



DEFENCE AVIATION SAFETY AUTHORITY

**COMMENT RESPONSE DOCUMENT TO NPA 2020-016 DASR  
PART M PROPOSED AMENDMENTS AND DELETIONS AS  
IDENTIFIED BY DASR GREEN TEXT REVIEW**

## INTRODUCTION

1. **General.** Readers should note that this Comment Response Document (CRD) outlines DASA's agreed policy and intended regulation changes and finalises the public consultation process in respect of this NPA. Only under extreme or unusual circumstances will DASA consider views or arguments opposing the views expressed in the CRD. Any member of the public having views or arguments to support an appeal against the decisions documented in this CRD may petition DASA to consider such an appeal.

2. **Background.** On 29 Jan 21, DASA released NPA 2020-016 DASR Part M Proposed Amendments and Deletions as Identified by DASR Green Text Review for comment. The period for public comment on the proposals contained in this NPA closed on 26 Feb 21.

## ANALYSIS OF COMMENTS

### General

3. DASA received responses to the NPA from five stakeholders and all responses were assessed by DASA with a formal position agreed to for changes to DASR M Continuing Airworthiness. A summary of the replies raised along with DASA's responses are highlighted below.

4. All responses to the NPA stated 'The proposal is acceptable' with the following caveats:
- 'without change' – provided by one respondent.
  - 'but would be improved if the following changes were made' – provided by four respondents, and further discussed below.

### Comment 1

5. One respondent disagreed with the proposed amendment to AMC M.A.201(g) green text. The concern was that the word 'or' at the conclusion of paragraph 1a should remain rather than 'and' as this requires two criteria to be satisfied.

6. **DASA Response.** Disagree.

7. **Disposition.** Though the AMC has been rewritten it is basically the same as the current AMC. There are two requirements to be satisfied in paragraph 1 in accordance with DASA recognition guidance, it's stating first check the organisation is oversighted by a recognised authority. Then, apply the requirements in the respective recognition certificate, to be clear, 'and' is correct. Paragraph 2 provides an alternate approach when the CAMO is providing an alternate means.

### Comment 2

8. One respondent disagreed with the proposal to change AMC M.A.201(h)(1) paragraph 4 green text to 'NOT APPLICABLE' as the current text provides useful information to the CAMO and should be retained as GM to M.A.711.

9. **DASA Response.** Agree.

10. **Disposition.** The green text in AMC M.A.201(h)(1) paragraph 4 is to be changed and the text relocated to new GM M.A.711(a)(3) as follows:

- AMC M.A.201(h)(1) paragraph 4



- (1) From: 'DASR M.A.711(a)(3)(i) contains provisions to contract/task an organisation to perform continuing airworthiness management tasks on behalf of the CAMO. The contracted/tasked organisation is considered to perform the continuing airworthiness management tasks as an integral part of the Operating Organisation's continuing airworthiness management system hence is required to work under the quality system of the CAMO. DASR M.A.711(a)(3)(ii) contains provisions for continuing airworthiness management tasks to be contracted/tasked to an organisation working under their own DASR M.A Subpart G approval. In this situation the contracted/tasked CAMO is not required to work under the quality system of the contracting/tasking CAMO. In either case, the contracting/tasking CAMO retains the responsibility for all CAMO functions irrespective of who is undertaking them. DASR M.A.201(k) contains provisions for the Operating Organisation to contract/task a DASR M.A. Subpart G approved organisation for the management of the continuing airworthiness of the aircraft it operates. In this case the contracted/tasked CAMO assumes the responsibility for all CAMO functions.'
  - (2) To: 'NOT APPLICABLE'
- b. New GM M.A.711(a)(3)
- (1) To: 'DASR M.A.711(a)(3)(i) contains provisions to contract/task an organisation to perform continuing airworthiness management tasks on behalf of the CAMO. The contracted/tasked organisation is considered to perform the continuing airworthiness management tasks as an integral part of the Operating Organisation's continuing airworthiness management system hence is required to work under the quality system of the CAMO. DASR M.A.711(a)(3)(ii) contains provisions for continuing airworthiness management tasks to be contracted/tasked to an organisation working under their own DASR M.A Subpart G approval. In this situation the contracted/tasked CAMO is not required to work under the quality system of the contracting/tasking CAMO. In either case, the contracting/tasking CAMO retains the responsibility for all CAMO functions irrespective of who is undertaking them. DASR M.A.201(k) contains provisions for the Operating Organisation to contract/task a DASR M.A. Subpart G approved organisation for the management of the continuing airworthiness of the aircraft it operates. In this case the contracted/tasked CAMO assumes the responsibility for all CAMO functions.'

### Comment 3

11. Two respondents disagreed with the proposed amendment of GM M.A.301(a) paragraph 8. The comments were that it could create confusion between test flights and maintenance check flights. There was a suggested amendment to the GM 'Maintenance check flight, whether required by Instructions for Continuing Airworthiness (ICA) or not, is not to be confused with a flight test which is covered under DASR 21.A.35 – Flight Tests.'

12. **DASA Response.** Agree.

13. **Disposition.** DASA will retain the current GM at this time and review the comments and proposed change to the GM text for inclusion in a future DASR amendment.

### Comment 4

14. Two respondents disagreed with the proposed change of paragraphs 5.2.1, 5.2.2 and 5.2.5 from AMC M.A.201(k) from green text to 'NOT APPLICABLE', as the paragraphs contained information on good business practices.

15. **DASA Response.** Agree.

16. **Disposition.** The AMC paragraphs will be retained at this time, DASA will consider changing the paragraphs to 'NOT APPLICABLE' and moving the paragraphs to new GM for M.A.201(k) in a future amendment.

## Comment 5

17. One respondent noted a discrepancy in the proposed change to the first sentence of AMC M.A.202(a).

18. **DASA Response.** Agree.

19. **Disposition.** There was a discrepancy in the NPA. The proposed change to the first sentence of AMC M.A.202(a) is as follows:

a. AMC M.A.202(a)

(1) From: Operating Organisations should ensure that the (Military) Type Certificate ((M)TC) holder **or the organisation responsible for the design of the aircraft or component** receives adequate reports of occurrences for that aircraft type, to enable the M(TC) holder to fulfil its DASR 21 obligations.

(2) To: Operating Organisations should ensure that the (Military) Type Certificate ((M)TC) holder **and any relevant design approval holder** receives adequate reports of occurrences for that aircraft type, to enable the M(TC) holder to fulfil its DASR 21 obligations.

## Comment 6

20. One respondent agreed with some reservation about the removal of the green text from AMC M.A.305(d) **'A symmetry check is equivalent to a mensuration check or alignment check which is typically covered in the applicable Aircraft Maintenance Programme (AMP).'**' as the AMC provides examples of substantiating data supporting airworthiness requirements.

21. **DASA Response.** Disagree.

22. **Disposition.** It is proposed to remove the green text as proposed by the NPA as it is a definition of a symmetry check, the AMC still has a symmetry check report as an example of substantiating data that may be included. It is proposed to add 'Symmetry Check - A symmetry check is equivalent to a mensuration check or alignment check which is typically covered in the applicable Aircraft Maintenance Programme (AMP) to the DASR glossary.

## Comment 7

23. There was one response stating that Appendix I to DASR AMC M.A.302 paragraph 6.5.13.2(h) – **'Changes to configuration, role or operating environment.'** should remain as this section is guidance and while current staff may well understand the requirements, retaining it will help future staff.

24. **DASA Response.** Disagree

25. **Disposition.** Appendix I to DASR AMC M.A.302 paragraph 6.5.13.2 sub paragraph (h) is to be deleted as per the NPA. The reason for the deletion is that the list is not an exclusive list and already includes Utilisation (high/low/operational environment) and Fleet commonality. Also information about configuration, role or operating environment will be in the proposed AC 001/2021 Aircraft Maintenance Programme and Reliability Programme.

## Comment 8

26. There was one response stating that GM M.A.704(a)(3) and GM M.A.704(a)(5) should remain as it provides guidance that a list of personnel can be in an external database or document provided it is referenced in the CAME.

27. **DASA Response.** Disagree.

28. **Disposition.** The regulation text 'the title(s) and name(s) of person(s) referred to in DASR M.A.706(a), M.A.706(c), M.A.706(d) and M.A.706(i) simply specifies the information that should be included in the CAME.'. Removal of the GM does not prevent the use of an external source for the information. The outcome based nature of DASR allows for flexibility as long as the outcome of the regulation is met. Use of an external document or database that is referenced in the CAME would be

meet the regulatory outcome, therefore the green text is not necessary and will be deleted as per the NPA.

#### **Comment 9**

29. There was one response stating that GM M.A.715(a)(1) should remain as it provides good information for the CAMOs and CAM Services providers to understand the conditions that would invalidate approval from DASA.

30. **DASA Response.** Agree.

31. **Disposition.** As the information is deemed useful the GM will be retained.

#### **Comment 10**

32. There was one response stating that the inclusion of the EMAR text weight and centre of gravity schedule in AMC M.A.901(d) would not add value and could cause confusion compared to the well know term weight and balance statement.

33. **DASA Response.** Disagree.

34. **Disposition.** The term weight and centre of gravity schedule is in both EASA Regulations and the European Military Airworthiness Requirement (EMAR) which DASA is based on. The reason for changing the text is to maintain alignment with EMAR and the term weight and balance statement is also included in the AMC as green text. In addition the term weight and centre of gravity schedule will be added to the DASA glossary.

#### **Comment 11**

35. There was a general comment that some AMC has replaced the term NMAA with DASA and this is supported and DASA should consider making this change consistent throughout DASA.

36. **DASA Response.** Agree.

37. **Disposition.** This was noted during the green text review and will be reviewed by DASA so that the text is consistent throughout all parts of DASA.

#### **Comment 12**

38. There were general comments that there was inconsistency in the use of terms Critical Maintenance Tasks and Error Capture Methods in the draft AC 001/2021 Aircraft Maintenance Programme and Reliability Programme and the terms such as flight safety sensitive maintenance in DASA 145.

39. **DASA Response.** Agree

40. **Disposition.** The draft AC 001/2021 Aircraft Maintenance Programme and Reliability Programme will be reviewed to ensure that it is consistent with terms used in DASA.

#### **Comment 13**

41. There was a suggestion that if a term in the DASA text is included in the DASA glossary, then a hyperlink to the glossary definition could be included in the DASA text for ease of reading / understanding for the reader.

42. **DASA Response.** Agree.

43. **Disposition.** The suggestion has merit and will be considered for inclusion in a future DASA amendment. Noting that it may only be possible to link directly to the DASA glossary rather than a specific definition.

### **ADDENDUM**

44. DASA advises that an additional DASA change proposal (DCP 2021-003) was submitted during the consultation period. This was done as part of a more comprehensive change to how Aircraft

Structural Integrity Management Plans (ASIMPs) and Engine Structural Integrity Management Plans (ESIMPs) are to be used as part of the means of satisfying DASR requirements. DCP 2021-003 proposed a number of changes as follows:

45. **DASR M.A.302(d) – Aircraft Maintenance Programme (AMP) AMC**, which currently reads:

“ Alternative and/or additional instructions to those defined in DASR M.A.302(d)1 and (2), proposed by the Operating Organisation, may include but are not limited to the following:

- Extension of the interval for certain tasks based on reliability data or other supporting information. Appendix I recommends that the AMP contains the corresponding extension procedures. The extension in periodicity of these tasks is directly approved by the NMAA, including ALIs (Airworthiness Limitation Items).
- Reduced intervals from those proposed by the (M)TC holder as a result of the reliability data or because of a more stringent operational environment.
- Additional tasks at the discretion of the Operating Organisation.
- For Aircraft Structural Integrity, Airworthiness Limitations are cited in the weapon system approved Aircraft Structural Integrity Management Program (ASIMP), while cited in the TCDS for the affected Propulsion System. Airworthiness Limitations (including safe life limit or safety by inspection program parameter for aircraft structure and dynamic components as defined in the weapon system ASIMP, critical inspection requirements or retirement times of propulsion system critical parts as defined in DASR GM 21.A.41— Type-certificate and restricted type-certificate, CMRs or other Airworthiness Limitations) are outside the scope of the reliability program and cannot be modified without engagement of an approved design organisation and NMAA approval.
- Note: Take care with escalation for Structural Integrity. Structure requires different logic to systems, especially for ‘nil findings’. For ASI, a history of ‘nil findings’ on an aircraft is not evidence for escalation of the inspection interval, because it is not evidence that there is any conservatism in any of the variables in the ICA’s ‘damage tolerance’ analysis . The chance of damage developing and growing only increases with time.”

Be changed to:

“ Alternative and/or additional instructions to those defined in DASR M.A.302(d)1 and (2), proposed by the Operating Organisation, may include but are not limited to the following:

- Extension of the interval for certain tasks based on reliability data or other supporting information. Appendix I recommends that the AMP contains the corresponding extension procedures. The extension in periodicity of these tasks is directly approved by the NMAA, including ALIs (Airworthiness Limitation Items).
- Reduced intervals from those proposed by the (M)TC holder as a result of the reliability data or because of a more stringent operational environment.
- Additional tasks at the discretion of the Operating Organisation.
- The Aircraft Structural Integrity Program (ASIP) and Propulsion System Integrity Program (PSIP) can provide the supporting information for the Operating Organisation to propose alternative and/or additional instructions. For aircraft structures and propulsion systems the ALIs will be cited in the Structural/System Integrity Management Plan (SIMP) and TCDS and should only be altered based on approved information from the (M)TC holder.”

46. The proposal is justified as:

- “the SI-specific green-text in this AMC should be simplified to focus only the fact that the ASIP/PSIP can be the means by which structures/propulsion AMP “alternative and/or additional

instructions” are justified, and be phrased to tell the community what they can do, not what they can’t do. The revised language ties directly to the lead-in sentence for point 7 of this AMC and the existing black text dot points.

- Whilst this Defence-unique amplification could be seen as ‘efficiency’ information for the benefit of the CAMO, it can also be argued that if they are routinely amending structural/propulsion AMP tasks or intervals *without* leveraging the data and expertise within the ASIP/PSIP then the suitability and robustness of such amendments may be diminished.
- The dot points under point 7 in this AMC are also prefaced by “may include but are not limited to the following”, so this section of the AMC is not telling the CAMO how AMP amendments should be proposed, but providing examples of the types of amendments they may propose.
- It also remains pertinent to highlight that AwLs/ALLs for structures and propulsion are outside the scope of what the operating organisation should be proposing changes for.
- The sentences under the current “Note” (i.e. why traditional reliability programme logic is not suitable for structures and propulsion) is guidance material and can be included in the planned AC.”

47. **Appendix I to DASR M.A.302 – Aircraft maintenance programme, *Identification of items*, AMC**, which currently reads:

“The items controlled by the reliability programme should be stated, eg by S1000D Chapters. Where some items, eg aircraft structure, engines, APU, are controlled by separate reliability programmes, eg ASIMP and ESIMP, the associated procedures, eg individual sampling or life development programmes, MTC holder structure sampling programmes) should be cross referenced in the reliability programme.”

Be amended to read:

“The items controlled by the reliability programme should be stated, eg by S1000D Chapters. Where some items, eg aircraft structure, engines, APU, are controlled by separate reliability programmes, eg Aircraft Structural Integrity Program (ASIP) and Propulsion System Integrity Program (PSIP), the associated procedures, eg individual sampling or life development programmes, MTC holder structure sampling programmes) should be cross referenced in the reliability programme.”

48. The proposal is justified as “the ASIP and PSIP are the reliability programme for structures and propulsion when viewed through a DASR Part M lens. This minor amendment is to correctly identify that the *Integrity Program* not the management plan *document* is the means by which structures and propulsion systems are items are controlled.”

49. **DASR M.A.305 ( c )– Aircraft continuing airworthiness records system (AUS) GM**, which currently reads:

“For clarification 'other airworthiness data as required by the MAA' includes other usage parameters that may be required to be captured to support continuing airworthiness, eg strain data, G exceedances, full stop landings versus touch and go. A list of airworthiness data required by the MAA can be found in the Aircraft Structural Integrity Management Plan (ASIMP) and Engine Structural Integrity Management Plans (ESIMP) for each Defence platform.”

be amended to read:

“Collection of operational usage data by the CAMO is also required to support MTCH obligations regarding periodic monitoring and assessment to ensure the continued integrity of the aircraft



structure and propulsion system (see **DASR 21.A.44(c)**). The MTCH should define the data required for these purposes.”

50. The proposal was justified on the basis that the:

- “revised focus of GM is to:
- Link to the DASR where analysis of operational usage data is required, rather than the GM trying to stand alone as the requirement to collect the data.
- Link the collection of the data to the MTCH obligations, rather than “data as required by the NMAA” which is not an accurate way to describe the requirement to collect the data in question.
- Removed reference to the ASIMP/ESIMP as the DASR references included adequately link to the ASIP and PSIP, and therefore the SIMPs.”

51. **DASR M.A.305(h)(2) – Aircraft Continuing Airworthiness Records System AMC**, which currently reads:

“The system to generate/keep records for military Aircraft Structural and Propulsions Systems Integrity life consumption units, eg Fatigue Life Expended Index, Equivalent Flight Hours, Engine Cycles and Life Usage Indices. are often very complex and typically require complementary systems to calculate and manage records of aircraft/propulsion system structural life consumption. These systems are to be verified and validated as specified in the **Airworthiness Design Requirements Manual (ADRM)**. Details of the system should be documented in the approved Aircraft Structural and Propulsions Systems Integrity Management Plan for the weapon system of interest.”

moved to M.A.305(d)(4) and amended to read:

“The system and methods required to track the status of structural and propulsion system life limited critical parts (i.e. those subject to Airworthiness Limitations) for military aircraft (e.g. Fatigue Life Expended Index, Equivalent Flight Hours, Engine Cycles and Life Usage Indices) are typically more complex than those for required for civil aircraft. The continuing airworthiness records system should contain all the data required to ensure components do not exceed the underlying basis of the Airworthiness Limitation interval. The MTCH should provide any relevant technical requirements to track the status of life limited components. The systems to calculate and manage structural and propulsion system life consumption should typically be implemented through the relevant platform Aircraft Structural Integrity Program (ASIP) and Propulsion System Integrity Program (PSIP).”

52. The proposal was justified on the basis that:

- “M.A.305(h)(2) pertains specifically to periods of time certain records need to be retained. The correct regulation to amplify complexity of tracking for structural and propulsion system life limited items is M.A.305(d)(4), therefore AMC should be moved.
- The parameters and methods required to track life accrual for structures and propulsion system intervals are typically more complex in the military environment due to the higher operational role and usage variability of military aircraft compared to civil aircraft. The data required to ensure components do not exceed the underlying basis of the AwL can therefore often be extensive (i.e. simply tracking AFHRS is not sufficient to know if components are exceeding the interval). This is military-specific information that the civil derived EMAR does not yet sufficiently cover.
- The extra Defence-unique information that is relevant under this AMC is that the Usage Monitoring / Individual Aircraft Tracking components of ASIPs and PSIPs should typically be the means of compliance for this requirement. Whilst this Defence-unique amplification could be seen as

'efficiency' information for the CAMO, it can also be argued that if the systems for tracking life consumption are not implemented through the ASIP/PSIP (and therefore aligned with the broader ongoing monitoring and assessment philosophy), then the suitability of the systems will be diminished."

53. **DASR M.A.801 (h) – Aircraft certificate of release to service (AUS) AMC**, which currently reads:

"'Endanger flight safety' means any instance where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning (including overheating), electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An airworthiness directive overdue for compliance is also considered a hazard to flight safety.

For Aircraft Structural and Propulsion Systems Integrity, unless you have pre-approved data from a DASR 21J approved military design organisation, or equivalent (including pre-approved repairs in the Structural Repair manual, Service Bulletins, Airworthiness Directives, etc.), you should assume that any structural non-compliance to Critical Structure, Primary Structure or Principle Structural Elements (PSE), could 'endanger flight safety'. Definition of what constitutes Critical Aircraft Structure may be found in the weapon system approved Aircraft Structural Integrity Management Plan (ASIMP), while Critical Propulsion System Parts may be found in the **DASR GM 21.A.41**—Type-certificate and restricted type-certificate."

be amended to read:

"'Endanger flight safety' means any instance where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning (including overheating), electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An airworthiness directive overdue for compliance is also considered a hazard to flight safety."

54. The proposal is justified as "Para 1 links 'Endanger flight safety' with an "unsafe condition" which is already sufficiently defined elsewhere in DASR. Para 1 also then provides sufficient examples for the endanger flight safety assessment. Para 2 is also potentially too broad and extends beyond the conditions that should be associated with endangering flight safety."

55. As these changes simplifies policy and improves clarity, DASA has consulted selectively and found that there are no objections. DASA has accepted the proposals for incorporation.

## AUTHORITY

56. The content of this Summary of Responses has been reviewed and is authorised.

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**Annex:**

- A. List of Respondents

**NOTICE OF PROPOSED AMENDMENT – NPA 2020-016**

**LIST OF RESPONDENTS**

1. HQAC (combined with HQAWC)
2. HQAMG
3. HQSRG
4. HQ FAA CAMO
5. Airbus Australia Pacific