



DEFENCE AVIATION SAFETY AUTHORITY

## COMMENT RESPONSE DOCUMENT NPA FOR DCP 2019 – 037 - AMENDMENT TO AMC & GM M.A.304(d) DATA FOR MODIFICATIONS AND REPAIRS

### INTRODUCTION

1. **General.** DASA takes this opportunity to thank those that have provided valuable community perspective and input. This Comment Response Document (CRD) summarises DASA's agreed regulation changes as a result of the Notice of Proposed DASR Amendment (NPA) for DCP 2019-037, and finalises public consultation on the NPA. DASA will consider arguments opposing the views expressed in this CRD only in exceptional circumstances. Any member of the regulated community having arguments to support an appeal against the decisions documented in this CRD may petition DASA.
2. **Background.** On 28 Mar 24, DASA released NPA for DCP 2019-037 - Amendment to AMC & GM M.A.304(d) - Data for modifications and repair for comment. The period for public comment on the proposals contained in this NPA closed on 18 Apr 24.
3. The proposed amendment to DASR M.A.304 was further amended as a result of NPA feedback and additional internal DASA review. Significant changes post NPA include:
  - a. DASR M.A.304(b) has been amended to identify the pathway for data that has already been approved by a Civil Aviation Authority, where that data has been re-approved under a DASR 21.A.263(d) privilege. GM DASR M.A.304(b) has been added to provide additional guidance on this change.
  - b. AMC DASR M.A.304(d) Para 6 retains the provision for a CAMO to classify products that are clearly minor - now in accordance with a procedure approved by DASA (not issued by DASA).
  - c. AMC DASR M.A.304(d) Para 10 specifies major repair approval holder obligations – there is no longer any need for a CAMO to ensure holder obligations for minor modifications and repairs.
  - d. AMC DASR M.A.304(d) Para 14-18 retains content on Technical information and Instructions, e.g. Service Bulletins that may be outside the scope of the relevant recognition certificate.
4. DASA is now in the process of updating affected recognition certificates to reflect this DASR amendment; in the interim, please see the [Aviation Authority Recognition](#) web page for guidance on how to address any differences between DASR and recognition certificates.

### ANALYSIS OF COMMENTS

#### General

5. DASA received three responses to NPA for DCP 2019-037. Two of the responses identified that the proposal was acceptable without change. The remaining response identified the proposal as acceptable, but would be improved if changes were made. Specific comments and their corresponding DASA responses are as follows:

#### Comment 1

6. AMC M.A.304(d) paragraph 3 - DASA 21J approval still required for all Major modifications or changes that are not suitably classified, means no change to current process.
  - a. **Explanation.** Most programs are not supported by external organisations that have a design classification system equivalent to DASA 21.A.91. Therefore, the ability to directly consume changes by the CAMO is no longer possible. There would need to be updates to the Recognition certificates to clearly show what is considered the equivalent of Minor, otherwise there will be increased engagement with the 21J.



- b. **Resource Implications.** This change will require a change to numerous Technical Manuals, Business level Process and Program Level Guides. Estimate several hundred hours of effort to bring command media into line with this proposed change.
- 7. **DASA Response.** For CAMOs consuming data that does not have a recognised major/minor classification, the amended AMC now retains the provision for a CAMO to classify products that are clearly minor in accordance with a procedure approved by DASA.

#### **Comment 2**

- 8. GM M.A.304(d) paragraph 1 - The change to remove the ability to classify changes with the Part M Organisation will add extra complexity to the change process.
  - a. **Explanation.** Currently while providing CAM services to a variety of ADF CAMOs, CAM staff are classifying changes using a Part 21J approved checklist, that are obviously Minor. The removal of the ability to undertake that work within the CAM services side of programs will require engaging the 21J, and in a lot of instances will require another individual to make that classification. This will have resource and efficiency impacts and may affect the ability to deliver CAM services in a timely manner.
  - b. **Resource Implications.** The need to engage the 21J to provide classification on all changes requires expanded levels of Engineering Authority across all programs. The change to recognition would not affect how current business is conducted unless recognition certificates are updated to expand what can be directly consumed by the CAMO.
- 9. **DASA Response.** For CAMOs consuming data that does not have a recognised major/minor classification, the amended AMC now retains the provision for a CAMO to classify products that are clearly minor in accordance with a procedure approved by DASA.

#### **AUTHORITY**

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

#### **AR NEWMAN**

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#### **Annex:**

- A. List of Respondents

**NOTICE OF PROPOSED AMENDMENT – for DCP 2019-037**

**LIST OF RESPONDENTS**

1. Airbus Australia Pacific
2. Boeing Defence Australia
3. Headquarters Surveillance & Response Group