DASR M - Hot Topics

• What has changed in Sep 30 Provisional Release?
• Deferred Defects – will be discussed in 145 presentation
• What happened to MIER?
• What is the role of a ‘deputy’ CAM in the DASR?
• How does GSE fit in DASR? —will be discussed later
• Airworthiness Review, when is it coming?
• How do I use the DASR on the web, e.g. printing?
• Error capture methods vs IMI
• Equivalent vs Alternate 145 AMOs – discussed in 145 pres
• Can a CAMO be responsible but not do the work?
What changed in Sep 30 Provisional Release?

Equivalent vs Alternate to DASR 145 AMOs [M.A.201(g) & (l)]
- discuss in 145 presentation

Occurrence reporting [M.A.202]
- BR Appendix I - discuss in later presentation

Deferred Defects [M.A.301(a)(2)]
- AMC/GM clarified - discuss in 145 presentation

Intent of TAREG “MIER” [GM M.A.301(a)(3) and GM M.A.708(b)(4)]

Aircraft Maintenance Programme (AMP) [M.A.302]
- Clarify Critical Maintenance Tasks and Error Capture requirements

Data produced by an organisation accepted by the NMAA [M.A.304(d)]
- Using a design organisation other than DASR 21J

Personnel Requirements [M.A.706]
- clarify nominated deputy management personnel

Controlled environment [M.A.901(c)(2)]
- To assist in extending MARC
What happened to MIER?

- **DASR**: GM M.A.301(a)3 and GM M.A.708(b)(4)
  - A MIER under TAREG can be processed under DASR in the following ways
  1. Adjust the packaging of maintenance
  2. Extend the AMP task interval
  3. Request 21J design support
  4. Utilise BR flexibility provisions
What is the role of a ‘deputy’ CAM in the DASR?

• Refer to FAQ and AMC M.A.706
  www.defence.gov.au/DASP

• Accountable manager shall designate a CAM [M.A.706(d)]

• CAM and nominated deputy require formal acceptance by NMAA on Form 4 [AMC M.A.706(d)]

• Principles apply for all nominated management personnel
What is the role of a ‘deputy’ CAM in the DASR?

Example 2: Typical Military CAMO

Accountable Manager

Continuing Airworthiness Manager (*)

Platform Manager 1

Airworthiness Review Staff (*)

Platform Manager 2

Airworthiness Review Staff (*)

Platform Manager 3

Airworthiness Review Staff (*)

Quality Manager (*)

Safety Manager

(*) Form 4 Holder
What is the role of a person ‘acting’ in CAM role in the DASR?

Accountable Manager

Acting Continuing Airworthiness Manager

Platform Manager 1
- Airworthiness Review Staff (*)

Platform Manager 2
- Airworthiness Review Staff (*)

Platform Manager 3
- Airworthiness Review Staff (*)

Quality Manager (*)

Safety Manager (*)

(*) Form 4 Holder
How does GSE fit in?

Command must **ensure** that hazards/risk reduced SFARP

- Explosives
- Diving
- Asbestos
- Poor reporting
- Lead
- Poor training
- Maintenance of plant
- Chemicals
- Lifting
- Oxygen
- Confined spaces
- Aviation
- Falling objects
- Electrical
- Noise
- Fire
- Contaminated air
- Fuel
- Excavating
- Poor labels
- Heights
- WHS Section 22-25
- WHS Section 20/21
- Section 16

**Defence Aviation Safety Program**
Safety is a Command Responsibility (WHS, Section 20/22)

Command must ensure that hazards/risk reduced SFARP

GSE - Not required to be amplified under aviation safety bubble (regulation). Covered by existing controls in the broader WHS management context.
Why does DASR not contain GSE regulation?

• Regulation / constraint is not needed to be applied from the Defence Aviation Safety Authority (DASA) to GSE

• That is not to say there is no regulation / constraint over GSE activities

• There is regulation and constraint from such sources as
  – the WHS Act,
  – acquisition practices which acquire GSE and related equipment from reputable organisations, maintenance and operating practices based on trained and experienced members using authoritative data from appropriate organisations,
  – configuration control procedures, and
  – contractual oversight from organisations such as CASG and CAMOs.

• DASA, and other contemporary aviation safety authorities, are comfortable that sufficient 'assurance' of safety is gained from the relevant organisations doing good acquisition / operation / maintenance / configuration control / oversight of GSE activities, that the DASA does not need to add extra constraint through regulations.
GSE Interaction with DASR

- **Military Air Operator (MAO)** have a vested interest in GSE from an output perspective, i.e.
  - Capability
  - Cost
  - Downtime

- **Continuing Airworthiness Management Organisation (CAMO)** have a regulatory responsibility related to GSE
  - Pre-flight inspection – all actions necessary to ensure the aircraft is fit to make the intended flight (AMC M.A.301(a)(1))
  - CAMO needs to ensure consumable fluids (fuel, oxy, hydraulic), services (power, air), meet specification (from aircraft ICA)

- **145 Approved Maintenance Organisation (DASR 145 AMO)** have a regulatory responsibility related to GSE
  - shall have available and use the necessary equipment, tools and material to perform the approved scope of work (145.A.40(a))
  - shall ensure that all tools, equipment and particularly test equipment, as appropriate, are controlled and calibrated according to an officially recognised standard at a frequency to ensure serviceability and accuracy. Records of such calibrations and traceability to the standard used shall be kept by the organisation (145.A.40(b))
Airworthiness Review, when is it coming?

• Trial Airworthiness Reviews – Nov 2016
• Airworthiness Review Course
  – Update based on trials
  – Pilot course end of 2016
  – ARC training 1\textsuperscript{st} Quarter 2017
  – Duration of course 1-2 days including practical elements
• Authorising Airworthiness Review Staff 2017
How do I use the DASR on the web, e.g. printing?

www.defence.gov.au/dasp
Error capture methods vs IMI

- Ensure that an error capturing method is implemented after performance of any critical maintenance task \([M.A.302(d)(3)]\)
  - CAMO is to identify critical maintenance tasks
    - using information from the MTC Holder
  - CAMO is to establish procedures for the identification of error capturing methods on those critical maintenance tasks.
    - Methodology to identify error capturing methods is at Appendix XIV to AMC 302(d)(3)
      - Include in the AMP
  - DASR 145.A.48(h) and associated AMC detail how to conduct error capturing methods
AMP – Error Capturing Methods

Appendix XIV to AMC M.A.302(d)(3)

START

OEM Provided Critical Maintenance Tasks List?

YES*

NO

Begin Critical Maintenance Task Determination

ID CMT Candidates

Does the task involve installation, replacement, adjustment, repair, modification, testing or reconnection?

NO

YES

Assess Inherent Risk

Could failure to correctly perform the task result in functional loss or damage that could directly endanger flight safety?

NO

YES

Task is a CMT
Assess Error Capturing Methods

* Notwithstanding the Critical Maintenance Task list being provided by the OEM, the CAMO remains responsible

Task is not a CMT Candidate
No need to assess Consequence

Task is not a CMT
No need to assess Error Capturing Methods
Assess Error Capture Methods

Are there design or test barriers that will always prevent or detect maintenance error?

NO

Are there blocking methods that will always prevent or detect maintenance error?

NO

Are there testing methods that will always prevent or detect maintenance error?

NO

Are there secondary detection methods that will always detect maintenance error?

NO

Will an independent inspection always detect maintenance error?

NO

Refer to AMTCH or NMAA for investigation

YES

Record how the Error Capture Method(s) will prevent or detect maintenance error.
Can a CAMO be responsible but not conduct the work?

• Appendix II to M.A.201(h)(1)
  – Sub-contracting of continuing airworthiness management tasks

• Quality Management
Can a CAMO be responsible but not conduct the work?
Another way to explain

Military Air Operator (FEG or equiv)

Accountable Manager (FEG CDR)

QMS (Quality Manager)

CAMO (CAM-DLC (O6))

Operations

Contractor Aircraft Maintenance Organisations

Contractor Military Design Organisations

Contracted Continuing Airworthiness Management Functions

Wing

Squadron

Operations

145 AMO* (Responsible Manager)

CAMO Functions

SPO

MDOA (MTCH-HOD)

CAMO Functions

* For leased aircraft all 145 AMO activities may be undertaken by contracted organisations
Questions???