Australian Government
Civil Aviation Safety Authority

PRINCIPLE

(OPS.13) Managing continuing airworthiness

July 2024

Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Inside front cover artwork: James Baban.

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Table 1. List of acronyms and abbreviations

Acronym/abbreviation	Description
AC	advisory circular
AD	airworthiness directive
AFM	aircraft flight manual
AMC	acceptable means of compliance
AMO	approved maintenance organisation
AOC	air operator's certificate
AWC	aerial work certificate
CAR	Civil Aviation Regulations 1988
CASR	Civil Aviation Safety Regulations 1998
CofA	certificate of airworthiness
HAAMC	head of aircraft airworthiness and maintenance control
HAMC	head of aeroplane maintenance control
ICA	instructions for continuing airworthiness
MC	maintenance controller
MCM	maintenance control manual
MEL	minimum equipment list
MMEL	master minimum equipment list
MR	maintenance release
NAA	national aviation authority
NVIS	night vision imaging system
PSEA	prescribed single-engine aeroplanes
PU	permissible unserviceability
RH	holder of the certificate of registration for an aircraft
RO	registered operator
SoM	system of maintenance

Definitions

Table 2. List of definitions

Term	Definition
aeronautical product	any part or material that is, or is intended by its manufacturer to be, a part of or used in an aircraft, unless excluded by the regulations
air transport operation	a passenger transport operation, a cargo transport operation, or a medical transport operation, which is conducted for hire and reward or is prescribed by an instrument issued under regulation 201.025 of CASR
approved system of maintenance	for an Australian aircraft, means a system of maintenance (SoM) for the aircraft that has been approved under CAR 42M, including any changes to the program that have been approved under CAR 42R
chief executive officer	a key person required under the Act and described in Subpart 119.D and Subpart 138.B.4 of CASR
class A aircraft	an Australian aircraft, other than a balloon, that satisfies either or both of the following paragraphs: (a) the aircraft is certificated as a transport category aircraft (b) the aircraft is being used, or is to be used, by the holder of an Australian air transport AOC which authorises the use of that aircraft in scheduled air transport operations.
class B aircraft	means an Australian aircraft that is not a class A aircraft
exposition	for an Australian air transport operator, means: (i) the set of documents approved by CASA under regulation 119.075 in relation to the operator; and (ii) if the set of documents is changed under regulation 119.085, 119.095 or 119.105, or in accordance with the process mentioned in regulation 119.100—the set of documents as changed
operations manual	for an aerial work operator, means: (i) the set of documents approved by CASA under regulation 138.045 in relation to the operator; or (ii) if the set of documents is changed under regulation 138.060, 138.064 or 138.068, or the process mentioned in regulation 138.066—the set of documents as changed
organisation	product or service provider, operator, business, and company, as well as aviation industry organisations

Reference to regulations

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this Principle are references to the *Civil Aviation Safety Regulations 1998* (CASR).

1. Assessment scope

1.1 Assessment of initial application

CASA uses this protocol document suite to assess the arrangements for managing continuing airworthiness for the following operations:

- Part 121 and Part 135 non-scheduled air transport operations
- Part 133—Air transport operations – rotorcraft
- Part 137—Aerial application operators – other than rotorcraft
- Part 138—Aerial work operations
- Part 141—Recreational, private and commercial flight training, other than certain integrated training courses in an aircraft
- Part 142—Integrated and multi-crew pilot flight training, contracted training and contracted checking activities in an aircraft.

> Note: Protocol suite (OPS.13) is not applicable to aircraft subject to Part 42 Continuing airworthiness management.

This protocol suite will be used to support the assessment of an initial air operator's certificate (AOC) or aerial work certificate (AWC) application under the relevant operational part, or a variation that triggers a significant change—such as the addition of an aircraft.

Regulation 41 of the Civil Aviation Regulations 1988 (CAR) states that the certificate of registration holder (RH) must ensure that all maintenance required to be carried out on the aircraft (including any aircraft components from time to time included in or fitted to the aircraft), by the aircraft's maintenance schedule, is carried out when required by that schedule. However, regulation 202.222 of CASR places this responsibility on the registered operator (RO).

The assessment of an AOC/AWC application will involve verification through a range of activities, including:

- desktop assessment
- site inspection of facilities
- assessment of key personnel and other personnel who may be responsible for continuing airworthiness.

This principle provides guidance to airworthiness inspectors when using the associated *Worksheet (OPS.13) Managing continuing airworthiness*. The worksheet provides the airworthiness inspector with a regulation-based tool for recording the outcomes of the assessment.

1.2 Assessment of a significant change application

An approval under the regulations (including a variation to a current approval) is a significant change under regulations 119.020, 138.012, 141.025 and 142.030. Inspectors must complete the approval data sheet to support the significant change. For regulations 137.080, 137.085, and 137.090, inspectors must complete the approval data sheet to support the amendments.

1.3 Assessment worksheet user instructions

This principle provides guidance to the inspector when using the associated Worksheet (OPS.13) Managing continuing airworthiness. The worksheet provides inspectors with a regulation-based tool for recording the outcomes of the assessment. It is set out as follows:

- user instructions
- assessment worksheets

- assessment summary
- approval data sheet.

1.4 Approvals

The maintenance control manual (MCM) content, required by regulation 42ZY of CAR for Class A aircraft, will form part of the exposition/operations manual and be assessed under regulations 119.075 and 138.045.

Other CASA approvals related to continuing airworthiness, that require their own assessment, will support the initial application and approval (sometimes referred to as subordinate approvals). If required by the regulations, they are:

- special flight permit – approved under regulation 21.200 of CASR
- permissible unserviceability (PU), which includes minimum equipment list (MEL) extension not covered by regulation 91.945 – approved under regulation 21.007 of CASR and regulation 37 of CAR
- MEL initial approval – approved under regulation 91.935 of CASR
- MEL variation – approved under regulation 91.940 of CASR
- MEL extension – approved under regulation 91.945 of CASR
- SoM – approved under Division 3 of Part 4A of CAR
- alternate maintenance release – approved under subregulation 43(1) of CAR
- alternate logbook – approved under subregulation 50B(1) of CAR
- pilot maintenance approved – approved under subregulation 42ZC(6) of CAR
- approval of maintenance controller under regulation 42ZV of CAR
- training program for maintenance personnel under 214 of CAR
- exemption, variation, and exclusion
- prescribed single-engine aeroplanes (PSEA) at initial application.

The following documents, which support continuing airworthiness, may be approved by CASA or a CASA-approved external delegate, for each relevant aircraft:

- systems of maintenance (SoM)
- minimum equipment list (MEL)
- certificate of airworthiness (CofA).

1.5 Other related assessments

The following documents will be used by an airworthiness inspector to assess related approvals:

- Protocol suite (OPS.01) Minimum equipment list
- Protocol suite (OPS.02) Permissible unserviceabilities
- Protocol suite (OPS.03) Prescribed single-engine aeroplanes (PSEA)
- Protocol suite (OPS.04) Navigation authorisations
- Protocol suite (OPS.06) Extended Diversion Time Operations (EDTO)
- Protocol suite (OPS.22) Aircraft ground de-icing and anti-icing program
- Protocol suite (OPS.24) Aircraft leasing arrangements
- Protocol suite (OPS.27) Article 83 bis agreement
- Protocol suite (MP.01) Approval of maintenance programs
- Protocol suite (DEL.03) Pilot maintenance

1.6 Assessment of aeroplane maintenance control (Part 137 only)

Continuing airworthiness management arrangements under Part 137 are referred to as aeroplane maintenance control (refer to regulation 137.070). A Part 137 aerial application operator must nominate a head of aeroplane maintenance control (HAMC) as key personnel. Refer to section 2.1.2 of this principle.

2. Organisational structure

The chief executive officer of an Australian air transport operator or an aerial work operator is accountable for the organisational structure to manage the continuing airworthiness and maintenance of the aircraft they operate. Depending on the size nature and complexity of operations the structure may consist of one person or multiple personnel. To be suitable, the inspector must confirm that the proposed structure will meet operational requirements.

2.1 Person responsible for continuing airworthiness

Each operator must ensure that a person is assigned the responsibility, however named, for the continuing airworthiness and maintenance of aircraft. For Part 119, Part 138, Part 141 and Part 142 operators, the person responsible for continuing airworthiness is not a key personnel position. However, the requirement for an approval for a person (e.g. a maintenance controller) will trigger a significant change under regulations 119.020(c), 138.012(d), 141.025(d) and 142.030(d).

For Part 137 operators, the operator must nominate, and include in their operations manual, the name of the HAMC who holds a key personnel position under section 28(3) of the Civil Aviation Act 1988 (the Act). Under regulation 137.080, 137.085 or 137.090, the amendment to the operations manual must be approved by CASA.

The exposition/operations manual must detail the qualifications and responsibilities for the person responsible for continuing airworthiness. To be suitable, the inspector should confirm the following areas of responsibility are included:

- the maintenance schedule is appropriate and current for each aircraft
- the maintenance release (MR) for each aircraft is valid for the intended operation
- the maintenance scheduling
- the monitoring and recording of aircraft hours, cycles and other information relevant to maintenance scheduling
- the monitoring of deferred maintenance actions
- review of Airworthiness Directives (ADs) for applicability and compliance
- defects and unscheduled maintenance are rectified or deferred compliantly
- the investigation and reporting of defects
- an agreement is in place for aircraft when the operator is not the RO (cross-hire process).

In addition to the above, the inspector should confirm that the following matters are covered (if applicable):

- selection process and contracting of maintenance providers is thorough
- contracts exist for supply of approved data
- process exists for updating the aircraft records system on completion of each maintenance task or inspection
- the aircraft flight manual (AFM) is current and includes all supplements
- each aircraft has a valid CofA for the operation
- process for arranging pilot maintenance training and approval
- the safe and compliant introduction of additional aircraft to the operator's fleet when the operator is the RO.

2.1.1 Support personnel positions

Depending on the size and scope of operations, the organisational structure may include additional personnel to support the airworthiness control of the aircraft. In determining suitability, the inspector should consider the number of aircraft operated and the complexity of the airworthiness control system.

2.1.2 Part 137 aeroplane maintenance control and HAMC

The operator must nominate an individual to be the key personnel position holder (HAMC). The duties should include those duties as listed in the *Standard Operations Manual for Applications Operations* (HAMC position), as this manual may be submitted with the application (refer to regulation 137.040). The duties must include ensuring that the operator complies with Subpart 137.M—Fitting and removal of role equipment.

> Note: The Aerial Agricultural Association of Australia (AAAA) developed the standard operations manual, and it has been accepted by CASA as meeting the requirements of Part 137 in relation to aerial agricultural operations.

The duties of the HAMC should include, as a minimum:

- monitoring of aircraft hours, cycles and other information relevant to the scheduling of maintenance
- scheduling of maintenance as per the requirements of the individual aeroplane logbook statement (which includes the nominated maintenance schedule)
- monitoring, control and review of aircraft maintenance schedules/programs
- compliance with ADs
- arrangement of defect rectification and unscheduled maintenance
- investigation and reporting of defects
- assessing the appropriateness of maintenance providers and monitoring the provider's ongoing performance
- maintenance and security of aircraft and aircraft component records
- storage and handling of any aircraft spares or aircraft servicing products held by the operator
- managing the engine condition trend monitoring (ECTM) program, including data collection, analysis and follow-up actions (as appropriate).

> Note: The above duties should satisfy the operator's responsibility if they are the RH or RO. Refer to regulation 41 of CAR and regulation 202.222 of CASR.

The HAMC must ensure training of company personnel in fitting and removal of role equipment is conducted by an appropriate person.

Interview/Examination

The decision to conduct an interview/examination will depend on the nominee's previous experience and the size and scale of the operations. Unless the nominee has held the equivalent position for another operator and is known to CASA, the inspector should conduct an interview to determine suitability. Where a nominee will also be occupying a key personnel position, the interview/examination should include all elements for each position.
If the interview/examination indicates a lack of knowledge for the role, CASA may direct the nominee to undergo a course of training. The inspector will need to determine the deficiencies and provide feedback to the nominee on what training is required.

Chapter 4 of this principle provides guidance on the conduct of an interview and the use of the interview worksheet.

Use Record of interview (OPS.13) Person responsible for managing continuing airworthiness.

2.1.3 Replacement of personnel responsible

A change to the person responsible for continuing airworthiness of the operator's aircraft is not automatically a significant change under the regulations and would therefore not necessarily require approval. However,

regulation 137.075 requires an operator to advise CASA of a change to the HAMC (key personnel) which must be approved through an amendment to the operations manual.

Subregulation 137.060(5) requires that all key personnel positions are filled, which includes the HAMC. Before a HAMC is absent, the operator must nominate a replacement.

To be suitable, depending on the size and complexity of the operation, an operator may choose to have an alternate person available to take on the duties for managing continuing airworthiness. This may be as simple as monitoring the maintenance release and compliance with airworthiness directives for the duration of the absence of the person responsible.

2.1.4 Maintenance controller for class A aircraft

A maintenance controller (MC) is the person appointed by the operator of a class A aircraft and must be approved by CASA under regulation 42ZV of CAR.

A change to an MC, or the addition of an MC, must be approved by CASA under regulation 42ZV of CAR and therefore constitutes a significant change under the regulations.

Some operators may have multiple MCs. The exposition/operations manual (including the MCM) will need to detail the chain of command and areas of responsibility.

The exposition/operations manual must detail what functions the MC must perform for the aircraft listed on their instrument of appointment:

- the control of all maintenance carried out on the aircraft, either scheduled or unscheduled
- the development, organisation and supervision of all activities and procedures specified in the MCM
- the transfer of an aircraft's maintenance records to a new RO for the aircraft
- the investigation of all defects in the aircraft that come to the attention of the aircraft's maintenance organisation.

Interview/Examination

The decision to conduct an interview/examination will depend on the nominee's previous experience and the size and scale of the operations. Unless the nominee has held the equivalent position for another operator and is known to CASA, the inspector should conduct an interview to determine suitability.

If the interview/examination indicates a lack of knowledge for the role, CASA may direct the nominee to undergo a course of training. The inspector will need to determine the deficiencies and provide feedback to the nominee on what training is required.

Chapter 4 of this principle provides guidance on the conduct of an interview and the use of the interview worksheet.

Use Record of interview (OPS.13) Maintenance controller.

3. Continuing airworthiness management

3.1 Exposition/operations manual

For Part 119 and Part 138 operators, the exposition/operations manual must include a description for managing the continuing airworthiness of an aircraft.

For a Part 141 and Part 142 operators, the exposition/operations manual must include a description of the way turbine-engined aircraft are managed and maintained to assure continuing airworthiness.

However, under subregulations 39(1) and 41(1) of CAR, if the operator is the registered operator of the aircraft, they must ensure that all maintenance required to be carried out on the aircraft, by the aircraft's approved system of maintenance (including any aircraft components from time to time included in or fitted to the aircraft), is carried out when required by that system.

To be suitable the inspector should confirm that the exposition/operations manual includes sufficient information relevant to the continuing airworthiness of the aircraft.

> Note: To assess a maintenance program use Protocol suite (MP.01) Approval of maintenance programs.

An operator's exposition/operations manual must detail each aircraft the operator intends to operate. For Part 119 operators the exposition must detail the type and model of aircraft, for Part 138 and Part 141 the operations manual must list the kind of aircraft. In the case of Part 142, the exposition must list the kind of aircraft flown into, out of, or outside Australian territory.

If the operations include the use of class A aircraft, the exposition/operations manual must include an approved maintenance control manual (MCM) and each class A aircraft must be listed in the MCM.

3.2 Facilities

Regulation 213 of CAR requires an operator to have trained staff, suitable facilities and equipment to ensure that airframes, engines, propellers, instruments, equipment and accessories are properly maintained when they are in use. Regulation 212 of CAR defines the operator as 'an operator engaging in commercial operations'. It is important to understand that this obligation remains with the operator, whether or not they use a third party for their aircraft maintenance.

The suitability of facilities depends on the size and complexity of the operator's maintenance activities. For example, if the operator contracts out the airworthiness management and maintenance to a third party, the facilities may be limited to a process to ensure that the required maintenance is completed in accordance with the approved system of maintenance. The operator should demonstrate how they maintain oversight of the aircraft maintenance program.

3.3 Approved maintenance data

The operator must have access to instructions for continuing airworthiness (ICA) applicable to their aircraft to enable creation of, and amendment to, maintenance schedules and organise required maintenance. This would constitute the continuing airworthiness elements of the reference library required by the regulations.

To be suitable, the inspector should consider the following matters (which may require a site visit to confirm they are operating and effective):

- aircraft type certificate data sheet (TCDS)
- ICA issued by the manufacturer of an aircraft, aircraft components or aircraft material
- ICA issued by the holder of a supplemental type certificate
- CASA website and subscription service

- other national aviation authorities (NAA's) website and subscription service
- master minimum equipment list (MMEL) current version
- role, emergency and survival equipment inspections
- ICA issued under Part 21.

3.4 Airworthiness Directives

The exposition/operations manual should include an explanation of the AD management processes. To be suitable, the inspector should consider the following:

- a nominated person responsible for oversight of AD management
- assurance that the operator has access to, or is in receipt of, all applicable ADs
- review for applicability of each AD
- all applicable ADs are included in maintenance scheduling
- emergency and urgent AD management, and communication to operational personnel.

> Note: If the operator uses a third party for the provision of maintenance services, they must still have visibility of any airworthiness directives applicable to their aircraft.

3.5 Maintenance schedule

Each aircraft must have an approved maintenance schedule.

To be suitable, the inspector should confirm that the exposition/operations manual details the maintenance schedule management as follows:

- nominated person to be responsible for reviewing and controlling the operator's aircraft maintenance schedules and related control and tracking systems
- management of the schedules for any spare equipment, components, major components such as engines, auxiliary power unit (APUs) and propellors
- arrangements for control or review of the operator's aircraft maintenance schedules
- a description to identify defective systems of maintenance or schedules
- correcting a defective maintenance system or schedule
- monitoring aircraft component change intervals that are not part of an approved reliability program. (An operator may voluntarily reduce the change interval of a component, to reduce a maintenance burden, and this reduction is typically included in a SoM)

The operator must include, in their logbook statement, which maintenance schedules are being used for continuing airworthiness, these may include:

- the manufacturers maintenance schedule
- CASA maintenance schedule 5
- a combination of both the manufacturers schedule and the CASA schedule 5.

Notes

- Each aircraft, whether class A or class B, must nominate schedule of maintenance.
- For class A aircraft, the SoM must be approved by CASA or an industry delegate. Refer to Protocol suite (MP.01) Approval of maintenance programs.
- Relief is available for some inspections listed as additional maintenance in Civil Aviation Order (CAO) 100.5.

If the operator wants an extension to a mandatory maintenance schedule item interval (such as an airworthiness limitation) they must provide supporting documentation that usually originates from the original equipment manufacturer (OEM). The extension request is subject to CASA approval.

A suitable exposition/operation may include, if required, the procedures the operator will use to apply to CASA for:

- an aircraft maintenance alternative means of compliance (AMOC)
- extension to a task interval
- replacement of an item required by an AD.

3.6 Servicing and aeronautical products (spares) management

The operator's exposition/operations manual may require details for the storage and management of:

- aeronautical products required for servicing and cleaning of aircraft, this section could include engine and hydraulic oils permitted for servicing by pilots
- major components that are not under the control of a maintenance provider.

3.7 Maintenance release

The exposition/operations manual must include procedures to ensure the correct review and completion of the maintenance release (MR) as part of the in-service activities. This section is typically included in the operational section of the exposition/operations manual.

Continuing airworthiness management should include additional processes for:

- recording, monitoring and verifying accuracy of time-in-service (refer to regulations 43 and 43B of CAR)
- identity of the class A MR in the MCM
- identity of class B MR
- if approved by CASA, alternate MR procedures
- monitoring both the maintenance due that is listed on MRs, and due lists appended to an MR
- PU and SFP limitations management (once issued) for an aircraft
- assurance that deferred maintenance on an expired MR is actioned
- retention of expired MRs.

3.8 Maintenance records

CAO 100.5 details the requirements for maintenance records. To be suitable, the inspector should confirm that procedures are documented to ensure accurate time in service recording and complete, up-to-date, and accurate maintenance records are retained for the periods specified, including:

- acknowledgment of the operator's responsibility to keep and maintain records including logbooks (refer to regulations 50A to 50D of CAR)

- a nominated person to be responsible for keeping or managing maintenance records
- the infrastructure necessary to implement and manage the system and ensure the accuracy and integrity of time in service and maintenance records
- specific procedures to transfer the maintenance records to a new operator
- procedures in the event of aircraft disposal
- if applicable, contractual arrangements for outsourcing maintenance record keeping
- making records available to Australian Transport Safety Bureau (ATSB) and CASA in the event of an incident or accident.

3.9 Defect control and reporting

It is recommended that the operator's procedures include a system to manage defects once they are recorded in the flight technical log or MR, while the aircraft is operational. Such a system should include:

- identifying the nominated person responsible for managing and coordinating defect rectification
- the infrastructure necessary to control and manage defects affecting the operator’s aircraft
- the rectification processes and deferral of rectification with reference to an MEL, configuration deviation guide (CDL), ICA including an AD, or other approved means
- the procedures to ensure that defects are investigated and reported in accordance with Part 4B of CAR.

For assessment of crew member defect reporting procedures refer to:

- Protocol suite (OPS.121) Australian air transport operations - larger aeroplanes
- Protocol suite (OPS.133) Australian air transport operations – rotorcraft
- Protocol suite (OPS.135) Australian air transport operations - smaller aeroplanes
- Protocol suite (OPS.138) Aerial work operations.

3.10 Weight and balance data

The exposition/operations manual must have a process for managing changes to the aircraft weight and balance data. To be suitable, the exposition/operations manual should include:

- a process to ensure aircraft re-weigh is included in the maintenance schedule
- a process that ensures after aircraft modification, re-paint or repair, a review of the weight and balance is carried out.

3.11 Overseas maintenance

If an operator is intending to have maintenance conducted overseas, the exposition/operations manual must ensure that all maintenance performed on the aircraft outside the Australian territory will be:

- carried out in accordance with regulation 42ZD of CAR
- carried out in accordance with the aircraft approved SoM or maintenance schedule
- certified in accordance with regulation 42ZN of CAR
- carried out by a contracting state.

If an MR is issued overseas, the authorised person issuing the MR must be approved by CASA and may include a pilot as the CASA-authorised person. The procedures for managing the issue of MR should be detailed in the operator’s document suite.

3.12 Contractual arrangements for maintenance and training

The operator's exposition/operations manual must detail processes for engaging with other entities that will provide services that contribute to continuing airworthiness management of the operator's aircraft. Service providers can supply aircraft maintenance services, spare parts (aeronautical products), maintenance personnel training and engine trend monitoring data capture. If an operator has their own maintenance organisation, their service arrangement should still be contracted. Service level agreements (SLA) may be the preferred option. To be suitable, the arrangement/agreement must clearly document that the responsibility for managing continuing airworthiness remains with the operator.

The operator must ensure that the maintenance organisations have the capability to maintain their aircraft and are authorised under regulation 42ZC of CAR for the maintenance activities required. The operator may also engage a Part 145 approved maintenance organisation (AMO), provided the AMO has approval to conduct maintenance required under the CAR. This should be determined by a pre-contractual audit conducted by the operator, or an independent auditor and the audit includes checks, at a minimum, that confirm the selected maintenance providers have:

- sufficient facilities
- appropriate tooling and equipment
- approved data/ICA
- sufficient spare parts
- aircraft maintenance engineer (AME) Part 66 licence coverage and personnel.

3.12.1 Sourcing of aeronautical products

The operator must ensure that they, and the maintenance organisations, have access to approved aeronautical products, including components, for their aircraft. This may be determined by an audit of approved suppliers conducted by the operator or an independent auditor.

Components obtained for installation from the manufacturer, overhaul agencies, another operator or maintenance organisation must meet the criteria specified in regulation 42W of CAR. Refer also to AC 20-03 for identification and management of aeronautical products.

3.13 Maintenance personnel training

Regulation 214 of CAR requires an operator to ensure that provision is made for the proper and periodic instruction of all maintenance personnel, particularly in connection with the introduction into service of new equipment or equipment with which the maintenance personnel are not familiar. The training program must be approved by CASA.

If the aircraft is maintained by a Part 145 AMO who is approved to conduct maintenance required by the CAR, there is no need for an approval under regulation 214 of CAR (refer to regulation 337 of CAR).

Examples of when training may be required

- Before introduction of new aircraft into service, aircraft components or equipment with which the maintenance personnel are not familiar.
- Incorporating modifications to aircraft or aircraft systems or variations between aircraft models operated.
- When new or different materials, technology or procedures are introduced into maintenance practices.
- Different operational requirements.
- Engaging new or contract employees.

- Introduction of an MEL.

3.14 Pilot maintenance

An operator may wish to have pilots trained to conduct aircraft maintenance. The operator should include, in their exposition/operations manual, a system of approving a pilot to conduct maintenance of the aircraft.

3.14.1 Schedule 8 maintenance tasks

To be approved to conduct Schedule 8 maintenance tasks, the exposition/operations manual should include:

- the operator's training syllabus
- the person (role) identified to conduct the training and the competency assessment
- the method of recording the training
- a check of who is entitled to hold the approval
- the method of issuing the approval to the pilot and determining when the approval expires
- any re-training requirements.

Note: The operator approves the pilot, while CASA approves the content on initial application.

3.14.2 Non-schedule 8 maintenance tasks

For operators that are unable to readily engage licenced maintenance personnel at remote locations, an application can be made to CASA for flight crew to carry out maintenance tasks that are not included in Schedule 8 of CAR.

Use Protocol suite (DEL.03) Pilot maintenance.

3.14.3 CASA approval of an authorised person to approve pilots

CASA may approve a person who will become an authorised person to approve an operator's pilots. Use Protocol suite (DEL.03) Pilot maintenance for the assessment.

4. Interviews

The decision to conduct an interview will depend on the results of the desktop assessment. In deciding to interview, the inspector should consider:

- previous experience of the nominee in a substantively similar role
- previous record in that role (e.g. compliance history)
- whether the person is fulfilling the requirement for more than 1 position.

If it is determined that an interview is required, CASA must[1] provide the operator with written notification of this direction.

The interview record worksheet is intended to provide an adequate structure for the interview, while also providing enough flexibility to handle the range of organisations and the range of nominee experience that may arise. This worksheet provides:

- an introduction to the interview
- questions to start a guided discussion about the elements being assessed
- options for follow-up questions (refer to section 4.1.2 of this principle) – these can be pre-prepared or added later as a record of the discussion that took place
- space to record the applicant's responses
- a conclusion to the interview.

Not all questions on the interview worksheet need to be answered. The questions are generic in nature, and it is up to the inspector to determine what questions are relevant to the assessment.

The inspector may add questions to address matters that are specialist in nature. For example, if the operator conducts low level night vision imaging system (NVIS) operations, the inspector may wish to ask questions relating to the airworthiness requirements of NVIS.

The interview should be planned to take no longer than 2 hours.

4.1 Interview techniques

4.1.1 Open/closed questions

Open questions require the applicant to formulate an answer, whereas closed questions can be limited to yes/no answers (i.e. the applicant has a 50:50 chance of guessing the right answer). Where possible the inspector should try to utilise open questions.

Example

Open question: How does your company review safety?

Closed question: Does your company have a formal management review process?

4.1.2 Follow-up questions

Questions can be used to start a discussion . The inspector should use their skills and knowledge to ask follow-up questions to:

- elicit more information from a quiet/reserved applicant

[1] Subregulation 119.165(3) and 138.120(3)

- bring a chatty applicant, who goes off on tangents, back to your line of questioning
- prompt the applicant, if you feel they have simply forgotten to mention something they probably know (be careful not to prompt the applicant with a 'correct' answer if they appear to be floundering/guessing)
- elicit information to determine that the applicant is meeting (or will be able to) the requirements of the role within their specific organisation (consider the size and scope of the organisation).

Sample follow-up questions

- Can you tell me a bit more about….?
- Does this include….?
- Do you think…is effective?
- What is your role within the…system?
- For larger companies, questions about chain of command and managing relationships with different levels.
- For smaller companies, questions about having their voice heard.

4.1.3 Other considerations

The inspector should always keep the regulation being assessed in mind. They should ensure there is enough evidence to verify that the applicant meets the requirements of the regulation – anything less is underreach. However, inspectors should not interrogate applicants on details of their role that go beyond the requirements of the regulation (overreach).

Interviews should be kept friendly and professional. The inspector's role is to get the applicant to perform to the best of their ability, without helping them and without making them nervous.

5. Revision history

Amendments/revisions for this principle are recorded below in order of the most recent first.

Table 3. Revision history table

Version No.	Date	Parts / Sections	Details
2.2	July 2024	All	Modified to align with worksheet changes, to support EAP elevate program.
2.1	May 2024	All	Reformat to latest template
2.0	April 2023	All	Post implementation review and inclusion of new protocol suites.
1.0	September 2022	All	First Issue