



DEFENCE AVIATION SAFETY AUTHORITY

**NOTICE OF PROPOSED AMENDMENT
FOR DASR CHANGE PROPOSAL 2019-037**

**AMENDMENT TO AMC & GM M.A.304(d) DATA FOR
MODIFICATIONS AND REPAIRS**

INTRODUCTION

Applicability

1. This proposal is applicable to Continuing Airworthiness Management Organisations (CAMOs) directly consuming data for modifications and repairs produced by an organisation accepted by DASA (consuming design data through recognition).

Purpose

2. The purpose of this Notice of Proposed Amendment (NPA) is to enable community consultation in regards to the proposed amendments of AMC and GM M.A.304(d) - Data for modifications and repairs (AUS).

Background

3. The intent of this change to DASR is to enable greater direct CAMO consumption of modifications and repairs, approved by a recognised authority, reducing unnecessary re-approval by Military Design Organisations (MDO) approved IAW DASR 21.

Proposed Amendments

4. This update simplifies and clarifies the requirements for a CAMO to directly consume modifications and repairs, through recognition, IAW DASR M.A.304(d) and relevant annexes to recognition certificates.

5. This update also removes classification of changes (an initial airworthiness activity) from DASR M and aligns the AMC M.A.304(d) with DASR 21. Current AMC allows a CAMO, through a procedure issued by DASA, to identify modifications and repairs that are clearly 'minor' and directly consume without reference to an MDO approved IAW DASR 21. Revised AMC will require that all design classifications, if needed, be completed IAW DASR 21. In this case, an MDO approved IAW DASR 21 does not need to re-approve the modification or repair if the CAMO can directly consume it after classification. .

6. The proposed amendment makes the current GM M.A.304(d) text redundant, therefore it will be deleted.

7. Proposed new GM M.A.304(d) text provides additional context and guidance to the proposed AMC M.A.304(d).

8. The proposed amendments are in Annex A.

9. The proposed amendments are to be harmonised with amendments to DASA Recognition Certificates. Attached, in Annex B, is a draft of the proposed United States Army Military Aviation Authority (MAA) Recognition Certificate: Annex B - Assessing the Suitability of Approved Modification and Repair Data for Direct Consumption. This provides a proposed exemplar for changes to DASA Recognition Certificates in support of proposed changes to DASR M.A.304(d).



Benefits of Proposed Change

10. Proposed changes provide a simplified and clear method for CAMOs to directly consume data for modification and repairs produced by an organisation accepted by DASA.

Implementation Strategy

11. Following the end of the NPA public consultation period, DASA will review all comments and consult with stakeholders if required to finalise any changes. The changes in this NPA are intended to be promulgated in the July 2024 DASR release. The amended AMC and GM will become effective immediately upon the DASR release. Amended recognition certificates will be released concurrent with the July 2024 DASR release.

HOW TO SUBMIT COMMENTS ON THIS NPA

Format

12. Record responses to this NPA on the NPA Response Sheet included in Annex C. Submit responses by email to dasa.dasr@defence.gov.au. Hardcopies are not required.

Timing

13. Comments on NPA for DASR Change Proposal (DCP) 2019-037 are to be forwarded to DASA by close of business 18 Apr 24.

Additional Information

14. Requests for additional information concerning this NPA should be sent to dasa.dasr@defence.gov.au.

DISPOSITION OF RESPONSES RECEIVED

15. A Comment Response Document will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions.

AR NEWMAN

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Mar 24

Annexes:

- A. NPA for DCP 2019-037 Proposed Changes to AMC and GM M.A.304(d)
- B. Draft Annex B to United States Army Military Aviation Authority Recognition Certificate
- C. NPA for DCP 2019-037 Response Sheet

NPA FOR DCP 2019-037
PROPOSED CHANGE TO AMC M.A.304(d)

DASR CLAUSE: AMC M.A.304(d) - Data for modifications and repairs (AUS)

RATIONALE FOR CHANGE

Opportunities for improvement have been identified in the current AMC and GM DASR M.A.304(d), including relevant annexes to recognition certificates. Current AMC also allows a CAMO to classify designs. This update removes classification of changes (an initial airworthiness activity) from DASR M and aligns the AMC with DASR 21.

AMC, GM and associated Recognition Certificates have been amended to clarify and simplify when data for modification and repairs, produced by an organisation accepted by DASA, can be directly consumed by a CAMO.

CURRENT AMC TEXT

Scope

1. Data may be consumed under this sub-clause if it is accessed through recognition (see recognition web-page) and processed in accordance with this AMC.
2. Only the following may be consumed under DASR M.A.304(d):
 - a. data for repairs, including 'MAJOR' repairs in some circumstances; and
 - b. data for modifications classified as 'minor'.

Procedures

3. The CAMO shall establish procedures to assess and process data intended for consumption under DASR M.A.304(d). The procedures shall identify how data accessed through recognition can be assessed as suitable in accordance with the recognition certificate caveats and consumed. As described below, the data will in some circumstances require additional processing prior to consumption, such as:
 - a. identifying the classification of the modification or repair as 'MAJOR' or 'minor',
 - b. assessing 'MAJOR' repair data as suitable for consumption,
 - c. assessing alternate instruments as suitable for consumption, and
 - d. assessing technical information and instructions as acceptable for consumption.

Classification

4. The existing classification of modifications and repairs originating from some recognised airworthiness systems is valid within the DASA system because the 'MAJOR' / 'minor' definition is aligned to DASR 21.A.91 - Classification of changes in type design. The relevant recognition certificate will identify where this is the case.
5. Where the recognition certificate indicates that use of the data is subject to further classification, the CAMO must ensure that the modification or repair is appropriately classified as 'MAJOR' or 'minor' in accordance with DASR 21.A.91 Classification of changes in type design. Classification may be done by:
 - a. the CAMO, through a procedure issued by DASA;
 - b. a DASR 21J MDO with the appropriate scope and privilege;
 - c. the MTC holder in accordance with the TCAE, where a DASR 21J MDO is not available for the relevant aircraft type; or
 - d. DASA.

CAMO classification of an approved design product

6. This provision, referenced at paragraph 5a, enables the CAMO to identify modifications and repairs that are clearly 'minor'. All other designs should then either be treated as 'major' or classified by another organisation listed at paragraph 5.
7. Classification by the CAMO shall be done in accordance with a procedure developed by the CAMO and issued by DASA. Such a procedure shall, as a minimum:
 - a. result in a 'minor' determination only where clearly supported by the characteristics of the data, ie the
 - b. assessment is not complex or uncertain; and
 - c. identify the specific CAMO personnel authorised to conduct or approve the classification, including their
 - d. qualifications, knowledge and experience relevant to making such determinations.

Consumption of MAJOR repairs

8. A recognition certificate may enable the consumption of data for 'MAJOR' repairs without further approval of the data. The circumstances under which direct consumption may occur will be influenced by the specific support arrangements in place for each platform; such as the design organisations developing the repair, the type, scope, or location of repairs, and other relevant factors. The CAME shall document the procedures to assess 'major' repair data for consumption on a platform-by-platform basis.
9. Where the CAMO assessment of a MAJOR repair identifies that the data is not acceptable for direct consumption, that data may be passed to an appropriate design organisation for processing of approval in accordance with DASR 21 Subpart M Repairs and subsequent consumption via DASR M.A.304(a) or M.A.304(b).

Alternate instruments

10. Each recognition certificate lists the 'native' instruments issued within the corresponding airworthiness system. Cases may arise where a design organisation could normally issue a native instrument but is restricted from doing so, for reasons such as:
 - a. legal restrictions prohibiting the organisation from issuing an approval to a military customer or against a DASA type certificate; or
 - b. the approval not being subject to the oversight of the parent airworthiness authority because it is for a military customer, against a DASA type certificate or slightly outside the organisation's scope.
 - c. in such cases, DASA may agree the data may be consumed as an 'alternate' instrument where the CAMO can demonstrate to DASA's satisfaction that:
 - d. it is not feasible for the design organisation to attain a DASR 21 Subpart J design organisation approval or provide the data under subcontract to such an organisation;
 - e. the organisation is a suitable provider of the required data, i.e. the work is within the scope of the organisation's approval (or similar) or so closely aligned that no hazards to airworthiness are introduced;
 - f. the design data is developed, and the alternate instrument is issued, using the same personnel and processes by which the organisation provides a similar product acceptable through recognition;
 - g. the caveats set out in the relevant recognition certificate are applied to the greatest practicable extent; and
 - h. any other controls necessary to ensure safety are in place.

Technical information and instructions, eg Service Bulletins

11. The airworthiness instruments named in the recognition certificate annexes are generally the instruments issued by the recognised authority, or by a design organisation, to approve a modification or repair. Rather than these instruments, Defence organisations will often receive technical information or instructions describing the embodiment of the corresponding modification or repair, eg a Service Bulletin.
12. In such cases, and where eligible, the technical information or instructions should be treated in accordance with the corresponding recognition scope, conditions and caveats as if it were the underlying airworthiness instrument. For example:
 - a. A service bulletin describing the embodiment of a minor modification should be treated like an approval of minor change to type design or its equivalent in the recognised system.
 - b. A technical instruction describing the embodiment of a major repair should be treated like an approval of major repair design or its equivalent in the recognised system.
13. Eligibility. To be eligible for treatment under this subclause, technical information or instructions describing the embodiment of a modification or repair must be:
 - a. issued by a type of organisation acceptable through recognition to issue any type of airworthiness instrument, such as an approval of minor change to type design; and
 - b. issued in accordance with a procedure agreed by the recognised airworthiness authority, eg under the privilege of a design organisation approval.
14. Classification. The technical information or instructions may clearly indicate that the modification or repair is classified as 'minor' or 'major' in the recognised system. Where this is not the case, or where the relevant recognition annex identifies that instruments issued within that system require classification, the data should first be treated in accordance with the 'Classification' section above.
15. Status. Eligible technical information or instructions are not an 'alternate' instrument described above because they are issued with the agreement of the recognised authority.

REVISED AMC TEXT

1. Data is produced by an organisation accepted by DASA if:
 - a. The data originates from an organisation oversighted by a recognised aviation authority; and
 - b. The CAMO ensures that the data is acceptable in accordance with the scope, conditions and caveats set out in the applicable Recognition certificate (see DASA Recognition web page).
2. If within the permitted scope, conditions and caveats of the relevant recognition certificate issued by DASA, a CAMO may directly consume repair and modification data where:
 - a. The repair or modification is classified as equivalent to minor IAW DASR 21 (classification equivalency contained in each recognition certificate); or
 - b. For all other repairs, via a procedure endorsed by the MTC holder and documented within the CAME.

NOTE: Scope, conditions and caveats detailed in recognition certificates take precedence

3. The CAMO cannot directly consume modification data where the modification is classified as equivalent to MAJOR IAW DASR 21 or is not suitably classified (classification equivalency contained in each recognition certificate).
4. Where there is any doubt about whether the data is for a repair or modification, the MTC holder shall be consulted.
5. Prior to consuming data for modifications and repairs, the CAMO shall confirm that the modification or repair:
 - a. is applicable to the aircraft type;
 - b. is compatible with the Defence configuration, role and environment;
 - c. contains clear and unambiguous maintenance data, including installation instructions and any limitations; and
 - d. has any other necessary controls to ensure safe operation of the aircraft.

6. In cases where the CAMO is unable to source a recognised artefact, DASA may agree that the CAMO can consume an alternate artefact where it can demonstrate to DASA's satisfaction that:
 - a. it is not feasible for the design organisation to attain a DASR 21 Subpart J design organisation approval;
 - b. the design organisation is unable to provide the data for modifications or repairs under an existing DASR 21 Subpart J organisation approval using the sub-contractor provisions of DASR 21.A.239 — Design assurance system and Safety Management System;
 - c. the data for modifications or repairs is developed, and the alternate artefact is issued, using the same personnel and processes by which the organisation provides a recognised artefact under the oversight of a recognised aviation authority;
 - d. the organisation is a suitable provider of the required data;
 - e. appropriate controls are in place to ensure safety; and
 - f. the relevant MTC holder has endorsed the consumption of the alternate artefact.

DASR AMENDMENT RECORD
DCP 2019 - 037

DASR CLAUSE: GM M.A.304(d) - Data for modifications and repairs (AUS)

RATIONALE FOR CHANGE

Changes to AMC and recognition certificates mean the current green text GM is no longer relevant. New GM text provides additional context and guidance to new AMC.

CURRENT GM TEXT

The purpose of DASR M.A.304(d) is to allow the CAMO to consume data for repairs and 'minor' modifications through recognition. This provision enables access to data packaged in a variety of different ways originating from within civil and military airworthiness systems around the world. The complexity of the CAMO's procedures for consuming such data will be determined by the types of modifications and repairs to be consumed, their source and the associated support constructs.

Alternate instruments (see DASR AMC M.A.304(d)) will only be acceptable from organisations outside Australia.

Figure 1 below outlines the provisions of DASR M.A.304(d).

Note due to size constraints, Figure 1 is not included in this amendment record

REVISED GM TEXT

1. Each recognition certificate will identify if the design classification, for a modification or repair, is equivalent to DASR 21. Where the classification of a modification or repair is not equivalent to DASR 21, a CAMO can seek classification by DASA or an MDO approved IAW DASR 21 with the appropriate privileges. In this case, an MDO approved IAW DASR 21 does not need to re-approve the modification or repair if the CAMO can directly consume it after classification.
2. The CAME procedure referenced in AMC M.A.304(d) paragraph 2(b), to allow CAMO consumption of a repair that is classified as MAJOR or is not suitably classified, should be approved by DASA prior to use (i.e. not via a CAMOs indirect approval procedure in accordance with M.A.704(c)). MTC holder endorsement of this procedure is required to ensure that CAMO consumption of a repair, classified as MAJOR or not suitably classified, does not compromise the MTC holder's ability to carry out their obligations – including within 21.A.44 & 21.A.451.
3. Where the CAMO assessment of a MAJOR repair identifies that the data is not acceptable for direct consumption, that data may be passed to an appropriate design organisation for processing of approval in accordance with DASR 21 Subpart M Repairs and subsequent consumption via DASR M.A.304(a) or M.A.304(b).

DEFENCE AVIATION SAFETY AUTHORITY

Aviation Authority Recognition

United States Army Military Aviation Authority

ANNEX B: ASSESSING THE SUITABILITY OF APPROVED MODIFICATION AND REPAIR DATA FOR DIRECT CONSUMPTION

Introduction

1. The United States Army Military Aviation Authority (MAA) is recognised by the Defence Aviation Safety Authority (DASA) as a competent MAA that applies appropriate safety oversight to the design of crewed aircraft. This annex sets out:
 - a. the scope of this recognition,
 - b. conditions on recognition,
 - c. caveats, and
 - d. notes for the information of organisations using this annex.
2. This annex applies to Continuing Airworthiness Management Organisations approved by DASA.
3. DASA considers the US Army MAA to comprise:
 - a. US Army Forces Command,
 - b. Systems Readiness Directorate, and
 - c. US Army Materiel Command.
4. DASA considers the Defense Contract Management Agency (DCMA) to be acting as an agent of the US Army MAA when overseeing commercial organisations against contractual requirements based on US Army MAA policy or approved data.
5. Advice on fulfilling the requirements of this annex will be provided by DASA on request.

Scope

6. Subject to the conditions and caveats described in this annex, the following airworthiness authorisations issued or endorsed by the US Army may be directly consumed under Defence Aviation Safety Regulation (DASR) M.A.304(d):
 - a. Airworthiness Release or recommendation for Airworthiness Release issued in accordance with Army Regulation (AR) 70-62 *Airworthiness of Aircraft Systems*,
 - b. Statement of Airworthiness Qualification issued in accordance with Army Regulation (AR) 70-62 *Airworthiness of Aircraft Systems*, and

- c. Repair Approval issued through a Maintenance Engineering Call or Maintenance Engineering Order issued in accordance with AR 70-62.
7. Safety of Flight Message (SOF), Aviation Safety Action Message (ASAM) or Aviation Maintenance Advisory Message (AMAM) released in accordance with AR 750-6 and PAM 738-751.

Conditions

8. The provisions of this annex may only be applied to airworthiness instruments that are:
- a. modifications classified as minor IAW DASR 21; and
 - b. all repairs.
9. This recognition applies only to crewed aircraft.

Caveats

10. The US Army MAA design classification is not considered equivalent to DASR 21.

Notes

11. The above caveats do not preclude any additional activities deemed necessary by the consumer to fulfil its responsibility to ensure safety.
12. US Army airworthiness policy does not require that safety risks are eliminated so far as is reasonably practicable (SFARP) or otherwise minimised SFARP.
13. For approved 'major' repairs that cannot be consumed under the provisions of this annex, the repair may be treated using the provisions of Annex A.
14. A Modification Work Order (MWO) can be issued for any US Army materiel and not aviation products specifically. As such, MWOs can be issued for modifications that have not been approved through the Airworthiness Release process.
15. Some authorisations may specify the authority as Systems Readiness Directorate (SRD), who hold a delegation of Aviation Authority from AMCOM. Prior to January 2020, this organisation was known as Aviation Engineering Directorate (AED).

NPA FOR DCP 2019-037 Response Sheet

AMENDMENT TO AMC & GM M.A.304 DATA FOR MODIFICATIONS AND REPAIRS

Please forward this sheet as an email attachment to [DASA](#) by 18 Apr 24. A word version of this response sheet can be found via Objective No: [BO3960659](#) or alternatively contact [DASA](#).

Please indicate your acceptance or otherwise of this proposal by ticking the appropriate box below. Additional comments, suggested amendments or alternative action are welcome and may be provided on this response sheet or by separate correspondence.

- ☐ The proposal is **acceptable without change**.
- ☐ The proposal is **acceptable but would be improved if the following changes were made:**
- ☐ The proposal is **not acceptable but would be acceptable if the following changes were made:**

LSN	NPA Reference: (i.e Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation
1			
2			
3			
4			
5			

RESOURCE IMPLICATIONS

Please provide specific comment on any significant resource implications that this proposal may have for your organisation, for both its implementation and ongoing compliance. Your comments should address both financial and human resource considerations.

Resource implications – Proposal implementation	
Resource implications – Proposal sustainment	

RESPONDENT DETAILS

Your name:	
Submission date:	
Your organisation:	
Email address:	
Postal address:	
Phone:	
Whose views are represented in your response? i.e. Is your response the authoritative response from your organisation?	Responding on behalf of : Individual [] Regulated Military entity [] Regulated Commercial entity [] Wing HQ [] Group HQ [] ADF Regulatory, Technical or Logistics policy agency [] Other commercial entity [], Other [] Please describe:
Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:	YES [] NO []