because of needed maintenance, non-compliance with the applicable specifications, airworthiness directives, or other approved data, the following or a similarly worded statement—I certify that this aircraft has been inspected in accordance with (insert type) inspection and a list of discrepancies and unairworthy items dated (date) has been provided for the aircraft owner or operator; and
  - (6) If an inspection is conducted under an inspection programme provided for in this regulation, the entry shall identify the inspection programme accomplished, and contains a statement that the inspection was performed in accordance with the inspections and procedures for that particular programme.
- (j) Listing of discrepancies. If the person performing any inspection required by this regulation finds that the aircraft is not airworthy or does not meet the applicable type certificate data sheet, airworthiness directives, or other approved data upon which its airworthiness depends, that person shall give the owner or lessee a signed and dated list of those discrepancies.

#### 6.5.1.9 AIRWORTHINESS DATA

- (a) The AMO shall be in receipt of all airworthiness data appropriate to support the work performed from the Authority, the aircraft/aeronautical product design organisation, and any other approved design organisation in the State of Manufacture or State of Design, as appropriate.

*Note: The Authority may classify data from another authority or organisation as mandatory and may require the AMO to hold such data.*

- (b) Where the AMO modifies airworthiness data specified in paragraph (a) to a format or presentation more useful for its maintenance activities, the AMO shall submit to the Authority an amendment to the AMO Procedures Manual for any such proposed alterations for acceptance.
- (c) All airworthiness data used by the AMO shall be kept current and made available to all personnel who require access to that data to perform their duties.
- (d) The IS: 6.5.1.9 contains detailed requirements concerning airworthiness data.

#### 6.5.1.10 REPORTING OF UNAIRWORTHY CONDITIONS

- (a) The AMO shall report to the Authority and the aircraft design organisation of the State of Design any identified condition that could present a serious hazard to the aircraft.
- (b) Reports shall be made on a form and in a manner prescribed by the Authority and contain all pertinent information about the condition known to the AMO. The report shall contain at least the following items:
- (1) Aircraft registration number.
  - (2) Type, make and model of the article.

- (3) Date of the discovery of the failure, malfunction, or defect.
  - (4) Time since last overhaul, if applicable.
  - (5) Apparent cause of the failure, malfunction, or defect.
  - (6) Other pertinent information that is necessary for more complete identification, determination of seriousness, or corrective action.
- (c) Where the AMO is contracted by an AOC holder to carry out maintenance, that AMO shall report to the AOC holder any condition affecting the aircraft or aeronautical product.
  - (d) Reports shall be made as soon as practicable, but in any case within three days of the AMO identifying the condition to which the report relates.

#### 6.5.1.11 AUTHORITY TO CONDUCT INSPECTIONS

- (a) Each certificated approved maintenance organisation must allow the Authority to inspect that approved maintenance organisation and any of its contract maintenance facilities at any time to determine compliance with this part. Arrangements for maintenance, preventive maintenance, or alterations by a contractor must include provisions for inspections of the contractor by the Authority.

#### 6.5.1.12 AMO PERFORMANCE STANDARDS

- (a) Each certificated approved maintenance organisation that performs any maintenance, preventive maintenance, or modifications for an air operator certificated under Part 9 having an approved maintenance programme under Part 9.4.1.12 and approved continuous maintenance programme under Part 9.4.1.13 shall perform that work in accordance with the AOC holder's manuals.
- (b) Except as provided in paragraph (a), each certificated approved maintenance organisation shall perform its maintenance and modification operations in accordance with the applicable standards in Part 5, Airworthiness. It shall maintain, in current condition, all manufacturer's service manuals, instructions, and service bulletins that relate to the articles that it maintains or modifies.
- (c) In addition, each certificated approved maintenance organisation with an avionics rating shall comply with those sections in Part 5 that apply to electronic systems, and shall use materials that conform to approved specifications for equipment appropriate to its rating. It shall use test apparatus, shop equipment, performance standards, test methods, alterations, and calibrations that conform to the manufacturer's specifications or instructions, approved specification, and if not otherwise specified, to accepted good practices of the aircraft avionics industry.

## **CURAÇAO CIVIL AVIATION REGULATIONS**

### **PART 6 — IMPLEMENTING STANDARDS**



## **PART 6 — IMPLEMENTING STANDARDS**

**IS: 6.2.1.3    RESERVED**

**IS: 6.2.1.5    RESERVED**

**IS: 6.2.1.12 QUALITY SYSTEM**

- (a) In order to show compliance with 9.2.2.3, an AMO should establish its quality system in accordance with the instruction and information contained in the following paragraphs.

**1.0. General.****1.1 Terminology.**

- (a) The terms used in the context of the requirement for an AMO's quality system have the following meaning:
- (1) **Accountable Manager.** The person acceptable to the Authority who has corporate authority for ensuring that all maintenance activities can be financed and carried out to the standard required by the Authority, and any additional requirements defined by the AMO.
  - (2) **Quality assurance.** Quality assurance, as distinguished from quality control, involves activities in the business, systems, and technical audit areas. A set of predetermined, systemic actions which are required to provide adequate confidence that a product or service satisfies quality requirements.

**1.2 Quality Policy.**

- 1.2.1** An AMO shall establish a formal, written quality policy statement that is a commitment by the accountable manager as to what the quality system is intended to achieve. The quality policy should reflect the achievement and continued compliance with the Curaçao Regulations together with any additional standards specified by the AMO.
- 1.2.2** The accountable manager is an essential part of the AMO management organisation. The term "accountable manager" is intended to mean the Chief Executive/President/Managing Director/ General Manager, etc. of the AMO, who by virtue of his or her position has overall responsibility (including financial) for managing the organisation.
- 1.2.3** The accountable manager will have overall responsibility for the AMO quality system, including the frequency, format and structure of the internal management evaluation activities as prescribed in paragraph 3.9 below.

**1.3 Purpose of the Quality System.**

- 1.3.1** The quality system should enable the AMO to monitor compliance with these Curaçao Regulations, the AMO's manual system, and any other standards specified by the AMO, or the Authority, to ensure safe operations and airworthy aircraft.

**1.4 Quality Manager.**

- 1.4.1** The function of the quality manager to monitor compliance with, and the adequacy of, procedures required to ensure safe operational practices and airworthy aircraft as required by these Curaçao Regulations may be carried out by more than one person by means of different, but complementary, quality assurance programmes.
- 1.4.2** The primary role of the quality manager is to verify, by monitoring activity in the field of, maintenance, that the standards required by the Authority, and any additional requirements defined by the AMO, are being carried out under the supervision of the relevant required management personnel.
- 1.4.3** The quality manager should be responsible for ensuring that the quality assurance programme is properly established, implemented and maintained.

**1.4.4** The quality manager should:

- (a) Report to the accountable manager;
- (b) Not be one of the required management personnel; and
- (c) Have access to all parts of the AMO's, and as necessary, any sub-contractor's organisation.

**1.4.5** In the case of small/very small AMO, the posts of the Accountable Manager and quality manager may be combined.

## **2.0 Quality System.**

### **2.1 Introduction.**

**2.1.1** The AMO's quality system should ensure compliance with and adequacy of operational and maintenance activities requirements, standards, and procedures.

**2.1.2** The AMO should specify the basic structure of the quality system applicable to the operation.

**2.1.3** The quality system should be structured according to the size and complexity of the organisation to be monitored.

### **2.2 Scope.**

**2.2.1** As a minimum, the quality system should address the following:

- (a) The provisions of these [Model Regulations];
- (b) The AMO's additional standards and operating practices;
- (c) The AMO's quality policy;
- (d) The AMO's organisational structure;
- (e) Responsibility for the development, establishment and management of the quality system;
- (f) Documentation, including manuals, reports and records;
- (g) Quality procedures;
- (h) Quality assurance;
- (i) The required financial, material and human resources;
- (j) Training requirements.

**2.2.2** The quality system should include a feedback system to the accountable manager to ensure that corrective actions are both identified and promptly addressed. The feedback system should also specify who is required to rectify discrepancies and non-compliance in each particular case, and the procedure to be followed if corrective action is not completed within an appropriate timescale.

### **2.3 Relevant Documentation.**

**2.3.1** Relevant documentation includes the relevant part of the operator's manual system.

**2.3.2** In addition, relevant document should include the following:

- (a) Quality policy;
- (b) Terminology;
- (c) Specified maintenance standards;
- (d) A description of the organisation;
- (e) The allocation of duties and responsibilities;
- (f) Operational procedures to ensure regulatory compliance;
- (g) Accident prevention and flight safety programme;

- (h) The quality assurance programme, reflecting:
  - (1) Schedule of the monitoring process;
  - (2) Audit procedures;
  - (3) Reporting procedures;
  - (4) Follow-up and corrective action procedures;
  - (5) Recording system;
  - (6) The training syllabus; and
  - (7) Document control

### **3.0 Quality assurance programme.**

#### **3.1 Introduction.**

**3.1.1** The quality assurance programme should include all planned and systematic actions necessary to provide confidence that all maintenance is conducted in accordance with all applicable requirements, standards and I procedures.

**3.1.2** When establishing a quality assurance programme, consideration should be given to at least the following:

- (a) Quality inspection;
- (b) Audit;
- (c) Auditors;
- (d) Auditor's independence
- (e) Audit scope;
- (f) Audit scheduling;
- (g) Monitoring and corrective action;
- (h) Management evaluation

#### **3.2 Quality Inspection.**

**3.2.1** The primary purpose of a quality inspection is to observe a particular event/action/document, etc. in order to verify whether established procedures and requirements are followed during the accomplishment of that event and whether the required standard is achieved.

**3.2.2** Typical subject areas for quality inspections are:

- (1) Facilities size and segregation;
- (2) Office accommodation
- (3) Work environment
- (4) Storage
- (5) Management changes
- (6) Staff numbers and man-hour plan
- (7) Competence process
- (8) Qualifying certifying staff;
- (9) Records of certifying staff;
- (10) Issue of authorisations
- (11) Adequate equipment;
- (12) Equipment control and calibration;
- (13) Approved data held;
- (14) Modified maintenance data;

- (15) Data availability;
- (16) Data up to date;
- (17) Aircraft release;
- (18) Release document contents;
- (19) Release control
- (20) Details on work documents;
- (21) Operator's copy of release;
- (22) Record retention;
- (23) Reporting unairworthy findings;
- (24) Clear work orders;
- (25) Procedures per AMO Procedures Manual;
- (26) Suppliers and subcontractors;
- (27) Acceptance of parts;
- (28) Parts control in stores;
- (29) Use of tools;
- (30) Cleanliness standards;
- (31) Control of repairs;
- (32) Aircraft Maintenance Programme completion;
- (33) Airworthiness directive control;
- (34) Control of alterations;
- (35) Control of working documents;
- (36) Base maintenance defects;
- (37) Defective parts to stores;
- (38) Parts to outside contractors;
- (39) Computer maintenance systems;
- (40) Engine running;
- (41) Aircraft procedures;
- (42) Line maintenance control parts;
- (43) Line servicing control;
- (44) Line defect control;
- (45) Aircraft Technical Log – Maintenance Records section completion;
- (46) Pool and loan parts;
- (47) Return defective parts to base;
- (48) Product maintenance exemption control;
- (49) Procedures deviation control;
- (50) Special services control (NDI);
- (51) Contractors working teams;
- (52) Product audit;
- (53) Privileges and locations control;
- (54) Limitation control;
- (55) Control of changes.

**3.2.3** Typical methods for quality inspections for maintenance include:

- (a) Product sampling - the part inspection of a representative sample of the aircraft fleet;
- (b) Defect sampling - the monitoring of defect rectification performance;
- (c) Concession sampling - the monitoring of any concession to not carry out maintenance on time;

**3.3 Audit.**

**3.3.1** An audit is a systematic and independent comparison of the way in which an operation is being conducted against the way in which the published operational procedures say it should be conducted.

**3.3.2** Audits should include at least the following quality procedures and processes:

- (a) A statement explaining the scope of the audit;
- (b) Planning and preparation;
- (c) Gathering and recording evidence; and
- (d) Analysis of the evidence.

**3.3.3** Techniques that contribute to an effective audit are:

- (a) Interviews or discussions with personnel;
- (b) A review of published documents;
- (c) The examination of an adequate sample of records;
- (d) The witnessing of the activities that make up the operation; and
- (e) The preservation of documents and the recording of observations.

**3.4. Auditors.**

**3.4.1** An AMO should decide, depending upon the complexity of the organisation, whether to make use of a dedicated audit team or a single auditor. In any event, the auditor or audit team should have relevant maintenance experience.

**3.4.2** The responsibilities of the auditors should be clearly defined in the relevant documentation.

**3.5 Auditor's Independence.**

**3.5.1** Auditors should not have any day-to-day involvement in the area of the maintenance activity that is to be audited. An AMO may, in addition to using the services of full-time dedicated personnel belonging to a separate quality department, undertake the monitoring of specific areas or activities by the use of part-time auditors. An AMO whose structure and size does not justify the establishment of full-time auditors, may undertake the audit function by the use of part-time personnel from within its own organisation or from an external source under the terms of an agreement acceptable to the Authority. In all cases the AMO should develop suitable procedures to ensure that persons directly responsible for the activities to be audited are not selected as part of the auditing team. Where external auditors are used, it is essential that any external specialist is familiar with the type of operation and/or maintenance conducted by the operator.

**3.5.2** The AMO's quality assurance programme should identify the persons within the company who have the experience, responsibility and authority to:

- (a) Perform quality inspections and audits as part of ongoing quality assurance;
- (b) Identify and record any concerns or findings, and the evidence necessary to substantiate such concerns or findings;
- (c) Initiate or recommend solutions to concerns or findings through designated reporting channels;
- (d) Verify the implementation of solutions within specific timescales;

- (e) Report directly to the quality manager.

### **3.6 Audit Scope.**

**3.6.1** AMOs are required to monitor compliance with the operational and maintenance procedures they have designed to ensure safe operations, airworthy aircraft and the serviceability of both operational and safety equipment. In doing so they should as a minimum, and where appropriate, monitor:

- (a) Organisation;
- (b) Plans and company objectives;
- (c) AMO certification (AMO/Operations specifications)
- (d) Supervision;
- (e) Manuals, logs, and records;
- (f) Duty time limitations, rest requirements, and scheduling;
- (g) Maintenance programmes and continued airworthiness;
- (h) Airworthiness directives management;
- (i) Maintenance accomplishment;
- (j) Defect deferral;
- (k) Dangerous goods;
- (l) Security;
- (m) Training.

### **3.7 Audit Scheduling.**

**3.7.1** A quality assurance programme should include a defined audit schedule and a periodic review cycle area by area. The schedule should be flexible, and allow unscheduled audits when trends are identified. Follow-up audits should be scheduled when necessary to verify that corrective action was carried out and that it was effective.

**3.7.2** An AMO should establish a schedule of audits to be completed during a specified calendar period. All aspects of the operation should be reviewed within every 12-month period in accordance with the programme unless an extension to the audit period is accepted as explained below. An AMO may increase the frequency of audits at its discretion but should not decrease the frequency without the agreement of the Authority. Audit frequency should not be decreased beyond a 24-month period interval.

**3.7.3** When an AMO defines the audit schedule, significant changes to the management, organisation, operation, or technologies should be considered as well as changes to the regulatory requirements.

### **3.8 Monitoring and Corrective Action.**

**3.8.1** The aim of monitoring within the quality system is primarily to investigate and judge its effectiveness and thereby to ensure that defined policy and maintenance standards are continuously complied with. Monitoring activity is based upon quality inspections, audits, corrective action and follow-up. The AMO should establish and publish a quality procedure to monitor regulatory compliance on a continuing basis. This monitoring activity should be aimed at eliminating the causes of unsatisfactory performance.

**3.8.2.** Any non-compliance identified as a result of monitoring should be communicated to the manager responsible for taking corrective action or, if appropriate, the accountable manager. Such non-compliance should be recorded, for the purpose of further investigation, in order to determine the cause and to enable the recommendation of appropriate corrective action.

**3.8.3** The quality assurance programme should include procedures to ensure that corrective actions are taken in response to findings. These quality procedures should monitor such actions to verify their effectiveness and that they have been completed. Organisational responsibility and accountability for the implementation of corrective action resides with the department cited in the report identifying the finding.



The accountable manager will have the ultimate responsibility for resourcing the corrective active action and ensuring, through the quality manager, that the corrective action has re-established compliance with the standard required by the Authority, and any additional requirements defined by the operator.

**3.8.4** Corrective action. Subsequent to the quality inspection/audit, the AMO should establish:

- (a) The seriousness of any findings and any need for immediate corrective action;
- (b) The origin of the finding;
- (c) What corrective actions are required to ensure that the non-compliance does not recur;
- (d) A schedule for corrective action;
- (e) The identification of individuals or departments responsible for implementing corrective action;
- (f) Allocation of resources by the accountable manager, where appropriate

**3.8.5** The quality manager should:

- (a) Verify that corrective action is taken by the manager responsible in response to any finding of non-compliance;
- (b) Verify the corrective action includes the elements outlined in paragraph 3.8.4 above;
- (c) Monitor the implementation and completion of corrective action'
- (d) Provide management with an independent assessment of corrective action; implementation and completion;
- (e) Evaluate the effectiveness of corrective action through follow-up process.

### **3.9 Management Evaluation.**

**3.9.1** A management evaluation is a comprehensive, systematic, documented review by the management of the quality system, policies and procedures, and should consider:

- (a) The results of quality inspections, audits and any other indicators;
- (b) The overall effectiveness of the management organisation in achieving stated objectives.

**3.9.2** A management should identify and correct trends, and prevent, where possible, future non-conformities. Conclusions and recommendations made as a result of an evaluation should be submitted in writing to the responsible manager for action. The responsible manager should be an individual who has the authority to resolve issues and take action.

**3.9.3** The accountable manager should decide upon the frequency, format and structure of internal management evaluation activities.

### **3.10 Recording.**

**3.10.1** Accurate, complete and readily accessible records documenting the results of the quality assurance programme should be maintained by the AMO. Records are essential data to enable an operator to analyse and determine the root causes of non-conformity, so that areas of non-compliance can be identified and addressed.

**3.10.2** The following records should be retained for a period of 5 years:

- (a) Audit schedules;
- (b) Quality inspection and audit reports;
- (c) Responses to findings;

- (d) Corrective action reports;
- (e) Follow-up and closure reports; and
- (f) Management evaluation reports.

#### **4.0 Quality Assurance Responsibility for Sub-Contractors.**

##### **4.1 Sub-Contractors.**

**4.1.1** AMOs may decide to sub-contract out certain activities to external agencies for the provision of services related to areas such as:

- (a) Maintenance;
- (b) Training;
- (c) Manual preparation.

**4.1.2** The ultimate responsibility for the product or service provided by the sub-contractor always remains with the AMO. A written agreement should exist between the AMO and the sub-contractor clearly defining the safety related services and quality to be provided. The sub-contractor's safety related activities relevant to the agreement should be included in the AMO's quality assurance programme.

**4.1.3** The AMO should ensure that the sub-contractor has the necessary authorisation/approval when required and commands the resources and competence to undertake the task.

##### **5.0. Quality System Training.**

###### **5.1 General.**

**5.1.1** An AMO should establish effective, well-planned and resourced quality related briefing for all personnel.

**5.1.2** Those responsible for managing the quality system should receive training covering:

- (a) An introduction to the concept of the quality system;
- (b) Quality management;
- (c) The concept of quality assurance;
- (d) Quality manuals;
- (e) Audit techniques;
- (f) Reporting and recording; and
- (g) The way in which the quality system will function in the company

**5.1.3** Time should be provided to train every individual involved in quality management and for briefing the remainder of the employees. The allocation of time and resources should be governed by the size and complexity of the AMO.

###### **5.2 Sources of Training.**

**5.2.1** Quality management courses are available from the various [National] or International Standards Institutions, and an AMO should consider whether to offer such courses to those likely to be involved in the management of quality systems. AMO's with sufficient appropriately qualified staff should consider whether to carry out in-house training.

#### **6.0 Organisations with 20 or Less Full-Time Employees.**

##### **6.1 Introduction.**

**6.1.1** The requirement to establish and document a quality system and to employ a quality manager applies to all AMOs. References to large and small operators elsewhere in these Regulations are governed by aircraft capacity (i.e. more or less than 20 seats) and by mass (i.e. greater or less than 10 tonnes

maximum take-off mass). Such terminology is not relevant when considering the scale of an operation and the quality system required. In the context of quality systems therefore, operators should be categorised according to the number of full time staff employees.

**6.2 Scale of Operation.**

**6.2.1** AMOs who employ 5 or less full time staff are considered to be “very small” while those employing between 6 and 20 full time employees are regarded as “small” operators as far as quality systems are concerned. Full-time in this context means employed for not less than 35 hours per week excluding vacation periods.

**6.2.2** Complex quality systems could be inappropriate for small or very small operators and the clerical effort required to draw up manuals and quality procedures for a complex system may stretch their resources. It is therefore accepted that such operators should tailor their quality systems to suit the size and complexity of their operation and allocate resources accordingly.

**6.3 Quality System for Small/Very Small AMOs.**

**6.3.1** For small and very small AMOs it may be appropriate to develop a quality assurance programme that employs a checklist. The checklist should have a supporting schedule that requires completion of all checklist items within a specified timescale, together with a statement acknowledging completion of a periodic review by top management. An occasional independent overview of the checklist content and achievement of the quality assurance should be undertaken.

**6.3.2** The “small” AMO may decide to use internal or external auditors or a combination of the two. In these circumstances it would be acceptable for external specialists and or qualified organisations to perform the quality audits on behalf of the quality manager.

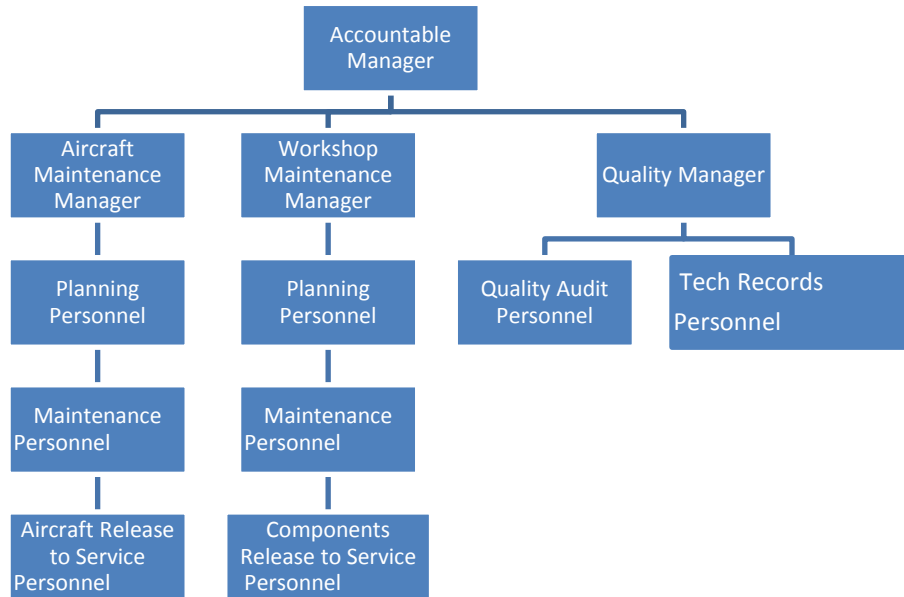
**6.3.3** If the independent quality audit function is being conducted by external auditors, the audit schedule should be shown in the relevant documentation.

**6.3.4** Whatever arrangements are made, the operator retains the ultimate responsibility for the quality system and especially the completion and follow-up of corrective actions.

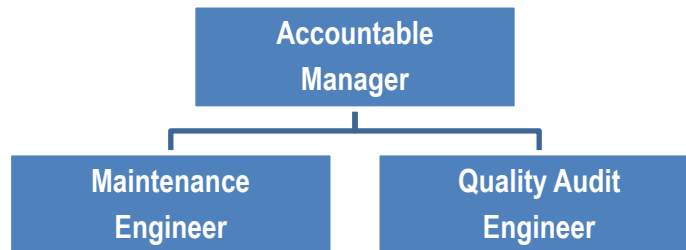
**Quality System – Organisation Examples**

(a) The following diagrams illustrate two typical examples of AMO Quality organisations.

(1) A typical large AMO.



(2) A typical small AMO.



**IS: 6.3.1.2 HOUSING AND FACILITY REQUIREMENTS**

- (a) For ongoing maintenance of aircraft, aircraft hangars shall be available and large enough to accommodate aircraft during maintenance activities.
- (b) Where the hangar is not owned by the AMO, it is recommended to:
  - (1) Establish proof of authorisation to use hangar;
  - (2) Demonstrate sufficiency of hangar space to carry out planned base maintenance by preparing a projected aircraft hangar visit plan relative to the maintenance programme;
  - (3) Update the aircraft hangar visit plan on a regular basis;
  - (4) Ensure, for aircraft component maintenance, aircraft component workshops are large enough to accommodate the components on planned maintenance;
  - (5) Ensure aircraft hangar and aircraft component workshop structures prevent the ingress of rain, hail, ice, snow, wind and dust, etc.;
  - (6) Ensure workshop floors are sealed to minimise dust generation; and
  - (7) Demonstrate access to hangar accommodation for usage during inclement weather for minor scheduled work and/or lengthy defect rectification.
- (c) Aircraft maintenance staff shall be provided with an area where they may study maintenance instructions and complete maintenance records in a proper manner.

*Note: It is acceptable to combine any or all of the above requirements into one office subject to the staff having sufficient room to carry out assigned tasks.*

- (d) Hangars used to house aircraft together with office accommodation shall be such as to insure a clean, effective and conformable working environment.
  - (1) Temperatures should be maintained at a comfortable level.
  - (2) Dust and any other airborne contamination should be kept to a minimum and not permitted to reach a level in the work task area where visible aircraft/component surface contamination is evident.
  - (3) Lighting should be such as to insure each inspection and maintenance task can be carried out.
  - (4) Noise levels should not be permitted to rise to the point of distracting personnel from carrying out inspection tasks. Where it is impractical to control the noise source, such personnel should be provided with the necessary personal equipment to stop excessive noise causing distraction during inspection tasks.
- (e) Where a particular maintenance task requires the application of specific environmental conditions different to the foregoing, then such conditions shall be observed. (Specific conditions are identified in the approved maintenance instructions.)
- (f) Where the working environment for line maintenance deteriorates to an unacceptable level with respect to temperature, moisture, hail, ice, snow, wind, light, dust/other airborne contamination; the particular maintenance or inspection tasks shall be suspended until satisfactory conditions are re-established.
- (g) For both base and line maintenance where dust or other airborne contamination results in visible surface contamination, all susceptible systems shall be sealed until acceptable conditions are re-established.

- (h) Storage facilities for serviceable aircraft components shall be clean, well ventilated and maintained at an even dry temperature to minimise the effects of condensation.
- (i) Manufacturer and standards recommendations shall be followed for specific aircraft components.
- (j) Storage racks shall provide sufficient support for large aircraft components such that the component is not distorted.
- (k) All aircraft components, wherever practicable, shall remain packaged in protective material to minimise damage and corrosion during storage.

### IS: 6.3.1.3 EQUIPMENT, TOOLS, AND MATERIAL

- (a) All applicable tools, equipment, and test equipment used for product acceptance and/or for making a finding of airworthiness shall be traceable to the Curaçao National Standards.
- (b) Except as provided in paragraph (a), in the case of foreign manufactured tools, equipment, and test equipment, the standard provided by the county of manufacture may be used if approved by the Authority.
- (c) Where the manufacturer specifies a particular tool, equipment, or test equipment then that tool, equipment, or test equipment shall be used unless the manufacturer has identified the use of an equivalent.
- (d) Except as provided in paragraph (c), tools, equipment, or test equipment other than that recommended by the manufacturer will be acceptable based on at least the following:
  - (1) The AMO shall have a procedure in the Maintenance Procedures Manual if it intends to use equivalent tools, equipment, or test equipment other than that recommended by the manufacturer.
  - (2) The AMO shall have a programme to include:
    - (i) A description of the procedures used to establish the competence of personnel that make the determination of equivalency to tools, equipment, or test equipment.
    - (ii) Conducting and documenting the comparison made between the specification of the tool, equipment or test equipment recommended by the manufacturer and the equivalent tool, equipment, or test equipment proposed.
    - (iii) Ensuring that the limitations, parameters, and reliability of the proposed tool, equipment, or test equipment are equivalent to the manufacturer's recommended tools, equipment, or test equipment.
    - (iv) Ensuring that the equivalent tool, equipment, or test equipment is capable of performing the appropriate maintenance function, all normal tests, or calibrations, and checking all parameters of the aircraft or aeronautical product undergoing maintenance or calibration.
- (e) The AMO shall have full control of the equivalent tool, equipment, or test equipment (i.e., ownership, lease, etc.)
- (f) An AMO approved for base maintenance shall have sufficient aircraft access equipment and inspection platforms/docking such that the aircraft may be properly inspected.

- (g) The AMO shall have a procedure to inspect/service and, where appropriate, calibrate tools, equipment, and test equipment on a regular basis and indicate to users that an item is within any inspection or service or calibration time limit.
- (h) The AMO shall have a procedure if it uses a standard (primary, secondary or transfer standards) for performing calibration, to ensure that standard cannot be used to perform maintenance.
- (i) A clear system of labeling all tooling, equipment and test equipment shall be used to give information on when the next inspection or service or calibration is due, and give status information if the item is unserviceable for any other reason where it may not be obvious.
- (j) A clear system of labeling all tooling, equipment, and test equipment shall be used to give information on when such tooling, equipment, and test equipment is not used for product acceptance and/or for making a finding of airworthiness.
- (k) A register shall be maintained for all calibrated tools, equipment and test equipment together with a record of calibrations and standards used.
- (l) Inspection, service, or calibration on a regular basis shall be in accordance with the equipment manufacturers' instructions except where the AMO can show by results that a different time period is appropriate in a particular case and is acceptable to the Authority.

#### **IS: 6.4.1.1 PERSONNEL REQUIREMENTS**

- (a) The AMO functions shall be subdivided under individual managers or combined in any number of ways, dependent upon the size of the AMO.
  - (b) The AMO shall have, dependent upon the extent of approval, the following:
    - (1) A base maintenance manager.
    - (2) A line maintenance manager.
    - (3) A workshop manager 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 Authority.*
- (c) The Accountable Manager shall be responsible for ensuring that all necessary resources are available to accomplish maintenance required to support the AMO's approval.
  - (d) The Base Maintenance Manager shall be responsible for:
    - (1) 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
    - (2) Any corrective action resulting from quality compliance monitoring.
  - (e) The Line Maintenance Manager shall be responsible for:
    - (1) Ensuring that all maintenance required to be carried out on the line, including line defect rectification, is performed to the required standards; and
    - (2) Any corrective action resulting from quality compliance monitoring.
  - (f) The Workshop Manager shall be responsible for:
    - (1) Ensuring that all work on aircraft components is performed to required standards; and

- (2) Any corrective action resulting from quality compliance monitoring.
- (g) The Quality Manager shall be responsible for:
  - (1) Monitoring the AMO's compliance with Part 6; and
  - (2) Requesting remedial action as necessary by the base maintenance manager/line maintenance manager/workshop manager or the accountable manager, as appropriate.
- (h) The AMO may adopt any title for managerial positions, but shall identify to the Authority the titles and persons chosen to carry out these functions.
- (i) Where an AMO chooses to appoint managers for all or any combination of the identified functions because of the size of the undertaking, these managers shall report ultimately through either the Base Maintenance Manager or Line Maintenance Manager or Workshop Manager or Quality Manager, as appropriate, to the accountable manager.
- (j) The managers specified in this subsection shall be identified and their credentials submitted to the Authority. To be accepted, such managers shall have relevant knowledge and satisfactory experience related to aircraft/aircraft component maintenance as appropriate in accordance with these regulations.

*Note: Certifying staff may report to any of the managers specified depending upon which type of control the AMO uses (for example, licensed engineers, independent inspection/dual function supervisors, etc.) so long as the quality compliance monitoring staff remain independent.*

- (k) The AMO shall have a production man-hours plan showing that it has sufficient man-hours for the intended work.
- (l) If an AMO is approved for base maintenance, the plan shall relate to the aircraft hangar visit plan.
- (m) Man-hour plans shall regularly be updated.

*Note: Work performed on any aircraft registered outside Curaçao should be taken into account where it impacts upon the production man-hours plan.*

- (n) Quality monitoring compliance function man-hours shall be sufficient to meet the requirement of 6.2.1.12(b).
- (o) Planners, mechanics, supervisors and certifying staff shall be assessed for competence by "on the job" evaluation or by examination relevant to their particular role within the AMO before unsupervised work is permitted.
- (p) To assist in the assessment of competence, job descriptions are recommended for each position. The assessment shall establish that:
  - (1) Planners are able to interpret maintenance requirements into maintenance tasks, and have an appreciation that they have no authority to deviate from the aircraft maintenance programme.
  - (2) Managers are able to properly manage the work output, processes, resources and priorities described in their assigned duties and responsibilities in a safe compliant manner in accordance with regulations and organisation procedures.
  - (3) Mechanics are able to carry out maintenance tasks to any standard specified in the maintenance instructions and will notify supervisors of mistakes requiring rectification to re-establish required maintenance standards.



- (4) Supervisors are able to ensure that all required maintenance tasks are carried out, and where not done or where it is evident that a particular maintenance task cannot be carried out to the maintenance instructions, then such problems will be reported to and agreed by the quality organisation.
  - (5) Certifying staff are able to determine when the aircraft or aircraft component is and is not ready for release to service.
  - (6) Support staff are able to determine that relevant tasks or inspections have been carried out to the required standard.
  - (7) Quality audit staff are able to monitor compliance with Part-6 identifying non-compliance in an effective and timely manner so that the organisation may remain in compliance with Part-6.
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- (q) In the case of planners, supervisors, and certifying staff, knowledge of AMO procedures relevant to their particular role shall be demonstrated.
  - (r) Training of certifying staff shall be performed by the AMO or by an institute selected by the AMO. In either case, the AMO shall establish the curriculum and standards for training, as well as pre-qualification standards for the personnel intended for training. Pre-qualification standards are intended to insure that the trainee has a reasonable chance of successfully completing any course.
  - (s) Examinations shall be set at the end of each training course.
  - (t) Initial training shall cover:
    - (1) Basic engineering theory relevant to the airframe structure and systems fitted to the class of aircraft the AMO intends to maintain;
    - (2) Specific information on the actual aircraft type on which the person is intended to become a certifying person including the impact of repairs and system/structural defects; and
    - (3) Company procedures relevant to the certifying staff's tasks.
  - (u) Continuation training should cover changes in AMO procedures and changes in the standard of aircraft and/or aeronautical products maintained.
  - (v) The training programme shall include details of the number of personnel who will receive initial training to qualify as certifying staff over specified time periods.
  - (w) The training programme established for maintenance personnel and certifying staff by the AMO shall include training in knowledge and skills related to human performance including co-ordination with other maintenance personnel and flight crew.
  - (x) (1) For the purposes of subpart 2.6.1.6(a)(1) and 2.6.1.6(a)(3)(ii) personnel, minor scheduled line maintenance means any minor scheduled inspection/check up to and including a weekly check specified in the aircraft maintenance programme. For aircraft maintenance programmes that do not specify a weekly check, the authority will determine the most significant check that is considered equivalent to a weekly check.
    - (2) Typical tasks permitted after appropriate task training to be carried out by the 2.6.1.6(a)(1) and 2.6.1.6(a)(3)(ii) personnel, for the purpose of these personnel issuing an aircraft certificate of release to service as specified in 6.5.1.7 as part of minor scheduled line maintenance or simple defect rectification are contained in the following list:
      - a. Replacement of wheel assemblies.

- b. Replacement of wheel brake units.
- c. Replacement of emergency equipment .
- d. Replacement of ovens, boilers and beverage makers.
- e. Replacement of internal and external lights, filaments and flash tubes.
- f. Replacement of windscreen wiper blades.
- g. Replacement of passenger and cabin crew seats, seat belts and harnesses.
- h. Closing of cowlings and refitment of quick access inspection panels.
- i. Replacement of toilet system components but excluding gate valves.
- j. Simple repairs and replacement of internal compartment doors and placards but excluding doors forming part of a pressure structure.
- k. Simple repairs and replacement of overhead storage compartment doors and cabin furnishing items.
- l. Replacement of static wicks.
- m. Replacement of aircraft main and APU aircraft batteries.
- n. Replacement of inflight entertainment system components other than public address.
- o. Routine lubrication and replenishment of all system fluids and gases.
- p. The de-activation only of sub-systems and aircraft components as permitted by the operator's minimum equipment list where such de-activation is agreed by the authority as a simple task.
- q. Inspection for and removal of de-icing/anti-icing fluid residues, including removal/closure of panels, cowls or covers or the use of special tools.
- r. Replacement of any other component as agreed by the authority for a particular aircraft type only where it is agreed that the task is simple.
- s. Any other task agreed by the authority as a simple task for a particular aircraft type. This may include defect deferment when all the following conditions are met:
  - a. There is no need for troubleshooting; and
  - b. The task is in the MEL; and
  - c. The maintenance action required by the MEL is agreed by the authority to be simple. In the particular case of helicopters, and in addition to the items above, the following:
- t. Removal and installation of Helicopter Emergency Medical Service (HEMS) simple internal medical equipment.
- u. Removal and installation of external cargo provisions (i.e., external hook, mirrors) other than the hoist.
- v. Removal and installation of quick release external cameras and search lights.
- w. Removal and installation of emergency float bags, not including the bottles.
- x. Removal and installation of external doors fitted with quick release attachments.
- y. Removal and installation of snow pads/skid wear shoes/slump protection pads.

- (3) No task which requires troubleshooting should be part of the authorised maintenance actions. Release to service after rectification of deferred defects should be permitted as long as the task is listed above.
  - (4) The requirement of having appropriate aircraft rated certifying staff qualified as category B1, B2, B3, as appropriate, in the case of aircraft line maintenance does not imply that the organisation must have B1, B2 and B3 personnel at every line station. The AMO procedures manual should have a procedure on how to deal with defects requiring B1, B2 or B3 certifying staff.
  - (5) The authority may accept that in the case of aircraft line maintenance an organisation has only B1, B2 or B3 certifying staff, as appropriate, provided that the authority is satisfied that the scope of work, as defined in the AMO procedures manual does not need the availability of all B1, B2 and B3 certifying staff. Special attention should be taken to clearly limit the scope of scheduled and non-scheduled line maintenance (defect rectification) to only those tasks that can be certified by the available certifying staff category.
- (y) In accordance with subpart 6.4.1.1(k) and subpart 6.4.1.7, the qualification requirements (basic licence, aircraft ratings, recent experience and continuation training) are identical for certifying staff and for support staff. The only difference is that support staff cannot hold certification privileges when performing this role since during base maintenance the release to service will be issued by category C certifying staff.

Nevertheless, the organisation may use as support staff (for base maintenance) persons who already hold certification privileges for line maintenance.

- (z) 1. Holding a Part-2 licence with the relevant type/group rating, does not mean by itself that the holder is qualified to be authorised as certifying staff and/or support staff. The organisation is responsible to assess the competence of the holder for the scope of maintenance to be authorised.
2. The sentence, subpart 6.4.1.7(a) “the organisation shall ensure that certifying staff and support staff have an adequate understanding of the relevant aircraft and/or components to be maintained together with the associated organisation procedures” means that the person has received training and has been successfully assessed on:
- (i) the type of aircraft or component;
  - (ii) the differences on:
    - (A) the particular model/variant;
    - (B) the particular configuration.

The organisation should specifically ensure that the individual competencies have been established with regard to:

- (a) relevant knowledge, skills and experience in the product type and configuration to be maintained, taking into account the differences between the generic aircraft type rating training that the person received and the specific configuration of the aircraft to be maintained.
  - (b) appropriate attitude towards safety and observance of procedures.
  - (c) knowledge of the associated organisation and operator procedures (i.e. handling and identification of components, MEL use, Technical Log use, independent checks, etc.).
3. Some special maintenance tasks may require additional specific training and experience, including but not limited to:

- (a) in-depth troubleshooting;
- (b) very specific adjustment or test procedures;
- (c) rigging;
- (d) engine run-up, starting and operating the engines, checking engine performance characteristics, normal and emergency engine operation, associated safety precautions and procedures;
- (e) extensive structural/system inspection and repair;
- (f) other specialised maintenance required by the maintenance programme.
- (g) For engine run-up training, simulators and/or real aircraft should be used.

4. The satisfactory assessment of the competence should be conducted in accordance with a procedure approved by the authority (item 4.4 of the AMO procedures manual, as described in IS 6.5.1.1).

5. The organisation should hold copies of all documents that attest the competence and recent experience for the period described in subpart 6.4.1.7(j).

Additional information is provided in subpart 2.6.1.6(b)2(Part-2).

- (aa) The organisation issues the certification authorisation when satisfied that compliance has been established with the appropriate paragraphs of Part-6 and Part-2. In granting the certification authorisation the maintenance organisation approved under Part-6 needs to be satisfied that the person holds a valid Part-2 aircraft maintenance licence and may need to confirm such fact with the authority.
- (bb) For the interpretation of “6 months of actual relevant aircraft maintenance experience in any consecutive 2-year period”, the provisions of subpart 2.6.1.6(b)2(Part-2) are applicable.
- (cc)
  1. Continuation training is a two way process to ensure that certifying staff remain current in terms of procedures, human factors and technical knowledge and that the organisation receives feedback on the adequacy of its procedures and maintenance instructions. Due to the interactive nature of this training, consideration should be given to the possibility that such training has the involvement of the quality department to ensure that feedback is actioned. Alternatively, there should be a procedure to ensure that feedback is formally passed from the training department to the quality department to initiate action.
  2. Continuation training should cover changes in relevant requirements such as Part-6, changes in organisation procedures and the modification standard of the products being maintained plus human factor issues identified from any internal or external analysis of incidents. It should also address instances where staff failed to follow procedures and the reasons why particular procedures are not always followed. In many cases the continuation training will reinforce the need to follow procedures and ensure that incomplete or incorrect procedures are identified to the company in order that they can be corrected. This does not preclude the possible need to carry out a quality audit of such procedures.

3. Continuation training should be of sufficient duration in each 2 year period to meet the intent of 6.4.1.7(d) and may be split into a number of separate elements. 6.1.4.7(d) requires such training to keep certifying staff updated in terms of relevant technology, procedures and human factors issues which means it is one part of ensuring quality. Therefore sufficient duration should be related to relevant quality audit findings and other internal / external sources of information available to the organisation on human errors in maintenance. This means that in the case of an organisation that maintains aircraft with few relevant quality audit findings, continuation training could be limited to days rather than weeks, whereas a similar organisation with a number of relevant quality audit findings, such training may take several weeks. For an organisation that maintains aircraft components, the duration of continuation training would follow the same philosophy but should be scaled down to reflect the more limited nature of the activity. For example certifying staff who release hydraulic pumps may only require a few hours of continuation training whereas those who release turbine engine may only require a few days of such training. The content of continuation training should be related to relevant quality audit findings and it is recommended that such training is reviewed at least once in every 24 month period.

4. The method of training is intended to be a flexible process and could, for example, include a Part-3 continuation training course, aeronautical college courses, internal short duration courses, seminars, etc. The elements, general content and length of such training should be specified in the maintenance procedure manual unless such training is undertaken by an organisation approved under Part-3 when such details may be specified under the approval and cross referenced in the maintenance procedure manual.

- (dd) The programme for continuation training should list all certifying staff and support staff and when training will take place, the elements of such training and an indication that it was carried out reasonably on time as planned. Such information should subsequently be transferred to the certifying staff and support staff record as required by 6.4.1.7(j).
- (ee) As stated in 6.4.1.7(f), except where any of the unforeseen cases of subpart 6.4.1.1(l)(3) applies, all prospective certifying staff and support staff should be assessed for competence related to their intended duties in accordance with IS:6.4.1.1(p) and IS 6.4.1.4, as applicable.
- (ff)
  1. The following minimum information as applicable should be kept on record in respect of each staff and support staff:
    - a. Name
    - b. Date of Birth
    - c. Basic Training
    - d. Type Training
    - e. Continuation Training
    - f. Experience
    - g. Qualifications relevant to the authorization
    - h. Scope of the authorisation
    - i. Date of first issue of the authorisation
    - j. If appropriate – expiry date of the authorisation
    - k. Identification Number of the authorisation

2. The record may be kept in any format but should be controlled by the organisation's quality department. This does not mean that the quality department should run the record system.

3. Persons authorised to access the system should be maintained at a minimum to ensure that records cannot be altered in an unauthorised manner or that such confidential records become accessible to unauthorised persons.
  4. The authority is an authorised person when investigating the records system for initial and continued approval or when the authority has cause to doubt the competence of a particular person.
- (gg)
1. It is the responsibility of the Part-6 organisation issuing the category A certifying staff authorisation to ensure that the task training received by this person covers all the tasks to be authorised. This is particularly important in those cases where the task training has been provided by a Part-3 organisation or by a Part-6 organisation different from the one issuing the authorisation.
  2. “Appropriately approved in accordance with (Part-3)” means an organisation holding an approval to provide category A task training for the corresponding aircraft type.
  3. “Appropriately approved in accordance with (Part-6)” means an organisation holding a maintenance organisation approval for the corresponding aircraft type.
- (hh)
1. The privilege for a B2 licence holder to release minor scheduled line maintenance and simple defect rectification in accordance with subpart 2.6.1.6(a)(3)(ii)(Part-2) can only be granted by the Part-6 approved organisation where the licence holder is employed/contracted after meeting all the requirements specified in 6.4.1.7(o). This privilege cannot be transferred to another Part-6 approved organisation.
  2. When a B2 licence holder already holds a certifying staff authorisation containing minor scheduled line maintenance and simple defect rectification for a particular aircraft type, new tasks relevant to category A can be added to that type without requiring another 6 months of experience. However, task training (theoretical plus practical hands-on) and examination/assessment for these additional tasks is still required.
  3. When the certifying staff authorisation intends to cover several aircraft types, the experience may be combined within a single 6-month period.
- For the addition of new types to the certifying staff authorisation, another 6 months should be required unless the aircraft is considered similar per subpart 2.6.1.6(b)2(Part-2) to the one already held.
4. The term “6 months of experience” may include full-time employment or part-time employment. The important aspect is that the person has been involved during a period of 6 months (not necessarily every day) in those tasks which are going to be part of the authorisation.

### **IS 6.4.1.2 INDOCTRINATION, INITIAL, RECURRENT, SPECIALISED AND REMEDIAL TRAINING.**

- (a) Each AMO shall provide indoctrination training for employees that includes at least 40 hours of instruction in at least the following subjects:
- i. Regulations of Curaçao – particularly those associated with AMO maintenance functions and authority as reflected on the certificate and operations specifications.

- ii. Company manuals, policies, procedures and practices, including quality control processes, particularly those associated with ensuring compliance with maintenance (including inspection), preventive maintenance, and alteration procedures established to show compliance with Part 6;
  - iii. Dangerous goods requirements of 6.4.1.3, including other local, Curaçao, and national laws requiring training for different categories of employees.
  - iv. Human performance, including coordination with other maintenance personnel and flight crew.
  - v. Maintenance human factors – the elements should focus on aviation maintenance and safety related issues.
  - vi. Computer systems and software – as applicable to the repair station’s maintenance (including inspection, preventive maintenance and alteration systems and procedures, and
  - vii. Facility security - which shall include company security objectives, specific security procedures, employee responsibilities, actions to take in the event of a security breach, and the organisational security structure.
- (b) Initial training. Each AMO shall provide initial training for employees that includes at least 80 hours of instruction in at least the following subjects consistent with the specific employee position and assigned job activities:
- i. General review;
  - ii. Specific job or task training;
  - iii. Shop safety;
  - iv. Records and recordkeeping;
  - v. Materials and parts;
  - vi. Test equipment, including ground support equipment;
  - vii. Tools;
  - viii. Maintenance human factors, and
  - ix. Any other items as required by the Authority.
- (c) Recurrent training. Each AMO shall provide recurrent training for employees that include at least 8 hours of instruction in the subjects below:
- i. Refresher of subjects covered in initial training
  - ii. New items introduced in the AMO since completion of initial training;
  - iii. Any other items required by the Civil Aviation Authority.
- (d) Specialised training. Each AMO shall provide specialised training, including initial and recurrent, for employees whose duties require a specific skill. Examples of specialised skills include: flame and/or plasma spray operations, special inspection or test techniques, special machining operations, complex welding operations, aircraft inspection techniques or complex assembly operations.

- (e) Remedial training. Each AMO shall provide remedial training to rectify an employee's demonstrated lack of knowledge or skill by providing information as soon as possible. In some instances, remedial training may consist of an appropriately knowledgeable person reviewing procedures with an employee through on-the-job training. Remedial training should be designed to fix an immediate knowledge or skill deficiency and may focus on one individual. Successful remedial training should show an individual what occurred, why it occurred, and in a positive manner, how to prevent it from occurring again.
- (f) Each AMO, in developing training for employees, shall take into account the various training, experience, and skill levels of its employees as follows:
  - i. Employees that hold an AMT licence;
  - ii. Employees with experience performing similar tasks at another AMO;
  - iii. Employees with applicable military aviation maintenance experience; and
  - iv. Employees with no prior skills, experience, or knowledge.
- (g) Each AMO shall have procedures to determine the frequency of recurrent training and the need for specialised and remedial training.
- (h) Each AMO shall assess the competency of its employees for performing his or her assigned duties after completion of initial, recurrent, specialised and remedial training. This assessment of competency shall be appropriately documented in the employee's training records and shall be done by any of the following methods, depending upon the size of the AMO, its capabilities and experience of its employees:
  - i. Written test.
  - ii. Completion of a training course.
  - iii. Skill test.
  - iv. Group exercise.
  - v. On the job assessment.
  - vi. Oral examination in the working environment.

### IS: 6.4.1.3 DANGEROUS GOODS TRAINING PROGRAMME

- (a) Dangerous goods training, at a minimum, shall include at least 8 hours instruction in at least the following:
  - i. General awareness/familiarisation training —designed to provide familiarity with the requirements of this Part and the dangerous goods regulations in Part 9 and to enable the employee to recognise and identify dangerous goods.
  - ii. Function-specific training —concerning the specific requirements of this Part and the dangerous goods regulations in Part 9, or exemptions or special permits issued, relating to the specific functions the employee performs.
    - (i) Safety training concerning:
    - (ii) Emergency response.
    - (iii) Measures to protect the employee from the hazards associated with the dangerous goods to which they may be exposed in the work place, including specific measures the employer has implemented to protect employees from exposure.



- (iv) Methods and procedures for avoiding accidents, such as the proper procedures for handling packages containing dangerous goods.
- iii. Security; awareness training —addressing the security risks associated with dangerous goods transportation and methods designed to enhance transportation security. This training must also include a component covering how to recognise and respond to possible security threats.
- iv. In-depth security training —must include company security objectives, specific security procedures, employee responsibilities, actions to take in the event of a security breach, and the organisational security structure.
- v. Any other training required by the Civil Aviation Authority.

#### IS: 6.4.1.4 HUMAN FACTORS AND HUMAN PERFORMANCE

- (a) In respect to the understanding of the application of human factors and human performance issues, all maintenance organisation personnel should have received an initial and continuation human factors training. This should concern to a minimum:
  - i. Post-holders, managers, supervisors;
  - ii. Certifying staff, support staff and mechanics;
  - iii. Technical support personnel such as planners, engineers, technical record staff;
  - iv. Quality control/assurance staff;
  - v. Specialised services staff;
  - vi. Human factors staff/human factors trainers;
  - vii. Store department staff, purchasing department staff;
  - viii. Ground equipment operators.
- (b) Initial human factors training should cover all the topics of the training syllabus specified in AC 6.4.1.1 either as a dedicated course or else integrated within other training. The syllabus may be adjusted to reflect the particular nature of the organisation. The syllabus may also be adjusted to meet the particular nature of work for each function within the organisation. For example:
  - i. small organisations not working in shifts may cover in less depth subjects related to teamwork and communication;
  - ii. planners may cover in more depth the scheduling and planning objective of the syllabus and in less depth the objective of developing skills for shift working.

All personnel, including personnel being recruited from any other organisation should receive initial human factors training compliant with the organisation's training standards prior to commencing actual job function, unless their competence assessment justifies that there is no need for such training. Newly directly employed personnel working under direct supervision may receive training within 6 months after joining the maintenance organisation.
- (c) The purpose of human factors continuation training is primarily to ensure that staff remain current in terms of human factors and also to collect feedback on human factors issues. Consideration should be given to the possibility that such training has the involvement of the quality department. There should be a procedure to ensure that feedback is formally passed from the trainers to the quality department to initiate action where necessary.

Human factors continuation training should be of an appropriate duration in each two year period in relation to relevant quality audit findings and other internal/external sources of information on human errors in maintenance available to the organisation.

- (d) Human factors training may be conducted by the maintenance organisation itself, or independent trainers, or any training organisations acceptable to the authority.
- (e) The human factors training procedures should be specified in the maintenance procedure manual.

#### **IS: 6.4.1.5 RECORDS OF MANAGEMENT, SUPERVISORY, INSPECTION AND CERTIFYING STAFF**

- (a) The following minimum information shall be kept on record in respect of each management, supervisory, inspection, and certifying person:
  - i. Name;
  - ii. Date of birth;
  - iii. Basic training;
  - iv. Type training;
  - v. Continuation training;
  - vi. Experience;
  - vii. Qualifications relevant to the approval;
  - viii. Scope of the authorisation;
  - ix. Date of first issue of the authorisation;
  - x. Expiration date of the authorisation (if appropriate); and
  - xi. Identification number of the authorisation.
- (b) Records of these individuals shall be controlled.
- (c) The number of persons authorised to access the system shall be limited to minimise the possibility of records being altered in an unauthorised manner and to limit confidential records from become accessible to unauthorised persons.
- (d) A certifying person shall be given reasonable access on request to his or her records.
- (e) The Authority is authorised to and may investigate the records system for initial and continued approval, or when the Authority has cause to doubt the competence of a particular certifying person.
- (f) The AMO shall keep the record of these individuals for at least two years after that person has ceased employment with the AMO or after withdrawal of his or her authorisation. Upon request, the certifying staff shall be furnished with a copy of their record on leaving the AMO.

*Note: Authorised persons, apart from the AMO's quality department or maintenance supervisors/managers, include the Authority.*

**IS: 6.5.1.1 AMO PROCEDURES MANUAL**

- (a) The AMO procedures manual shall contain the following content.

**1.0 General:**

- 1.1 a general description of the scope of work authorised under the organisation's terms of approval;
- 1.2 a description of the organisation's procedures and quality or inspection system.
- 1.3 a general description of the organisation's facilities;
- 1.4 the names, tasks, duties and responsibilities of the person or persons are required to ensure the maintenance organisation is in compliance with the regulations of Curaçao;
- 1.5 a description of the procedures used to establish the competence of maintenance personnel as required by 6.4.1.2 and 6.4.1.3;
- 1.6 a description of the method used for the completion and retention of the maintenance records required by 6.5.1.8. The records shall show that all requirements for signing of the maintenance release have been met. The records shall be kept for a minimum period of one year after signing of the maintenance release;
- 1.7 a description of the procedure for preparing the maintenance release and the circumstances under which the release is to be signed;
- 1.8 the personnel authorised to sign the maintenance release and the scope of their authorisation. The person signing the maintenance release shall be qualified in accordance with Part 2;
- 1.9 a description, when applicable, of the additional procedures for complying with an operator's maintenance procedures and requirements;
- 1.10 a description of the procedures in respect of aeroplanes of over 5 700 kg maximum certificated take-off mass and helicopters of over 3 175 kg maximum certificated take-off mass, whereby information on faults, malfunctions, defects and other occurrences which cause or might cause adverse effects on the continuing airworthiness of the aircraft is transmitted to the organisation responsible for the type design of that aircraft and to the operator's airworthiness authority; and
- 1.11 a description of the procedure for receiving, amending and distributing within the AMO all necessary airworthiness data from the Type Certificate holder or type design organisation;
- 1.12 if the manual is also used to comply with the requirements of the maintenance programme for an aircraft, the maintenance programme should be included.

**2.0 Management**

- 2.1 a statement signed by the CEO confirming that the manual defines the organisation's procedures and associated personnel responsibilities and will be complied with at all times;
- 2.2 an organisation chart showing the associated chains of responsibility of the persons nominated responsible for the AMO safety management system.
- 2.3 notification procedures to the airworthiness authority regarding changes to the organisation's activities/approval/location/personnel;
- 2.4 liaison or contractual arrangements with other organisations that provide services associated with the approval; and
- 2.5 amendment procedures for the manual.

**3.0 Maintenance procedures**

- 3.1 supplier evaluation procedure;
- 3.2 acceptance/inspection of aircraft components and material from outside contractors;
- 3.3 storage, labelling/tagging and release of aircraft components and material to aircraft maintenance;
- 3.4 acceptance of tools and equipment;

- 3.5 calibration of tools and equipment;
- 3.6 use of tools and equipment by staff (including alternate tools);
- 3.7 cleanliness standards of maintenance facilities;
- 3.8 maintenance instructions and relationship to aircraft/aircraft component manufacturers' service information including updating and availability to staff;
- 3.9 repair procedure;
- 3.10 procedures for compliance with an operator's aircraft maintenance programme;
- 3.11 airworthiness directives procedure;
- 3.12 optional modification procedure;
- 3.13 maintenance documentation in use and completion of same;
- 3.14 technical record control;
- 3.15 procedures for handling of defects arising during maintenance;
- 3.16 issue of the maintenance release required by 6.5.1.7
- 3.17 records for the operator (if the organisation is not an operator itself);
- 3.18 reporting of defects and other occurrences as required by the Authority;
- 3.19 return of defective aircraft components to store;
- 3.20 control of defective components sent to outside contractors for overhaul, etc.;
- 3.21 control of computer maintenance record systems;
- 3.22 reference to specific maintenance procedures such as engine running procedures, aircraft pressure run procedures, aircraft towing procedures; and aircraft taxiing procedures;
- 3.23 sub-contract procedures;
- 3.24 human factors; and
- 3.25 manpower resources.
- 3.0 Line maintenance procedures (when applicable)**
- 3.1 line maintenance control of aircraft components tools, equipment, etc.;
- 3.2 line maintenance procedures related to servicing/ fuelling/de-icing, etc.;
- 3.3 line maintenance control of defects and repetitive defects;
- 3.4 line procedure for pooled parts and loan parts; and
- 3.5 line procedure for return of defective parts removed from aircraft.
- 4.0 Quality system procedures**
- 4.1 quality audit of organisation procedures;
- 4.2 quality audit of aircraft;
- 4.3 quality audit findings remedial action procedure;
- 4.4 the qualification and training procedures for personnel issuing a maintenance release ("certifying staff and support staff");
- 4.5 records of certifying staff;
- 4.6 the qualification and training procedures for quality audit personnel;
- 4.7 the qualification and training procedures for mechanics;
- 4.8 exemption process control;
- 4.9 concession control for deviation from organisation's procedures;
- 4.10 qualification procedure for specialised activities such as non-destructive testing (NDT), welding, etc.;
- 4.11 control of manufacturer's working teams based at the premises of the organisation, engaged in tasks

- which interface with activities included in the approval; and
- 4.12** quality audit of sub-contractors (or acceptance of accreditation by third parties, e.g. use of NDT organisations approved by a State regulatory body other than the airworthiness authority).
- 5.0 Examples of standard documents.**
- Examples of standard documents used by the AMO which are associated with activities undertaken under the terms and conditions of the approval, such as: 1) technical record control; or 2) rectification of defects.
- 6.0 Quality assurance audit procedures**
- The list, which follows, is not exhaustive, but includes the principal audit checks which need to be considered.
- 6.1. Checks on aircraft, while undergoing scheduled maintenance, for:**
- 6.1.1** compliance with maintenance programme and mandatory continuing airworthiness requirements and ensuring that only work instructions reflecting the latest amendment standards are used;
- 6.1.2** completion of work instructions including the transfer of defects to additional worksheets, their control, and final collation. Action taken in respect of items carried forward, not completed during the particular inspection or maintenance task;
- 6.1.3** compliance with manufacturers' and the organisation's standard specifications and procedures;
- 6.1.4** standards of inspection and workmanship;
- 6.1.5** condition of corrosion prevention and control treatments and other protective processes;
- 6.1.6** aircraft maintenance which is not limited to the normal working day; procedures adopted during shift changeover of personnel to ensure continuity of inspection and responses; and
- 6.1.7** precautions taken to ensure that, on completion of any work or maintenance, all aircraft are checked for loose tools and miscellaneous small items such as split pins, wire, rivets, nuts, bolts and other debris, and for general cleanliness and housekeeping.
- 6.2 Checks on airworthiness data for:**
- 6.2.1** adequacy of aircraft manuals and other technical information appropriate to each aircraft type, including engines, propellers and other equipment, and the continuing receipt of revisions and amendments, availability of continuing airworthiness data, e.g., Airworthiness Directives, life limits, etc.;
- 6.2.2** assessment of manufacturer's service information, determining its application to aircraft types maintained and the recording of compliance or embodiment;
- 6.2.3** maintenance of a register of manuals and technical literature held within the organisation, their locations and current amendment status; and
- 6.2.4** assurance that all the organisation's manuals and documents, both technical and procedural, are kept up to date.
- 6.3 Checks on stores and storage procedures for:**
- 6.3.1** the adequacy of stores and storage conditions for rotatable components, small parts, perishable items, flammable fluids, engines and bulky assemblies in accordance with the specifications adopted by the organisation;
- 6.3.2** the procedure for examining incoming components, materials and items for conformity with order, release documentation and procurement from sources approved by the organisation;
- 6.3.3** the "batch recording" of goods received and identification of raw materials, the acceptance of part life items into stores, requisition procedures for issue of items from stores;
- 6.3.4** labelling procedures, including the use of serviceable/unserviceable/repairable labels and their certification and final disposal after installation, and labelling procedures for components which are

- serviceable but “part life” only;
- 6.3.5** the internal release procedure to be used when components are to be forwarded to other locations within the AMO;
- 6.3.6** the procedure to be adopted for the release of goods or overhauled items to other organisations (this procedure should also cover items being sent away for rectification or calibration);
- 6.3.7** the procedure for the requisitioning of tools together with the system for ensuring that the location of tools, and their calibration and maintenance status, is known at all times; and
- 6.3.8** control of shelf life and storage conditions in the stores; control of the free-issue dispensing of standard parts, identification and segregation.
- 6.4 Checks on maintenance facilities for:**
- 6.4.1** cleanliness, state of repair and correct functioning of hangars, hangar facilities and special equipment and the maintenance of mobile equipment;
- 6.4.2** adequacy and functioning of special services and techniques including welding, nondestructive inspection (NDI), weighing, painting;
- 6.4.3** viewer/printer equipment provided for use with microfiche, microfilm and compact disk, ensuring that regular maintenance takes place and an acceptable standard of screen reproduction and printed copy is achieved;
- 6.4.4** the adequacy of special tools and equipment appropriate to each type of aircraft, including engines, propellers and other equipment;
- 6.4.5** the calibration and maintenance of tools and measuring equipment; and f) environmental controls.
- 6.5 Checks on the AMO’s general airworthiness control procedures for:**
- 6.5.1** monitoring the practices of the organisation in respect of scheduling or pre-planning maintenance tasks to be carried out in the open air and adequacy of the facilities provided;
- 6.5.2** operation of the system for service difficulty reporting required by the Authority
- 6.5.3** authorisation of personnel to issue maintenance releases in respect of inspections and maintenance tasks; the effectiveness and adequacy of training, including continuation training and the recording of personnel experience, training and qualifications for grant of authorisation;
- 6.5.4** the effectiveness of technical instructions issued to maintenance personnel;
- 6.5.5** the adequacy of personnel in terms of qualifications, numbers and ability in all areas required to support the activities included in the approval granted by the airworthiness authority;
- 6.5.6** the efficacy and completeness of the quality audit programme;
- 6.5.7** maintaining logbooks and other required records and ensuring that these documents are assessed in accordance with the requirements of Curaçao;
- 6.5.8** ensuring that repairs are only carried out in accordance with approved repair schemes and practices;
- 6.5.9** control of sub-contractors;
- 6.5.10** control of activities sub-contracted to it, such as management of the operator’s maintenance programme;
- 6.5.11** monitoring “Exemption process control” and monitoring “Concession control for deviation from the AMO’s procedures”; and
- 6.5.12** follow-up internal reporting/occurrences.
- 7.0 Safety Management System (SMS)**
- 7.1.** Address the AMO’s safety management system, required by Part 6: 6.4.1.6 and Part 1: 1.6, with reference to a separate manual or include the SMS practices within the AMO Procedures Manual.

**IS: 6.5.1.7    RESERVED****IS: 6.5.1.9    AIRWORTHINESS DATA- INSTRUCTIONS FOR CONTINUED AIRWORTHINESS**

- (a) The AMO shall be in receipt of all airworthiness data appropriate to support the work performed from the Authority, the aircraft/aeronautical product design organisation, and any other approved design organisation in the State of Manufacture or State of Design, as appropriate. Some examples of maintenance-related documents are:
- i. Civil Aviation Regulations.
  - ii. Associated advisory material.
  - iii. Airworthiness directives.
  - iv. Manufacturers' maintenance manuals.
  - v. Repair manuals.
  - vi. Supplementary structural inspection documents.
  - vii. Service bulletins.
  - viii. Service letters.
  - ix. Service instructions.
  - x. Modification leaflets.
  - xi. Aircraft maintenance programme.
  - xii. NDT Manual, etc.

*Note 1: Paragraph (a) primarily refers to maintenance data that has been transcribed from the Authority and all Type Certificate holders into the AMO's format, such as customised maintenance cards or computer based data.*

*Note 2: To obtain acceptance from the Authority, it is important that accuracy of transcription is assured.*

- (b) A procedure shall be established to monitor the amendment status of all data and maintain a check that all amendments are being received by being a subscriber to any document amendment scheme.
- (c) Airworthiness data shall be made available in the work area in close proximity to the aircraft or aeronautical product being maintained and for supervisors, mechanics, and certifying staff to study.
- (d) Where computer systems are used to maintain airworthiness data, the number of computer terminals shall be sufficient in relation to the size of the work programme to enable easy access, unless the computer system can produce paper copies. Where microfilm or microfiche readers/printers are used, a similar requirement is applicable.

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