Irish Aviation Authority

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Údarás Eitlíochta na hÉireann

Foirgneamh na hAmanna I I–I2 Sráid D'Olier Baile Átha Cliath 2, Éire AAM No. 01 Revision: 02 Date: 25.08.23



Title: Variations to Aircraft Maintenance Programme Frequencies

Advisory Memoranda are provided for information purposes only and must not be misconstrued as formally adopted Acceptable Means of Compliance (AMC) or as Guidance Material (GM).

1. INTRODUCTION

The purpose of this Airworthiness Advisory Memorandum (AAM) is to assist an owner/operator of an aircraft subject to Part M, in establishing an acceptable means of varying the frequencies prescribed in an Aircraft Maintenance Programme (AMP). An AMP contains the maintenance tasks and the periods (intervals/frequencies) at which each part of the aircraft should be inspected.

These frequencies may be defined in:

- a) Flight Hours (FH);
- b) Flight Cycles (FC);
- c) Calendar Time; or
- d) Any combination of the above.

The above frequencies may apply to individual tasks or groups of tasks (e.g. A, C checks).

In certain exceptional circumstances it may not be possible for an operator/a CA(M)O to accomplish scheduled maintenance on a unique aircraft within the frequencies prescribed in the AMP. These frequencies may only be varied with the approval of or through an approved procedure in the AMP approved by the Irish Aviation Authority (IAA).

2. REFERENCES

- Appendix I to AMC M.A.302 and AMC M.B.301(b) paragraph 4
- This Advisory Memorandum supersedes and replaces Airworthiness Advisory Memorandum 07-10.

3. PERMITTED VARIATIONS TO MAINTENANCE PROGRAMME FREQUENCIES

- 3.1 Permitted variations do not apply to:
 - a) Life limitations;
 - b) Airworthiness directives (ADs);
 - c) Maintenance Programme tasks which have been classified as mandatory by the Type Certificate Holder or by EASA;
 - d) Certification Maintenance Requirements (CMRs);
 - e) Airworthiness limitation Items (ALIs);
 - f) ETOPs/EDTO related tasks;
 - g) Safety Directives;
 - h) Tasks derived from a MRB/MPD based on MSG-3 analysis and with a Failure Effect Category (FEC) of 8 'Hidden Safety Effect'.
- 3.2 A permitted variation to a period required by the AMP may be granted by the Authority on a case by case basis on occasions where the operator does not have the ability to perform the required maintenance within the prescribed limits.
- 3.3 Contrary to an amendment to the AMP, a permitted variation applies to a unique aircraft, for a unique occasion.

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- 3.4 A permitted variation should not be understood to be a maintenance planning tool, but as an exceptional means to allow the operator to fly for a limited period of time until the required maintenance is performed.
- 3.5 It therefore follows that acceptable reasons for requesting a permitted variation may include unforeseen workload peak in the maintenance organisation, so that it is not physically possible to perform the required maintenance on time.
- 3.6 The maximum variation of a prescribed frequency is indicated below:

(a) Items controlled by Flight Hours (FH):	
(i) 5,000 FH or less:	10%.
(ii) More than 5,000 FH:	500 FH.
(b) Items controlled by calendar time:	
(i) 1 year or less:	10% or 1 month, whichever is the lesser.
(ii) More than 1 year, but not exceeding 3 years:	2 months.
(iii) More than 3 years :	3 months.
(c) <u>Items controlled by landing/cycles:</u>	
(i) 500 landings/cycles or fewer:	5% or 25 landing/cycles, whichever is the lesser.
(ii) More than 500 landings/cycles:	5% or 250 landings/cycles, whichever is the lesser.
(d) Items controlled by more than one limit:	

(a) items controlled by more than one limit:

For items controlled by more than one limit, e.g. items controlled by flying hours and calendar time or flying hours and landings/cycles, the more restrictive limit should be applied.

- 3.7 A permitted variation may only be granted by the Authority, unless it has been agreed to delegate such responsibility to the operator.
- 3.8 An application for a permitted variation should at least include the following information:
 - a) Aircraft identification, by registration marks;
 - b) Justification of the need for such a variation;
 - c) Proposed extension in the appropriate figure (flight hours, cycles, etc.);
 - d) Current inspection status of the aircraft;
 - e) List of aircraft deferred defects which are affected by the variation;

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- f) Confirmation that the variation does not affect any mandatory maintenance tasks, life limitation. ADs etc.: and
- g) Compensation tasks (i.e. additional maintenance tasks undertaken to be performed before the new proposed limit).
- 3.9 According to the nature of the information submitted in accordance with para 3.8 above the IAA may decide:
 - a) To refuse the variation;
 - b) To accept the variation, with or without additional conditions (such additional conditions may include a request to exclude a certain number of postponed defects from the variation); or
 - c) To accept the variation, but with a different limit.
- 3.10 In relation to the principles in paragraph 3.4 above, the number of variations already granted by the Authority during the past 6 months may have a bearing on the decision made by the Authority.

4. PERMITTED VARIATIONS - DELEGATION TO THE OPERATOR

- 4.1 Notwithstanding paragraphs the above the Authority may agree upon a procedure to delegate the decision of the variation to the Operator in the Continuing Airworthiness Management Exposition (CAME) or the approved AMP.
- 4.2 Where such a delegation is agreed upon, the following conditions will apply:
 - 4.2.1 The Operator's CAME should identify who is authorised to grant the variation. Such person(s) should be acceptable to the Authority.
 - 4.2.2 The Operator shall inform the Authority of each variation within 48 hours, unless the Authority otherwise agrees to receive such information through monthly reports etc.
 - 4.2.3 The Operator's CAME should identify the following:
 - a) The person(s) having delegation;
 - b) The forms to be used to request, authorise and record the variations;
 - c) The procedure for reviewing the request of variations by the Operator; and
 - d) The procedure for informing the Authority when variations were granted.
 - 4.2.4 In relation to the principles, the Authority will review at least once a year the number of variations granted to the Operator. If the number of variations appears to be too high, it may decide to withdraw the delegation or vary the conditions of delegation.

Any queries relating to this memorandum should be addressed to the Manager Airline Airworthiness, Airworthiness Division, Irish Aviation Authority, The Times Building, 11-12 D'Olier St., Dublin 2.