

Technical Airworthiness Authority Advisory (TAA Advisory)	
Title	Application to Waive Specific Eligibility Requirements for Technicians Being Authorized to Perform and/or Certify Maintenance or Carry Out Aircraft Release
TAA Advisory Number	2020-01
Effective Date	16 March 2020
TAM Reference	Part 1, Chapter 4, Section 1.4.2.S2, Paragraphs c. and d.
OPI / Telephone	DTAES 4-5 / 819-939-4757
RDIMS File	2182D-1027-812-6- VOL 1 #1942296 (English) #1984477 (français)

1. Purpose

- 1.1 This Technical Airworthiness Authority (TAA) Advisory provides guidance to Maintenance Organizations seeking TAA authorization to waive specific knowledge, skills or experience “eligibility” requirements for maintainers being authorized to perform and/or certify maintenance or carry out aircraft release.

2. Applicability

- 2.1 This TAA Advisory applies to AMOs who are seeking relief from technical airworthiness requirements in assigning authority to their technicians to perform maintenance and/or execute MRA or ARA on DND/CAF aircraft. This TAA Advisory may be used when a waiver request, submitted to the TAA, can demonstrate that the assignment will not affect safety or reduce it below a level that is acceptable to the TAA.

3. Related Materials

3.1 Regulatory References:

- 3.1.1 C-05-005-001/AG-001 – *Technical Airworthiness Manual (TAM)*:
a. Part 1, Chapter 4 (1.4.2.S1 – Organizational Authority and 1.4.2.S2 – Individual Technical Authority)
b. Part 5, Chapter 9 (5.9.2.S1– Exemption or Deviation Request)
3.1.2 TAA Advisory 2016-04 – *Recognition of Airworthiness Authorities*
3.1.3 TAA Advisory 2015-01 – *Basic Airworthiness Exam Requirements for MRA Candidates within a TAA-Accredited Organization*

3.2 Acronyms

ACA	Aircraft Certification Authority
AME	Aircraft Maintenance Engineer
AMO	Acceptable Maintenance Organization
ARA	Aircraft Release Authority
DND	Department of National Defence
HF	Human Factors
MPM	Maintenance Process Manual
MRA	Maintenance Release Authority
OJT	On-the-Job Training
POM	Performance of Maintenance

PRAA	Person Responsible for Assignment of Authority
SCA	Shop Certification Authority
SMM	Senior Maintenance Manager
TAA	Technical Airworthiness Authority
TAM	Technical Airworthiness Manual
WHMIS	Workplace Hazardous Materials Information System

4. Discussion

4.1 According to the Department of National Defence (DND) Technical Airworthiness Manual (TAM) (reference 3.1.1), an Acceptable Maintenance Organization's (AMO) Maintenance Process Manual (MPM) shall define the eligibility requirements, in terms of knowledge, skills and experience that an individual must meet prior to being authorized to perform maintenance and/or execute Maintenance Release Authority (MRA) (i.e., Aircraft Certification Authority (ACA) and Shop Certification Authority (SCA)), or Aircraft Release Authority (ARA). While the AMO is expected to adhere to these rules, there may be occasions when an SMM may need to consider granting authorization to an existing individual within the AMO, or hiring a new employee, who does not fully meet the defined eligibility requirements for the intended role. In this case, the SMM may submit a waiver request to the TAA for approval, providing that the SMM can demonstrate that it will not affect safety, or reduce safety below a level that is acceptable to the TAA. In accordance with reference 3.1.1.b, a waiver submission should include:

- a. Identification and describe the airworthiness deficiency for which the exemption is requested;
- b. Background to the request;
- c. Rationale and supporting arguments to substantiate the request, including alternate airworthiness requirements and/or demonstrating equivalency;
- d. Identification of any reduction to the level of safety, or airworthiness risks, arising from the request;
- e. Identification and propose conditions that could mitigate or eliminate any risks;
- f. Duration of the exemption, if applicable, with associated mitigation plans; and
- g. Supporting Documentation.

4.2 The following paragraphs provide guidance and considerations that may be taken into account while assessing an individual's knowledge, skills and experience requirements against the AMO policy defined within their MPM.

4.2.1 Knowledge

4.2.1.1 In general terms, and in compliance with reference 3.1.1.a, standard 1.4.2.S2, the organization's MPM will define knowledge in terms of trades training, specialty training, on-type training, initial training and airworthiness training. Any individual responsible for the conduct of maintenance and/or certification authority shall have completed a basic avionics, mechanical/structures or specialty maintenance course by a training organization acceptable to the TAA. This may include training by an approved RCAF training facility, or a training facility approved by another civil or military airworthiness authority. Reference 3.1.2 provides information on civil or military airworthiness authorities that have been recognized by the TAA. A waiver request would have to present a strong case, with objective evidence, demonstrating equivalent training gained through formal courses and work experience.

4.2.1.2 An ACA can be granted once the individual has met basic knowledge pre-requisites (i.e., AME licence holder or completion of TAA-approved apprenticeship program) and completed an on-type course. Generally a request to waive the on-type course for ACA would not be supported, unless the organization can demonstrate that the individual has received equivalent training

through other means (i.e., a combination of defined OJT program and experience within the organization).

- 4.2.1.3 For the SCA authorization, the individual would normally need to obtain a diploma or certificate in the appropriate field for the work that the SCA is being assigned. This can also be satisfied through an OJT program and/or work experience, if it is defined in the organization's MPM.
- 4.2.1.4 Individuals considered for ARA are normally selected from the organization's most experienced ACAs, provided they have a good understanding of their MPM and their airworthiness responsibilities. While rare, any deviation from the requirements for ARA must be well substantiated within the waiver request.
- 4.2.1.5 Initial training normally covers non-trade specific training that applies to all staff within the organization. This would include (but is not limited to) Indoctrination, Quality System, Human Factors, WHMIS, Tool Control and First Aid Training. The requirements for initial training should be described within the organization's MPM. The TAA would not expect to see a waiver request in this area.
- 4.2.1.6 For any individual who will hold MRA, Technical Airworthiness Training is mandatory and is not usually part of initial training. This is normally met through the in-house training of the TAA-approved MPM and associated procedures, followed by a Basic Airworthiness Exam. Details on the requirements for a Basic Airworthiness Exam may be found at reference 3.1.3. Appropriate Airworthiness Training and exam may not be waived.

4.2.2 Skills

- 4.2.2.1 This requirement refers to the need to provide evidence that the individual under consideration has completed a selection of maintenance tasks related to the roles and airworthiness authorization being assigned. In general, the organization's MPM should define the required skills and how they are achieved (e.g., on-the-job training). While basic skills are gained through the individuals' apprenticeship program, this does not negate the need to further develop their skills through a systematic performance of the task and evidence that the individual has satisfactorily completed the task to the satisfaction of the SMM and/or PRAA must be documented. In some cases, this hands-on training may be acquired during the aircraft type course. Any deviation from the skills eligibility requirements defined in the MPM will require a waiver.
- 4.2.2.2 If the organization's scope includes the requirement for granting ARA, the MPM will need to describe how the individual will gain the skills required to execute ARA. This would include exposure to all of the scenarios covering Aircraft Release responsibilities, demonstrated through OJT to the satisfaction of the SMM or PRAA. Any deviation from the requirements defined in the organization's TAA-approved MPM would require a waiver.

4.2.3 Experience

- 4.2.3.1 Depending on the roles and authorizations being assigned, experience requirements may vary from the completion of an apprenticeship program to minimum defined criteria based on experience working within an AMO and experience working on similar aircraft types or components. For ACAs, reference 3.1.1.a, standard 1.4.2.S2 includes experience gained through the individual's apprenticeship program, experience working within a TAA-Acceptable Maintenance Organization and experience on aircraft that have been issued type certificates by an airworthiness authority acceptable to the TAA. SCA experience is expressed in hours working on relevant components, under the direct supervision of a SCA. For ARA assignment, additional experience requirements are imposed on top of the ACA ones.
- 4.2.3.2 Requests for a waiver of experience requirements are the most common waivers received by the TAA. As with all eligibility requirements, any deviation from the experience requirements defined in the organizations MPM will require a waiver approval.

- 4.3 Organizations requesting a waiver for their personnel must submit the *Request for Technical Airworthiness Function Waiver* provided in Annex A to this advisory. Once the waiver has been approved, and any mitigating actions completed, the individual may be formally authorized in accordance with the organization's MPM. A copy of the waiver should be held on the member's file throughout the individual's employment with the organization, or until the requirement in the MPM has been met, thereby nullifying the waiver.

NOTE

It should be noted that, if an organization is planning on hiring a number of individuals with similar backgrounds, it may be more efficient to approach the TAA for an amendment to the MPM to cover off this scenario.

Request for Technical Airworthiness Function Waiver Form

Request for Technical Airworthiness Function Waiver			
Name: Block A		POC: Block C	
Unit/Company: Block B		POC Phone/Cell: Block D	
1. Level of authorization sought:		2. Specific MPM references and reason for request:	
Block E	POM		Block F
	SCA		
	ACA		
	ARA		
3. Summary of Previous Aviation Background and Experience:			
Block G			
4. Previous Aircraft Qualifications:		5. Previous Aircraft Authorizations:	
Block H		Block I	
6. I certify that all information provided above is true and that all supporting documentation shall be produced on request.		Block J	
		Applicant's Signature and Date	
7. Plan for overcoming deficiency:			
Block K			
8. I certify that I have reviewed this applicant's records and that the plan above will be carried out. I recommend that this waiver be granted.		Block L	
		SMM's Signature and Date	
9. The requested waiver is: (check one)		Block N	
Accepted			
Denied Block M			
		TAA's Signature and Date	

**ANNEX A
TO TAA ADVISORY 2020-01
DATED 16 MARCH 2020**

Instructions for completing the *Request for Technical Airworthiness Function Waiver Form*

Block A: Identify the individual for whom the waiver is requested.

Block B: Identify the organization making the waiver request.

Block C: Name the Point of Contact (usually, the SMM or PRAA).

Block D: Provide phone for the Point of Contact.

Block E: Identify the authorization level being sought.

Block F: Clearly identify why the waiver is required, as well as the TAM and Organization's policy manual requirements. If referencing a document, ensure to state the document revision being used.

Block G: Identify individual's relevant background and experience.

NOTE

Do not use abbreviations. This block should be accompanied by the individual's resume and any applicable artifacts (in attachment).

Block H: Identify specific past training, examinations, and experience that makes the candidate eligible for the authorization sought. Ensure it is written without abbreviations and clearly understandable, especially if training and qualifications were gained outside of Canada, as training in other countries is often unknown. Explain the equivalency of qualifications to Transport Canada or Canadian Military qualifications. This block should be accompanied by supporting diplomas, certificates and course descriptions, as required.

Block I: List all previous authorizations the candidate has held. Ensure they are easily understandable and do not use abbreviations. If previous authorizations were from outside Canada, explain the equivalency to Transport Canada or Canadian Military authorizations. Authorization records should be provided, as applicable.

Block J: Insert individual's signature to certify that all information provided above is true and that all supporting documentation shall be produced on request.

Block K: Identify the organization's plan for overcoming the candidate's requirement gaps. You must also include the maintenance tasks/minimum time that the candidate will be required to fulfill prior to becoming eligible for the authority sought. Also address any specific training to be carried out. It is acceptable to refer to a specific section of agreed-upon policy (e.g., a specific section in an airworthiness implementation plan.) If referring to a document, ensure to state the revision of the document being referenced and provide a copy, if applicable.

Block L: Insert Senior Maintenance Manager's signature to certify that all information provided above is true and has been reviewed. The organization's plan in block K will be carried out. The SMM's signature also certifies that the plan in block K is sufficient in overcoming the candidate's gaps and, as such, the recommendation for the individual to be granted the certification authority sought without compromising the required level of safety.

Block M: This block will be filled out by the TAA, or TAA-authorized individual, and will indicate if the waiver is accepted or denied.

Block N: This block is signed by the TAA, or TAA-authorized individual who reviewed this form and any accompanying documentation in determining the acceptance or denial of the waiver, as indicated in block M. The acceptance by the TAA or authorized delegate means that the validation and specific mitigation plan conducted by the PRAA and certified by the SMM demonstrated that the intent of the TAM requirements have been met through formal training, OJT, or previous experience on similar aircraft types, or a combination thereof.