

## **AIRCRAFT LEASING – TRANSFER OF RECORDS.**

### **1. General**

- 1.1 This appendix is intended to define clearly the minimum requirements for aircraft owners and airlines who are planning or preparing to transfer or lease an aircraft across international boundaries.
- 1.2 The requirements are intended to be used as minima; additional requirements may be demanded by the lessor or purchaser.
- 1.3 Documentation should be provided to establish the national regulations under which the maintenance and operation of the aircraft have been carried out. This should also include, where applicable, details of any deviations from, or exemptions issued against, those regulations.
- 1.4 The maintenance programme should be identified to the following standard:
- 1.4.1 *Approval.* The approval or acceptance of the maintenance programme by the associated regulatory authority should be identified.
- 1.4.2 *Traceability.* The maintenance programme should be identified and be traceable to its approved minimum requirements standard, e.g. Maintenance Review Board (MRB) report, the manufacturer's recommended maintenance programme or recommended tasks. In the event that the programme fails to meet the minimum requirement standard, all areas of such deficiencies should be identified and corrective action taken on the aircraft or to the programme as necessary. The minimum standard is understood to mean only minimum required tasks and not the intervals.
- 1.4.3 *Documentation.* A printed copy of the maintenance schedule should be provided, identifying all tasks and functions in such a manner as to permit traceability to the corresponding work cards. This includes sampling programme tasks.

### **2. Records and Documentation.**

#### **2.1 General.**

- 2.1.1 Consideration should be given to aircraft records and documentation as indicated.

#### **2.1.2 Governing requirement.**

Prior to initiation of the lease or transfer, representatives of both parties should coordinate the scope and content requirements of the aircraft, engine, propeller and technical log book that will be eventually be required upon aircraft return or further transfer. The governing record-keeping regulation under which the aircraft records should be maintained should be determined prior to initiation of the lease or transfer.

#### **2.1.3 Language.**

All aircraft records should be maintained in English. For practical purposes another language may be used; however, a translation to English should be provided at the time of transfer.

#### **2.1.4 Documentation requirements.**

2.1.4.1 Documentation requirements for incoming components and parts should be identified in the operator's manual to support its purchasing and receiving inspection functions. This includes, but is not limited to, documentation of airworthiness directive (AD) compliance, time on life-limits, description of work performed and certification of new and repaired parts. Once these requirements are satisfied and the essential information is entered into the operator's records system, the only source documentation required to be retained is that necessary to:

- a) Satisfy the requirements of the DCA or the responsible regulatory authority.
- b) Support the operator's continuing analysis and surveillance system.
- c) Support future maintenance on the affected parts.

However operator's are advised to retain or archive documentation of AD compliance, life-limited part service times and other information which may be useful in the future.

- 2.1.4.2 When a used aircraft is introduced into an operator's fleet, the receiving operator should review the records to ensure they provide the current maintenance information necessary to phase the aircraft into the operator's maintenance programme. This includes records such as the documentation of the last schedule inspection, the current status of ADs, life-limited parts and components, supplemental structural inspection documents, damage-tolerance inspection status, certification maintenance requirements, major repairs and major alterations.
- 2.1.4.3 If the aircraft is being transferred to another operator, the records from the transferring operator of the status of life-limited parts and AD, including the method of AD compliance, should be acceptable as valid unless obvious discrepancies are apparent. The transferring operator should provide a written statement that the records are correct.
- 2.1.4.4 If the aircraft is being transferred to another operator, the records from the transferring operator of the status of life-limited parts and AD, including the method of AD compliance, should be acceptable as valid unless obvious discrepancies are apparent. The transferring operator should provide a written statement that the records are correct.
- 2.1.4.5 If the aircraft is being transferred from another state, it may be necessary to evaluate the previous operator's maintenance scheduling and record-keeping system to ensure the validity of the records. This may require communication between DCA and the regulatory authority of that state.
- 2.1.4.6 The following are recommendations for determining the validity of the current status of life-limited parts and AD compliance:

- a) If the state of the operator is an ICAO signatory, the operator's records should meet ICAO requirements and a record of current status would be acceptable;

*Note – ICAO record-keeping requirements are specified in Annex 6, Part I, Chapter 8 (Aeroplanes) and Part III, Chapter 6 (Helicopters).*

- b) A spot check of visible AD would be indicative of the accuracy of those records;
- c) A spot check of source records for the record-keeping system of the transferring operator would indicate the quality of those records;
- d) The state of the transferring operator's shop records would be indicative of the integrity of the operator's record-keeping system;
- e) Significant errors or omissions in a records status report would indicate inadequate records and record-keeping system.

2.1.5 Part numbers.

Records must accurately reflect the manufacturer's part number as applicable. In the event that the operator utilizes a part numbering system other than the manufacturer's system, a complete cross-reference should be provided with the records. If alternative part numbers are recorded, technical substantiation should be available to support the part substitution.

2.1.6 Serial numbers.

All components and assemblies controlled by serial numbers should have their serial numbers recorded in the maintenance records. In the event that the operator utilizes a serial numbering system other than the manufacturer's system, a complete cross-reference should be provided with the records.

2.1.7 Dates.

All records should be properly dated with reference to an installation or maintenance function accomplishment. If the date format is numeric, the system should use a day/month/year format to date the records.

2.2 Record-keeping requirements for airworthiness directives.

2.2.1 The current status of applicable ADs for a particular airframe, engine, propeller, rotor or appliance should be maintained. This record should:

- a) Identify the particular airframe, engine, propeller, rotor or appliance;
- b) Identify the applicable AD (including amendment number, if required);

- c) Indicate the date when the AD was accomplished (if required) or when the next recurring inspection or action is due;
  - d) Describe the method of compliance (if more than one method is specified in the AD);
  - e) show the appropriate measuring parameters (hours, cycles and/or calendar times).
- 2.2.2 The requirements of the regulatory authority will determine the specific data required as part of a maintenance record. An operator is not required to retain actual work documents to show accomplishment of the work on a given airframe, engine, propeller, rotor or appliance to document AD compliance unless such records are otherwise called for by the requirements of the regulatory authority.
- Note – Current status information is required to be maintained as long as the airframe, engine, propeller, rotor or appliance is used or intended to be used by the operator. ICAO requirements for retention of records are specified in Annex 6, Part I, Chapter 8 (Aeroplanes) and Part III, Chapter 6 (Helicopters).*
- 2.3 Record-keeping requirements for life-limited parts.
- 2.3.1 Each operator should maintain the current status of life-limited parts. If the operator obtained such parts new from the manufacturer, the current status will be based upon the operator's in-service history of the part. If the part has been obtained from a previous operator, the current status will be based on the status from the previous operator plus the present operator's in-service history. The current status of life-limited parts is required upon each transfer throughout the operating life of the part. When such parts are transferred, the previous operator should produce an in-service history for life-limited parts, irrespective of the operator's governing regulations. When life-limited parts are transferred between operators, a written statement by the previous operator, attesting to the current status of life-limited parts, is an acceptable method of indicating prior operating service of the part(s).
- 2.3.2 When the records of current status for life-limited parts are lost or destroyed, an equivalent level of safety may be determined by consideration of other records available, such as technical records, utilization reports, manufacturer's information or presentation of other evidence. If review of other available documentation reveals significant errors or omissions that prevent the development of a current status of life-limited part(s), the part(s) in question should be retired from service. It is the operator's responsibility to notify the regulatory authority when such records are lost or destroyed and to initiate an immediate search for records from which the current status of the life-limited part(s) can be determined.
- 2.3.3 Not all life-limited parts will necessarily be marked with part and serial numbers. For aircraft of United States manufacture, for instance, specific requirements for life-limited parts to be marked with part and serial numbers have only existed since the early 1980s; operators must be able to track life-limited parts manufactured prior to the early 1980s, although such parts may not be serialized items.
- 2.3.4 Operators may receive life-limited parts from a repair station that has a system to determine the current status of such life-limited parts. This system should be recognized as a factor in the substantiation of the current status of life-limited parts.
- 2.4 Transfer of records.
- 2.4.1 When an aircraft, airframe, engine, propeller, rotor or appliance is transferred to a new operator, the records of these products should accompany the transfer. Such records should include the current status of maintenance, ADs and life-limited parts and should clearly identify the person responsible for the data in the report and the date associated with the records.
- 2.4.2 When an aircraft, airframe, engine, propeller, rotor or appliance is leased, the associated records should be transferred as if the transaction were a sale. By agreement between the lessee and the lessor, some records, such as work cards and inspection records, may be retained by the owner; however, the lessee has a responsibility to review the records retained by the owner and to ensure that the summary information used to support the airworthiness of the item is complete and accurate.
- 2.5 Lost records.
- In the event that required maintenance records have been lost or destroyed, alternative proof should be provided that the tasks in question have been performed.
- 2.6 Service bulletins.
- All service bulletins that have been incorporated should be listed, together with accomplishment dates. If options are available, the option complied with should also be indicated. When a service bulletin involves

recurring action, the times or dates, as applicable, of the last action and the next action due should be provided.

2.7 Modifications/alterations.

2.7.1 All modifications/alterations performed since the original aircraft delivery that are still existent on the aircraft should have been carried out in accordance with the requirements of the airworthiness authority of the State of Registry at the time of their incorporation.

2.7.2 A list of such modifications/alterations should be provided indicating their classification and supported by appropriate documentation. In the case of a major modification/alteration, this documentation should include as a minimum:

- a) The document defining the modification/alteration;
- b) The certification basis;
- c) The approval of the relevant authority.

2.8 Repairs.

All major repairs performed since original aircraft delivery and which are still existent upon the aircraft should be listed and demonstrated to be in compliance with the requirements of the airworthiness authority of the State of Registry at the time of their incorporation. If additional action is required, e.g. recurring inspection, this should also be indicated.