

# **BERMUDA DCA PROCEDURE PR 01**

## **Installed aircraft components removed to service another aircraft (Robbery)**

### **1 Introduction**

- 1.1 During the normal operation of a fleet of aircraft, a lack of readily available aircraft spares can occur requiring an operator to consider the removal of a required component from one aircraft to service another. This situation is recognised by many regulatory authorities that have accordingly developed specific regulations.
- 1.2 Regulations concerning aircraft robberies are generally developed for National aviation industries and therefore are not intended for cross international boundaries.
- 1.3 EASA, FAA and Transport Canada all have specific regulations each of which essentially are aimed at ensuring that the consequences of removing an aircraft component from one aircraft to service another are accounted for to ensure the continued airworthiness of the effected aircraft.
- 1.4 The recent notification by EASA (Ref. EASA D(2009)/WSC/KSP/BEP/62875) addressed to foreign EASA 145 approved maintenance organisations outlines the requirement to adhere to the EASA requirements; AMC 145.A.50(a) for component robberies.

### **2 Commercial operators of Bermuda registered aircraft**

- 2.1 It is recognised that commercial operators of Bermuda registered aircraft will find that their contracted EASA 145 maintenance organisations (Bermuda approved) will no longer be able to provide for the robbery of aircraft components for aircraft on the Bermuda register.
- 2.2 For operators utilising Bermuda registered aircraft it is recognised that this situation will present some operational difficulties.
- 2.3 Bermuda is currently in a programme of OTAR transition that many operators of Bermuda registered aircraft will be readily aware of. In light of this EASA notification and that of the Bermuda transition to OTARs, requirements have been developed to provide for Bermuda registered aircraft to be subject to the removal of components for the purpose of servicing another Bermuda registered aircraft.

### **3 Bermuda approved maintenance organisations**

- 3.1 Existing Bermuda approved maintenance organisation can develop for approval by the BDCA a procedure to enable the issuance of a Bermuda Serviceable Release Certificate (BSRC). The Air Navigation (Overseas Territories) Order Article 12 makes provisions for the issue of such a certificate for components removed under the terms of a component robbery identified in this document.
- 3.2 This document sets out minimum requirements to be met that should be formalised in a Bermuda approved maintenance organisation operating procedures to be approved by the BDCA.

### **4 Eligibility requirements donor and recipient aircraft**

- 4.1 The eligibility requirements for a component robbery (donor aircraft) are as follows:
  - (a) The aircraft must be on the Bermuda register; and
  - (b) The aircraft must be in an airworthy condition or in a controlled maintenance environment undergoing a scheduled maintenance check; and
  - (c) The aircraft must have a valid certificate of airworthiness.
- 4.2 The eligibility requirements for a component robbery (recipient aircraft) are as follows:
  - (a) The aircraft must be on the Bermuda register; and
  - (b) The aircraft must be part of the operator's fleet for which the donor aircraft forms.

### **5 Component robbery requirements**

- 5.1 Serviceable aircraft components removed from a Bermuda registered aircraft may be issued a Bermuda serviceable release by an appropriately rated and Bermuda approved 145 maintenance organisations subject to compliance with the following:
  - (a) The donor and recipient aircraft meet the eligibility requirements of this document outlined in paragraph 4; and
  - (b) The maintenance organisation shall ensure that the component is removed from the donor aircraft in accordance with approved data by an appropriately qualified and authorised person in accordance with a Bermuda maintenance organisation approval; and

- (c) The aircraft component may only be deemed serviceable if the last flight operation with the component fitted revealed no faults on that component and related system; and
- (d) The aircraft component shall be inspected for satisfactory condition including; particular damage, corrosion or leakage and compliance with any additional manufacturer's maintenance instructions and the requirements of the aircrafts maintenance programme; and
- (e) The aircraft records shall be researched for any unusual events that could affect the serviceability of the aircraft component such as involvement in accidents, incidents, heavy landings or lightning strikes. Under no circumstances may a Bermuda Serviceable Release Certificate be issued in accordance with paragraph 9 if it is suspected that the aircraft component has been subjected to extremes of stress, temperatures or immersion which could effect its operation; and
- (f) A maintenance history record including flight hours/cycles/landings as applicable must be available for all used serialised aircraft components including details of schedule maintenance requirements derived from the donors aircraft maintenance programme and maintenance planning schedule; and
- (g) Compliance shall be established with any continued airworthiness instructions (ICA) for applicable modifications and repairs for the robbed component/part by incorporating the ICAs into the recipient's aircraft maintenance programme and maintenance planning schedule; and
- (h) Any service life limited parts/components shall be determined and their service life remaining should be transferred to the recipient aircraft records; and
- (i) Compliance with applicable Airworthiness Directives shall be established and/or maintained particularly where non terminating action had previously been taken; and
- (j) Where applicable, mandatory reporting such as CPCP and SSID records shall be transferred including any pending actions associated with a modification or supplemental inspection regime; and
- (k) A modification status review shall be undertaken of the recipient aircraft and component/part to ensure eligibility for fitment; and
- (l) The inspection and functional test section of the aircraft maintenance manual may not address sufficient verification that the used aircraft component and associated system is functioning correctly. Consideration shall be given to undertaking component/system functionality testing that ordinarily is mitigated in the maintenance manual by simple high level component testing such as BITE in the case where a newly overhauled component is to be installed; and

- (m) Under no circumstances shall a donor aircraft be fitted with an unserviceable component/part in replacement for such removed to service another aircraft.
- (n) Where a component/part is removed and is not to be installed directly to the recipient aircraft appropriate actions shall be carried out with regard to transit and storage in accordance with the manufacture recommendations.
- (o) Component/parts shall not be removed for the purpose of storage pending the identification of a recipient aircraft.

## **6 Operator liaison**

- 6.1 The operator should furnish to the maintenance organisation data required of paragraph 5. The maintenance organisation should ensure suitable arrangements are in place to secure data from the operator.
- 6.2 The removal and installation of used aircraft components will inevitably have a detrimental effect on statistical and actual aircraft system reliability. The maintenance organisation should ensure that the operator's maintenance records readily identify details of aircraft component robbery.

## **7 Records**

- 7.1 The removal of an aircraft component/part for the purpose of servicing another aircraft will inevitably mean the donor aircraft will be left with a missing component/part. The donor's aircraft records including the aircraft technical log and where applicable maintenance shift handover records should readily identify the maintenance actions taken rendering the aircraft unserviceable and where applicable actions to be taken to restore serviceability.
- 7.2 The maintenance organisation should retain copies of any issued Bermuda Serviceable Release Certificate and any supporting data.
- 7.3 The operator should be furnished with copies of all maintenance records and certificates relating to an aircraft component/part robbery.

## **8 EASA Part 145A.50 Compliance**

- 8.1 The above procedure does not apply to components removed from a Bermuda registered aircraft where the component is loaned or leased to an operator of another Bermuda registered aircraft and all necessary airworthiness information listed in Paragraph 5 above is available to the organisation that loaned or leased the component. In these circumstance, provided that an acceptable procedure is detailed in the EASA approved MOE, an EASA Form 1 may be issued if compliance can be shown with all the requirements of EASA Part 145A.50 and the Acceptable Means of Compliance (AMC) contained in AMC 145.A.50 and in particular sub-paragraph 2.6.2.

## 9 Bermuda Serviceable Release Certificate

 GOVERNMENT OF BERMUDA Ministry of Transport Department of Civil Aviation	<h1 style="margin: 0;">SERVICEABLE RELEASE CERTIFICATE</h1>		
Certificate Number	No.		
<b>Component Part Robbery Certification Data</b>			
<b>Part One: Removal</b>	Aircraft type:	Registration:	Serial Number:
Location			In Service*    On scheduled maintenance* * delete as required
Component / Part	Description	Part No.	Serial No.
Original release certificate:	No.	State Authority	
Removed to service aircraft:	Aircraft type:	Registration:	Serial Number:
<b>Remarks:</b> include any requirements for installation such as: functional testing, adjustment, modification, life limitation, mandatory compliance, inspection, reactivation.			
The component/part* is declared serviceable in accordance with BDCA Procedure PR 01 following a review of the applicable systems serviceability, donor aircraft maintenance records, the accomplishment of the following Inspection and *functional check and removal from aircraft: NB *not applicable for part		Maintenance manual references:	
Bermuda DCA Release to Service 'the work recorded has been carried out in accordance with the Air Navigation (Overseas Territories) Order 2007 and in respect of that work the aircraft or component is fit for release to service'			
	Authorised Signature:	BDCA AMO Approval Ref. No.	Authorisation No.
	Name:	Date:	

<b>Part Two: Installation</b>	Aircraft type:	Registration:	Serial Number:
Location			In Service*    On scheduled maintenance* * delete as required
The component/part has been installed taking account of any special instructions identified above, installation instructions of the applicable maintenance manual or approved data have been complied with, the aircraft records have been updated in respect of this installation and the aircraft in respect of the work carried out is released to service		Maintenance manual references:	
Bermuda DCA Release to Service 'the work recorded has been carried out in accordance with the Air Navigation (Overseas Territories) Order 2007 and in respect of that work the aircraft or component is fit for release to service'			
	Authorised Signature:	BDCA AMO Approval Ref. No.	Authorisation No.
	Name:	Date:	

## **10 Certificate Issue**

10.1 Subject to satisfactory compliance with the requirements of this document a Bermuda Serviceable Release Certificate may be issued by the BDCA approved maintenance organisation and should contain the information as specified in paragraph 9.

10.2 A Certificate of Release to Service is required to be issued for all maintenance actions associated with these requirements in accordance with the AN(OT)O Article 12.

10.3 The Certificate of Release to Service shall use the following statement:

“the work recorded has been carried out in accordance with the Air Navigation (Overseas Territories) Order 2007 and in respect of that work the aircraft or component is fit for release to service”;

In all cases enter beside the statement of release to service:

- (1) the Certifying Staff person's signature; and
- (2) the AMO approval or authorisation number; and
- (3) the date of entry.