



GOVERNMENT OF INDIA

DIRECTORATE GENERAL OF CIVIL AVIATION

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AIRWORTHINESS ADVISORY CIRCULAR

F. No. DGCA-25012(07)/3/2023

Subject: **Maintenance Away from Approved Location(s) as per CAR 145.A.75(c).**

1. Introduction

- 1.1 Rule 133B of the Aircraft Rules, 1937 stipulates that organizations engaged in the maintenance of aircraft and aircraft components shall be approved. Further, CAR 145 specifies the requirements to be met by organizations seeking approval under Rule 133B to conduct aircraft maintenance.
- 1.2 Specifically, CAR 145.A.75(c) allows an organization to maintain any aircraft or any component for which it is approved at any location subject to the need for such maintenance arising either from the unserviceability of the aircraft or from the necessity of supporting occasional line maintenance, subject to the conditions specified in the exposition.
- 1.3 This circular provides the procedure to be followed by organization for performing maintenance on unserviceable aircraft or occasional line maintenance under CAR 145 at an unapproved location as per CAR 145.A.75(c).
- 1.4 The provisions of this AAC are complementary to the requirements of CAR 145 regulation "as amended" and does not supersede or replace the associated regulatory requirements.

2. Regulatory References

Rule 133B of the Aircraft Rules, 1937
CAR 145
CAR M

3. Definition and Applicability.

- 3.1 CAR 145.A.75.(c) allows a CAR 145 AMO to “maintain any aircraft or any component for which it is approved at any location subject to the need for such maintenance arising either from the **unserviceability of the aircraft** or from the necessity of supporting **occasional line maintenance**, subject to the conditions specified in the exposition”.
- 3.2 In addition, Appendix IV to CAR M (Class and Rating system), provides some additional flexibility in case of the B, C and D1 rated organizations (e.g. B/C rated organisation being allowed to carry out maintenance on installed engine/ component during base or line maintenance).
- 3.3 The privilege to perform maintenance in a non-approved location, means that the organisation is issuing a CRS outside the approved locations as per 145.A.50 (aircraft/engine/component/NDT certificate of release to service as applicable depending from the class rating hold by the organisation).
- 3.4 Activity outside the approved locations can be carried as described in the following para 4 “Maintenance away from the approved location under approved privileges as per 145.A.75(c)”.

4. Maintenance away from the approved location under approved privileges as per 145.A.75(c)

- 4.1 The procedure(s) related to granting this privileges shall be approved by DGCA based upon the ability of the Quality System to deal adequately with the CAR 145 requirements. Normally this ability cannot be demonstrated at the time of the initial approval, therefore this procedure cannot be included in the MOE nor approved by DGCA before the first 2 year surveillance cycle has been completed. Exceptions can be granted on a case by case basis for AMOs, who have a justified need to work outside the approved locations immediately after initial approval.
- 4.2 It should be noted that the fact that an organisation has been granted these privileges should not be understood as if any maintenance task could be performed at any location, or that such locations become “approved locations”.

5. Possible Scenarios

The following scenarios may be considered under approved privileges, meaning that the related maintenance activity outside the approved locations can be carried out based on a control procedure in the MOE:

- 5.1 **Scenario 1 - Occasional aircraft line maintenance:** applies only to the Ax rated AMO for the need of supporting an A/C operation in a non-approved location for line maintenance (e.g. one-time flight, short term or seasonal contract, flight schedule change, etc.). The use of this privilege is specifically limited to those cases where the maintenance organisation has a maintenance contract with the customer operator requesting such

maintenance outside the approved location and subject to an MOE control procedure which meets the minimum requirements specified in para 6.2 of this AAC.

5.2 Scenario 2 – A rated AMOs to support an unserviceable aircraft due to an unscheduled event (AOG): applies to the need of aircraft maintenance in the case of an unscheduled/ unexpected event, such as an AOG requiring defect rectification, subject to an MOE control procedure which meets the minimum requirements specified in para 6.3 of this AAC and further subject to the following limitations specific to the A rated AMO:

- The privilege is limited to maintenance organisations having received a work order or having a maintenance contract with the customer/operator requesting such maintenance outside the approved location;
- In the case of Aircraft Base Maintenance activity, prior notification has to be sent to the concerned RAO/ SRAO before starting the activity, to allow evaluation of the risk associated to the activity and possibly consider an on-site audit after receiving the notification.

5.3 Scenario 3 – B/C rated AMO to support “on-wing” maintenance: applies only to activities carried out “on-wing” following a maintenance work order received from the customer/operator (either scheduled or unscheduled maintenance), subject to an MOE control procedure which meets the minimum requirements specified in para 6.3 of this AAC and further subject to the following limitations specific to the B/C rated AMO:

- the activity is performed “on-wing” without removal of the component. Nevertheless, the Bx/Cx AMO may temporarily¹ remove a component for maintenance, in order to improve access to that component, except when such removal generates the need for additional maintenance;
- The MOE (of the Bx/Cx AMO):
 - includes procedures for the necessary coordination between the Bx, Cx, as applicable, and the Ax rated maintenance organisation responsible for issuing the aircraft CRS;
 - clearly indicates that the organisation is allowed to perform maintenance, as applicable, on an installed component/ engine/ APU (“on-wing”), including any associated condition;
 - specifies under which condition such organisation may be allowed to use aircraft maintenance data²;
- where the maintenance task to be performed is only included in the engine/ component maintenance data (e.g. it is only in the ESM or CMM)

¹ “temporarily” implies that the component removed is re-fitted on the same a/c during the same maintenance event before final aircraft CRS.

² EMM/CMM tasks are more detailed and with higher restrictions than any equivalent/similar AMM task supposed to be performed only during aircraft operations. Therefore, in the cases where the B/C rated AMO is intending to use the AMM instead of the relevant EMM/CMM data, the AMO shall liaise with the customer to have a clear indication in the work Order to use the AMM. Such decision cannot be of the B/C rated AMO which shall respectively use EMM/CMM data unless otherwise specified in the work order.

confirmation from the OEM is needed that the task can be carried out outside the workshop environment;

- In case of scheduled maintenance, the repetitive use of the privilege at the same location or for the same aircraft at different locations is not permitted. In such a case, approval for line maintenance may be obtained for the location(s);
- With regards to Cx rating, this privilege is intended for those components which are not readily transportable (e.g. thrust reverser, radome, LDG strut, etc.);

5.4 **Scenario 4 – NDT activities under D1 rating:** applies only to the D1 rated AMO. This class rating is only necessary for an AMO that carries out NDT as a particular task for another organisation and by definition this activity may need to be carried out at the customer's facility where the particular aircraft, engine or component is located, subject to an MOE control procedure which meets the minimum requirements specified in para 6.3 of this AAC and further subject to the following limitations specific of the D1 rated AMO:

- The MOE includes procedures for the necessary coordination between the D1 rated AMO and, as applicable, the Ax, Bx, Cx rated maintenance organisation responsible for issuing the final CRS of the aircraft, engine, component on which the NDT activity is carried out;
- DGCA is not intending to issue CAR 145 approval to D1 organizations only performing activities outside the approved locations without a permanent facility at the approved address where all applicable CAR145 organizations requirements are met, with particular reference to having facilities, personnel, maintenance data, tools and equipment to perform the intended/approved scope of work.

5.5 The following table summarises the acceptable cases of working outside the approved locations not requiring prior approval:

Possible Scenario	Ax		Bx	Cx	D1	MOE Control Procedure
Scenario 1 - Occasional aircraft line maintenance	X					Para 6.2
Scenario 2 – A rated AMOs to support an unserviceable aircraft due to an unscheduled event (AOG)	X	X				Para 6.3
Scenario 3 – B/C rated AMO to support “on-wing” maintenance			X	X		Para 6.3
Scenario 4 – NDT activities under D1 rating					X	Para 6.3

6. Condition to be specified in the Exposition.

6.1 When the maintenance organisation wishes to use the privileges described in the previous paragraph, the MOE 1.9 (scope of work) shall make reference to the fact that the maintenance organisation may perform works away from the approved locations, subject to the condition specified in MOE 2.24 (specific maintenance procedure). The MOE 2.24 procedures shall be developed based on the following paragraphs as applicable to the intended scenario and are intended to specify:

- which maintenance tasks are going to be performed under such privilege;
- how the maintenance organisation is going to ensure that the CAR 145 requirements are met in each case (in particular with regards to adequate facilities, sufficient staff, appropriate certifying staff, availability of tooling and equipment, availability of current maintenance data, adequate planning, release to service procedures, etc.);
- how the maintenance organisation's quality system is going to monitor compliance with the above requirements.

6.2 *Occasional aircraft line maintenance (Scenario 1)*

The procedure, shall be based on the following criteria:

(a) Scope of work shall be limited to:

- aircraft type listed in the MOE 1.9 scope of work and;
- routine tasks up to and including weekly check or 100 Hrs or 6 months schedule (or MOE 1.9 maintenance level whichever is less);
- trouble shooting and defect rectification
- any other specific limitation relevant to the organisation class rating, as indicated in para 5 of this AAC under scenario 1.

(b) A process shall be in place, under the responsibility of the Quality Manager, to show:

- how the maintenance Manager ensures that the necessary facilities, certifying staff, tools, equipment, material, maintenance data will be made available as necessary and how the maintenance records will be managed;

- The involvement of the Quality system and its approval for the occasional line maintenance, based on the following criteria:

Use of the non-approved location (consecutive calendar days)	Approval
equal or less than 10	Issued by the Quality manager based either on an on-site audit or a desktop review.
between 10 and 40	Issued by the Quality manager based on an on-site audit.
<p>Note 1: When the duration expected for the maintenance is more than 40 days, the approval of a new line station shall be requested to DGCA, to be listed in the MOE 5.3 (list of line maintenance locations as per 145.A.75.(d)).</p> <p>Note 2: The check/ schedule permitted under para 6.2(a) may be performed on the aircraft whensoever the same falls due at the location within the period approved by the Quality Manager.</p> <p>Note 3: In the absence of Quality Manager, Deputy Quality Manager holding post holder approval may issue approval for use of non-approved location in accordance with this AAC.</p>	

- that, when the privilege is used for more than 10 days (second case in the table above), the concerned RAO/ SRAO is notified of such approval within 7 days from the date of the beginning of the operation. In addition, that a list of all the CRS issued under this procedure will be made available to DGCA upon request;
- (c) The notification shall be formalized using a Form, to be enclosed in the MOE Part 5, including the following minimum information:
- Customer (s) operator requesting the maintenance activity;
 - Aircraft type(s);
 - Scope of the requested maintenance activity;
 - Location;
 - Number and category of certifying staff assigned to support this activity;
 - Quality Manager signature.
- (d) In case of scheduled maintenance, the repetitive use of the privilege at the same location or for the same aircraft at different locations is not permitted. In such a case, approval for line maintenance may be obtained for the location(s).

6.3 ***Maintenance outside the approved locations other than “occasional line maintenance” (Scenario 2, 3 and 4)***

The procedure, shall be based on the following criteria:

(a) The Scope of work shall be limited to:

- aircraft type or components or engines or NDT methods and associated maintenance level as listed in the MOE 1.9 scope of work and;
- any other specific limitation relevant to the organisation class rating, as indicated in para 5 of this AAC under scenario 2, 3 and 4, as applicable.

(b) A process shall be in place, under the responsibility of the Quality Manager, including:

- how the Maintenance Manager ensures that the necessary facilities, certifying staff, tools, equipment, material, maintenance data will be made available as necessary and how the maintenance records will be managed;
- the involvement of the Quality System and its approval for any work away from the approved location, based on a desktop review;
- availability of a list of all the CRS issued under this procedure to be made available to DGCA upon request;

In the case scenario 2 is used to perform aircraft base maintenance activities, a prior notification shall be sent to the concerned RAO/ SRAO before starting the activity (as a reference, the minimum information listed in paragraph 6.2 point (c) of this AAC are expected with the notification).

Sd/-
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