Inspectie Verkeer en Waterstaat
Ministerie van Verkeer en Waterstaat

Maintenance Directive

NL-2010-002

THIS MAINTENANCE DIRECTIVE (MD) IS PUBLISHED BY THE CAA-NL: • Acting as Airworthiness Authority (ICAO Annex 8) as the State of Registry	
Type Approval Holder's Name	Miscellaneous
Supersedure	Not applicable
Subject	**Maintenance – Continuing Airworthiness Records - Status of Repairs**
Manufacturer(s)	Miscellaneous
Applicability	This MD applies to and is limited to: (i) Repairs to aircraft structures only. (ii) Category: Large Aircraft with a type certificate base FAR25/JAR25/CS25. (iii) Registered aircraft in the civil aircraft register of The Netherlands (iv) Owners and Continuing Airworthiness Management Organizations (refer to Annex I (part M), section A, subpart G of Regulation (EC) No 2042/2003) managing aircraft defined in sub (ii) and (iii) of this paragraph. (v) Status list of repairs as stated in bullet 2 of M.A.305(d) in Annex I (part M), section A, subpart C of Regulation (EC) No 2042/2003.
TCDS number	Miscellaneous

Contact
Civil Aviation Authority of the Netherlands
Unit Planning and Support – Section aircraft registry
Saturnusstraat 50
Hoofddorp
P.O. Box 575
2130 AN Hoofddorp
The Netherlands
T +31 70 456 2239
F +31 70 456 3006
info.register@ivw.nl
www.ivw.nl

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Caution
This Maintenance Directive is issued by the Minister of Transport, Public Works and Water Management in accordance with the Aviation Act 2001 (Wet Luchtvaart), Article 3.22. Maintenance Directives affect aviation safety. These are regulations which require immediate attention. No person may operate an aircraft to which a Maintenance Directive applies, except in accordance with the requirements thereof, unless otherwise agreed with the Authority of the State of Registry (EC2042/2003, M.A.305).

Reason	On 28 September 2005 EASA issued and implemented rules for aircraft continuing airworthiness record systems in M.A.305. M.A.305(d) provides a summation of what the aircraft continuing airworthiness records must contain and bullet 2 of M.A.305(d) requires the current status of modifications and repairs. AMC M.A.305(d) provides a clarification of recording this current status: “The status of current modifications and repairs means a list of embodied modifications and repairs together with the substantiating data supporting compliance with the airworthiness requirements.” The reason for requiring a list of embodied repairs is to ensure direct access to maintenance data of approved repairs and to assess the impact of new mandatory instructions for continuing airworthiness. It assures a continuation of the corresponding instructions for continuing airworthiness (ICA-history). Furthermore it helps identifying physical inspections of repairs to get a direct link to approved maintenance data. This MD is issued in order to provide in more detail which repairs at least should be recorded in the list of embodied repairs and the means of compliance. Note: The compliance of this MD is derived from and is closely in-line with the Aging Airplane Safety Rule (AASR) of the FAA. EASA rulemaking is currently processing a comparable (harmonized) EASA rule.
Effective date	01 October 2010
Compliance	The aircraft continuing airworthiness records shall at least comply with the requirements as published in Appendix A of this MD.
Appendix A	Required Action(s) and Compliance Time(s)

Appendix A: Required Action(s) and Compliance Time(s)

1) COMPLIANCE TIME

a) Repairs, which are performed after the effective date of this MD, shall be recorded in the aircraft continuing airworthiness record system within 30 days as stated in subpart M.A.305(a).

b) Repairs, which are performed after 28 September 2005 and before the effective date of this MD, shall be recorded in the aircraft continuing airworthiness records within 6 months after the effective date of this MD.

c) Repairs, which are performed before 28 September 2005, shall be recorded in the aircraft continuing airworthiness records in an acceptable timeline, which corresponds to the FAA Aging Airplane Safety Rule timeline for conducting airplane surveys. This implementation schedule is defined in section 217.a of FAA AC 120-93, dated 20 November 2007. The schedule depends on the percentage of time, cycles, or both, in relation to an aircraft design service goal (DSG) and results into 3 categories:

i) Aircraft less than 75% of DSG on 18 December 2009: repairs shall be recorded in the aircraft continuing airworthiness records at or before the first heavy maintenance check (equivalent to a “D-check”) after an aircraft reaches 75% of DSG, not to exceed the DSG, or a period of 6 years after the effective date of this MD, whichever occurs later.

ii) Aircraft between 75% of DSG and DSG on 18 December 2009: repairs shall be recorded in the aircraft continuing airworthiness records at or before the next heavy maintenance check (equivalent to a “D-check”) after 20 December 2010, not to exceed the DSG or 6 years, whichever occurs later.

iii) Aircraft beyond DSG on 18 December 2009: repairs shall be recorded in the aircraft continuing airworthiness records at or before the next heavy maintenance check (equivalent to a “D-check”) after 20 December 2010, not to exceed 6 years.

2) MEANS OF COMPLIANCE

a) Repairs on aircraft structures, at least those repairs defined in sub 3) of this Appendix, should be recorded on the list of embodied repairs. The list of embodied repairs should at least contain the following parameters for each single repair-entry:

i) Description of repair.
ii) Location of repair.
iii) Reference to approved maintenance data (substantiation documentation: reference data such as DTA).
iv) Supplemental inspections and limitations when applicable.
v) Date of accomplishment of the repair.

Optional parameters are for example:

vi) Reference to damage report.
vii) Reference to accomplishment instructions.
viii) Reference to instruction for continuing airworthiness.
ix) Dimensions of repair.
x) Number of flight cycles/hours at the date of accomplishment of the repair.
xi) Operator specific parameters.

3) DETAILED CONDITIONS FOR COMPLIANCE

a) At least those repairs on aircraft, shall be recorded conform sub 2) of this MD, when those repairs are applied to:
   i) Primary structure, as defined by the applicable Type Certificate Holder in the aircraft specific Structural Repair Manual (SRM).
   ii) Components Vital to Flight Safety, which are defined as:
      (1) Certified Life Limited Parts and Components subjected to Airworthiness Limitations; and
      (2) Major components: under carriage and primary flight controls. For components an additional condition defined in 3b) is applicable.

b) For all components as defined in 3aii), special attention is required for the acceptance check prior to installation, to ensure that 145.A.42 is complied with and specifically that the repairs as specified in this MD have been properly recorded on the authorized release certificate, or in a referred logbook or logcard, to guarantee no loss of instructions for continued airworthiness during the installation of that component.

c) Excepted from sub 3a) of this MD: blend repairs on aircraft parts specified in sub 3a) of this MD when they are within the allowable damage limits specified in the applicable SRM of the Type Certificate Holder and the administration of these repairs is in conformance with this SRM.

d) Notes:
   i) It is recommended to record all repairs on the list of embodied repairs conform sub 2) of this MD.
   ii) All repairs shall be approved and have been shown to be in compliance with the applicable certification specification. For all repairs records as specified in M.A.305(d) shall be stored for periods specified in M.A.305(h).

4) **ALTERNATIVE METHODS OF COMPLIANCE**

If requested and appropriately substantiated, IVW/CAA-NL (Address in header) may approve alternative methods of compliance for this MD.