POSITION PAPER

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FORWARD

This position paper is being developed to assist maintenance and production approval holders with FAA policies that presently exist and can be used to develop a method of compliance to the implied intent of MAG 5, change 5 requirements outlined in this paper, while avoid the unintended conundrum of establishing a dual document system. One for "Domestic FAA" work, and another for FAA/EASA dual release work. The possibility of qualified vendors being eliminated because they are not FAA/EASA certificated, but only FAA certificated repair facilities. This would then require another round of locating, qualifying, and securing new vendors for your "Dual Release" work. Another more onerous consequence is re-tracing existing inventory to validate its acceptance under MAG 5, change 5 grandfather clause allowance. Finally, the unwelcome burden of paying for additional certification fees for issuance of a 8130-3 from PAH vendors when existing FAA national policy [sic] 8130.21H does not require that issuance except for exports, and since FAA/EASA US based facilities are NOT located outside the US or its territories those PAH's are not obligated to issue a 8130-3 without a fee. So the unintentional consequences to all the above is a huge administrative and financial burden to all affected by this MAG 5, change 5 agreement. Its our hope that this burdens awareness to the aviation community and regulators will cause a revision favorable to these questions put forward in this paper.

D.P. DaCosta
March 06, 2016

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1 REGULATORY REFERENCES

Sr. No.	*Document No.*	*Title/Subject*	*Rev./Change /Date*
1	MAG5 EC-1321/2014	Maintenance Annex Guidance (hereinafter 'MAG') between the FAA for the United States Of America and the European Aviation Safety Agency for the European Union	Change 5, effective date 09/09/2015
2	FAA/EASA TIP Rev 5	Technical Implementation Procedures For Airworthiness And Environmental Certification between the FAA for the United States Of America and the European Aviation Safety Agency for the European Union. (Especially Section 3.3 "Approval of Design Data Used in Support of Repairs)	09/15/2015
3	FAA Order 8130.21H	Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag, dated 08/01/13 – Procedures for Completion and Use of Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag	N/A
4	FAA Order 8120.22	Production Approval Procedures [Specifically Chapter 8, [8-1, 8-2].	02/25/2013
5	FAA Order 8110.118	Commercial Parts	09/20/2012
6	FAA Order 8300.16	Major Repair and Alteration Data Approval	04/18/2014
7	FAA Order 8130.2H	Airworthiness Certification of Aircraft and Related Products	02/04/2015
8	FAA AC43-18	Fabrication of Aircraft Parts by Maintenance Personnel	Change 2
9	FAA AC 21.101-1A	Establishing the Certification Basis of Changed Aeronautical Products	N/A
10	FAA AC 21-47	Submittal of Data to an ACO, a DER or ODA for Major Repair, or a Major Alteration	09/ /2010
11	FAA AC 21-29C	Detecting and Reporting Suspected Unapproved Parts	08/17/2011
12	FAA AC 43.210	Standardized Procedure For Requesting Field Approval Of Data, Major Alterations, and Repairs	02/17/2004
13	FAA AC 21-45	Commercial Parts	09/29/2012
14	FAA Form 8130-3	Authorized Release Certificate, Airworthiness Approval Tag	02/01/2014

The references made to any of the above documents in following sections refer to the document number and revision/change/effective date mentioned in above table unless and otherwise mentioned. These documents are the latest current documents at the time of writing this paper.

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2 BRIEF STATEMENT OF ISSUE

The Maintenance Annex Guidance (MAG) current revision change 5, contradicts with existing FAA directives, advisory circulars (AC) and regulations, creating confusion and issues among EASA-approved U.S.-based 14 CFR part 145 repair stations and other relevant organizations.

3 BACKGROUND

The MAG, which is Annex II of the Bilateral Agreement (BA) that is established between the United States and the European Community, had been revised from change 4 dated 01/29/2014 to change 5 dated 09/09/2015. It has been noted that, some of sections from Section B, Appendix I, paragraph 10, contradicts with relevant existing FAA orders, advisory circulars (ACs) and regulations. This contradiction between FAA and MAG has been creating confusion and ambiguity among EASA-approved U.S.-based 14 CFR part 145 repair stations.

These repair stations have contacted Mr. Dominick DaCosta (FAA DER-T, DAR-F) President of DERS Group Svc LLC (hereinafter 'DERS Group') seeking expertise guidance. Mr. Dominick DaCosta has over 30 years of aerospace manufacturing and 20 years of Engine/APU maintenance and repair experience. Mr. DaCosta is a FAA DER-T with delegations in Engines, Powerplant, Mechanical Systems, Structures with RS-DER authority and a DAR-F also for Class I, II and III parts. And DERS Group is a consortium of consultant FAA designees (DER, RS-DER, DAR) located at 2901 E. Ohio Blvd, Suite 140A, Terre Haute, IN 47803.

This Position Paper describes, (1) MAG change 5 revision mainly pertaining to Section B, Appendix I, paragraph 10, (2) it's contradiction with existing FAA Orders, ACs and regulations and, (3) ambiguity, problems that have arises for the Repair Stations or other equivalent organizations located in USA. Paper also (4) proposes an alternate means/procedure of compliance to comply with the intent and spirit of the MAG change 5, still adhering to existing orders, ACs and regulations.

FAA and EASA will be recipient of the position paper for their review, comments and acceptance. Upon FAA and EASA acceptance and/or approval of the proposed procedure, DERS Group will recommend the incorporation of the procedure to form part of the FAA 14 CFR part 145 Repair Station Manual/Quality Control Manual (RSM/QCM).

Even this paper mainly addresses repair station's (considering greatest population) regulatory confusion and proposes a procedure, same solution can be applicable to other eligible organizations such as U.S. air carrier certificate operating under Part 121 or Part 135.

4 FAA POLICIES/RULES, MAG AND ISSUES

This section explains FAA Form 8130-3 related artifacts, relevant extracts from Order 8130.21H, AC 43-18 and MAG, and establishes their correlation/conflict with each other.

1. FAA Form 8130-3

FAA employees, FAA certified/authorized organizations and designees uses 'Airworthiness Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag' to document the airworthiness approval status of the products and articles. This form can be used for domestic and export approvals, for new products and/or articles, or return to services for products and articles after maintenance, preventive maintenance, rebuilding and alterations.

Properly completed Form 8130-3 assist the end user in determining the airworthiness approval status of a New or Used product or article.

The following person can issue FAA Form 8130-3 (refer Order 8130.21H Chapter 1, Paragraph 1-8),

1) FAA Aviation Safety Inspector (ASI),
2) Person with appropriate function codes in accordance with FAA Order 8100.8D Designee Management Handbook when authorized by their Certificate of Authority (COA),
3) Persons authorized in accordance with FAA Order 8100.15B, Organization Designation Authorization Procedures, or
4) Persons authorized in accordance with paragraph 3-1 of FAA Order 8130.21H

The above point #2 refers to DMIR or DAR, whereas point #4 refers to PAH or Air agencies certificated under part 145, or the holder of a U.S. air carrier certificate operating under part 121 or part 135, with an approved continued airworthiness maintenance program.

FAA Form 8130-3 can be released as Single release (eligible for installation on only U.S. registered aircrafts) or dual release (eligible for installation on U.S. and European Union registered aircrafts) for new and used components.

2. FAA Order 8130.21H

4.2.1 Form 8130-3 'Recommend' only, New – PAH, Return to Service – PAH/145/121/135

FAA Order 8130.21H, Chapter 2, Paragraph 2-1(a) General Information on Domestic Airworthiness Approvals (page 2-1), has following statement,

- "The FAA *recommends* each PAH include FAA Form 8130-3 for all eligible product and article shipments."

Similar or identical statements can be found in Paragraph 2-3(a) Domestic Airworthiness Approval of **New** Products (Aircraft Engines and Propellers) and Paragraph 2-4(a) Domestic Airworthiness Approval of New Articles, page 2-2 and 2-3 respectively.

Paragraph 2-1(a), 2-3(a) and 2-4(b) refers to PAH, PAH suppliers/associated facilities identified in PAH's approved procedures and PAH's suppliers with Direct Shipment Authorization (DAS).

FAA Order 8130.21H, Chapter 3, Paragraph 3-1(b) General Information on Approval for **Return To Service,** page 3-1, has following statement,
*"A **PAH** may issue an FAA Form 8130-3 for approval for return to service after rebuilding, altering, or inspecting its product in accordance with § § 43.3(j) and 43.7(d). The use of FAA Form 8130-3 for this purpose is optional, but the FAA recommends its use."*
Paragraph 3-2(a) Approval for Return To Service After Maintenance, Preventive Maintenance, Rebuilding, and Alteration-Products and Articles, page 3-3, has following statement,
- *"Only those persons described in paragraph 3-1a and b, when authorized by § 43.7(c), (d), and (e), may issue an FAA Form 8130-3 for approval for return to service of products and articles that have undergone maintenance, preventive maintenance, rebuilding, or alteration, provided the applicable recordkeeping requirements of § § 43.9, 91.417, 91.421, 121.380, 135.439, or 145.219 are met. The use of FAA Form 8130-3 for this purpose is optional, but the FAA recommends its use."*

Paragraph 3-1a and b refers to 14 CFR part 145, part 121, 135 and PAH organizations respectively.

Similar or identical statements can be found in Paragraph 3-3(a) Approval for Return To Service-Products and Articles (applicable for 14 CFR part 145, part 121, 135 and PAH organizations respectively), page 3-4 and Paragraph 3-4(b) Issuance of FAA Form 8130-3 for Used Products and Articles Removed from a U.S.-Certificated Aircraft for Installation on Another U.S.-Certificated Aircraft, page 3-5.

Above regulatory analysis demonstrated that, in FAA regulatory system, the use of FAA Form 8130-3 for documenting domestic airworthiness approval of new products or articles is,

- Optional, and recommended only
- Only PAH, PAH suppliers/associated facilities identified in PAH's approved procedures and PAH's suppliers with DAS can issue Form 8130-3 for new products and articles
- 14 CFR part 145, part 121, 135 organizations can only issue Form 8130-3 for return to service (used) products and articles (assumption: these organization are not PAH also)
- PAH also can issue Form 8130-3 for return to service (used) for its products and articles

4.3 FAA AC 43-18

4.3.1 Repair Station FQCS Fabricated Parts

FAA AC 43-18 change 2, provides guidance for establishing Fabrication Quality Control System (FQCS) that ensures the same level of safety for parts fabricated under part 43, during maintenance or repair purposes, as those produced under the production rules under part 21. This AC allows a FAA-Certificated 14 CFR part 145 Repair Station to fabricate parts that have equivalent level of safety as those parts produced under original's design holder's production certificate during maintenance and alteration, to be consumed within repair station (not sold separately) by installing into the next higher assembly component part, or within a product, while undergoing maintenance or an alteration.

All of these parts fabricated by repair station under approved FQCS are fabricated under 14 CFR Part 21.8(d) and Part 43. This method of fabricating approved parts has also identified in AC 21-29C, section 3(b)(12) and in the section 3.3 of Technical Implementation Procedure (TIP) which is Annex I of the Bilateral Agreement (BA) established between the United States and the

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European Community

4. MAG Change 5

Following are the MAG Change 5, Section B changes identified from the revision history table, and that are related to this position paper,

1. Provided clarification Appendix 1 Paragraph 10 – Revised instructions when a FAA 8130-3 Form is issued with exceptions used for US and Europe
    a. No changes in subparagraphs a, b, c, d, e, f, g, i and j.
    b. Changes in subparagraph h, but not related to this paper.
2. Appendix 1, Paragraph 10(k) Use of the term "Must" where applicable instead of "Should"
    a. All 'should' are replaced with 'must' from subparagraphs k(1) New Components.
    b. 'Will' replaced with 'must' from subparagraphs k(2) Used Components.

Following are statements from the MAG Change 5 Section B, Appendix 1, Paragraph 10,

"(1) New Components.

i) New components must be traceable to the OEM as specified in the Type Certificate (TC) holder's Parts Catalogue and is in a satisfactory condition for installation. A release document issued by the OEM or Production Certificate (PC) holder must accompany the new component. The release document must clearly state that it is issued under the approval of the relevant AA under whose regulatory control the OEM or PC holder works.

ii) For U.S. OEMs and PC holders, release must be on the FAA Form 8130-3 as a new part…."

"(2) Used Components

i) Used components shall be traceable to AMOs and/or repair stations approved to certify previous maintenance, and in the case of life limited parts, certified the life used. The used component must be in a satisfactory condition for installation and be eligible for installation as stated in the TC holders Parts Catalogue.

ii) An FAA Form 8130-3 issued, as a dual maintenance release must accompany used components from EASA-approved U.S.-based 14 CFR part 145 repair stations…."

It can be observed that per MAG change 5, all new parts must accompany PAH issued Form 8130-3 as new. In MAG change 4, this requirement was 'should' instead of 'must'. This has created confusion and ambiguity creating issues for EASA-approved U.S.-based 14 CFR part 145 repair stations since these organizations have stock of parts that were purchased from PAH, PAH suppliers/associated facilities identified in PAH's approved procedures or PAH's suppliers with DAS. Such parts were not supplied with Form 8130-3 as there was neither such requirement from repair station nor any FAA requirement for PAH to issue such Form while shipping new parts. These parts were received with Certificate of Conformance (CofC) only.

This creates an issue when such repair station with above situation want to supply such part for installation on EU-registered aircraft.

4.5 Issues

The issue explained in previous section can be re-defined as, "EASA-approved U.S.-based 14 CFR part 145 repair stations, intend to install a PAH supplied (prior publication of MAG change 5) part (with no Form 8130-3, but with CofC) on EU-registered aircraft." **This can be identified as Issue #1.**

On other hand, in case if repair station has a FAA approved FQCS and fabricates replacement parts that intent to use during maintenance or alteration on EU-registered aircraft, there is no method in MAG that defines type and method of use of any FAA form, even the TIP Section 3.3 refers to such situation.

The issue can be re-defined as, "EASA-approved U.S.-based 14 CFR part 145 repair stations, intend to install a fabricated part within repair station under FQCS and intend to consume during maintenance or alteration on EU-registered aircraft". **This can be identified as Issue #2.**

5 DERS GROUP Svc LLC POSITION

The intension of this Position Paper is to develop a best logical and practically feasible procedure to comply with the intent of concern paragraphs of MAG, and still continue to adhere to existing FAA policies, guidance material and rules.

5.1 Defining Status of Products/Articles

FAA Order 8120.22 Production Approval Procedures (effective date- 02/25/2013) Chapter 8, describes the responsibilities, procedures, conditions and applicable regulations for performing subsequent work by following organizations,
- PAH (other than Product/Article's original PAH) or
- Repair Station, Airline, and Distributor etc.

The Section 8-1 states that,
"New products or articles that have left the control of a U.S. PAH or their approved supplier's quality system and are acquired by another PAH must have subsequent work performed in accordance with the part 21 quality system."
The three options for **new** products or articles are as follows:
(1)The product or article may be returned to original PAH and processed.
(2)The work may be performed by the original PAH personnel at the location of the receiving PAH.
(3) The work may be performed by the receiving PAH.

Hence the Section 8-1 helps to define the status of the products or articles when it remains within PAH (including PAH, approved supplier, or another PAH) as new.

The Section 8-2, defines the status of the Products or Articles that are no longer within Part 21 i.e. left the U.S. PAH or their approved supplier's quality system and are received by Repair

Station, Airline, and Distributor as,
"(1) Completed aircraft with airworthiness certificate or
(2) Spare, replacement, or modification articles or products intended for installation on a higher level product or article that has already met the applicability requirements of part 43. Therefore, the receiving airline, repair station, or distributor is responsible for ensuring that any maintenance, preventive maintenance, rebuilding, altering, etc., on such products or articles will be performed by persons authorized under part 43."

The Section 8-2 helps to define the status of the products or articles as spare, replacement or modification articles, when it left the PAH quality system. It justifies that as soon as the new product or article leave's PAH quality system, the status of the product or articles does not remain new. It is a spare, replacement or modification article that is never put into services and with in-service hours on it.

The regulatory analysis and references provided in this section emphasis on defining the status of the products or articles when its within PAH quality system or when it left PAH quality system, subsequently received by organizations such as repair stations. It is defined that if the product or article remains within a PAH quality system then the status remains new. But if product or article left PAH quality system it is no longer new product or article.

This section is considered to be one of the important section of this position paper which establishes basis for the proposed procedure/solutions that are presented in following sections.

5.2 Procedure #1

This section proposes a possible solution for the Issue #1 identified in previous section 4.5, where an EASA-approved U.S.-based 14 CFR part 145 repair station intend to use/consume a previously PAH supplied part that does not have a Form 8130-3 with it. As identified in section 4.4, MAG allows use of new parts that has U.S. PAH issued Form 8130-3.

The section 4.2.1 establishes that PAH, PAH suppliers/associated facilities identified in PAH's approved procedures and PAH's suppliers with Direct Shipment Authorization (DAS) only can issue Form 8130-3 for new products or articles.

FAA Order 8130.21H Chapter 4, Paragraph 4-1(j) states that,
"An FAA Form 8130-3 issued subsequent to the original finding of airworthiness is considered a recurrent airworthiness approval, for example, a PMA or TSO authorization article that left the PAH's quality/inspection system and is being presented for export."

So if the recurrent airworthiness status of such component needs to re-identify as new then component must be presented back to PAH for their evaluation to determine airworthiness status as new.

This means that in such cases, if any component that does not have FAA Form 8130-3 as new, then the repair station can send the components back to the PAH with the certification

(affiliation) and substantiation that component has been never used and was properly stored per the PAH instructions ensuring no change in any characteristics of the component.

And the Repair Station can request the PAH for the issuance of the FAA Form 8130-3 as new. It is oblivious that, once the PAH receives such component with such request from repair station, PAH must have to validate the component for any use, damage or change in characteristics due to storage or possible in-service history. Hence, PAH may have to disassemble, inspect, test the component and upon satisfactory results, may issue a Form 8130-3 as new for same component. Repair Station may also contract a FAA DAR for this purpose, but FAA DAR may also have to do all of the necessary steps that PAH will perform required for thorough validation of airworthiness status of the component.

Feasibility:
Considering whole process of sending back the component with affiliation and substantiate to the PAH, and PAH taking all necessary steps required thorough validation of airworthiness status of the component, needs tremendous efforts and investment in terms of time and cost and additional resources.

Assuming that all of such components that repair station have to send back to PAH, are never used and still in as it is original airworthiness condition, the additional efforts do not contribute materially to the previously established level of safety.

The FAA AC 21.101-1A dated 09/03/2010 outlines various steps to determine the impracticability of applying a requirement at a particular amendment level, in Chapter 3, Paragraph 10 and Appendix B. Same rational can be applied in this situation that knowing the fact that repair station stocked components are never used and are in same airworthiness status, sending them back to PAH for validating and issuance of Form 8130-3 as new, will not be economically viable.
Hence this AMOC will not be proposed for the FAA, EASA acceptance and/or approval, but presented here to demonstrate the latitude of the thinking and research that has put together.

5.3 Procedure #2

This section proposes a more feasible solution based on the rational provided in section 5-1 for defining the status of products or articles that have left the PAH quality system. This section defines such articles as spare, replacement, or modification articles or products. The section 5-1 also clarifies that such products or articles already met part 43 requirements and repair station is responsible is responsible for ensuring that any maintenance, preventive maintenance, rebuilding, altering, etc., on such products or articles will be performed by persons authorized under part 43.

Hence, the repair station can inspect such parts and can issue a dual release FAA Form 8130-3 for these components as 'Inspected' in Block 11 of the form. This form may have following or similar note in Block 12 that, "The part was purchased from the FAA-approved PAH/PAH supplier with DAS, against Purchase Order (number & date). The part was received with Certificate of Conformance dated (number & date)." This procedure is inline with FAA requirements for repair station of performing inspection on receiving (incoming) new articles, to verify for if,

- Component received is ordered on, has any shipping damages,
- Conforms to the standards, meets intended use, proper paper work in place, general condition and workmanship.

This will resolve the issue #1 identified in previous section and will ensure the traceability and airworthiness status of the part. This procedure ensures compliance with the Paragraph 10(k)(2)(i)(ii) of MAG change 5, Section B, Appendix 1.

The components produced by the repair station in accordance with FAA AC 43-18 under FQCS, are replacement components that are not put into service. Hence, the repair station inspect such fabricated parts and can issue FAA Form 8130-3 for these fabricated components as 'Inspected' in Block 11 of the form. This form may have following or similar note in Block 12 that, "Locally fabricated part, in accordance with FAA AC 43-18 Change 2, under approved Fabrication Quality Control System (FQCS). These parts can not be sold separately and must be consumed within repair station by installing into the next higher assembly component part, or within a product, while undergoing maintenance or an alteration".
This will allow the consumption of such fabricated components by installing into the next higher assembly component part, or within a product, while undergoing maintenance or an alteration.

Based on the exhaustive analysis that is presented in this paper along with the above feasible Procedure #2, a best logical path is prepared and presented in Appendix A. The proposed procedure #2 ensures compliance with the intent and spirit of the MAG change 5, still adhering to existing Orders, ACs and regulations, without burdening the repair stations.

The Appendix A is based on Procedure #2 and proposed to be incorporated into the repair station manual so that repair station can follow the FAA/EASA accepted/approved guidance that is provided in this paper. The Annex also contains examples of FAA Forms 8130-3 wherever applicable.

5.4 Recommendation

Considering new requirements from MAG Change 5, it is also recommended to the repair stations to convenience/request PAH supplying new components to must supply FAA Form 8130-3 as new. Repair Station can also include this requirement in the Purchase Orders, which requires PAH new part accompanying with Form 8130-3.

6 OTHER ISSUES & CONTRADICTIONS OF MAG5

1) As described in previous Section 4.2.1, PAH can also issue Form 8130-3 Return to service for its products and articles. But this possibility has not been considered in the MAG Change 5. Hence this will be considered as a point, which can be debated and may cause similar problems to the PAHs.

2) Orders 8110.118, 8300.16 and AC 21-45 refers to Commercial Parts which is a designation the FAA has defined in 14 CFR 21.1(b)(3) and 14 CFR 21.9(a)(4), introduces commercial parts under replacement and modification articles. As part of the TC, ATC, STC, ASTC, or PMA certification project, the applicant identifies whether or not they plan to develop a CPL as part of their ICA. Section 5(a) of Order 8110.118 states, "FAA design approval holders (DAH) have the privilege of designating qualified articles as commercial parts by including the CPL as part of their instructions for continued airworthiness (ICA). The manufacturer of an article on a CPL is not required to get an FAA production approval for that article." AC 21-29C also refers to commercial parts as one of the approved part under FAA regulatory; refer Section 3(b)(12).

   This possibility of manufacturing articles without a production approval has not been considered in the MAG change 5. And since the manufacturer of commercial part from CPL is not required to have production approval, they cannot issue a 81130-3 for such new manufactured articles, which contradicts with MAG Change 5 Section B, Appendix 1, Paragraph 10(k)(1)(ii) requirement.

Since the objective of this position papers was to resolve the repair station or other organization's issues that are presented here, above mentioned issues have not been addressed.

7 SUMMARY

- Certain paragraphs of MAG Change 5 brings confusion and issues to EASA-approved U.S.-based 14 CFR part 145 repair stations
- An exhaustive study of FAA policies and regulations along with MAG Change 5 has been presented to study existing FAA regulations, identify contradiction with MAG and proposes a procedure
- Proposed procedure ensures compliance with the intent and spirit of the MAG change 5, still adhering to existing Orders, ACs and regulations, without burdening the repair stations
- This proposed procedure is subject to FAA and EASA acceptance and/or approval
- This guidance in the form of procedure will be subject to incorporation into repair station RSQM/QCM
- MAG Change 5 still exhibits an issue to PAHs that is not addressed in this paper

8 CONTACT

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APPENDIX A

This appendix has been prepared in support of the Position Paper *(Document No. PP_DERSG_MAG5) by Mr. Dominick DaCosta (FAA DER-T, DAR-F and Owner of DERS Group Svc LLC, located at Terre Haute, IN, U.S.) in order to provide a logical procedural path in order to comply the intent of concern paragraphs of the Section B, Paragraph 10 of Maintenance Annex Guidance (MAG) Change 5, continue to adher to FAA policies and regulations.*

For any clarification or guidance please contact,
Dominick DaCosta,
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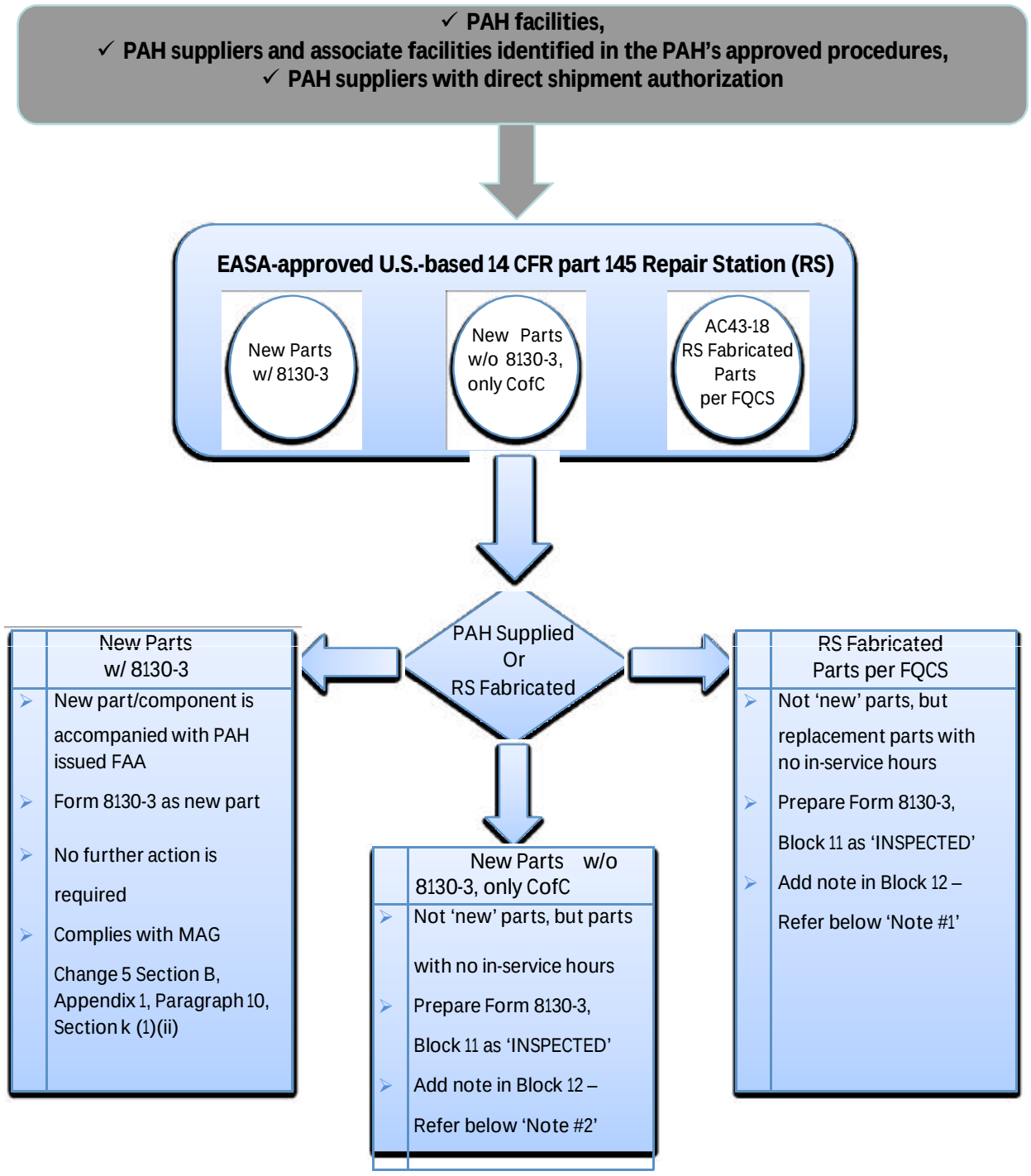
Owner, DERS Group Svc LLC Terre Haute, IN. +1 (812) 878-0277.



Note #1: *Locally fabricated part, in accordance with FAA AC 43-18 Change 2, under approved Fabrication Quality Control System (FQCS). These parts cannot be sold separately and must be consumed within repair station by installing into the next higher assembly component part, or within a product, while undergoing maintenance or an alteration. [Per EASA TIP 3.3.2]*

Note #2: *The part was purchased from the FAA-approved PAH/PAH supplier with DAS from PAH, using Purchase Order number dates **/**/****. The part was received with Certificate of Conformance dated Mar/31/2016".*