

Know Your Maintenance Programme

By Bruce Cooke, SAA Vice President (SP1980)

Recent events such as the Rotax overhaul life issue and the eligibility for maintenance flights during COVID lockdown has brought a number of queries to SAA along the lines of, "How come he can do that when I can't?" The answer is often a referral back to the aircraft documentation – "What does your maintenance programme say?"

Sadly, in many cases this has highlighted a lack of awareness of what is actually in the maintenance programme. Is this important? Well, the key principle of the New Zealand Civil Aviation Rules is that the aircraft operator (i.e. those of us who operate our own aircraft) is responsible for ensuring the aircraft is maintained in accordance with that programme, so we actually need to be familiar with what it says, and what our responsibilities are.

The majority of our members' aircraft are using the SAA Maintenance programmes, which are compiled according to the individual aircraft, but are based on pre-approved sections. Others may be from the aircraft or kit manufacturer. With a background in aviation documentation, I wrote my own for my Adventurer ZK-CKE, so I have a pretty good idea what is required to have one approved.

A Maintenance Programme is probably the most important aviation document when it comes to ensuring your aircraft is airworthy. All aircraft, be it a Boeing 777 or a microlight, are required to have one in some form or another. Its more than just a maintenance check sheet, it lays out WHO is responsible for the airworthiness of the aircraft (your application needs those details), WHAT is required, and WHEN it needs to be done. It defines the limits, and what adjustments or latitudes are permitted.

It is based on the "exposition" principle that is the standard in the aviation industry. Essentially CAA (or more correctly the Minister of Transport) presents the Civil Aviation Rules, and says, "Here are the requirements you have to meet". CAA then asks you "OK, what processes will you use to ensure you comply with those requirements?" Your Maintenance Programme is showing CAA how you will comply, referring to appropriate vendor publications, and itemising the maintenance process by means of checklists etc. CAA, as the regulator, can then measure your actions against this to

determine whether you are complying with the Rules and operating safely. For light aircraft such as ours, this means either the 12 or 24 month Review of Airworthiness by an IA (Inspection Authorisation) rated LAME, or, in the case of microlights, the annual inspection by your Part 149 Technical Inspector.

I know some owners are happy to "leave all of that to my LAME", but you cannot abrogate your responsibility under law. You can certainly ask them to check your documentation, etc., but it is still your responsibility to know what is in the programme, what is required and what your limitations may be. Most LAMEs are very supportive of owners knowing their responsibilities and are very happy to give advice when required.

Your maintenance programme is personalised, not just to your aircraft, but to you. It needs to reflect both the owner and aircraft. Changing key components on your aircraft may mean changing the programme – I am currently updating mine to reflect a change in propeller and a different radio, since it refers to documentation from the equipment vendors. What about changes to you? Is your address shown correctly?

A big issue that catches people out is changing ownership. If you have just purchased an aircraft (particularly a homebuilt), what is the status of the maintenance programme that came with it? In nearly all cases you will need to update the owner details at the very least. For aircraft using the SAA Programmes, you might not even be permitted to continue using the Programme. SAA licences the use of its maintenance programmes as they are intellectual property belonging to the organisation. There are two types of licence, an outright, transferable type that can be transferred with the aircraft when it is sold (for a \$500 outright fee), or the cheaper Members option (\$75.00). The Members option has specific license conditions – it is not transferable to other owners, and you must remain a member of SAA while you hold the licence to the programme.

From a practical point of view, this ensures you get any updates that may be required with changing rules, etc., and it also provides a substantial benefit to members (knowing how much is involved in writing such a programme, this is a bargain!).

It is important to understand that if you sell the aircraft, or if you cease your SAA membership, that the maintenance programme is no longer valid. Should an incident occur and CAA investigates, they could possibly ground the aircraft until a properly licensed programme is obtained. This could also affect your insurance as well. That sounds like quite a good incentive to know what your programme actually says! Please don't skip over the "End User License Agreement" as you do when installing computer software (yep, we all do that!).

Please, take the time to understand your Maintenance Programme, it's not just some bureaucratic paperwork to slow you down (It can actually give you some useful flexibility in some instances). Know your license obligations and whether it is actually transferable. Keep it up to date to match both people and aircraft. Make sure you have a safe and legal aircraft.

If you have any queries about your SAA Maintenance Programme, please contact the Administrator.



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