

MAINTENANCE AGREEMENT GUIDANCE

BETWEEN THE

**FEDERAL AVIATION ADMINISTRATION OF THE
UNITED STATES OF AMERICA**

AND THE

NATIONAL CIVIL AVIATION AGENCY OF BRAZIL



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Section A – Interaction Between the FAA and the ANAC

1.0 INTRODUCTION.

- 1.1** This document sets forth guidance for the approval and monitoring of maintenance facilities pursuant to the Maintenance Implementation Procedures (MIP) Under the Agreement for the Promotion of Aviation Safety Between the Government of the United States of America and the Government of Brazil (also known as the Bilateral Aviation Safety Agreement or BASA). The Federal Aviation Administration (FAA) and the National Civil Aviation Agency (ANAC) (collectively, referred to as Authorities, and individually as Authority) have agreed to cooperate and provide technical assistance in evaluating and accepting each other's approved maintenance organization systems. This Maintenance Agreement Guidance (MAG) contains the respective responsibilities and procedures for recommendations for FAA and ANAC certification, renewal of certification, certificate amendments, and continued monitoring of maintenance facilities located in the United States (U.S.) and the Federative Republic of Brazil (Brazil).
- 1.2** This MAG describes actions that may be required of applicants located in Brazil pursuing an FAA repair station certificate under Title 14 of the Code of Federal Regulations (14 CFR) part 145, §145.53(b); and the actions required of applicants located in the United States pursuing an ANAC Brazilian Civil Aviation Regulations (RBAC) maintenance organization certificate under RBAC § 145.53(b)-I. Pursuant to regulations 14 CFR part §145.53(b) and RBAC § 145.53(b)-I, the FAA and ANAC, respectively, may issue maintenance facility certificates based upon a certification made by the other authority in accordance with implementing procedures established under a BASA.
- 1.3** FAA legal standards for safety regulation are contained in Title 49 of the United States Code (49 U.S.C.), Subtitle VII, Part A, Subparts I, III, and IV; and 14 CFR, Chapter 1, Subchapters A, C, and G. The FAA regulatory requirements for maintenance are generally contained in 14 CFR parts 43 and 145. Guidance material and policy are outlined in ancillary documents and procedures, such as FAA Orders, Notices, policy memoranda, and Advisory Circulars (AC).
- 1.4** The primary Brazilian civil aviation legislation is the Brazilian Aeronautical Code (CBAer), Law nº 7.565/1986. The Law nº 11.182/2005 created and empowered ANAC as the responsible authority for the regulation and oversight of the civil aviation activities. The ANAC requirements for maintenance are generally contained in RBACs 43 and 145. Guidance material, policy, and procedures are contained in Supplementary Instructions (IS), Policy Files, Procedures Manuals (MPR), Detailed Work Instructions (ITD), and guide (Maintenance Organization Guide - GOM).
- 1.5** The FAA and the ANAC have identified the differences between RBACs 43 and 145 and 14 CFR parts 43 and 145. These differences are listed in the MIP as Special Conditions. As a result, an FAA-certificated 14 CFR part 145 repair station located in the United States, when in compliance with the regulatory and procedural requirements identified in

the ANAC Special Conditions, may apply for an ANAC RBAC 145 maintenance organization certificate. Conversely, an RBAC 145 maintenance organization located in Brazil, when in compliance with the regulatory and procedural requirements identified in the FAA Special Conditions, may apply for a 14 CFR part 145 repair station certificate. Applications will be processed under the applicable procedures established in this MAG and the applicable regulations.

- 1.6** The MIP permits reliance on the FAA and ANAC surveillance systems to the greatest extent possible. The FAA and the ANAC have agreed to reciprocal technical assistance to conduct surveillance on one another's behalf to ensure compliance with the respective regulatory requirements for maintenance and those requirements identified in the applicable Special Conditions. The frequency of the FAA and ANAC surveillance will be at least every 12 months in the main base, in the principal place of business, and in the satellite stations.

2.0 GENERAL MAG INFORMATION.

- 2.1 The MAG Sections.** The MAG is divided into the following five sections:

- a. Section A. Interaction between the FAA and the ANAC that entails implementation procedures and adherence to the terms of the MIP.
- b. Section B. RBAC 145 maintenance organizations located in the United States.
- c. Section C. 14 CFR part 145 repair stations located in Brazil.
- d. Section D. Entry into force and termination.
- e. Section E. Authority

2.2 Communications.

- 2.2.1** The FAA and the ANAC shall keep each other informed of significant changes within their respective systems, such as:

- a. Statutory and regulatory responsibilities.
- b. Organizational structure (e.g., personnel, management structure, technical training, staffing, office location).
- c. Significant revisions to standards or procedures associated with maintenance organization approvals.

NOTE: In case of an external audit by a U.S. or Brazil official entity (e.g., U.S. Office of Inspector General; Brazil Federal Court of Accounts - TCU; Brazil Office of the Comptroller General - CGU), the FAA and the ANAC shall coordinate the audit activities. The point of contact (POC) to coordinate these

activities will be determined by the FAA Aircraft Maintenance Division (AFS-300) and the ANAC Continuing Airworthiness Certification Branch (GCAC).

2.2.2 Contact information for the various technical aspects of the MAG, including communication of urgent issues, is located in Section A, Appendix A-1, FAA and ANAC Contacts.

2.3 Special Conditions.

2.3.1 The repair station/maintenance organization must comply with all regulatory differences identified in the applicable Special Conditions that are contained in Appendix 1 of the MIP.

2.3.2 FAA Special Conditions identify the requirements in 14 CFR parts 43 and 145 that do not have equivalent requirements in RBAC 43 and RBAC 145.

2.3.3 ANAC Special Conditions identify the requirements in RBAC 43 and RBAC 145 that do not have equivalent requirements in 14 CFR parts 43 and 145.

2.4 Websites. The MIP and MAG are located at the following websites:

2.4.1 FAA Websites:

- a. <https://drs.faa.gov>
- b. http://www.faa.gov/aircraft/air_cert/international/bilateral_agreements/baa_basa_listing/
- c. <http://www.faa.gov/aircraft/repair/>

2.4.2 ANAC Website:

- a. <https://sistemas.anac.gov.br/certificacao/Acordos/AcordosPais.asp?PaisCodi=0083>

2.5 Interpretations and Resolution of Issues Between the FAA and the ANAC. The FAA and the ANAC shall address interpretations and resolve issues through consultations or any other mutually agreed upon means Every effort shall be made to resolve issues at the lowest level possible. The FAA and the ANAC have agreed to the following processes:

2.5.1 In regard to conflicting interpretations between the FAA and the ANAC regarding the laws, regulations/standards, requirements, or acceptable means of compliance pertaining to certifications, approvals, or acceptance described in these procedures and guidance, the interpretation of the Authority whose laws, regulations, standards, requirements, or acceptable means of compliance are being interpreted will prevail.

2.5.2 For issues relating to the interpretation or application of these procedures and guidance, the FAA and the ANAC have agreed to the following:

- a. For the FAA principal inspector (PI), the FAA Coordinator (AFS-300) is the first POC, who shall coordinate issues with the ANAC Foreign 145 Group. Unresolved issues shall be expeditiously forwarded to the FAA National Coordinator. The FAA National Coordinator shall coordinate unresolved issues with the ANAC GCAC.
- b. For ANAC Inspectors, the ANAC Foreign 145 Group is the first POC, who shall coordinate issues with the FAA Coordinator (IFO). The FAA Coordinator (IFO) may consult with the FAA Coordinator (AFS-54) and the FAA National Coordinator, as needed. Unresolved issues shall be expeditiously forwarded to the GCAC. The GCAC shall coordinate unresolved issues with FAA National Coordinator.
- c. Issues that cannot be satisfactorily resolved through the procedures described above shall be referred to the joint leadership to be added to the next formal meeting agenda for further consideration.

Note: Joint Leadership: For the FAA, this is the Director of Safety Standards. For the ANAC, this is the Continuing Airworthiness Certification Branch manager (GCAC) or persons delegated by such positions.

- d. Issues that are not resolved by the next formal meeting shall be forwarded to the FAA Executive Director of Flight Standards Service (AFX-1) and the ANAC Head of Department of Flight Standards for resolution.

2.6 Revisions to the MAG. Revisions by the FAA or the ANAC to any applicable regulations, alternative methods of compliance (AMOC), guidance material, policies, procedures, and organizational structure may affect the MAG procedures. Accordingly, the MAG may need a revision upon notice of such changes by the FAA or by the ANAC.

2.6.1 AFX-1 and the ANAC Head of Department of Flight Standards, or their designees, have the authority to approve proposed revisions to the MAG. The changes to the MAG shall be implemented, as applicable, within 90 days after the effective date of the revision.

2.6.2 Any revision to the MAG that affects FAA or ANAC supplements must be incorporated by the repair stations/maintenance organizations in accordance with the procedures for revising their approved manuals, which should be within 90 days from the effective date of the revision.

2.6.3 The FAA National Coordinator shall record revisions in the MAG's revision history section, including a brief description of the revision. In the body of the MAG, a vertical change bar on the left margin of the page will reflect the location

of changed text from the previous revision. The approval page requires signatures by the authorized FAA and ANAC representatives.

3.0 DEFINITIONS.

3.1 In addition to the definitions found in Article II of the U.S.-Brazil BASA and Paragraph 1.8 of the MIP, and notwithstanding definitions contained in 14 CFR parts 21, 43, and 145 or in RBACs 145 and 43, for the purposes of this MAG, the following definitions apply:

- a. **Accepted:** For the purpose of the MAG, the proposals, submissions, or requests not requiring specific FAA/ANAC approval but required to be submitted to the ANAC/FAA are items that are presented for acceptance. Acceptance of a repair station/maintenance organization proposal may be accomplished by various means, including a letter, or by taking no action, which indicates there is no ANAC/FAA objection to the proposal.
- b. **Accountable Manager:** The Accountable Manager is normally intended to mean the chief executive officer (CEO) of the organization, who, by virtue of the position, has overall responsibility for running the organization (in particular and applicable to the ANAC, financial responsibility) and ensuring that all maintenance is carried out to the standards required by the FAA and the ANAC. When the Accountable Manager is not the CEO, this person should have direct access to the CEO and have a sufficiency of maintenance funding allocation.

NOTE: For ANAC, in addition to above, the Accountable Manager is the person designated by the maintenance organization who establishes and ensures the promotion of the safety policy and its strategic goals and ensures that all persons in the maintenance organization follow the RBACs. This person ensures that all operations are conducted under the applicable regulations and assumes the primary responsibility (accountability) for the maintenance organization.

- c. **Additional Fixed Location:** For the FAA, an additional fixed location is an extension of the certificate holder using the same repair station manual (RSM). The FAA will issue operation specification (OpSpec) A101 that identifies each location covered under the FAA certificate. For the additional fixed location to be covered under the MIP and this MAG, it must be located in the same country as the main facility..
- d. **Alteration:** See Paragraph 1.8 of the MIP.
- e. **ANAC Foreign 145 Group:** A group within the ANAC Maintenance Organizations Certification Technical Branch (GTOM) that works with the demands of RBAC 145 maintenance organizations located outside Brazil. In the FAA/ANAC agreement on maintenance, this group is responsible for:

1. Processing the recommendations of approval sent by the FAA of the RBAC 145 maintenance organizations in the United States.
 2. Acting as the first POC for clarifying technical issues arising from the FAA offices when related to the RBAC 145 maintenance organizations located in the United States.
 3. Centralizing the demands from GTOM and GTVA to be sent to the FAA.
- f. Approved: For the purpose of the MAG, approval is granted by letter, by a stamp of approval, by the issuance of OpSpecs, signature on the list of effective pages on the Manuals, or by some other official means of conveying approval.
- g. Approved Data:
1. For the FAA, refer to Paragraph 1.8 of the MIP and 14 CFR § 1.1.
 2. For the ANAC, the following data are considered approved:
 - a) Technical data included or covered by type certificate (TC), supplemental type certificate (STC), Parts Manufacturer Approval.
 - b) Airworthiness Directives.
 - c) Design data from a manufacturer (or type certificate holder), engineer report, process specification from the manufactures that are: approved by ANAC or by the Civil Aviation Authority (CAA) of the manufacturer country or country responsible for the type design.
 - d) Manufacturer manuals and service information (e.g., repair manuals, service bulletin, etc.) when approved by the ANAC or by the country responsible for the type design.
 - e) Manuals or technical publication from components or accessory manufacturers, even without a formal CAA approval, unless specifically classified as non-approved by a CAA or result in changes to engines, propellers, or airframes.
 - f) For repairs, technical publications developed for specific aeronautical articles issued by the manufacturer, by the ANAC, or by the manufacturer's CAA are considered approved technical data.
 - g) Any other data explicitly approved by the ANAC.
- h. Article:
1. For the FAA, an article means an aircraft, airframe, aircraft engine, propeller, appliance, or component part.

2. For the ANAC, an article means an aircraft, airframe, engine, propeller, accessory, component, or parts thereof.
- i. Certification Service Oversight Process (CSOP): A standard operating procedure that provides the process that Flight Standards Service (FS) offices use to accept, sequence, track, and report new applicant certification status in accordance with the Safety Assurance System (SAS).
- j. Current Technical Data:
 1. For the FAA, the meaning of the term current, as it applies to maintenance manuals and other documents, is regulation-specific and is explained in two FAA legal interpretation memorandums:
 - a) [Legal Interpretation of 14 C.F.R. § 91.409\(f\)\(3\), dated December 8, 2008;](#)
and
 - b) [Legal Interpretation of Current as it Applies to Maintenance Manuals and Other Documents Referenced in 14 C.F.R. §§43.13\(a\) and 145.109\(d\), dated August 13, 2010.](#)
 2. For the ANAC, current technical data relates to the latest revision status verified through the manufacturer.
- k. FAA Coordinator (AFS-54): The FAA Coordinator in the International Field Office Management Branch (AFS-54) serves as the primary liaison for all communications concerning FAA repair stations located outside of the United States. Additional duties and responsibilities of this position can be found in FAA Order 8900.1.
- l. FAA Coordinator (AFS-300): The FAA Coordinator (AFS-300) serves as the primary POC for the responsible FS offices within their area of oversight responsibility of U.S.-based repair stations holding an ANAC RBAC 145 maintenance organization certificate. This position also provides a central POC for the ANAC relating to issues, such as RBAC 145 maintenance organization Sampling Inspection System (SIS) audits, communicating changes in FAA guidance to the responsible FS offices, and sharing information related to ANAC-identified issues. When applicable, the FAA Coordinator (AFS-300) also resolves issues between the ANAC and the FAA at the lowest level.
- m. FAA Coordinator (IFO): The FAA Coordinator (IFO) is the POC for oversight responsibilities for 14 CFR part 145 repair stations located in Brazil. The FAA Coordinator (IFO) establishes a line of communication with the appropriate ANAC representative to coordinate and plan for the transfer of surveillance responsibilities, oversees the renewal of certificates, and addresses any concerns raised by the FAA/ANAC.
- n. FAA National Coordinator: The FAA National Coordinator supports the MIP/MAG and serves as the FAA Flight Standards liaison among the FAA Coordinator (AFS-

300), FAA Coordinator (AFS-54), and the ANAC. The FAA National Coordinator also manages interactions pertaining to interpretation of policy issues and other related activities, including:

1. Responsibility to coordinate with the ANAC's Department of Flight Standards and Rulemaking Technical Branch (GTNO) for revisions to the MAG.
 2. The POC to the ANAC for 14 CFR parts 43 and 145 regulatory matters under the MIP.
- o. GCAC: The ANAC Continuing Airworthiness Certification Branch (GCAC) is responsible for continued airworthiness activities under the Department of Flight Standards (SPO). In the FAA/ANAC agreement on maintenance, this branch is responsible for resolving issues not solved in lower levels with the FAA National Coordinator. Under the GCAC branch are the Maintenance Organizations Certification Technical Branch (GTOM) and the Continuing Airworthiness Surveillance Technical Branch (GTVA), which are managements that also perform functions in the ANAC/FAA agreement on maintenance.
- p. GTOM: The ANAC Maintenance Organizations Certification Technical Branch (GTOM) works on the technical standardization of the ANAC offices activities related to certification of maintenance organizations. The ANAC Foreign 145 Group is under the GTOM branch. In the FAA/ANAC agreement on maintenance, the GTOM is responsible for:
1. Performing and accompanying the SIS audit activities.
 2. Certification activities of repair stations/maintenance organizations.
 3. Performing the approval of the FAA Supplement provided by Brazilian-based RBAC 145 maintenance organizations.
 4. Acting as the POC with the FAA Coordinator (AFS-300) to coordinate issues related to the MAG and the MIP.
- q. GTVA: The ANAC Continuing Airworthiness Surveillance Technical Branch (GTVA) is responsible for the continued surveillance of the ANAC RBAC 145 maintenance organizations and RBAC 135 and RBAC 121 operators, also responsible to suspend, revoke and amend certificates and operations specifications of ANAC RBAC 145 maintenance organizations. In the FAA/ANAC agreement on maintenance, the GTVA is responsible for:
1. Performing and accompanying the SIS audit activities.
 2. Performing the Surveillance activities and amending certificates of repair stations/maintenance organizations.
 3. Performing the surveillance of the MIP Special Conditions.

- r. ANAC Office: The one of three ANAC offices responsible for the certification and surveillance of RBAC 145 maintenance organizations, the certification and surveillance of RBAC 121 and RBAC 135 air operators (airworthiness aspects), and the performance of aircraft inspections. Currently, there are three main offices across the country; São Paulo, Rio de Janeiro, and Brasília. In the ANAC offices the inspectors from the GTOM and GTVA groups will be in charge of activities related to the ANAC/ FAA maintenance agreement. In the FAA/ANAC agreement on maintenance, this regional offices are responsible for:
 - 1. Performing the approval of the FAA Supplement provided by Brazilian-based RBAC 145 maintenance organizations.
 - 2. Performing the surveillance of the MIP Special Conditions.
- s. GTNO: The ANAC branch responsible to coordinate, conduct and support the rulemaking process in the Department of Flight Standards (SPO). In the FAA/ANAC agreement, it is:
 - 1. Responsible to coordinate the necessary revisions to the MAG with the FAA National Coordinator.
 - 2. The POC for the FAA for RBAC 43 and RBAC 145 regulatory matters under the MIP.
- t. International Field Office (IFO): The FAA office responsible for the certification and oversight of 14 CFR part 145 repair stations and 14 CFR part 129 operations.
- u. Line Station: The term *line station* is a common term among CAAs, while the FAA uses the term *line maintenance authorization* when it authorizes line stations in a repair station's OpSpecs under 14 CFR part 145. These terms are synonymous when applied under the terms of a MIP. The FAA certificate must cover only additional line stations that are under the surveillance of a CAA.
- v. Main Base: For an RBAC 145 maintenance organization, this is the principal place of business.
- w. Maintenance Agreement Guidance (MAG): See paragraph 1.8 of the MIP.
- x. Maintenance Implementation Procedures (MIP): The document that sets forth the maintenance implementation procedures as agreed between the FAA and the ANAC authorized under a BASA.
- y. Maintenance Organizations: Refers to RBAC 145 maintenance organization certificate holders.
- z. Maintenance Organization Manuals (MOM): See paragraph 1.8 of the MIP.

aa. Modification:

1. For the FAA, means alteration.
2. For the ANAC, it means a change to the type design of an aircraft, engine, or propeller model that affects its weight, balance, structural strength, reliability, operational characteristics, airworthiness, power, noise characteristics, or emissions.

bb. Monitoring: See paragraph 1.8 of the MIP.

cc. Overhaul: See paragraph 1.8 of the MIP.

dd. Repair Station: Refers to a 14 CFR part 145-certificated repair station.

ee. Repair Station/Maintenance Organization: Refers to both the 14 CFR part 145-certificated repair station and the RBAC 145 maintenance organization.

ff. Repair Station Manual (RSM): See paragraph 1.8 of the MIP.

gg. Required Inspection Items (RII): 14 CFR parts 121 and 135, § 121.369(b)(2) and § 135.427(b)(2), require U.S. air carriers to designate the items of maintenance and alteration that must be inspected (required inspection) as RIIs and list them in its manual. RIIs must include, at a minimum, those items that, if not properly performed or if improper parts or materials are used, could result in a failure, malfunction, or defect endangering the safe operation of the aircraft. The RII items must be inspected by a person other than the one who performed the work, authorized it, and who is under the control of the air carrier inspection unit.

NOTE: For the ANAC, RII is equivalent to the IIO (Itens de Inspeção Obrigatória) as per RBACs 121.369(b)(2) and 135.427(b)(2).

hh. Safety Assurance System (SAS): SAS is the FAA's oversight system for 14 CFR parts 121 and 135 operators and applicants, and 14 CFR part 145 certificate holders and applicants.

- ii. SPO (Department of Flight Standards): The SPO is responsible for the certification and surveillance, at the operational level, of air operators, air operations, transport of dangerous goods, maintenance organizations, and human factors. In the FAA/ANAC agreement on maintenance, the SPO, along with AFX-1:
 - 1. Has the authority to approve the MAG and subsequent revisions.
 - 2. Is ultimately responsible to evaluate and approve actions to address the results from the SIS audit activities.
 - 3. Is responsible for the resolution of issues that are not resolved at the lower management levels.
- jj. Satellite Repair Station: For the FAA, a satellite repair station is a certificated repair station under the managerial control of another certificated repair station. It may not hold a rating not held by the certificated repair station with managerial control. It must be located in the same country as the main facility. Reference 14 CFR part 145, §145.107, and FAA Order 8900.1.
- kk. Secondary Base: For an RBAC 145 maintenance organization, it is an additional facility in a location different from that where the main base is located. The secondary base follows the same procedures of the main base established in the procedures manuals. In Brazil, each secondary base receives an operation specification under a unique maintenance organization certificate.

NOTE: A secondary base may have a different rating than the main base

- ll. Special Conditions: See paragraph 1.8 of the MIP.

4.0 FAA AND ANAC TRAININGS/BRIEFINGS.

- 4.1 In accordance with the MAG and the provisions of the MIP, the FAA and ANAC are responsible for ensuring inspectors complete initial training or briefings prior to the transfer of surveillance. The initial training/briefing will introduce the BASA, MIP, and the applicable Special Conditions and certification procedures contained in the MAG.
- 4.2 The FAA and the ANAC are responsible for providing the initial training/briefing for the other Authority on the procedures in this MAG related to the Special Conditions necessary for the certification.
- 4.3 The FAA Coordinator (AFS-300) and the ANAC Foreign 145 Group (GCAC) must inform each other in writing that the assigned inspectors are adequately trained/briefed prior to the transfer of surveillance responsibilities.
- 4.4 The FAA Coordinator (AFS-300) shall notify the FAA National Coordinator once a sufficient number of assigned inspectors have completed training within FAA FS offices.

- 4.5 Recurrent training/briefings should be conducted at 2-year intervals, or sooner, if necessary. The training/briefings should cover any revisions to the MIP or MAG, lessons learned from technical issues, and results from the SIS audit analysis. The recurrent training/briefings will be provided by the local Authority and, if necessary, accompanied by the other Authority.
- 4.6 Web-based training/briefings, PowerPoint presentations, or other methods are acceptable. The FAA's Aircraft Maintenance Division and the ANAC SPO shall develop and control the training information.
- 4.7 The FAA or the ANAC may provide additional on-the-job training/briefings, as necessary.
- 4.8 The FAA and the ANAC shall document training/briefing attendance. These records will be available upon request.

5.0 TRANSFER OF SURVEILLANCE OF CERTIFICATES/APPROVALS.

- 5.1 **Transfer Conditions.** The FAA and the ANAC agree that the transfer process of surveillance of certificates/approvals of 14 CFR part 145 repair stations and RBAC 145 maintenance organizations should start when the final written notice is exchanged, per the MIP, Section 1.2. The transfer shall be accomplished in accordance with the following transfer conditions.
 - 5.1.1 The FAA and the ANAC shall complete and document training of personnel regarding procedures relating to the MIP, the Special Conditions, and the MAG prior to the transfer.
 - 5.1.2 Inspecting, monitoring, and surveillance of eligible repair stations/maintenance organizations may commence once a sufficient number of staff have completed the training.
 - 5.1.3 The FAA Coordinators (IFO) and the ANAC Foreign 145 group (GCAC) shall establish a line of communication to coordinate and plan for the transfer of the surveillance of certificates/approvals and to address any concerns arising out of the transfer.
 - 5.1.4 The FAA National Coordinator and the ANAC GCAC shall exchange written documentation, or other acceptable means, to document inspector training prior to the transfer.
 - 5.1.5 For 14 CFR part 145-certificated repair stations located in Brazil, the FAA shall issue a certificate with ratings and limitations that align with the scope of ratings within the cross-reference chart in Section A of the MAG. For RBAC 145-certificated maintenance organizations located in the United States, the ratings and limitations of the certificate is limited to the 14 CFR part 145 certificate and

OpSpecs. The ANAC shall issue an RBAC 145 certificate that will make reference to the 14 CFR part 145 OpSpecs for ratings and limitations.

- 5.1.6 As soon as practical, the FAA Coordinator (AFS-300) and the ANAC Foreign 145 group shall establish a schedule identifying the repair station/maintenance organization(s) whose surveillance of certificates/approvals are to be transferred. The repair station/maintenance organizations' transfer dates shall be agreed upon by the FAA and the ANAC. The following written correspondence should be included for each certificate/approval:
- a. The FAA and the ANAC shall prepare a letter for each repair station/maintenance organization to notify the repair station/maintenance organization of the scheduled transfer date under the MIP and summarize the transfer conditions. The letter will also inform the repair station/maintenance organization of whether a manual supplement will be required at least 90 days prior to the transfer. The title of the letter is *Notification of the Transfer of Surveillance under a BASA/MIP*.
 - b. The FAA and the ANAC must also provide each other written correspondence for acceptance of the transferred certificate and assume the surveillance responsibilities. The title of the letter is *Acknowledgment of Surveillance Responsibility*.
 - c. Once the surveillance of the certificate/approvals is transferred, the FAA and the ANAC shall notify their respective repair station/maintenance organization that the transfer is complete under the MIP. The title of the letter is *Completion of Transfer under a BASA/MIP*.

NOTE: Once the certificate is transferred, the surveillance for the next renewal must evaluate the applicable Special Conditions.

- 5.1.7 The FAA and the ANAC shall request each repair station/maintenance organization to review the MAG and, if necessary, prepare a manual supplement to be submitted at least 90 days prior to the transfer date. The FAA Coordinator (AFS-300), FAA Coordinator (IFO), and ANAC Foreign 145 Group shall keep a record of the status of the manual supplements. Quarterly reports stating the status (e.g., provided, not provided, in process) of transfers should be forwarded to the respective coordinators.
- 5.1.8 The transfer of inspections, monitoring, and surveillance will take place within two years of the effective date of the MIP. To allow additional time for the FAA and the ANAC to complete the transfer process, written correspondence from the repair station/maintenance organization stating its intention of becoming certificated as described in the MIP may be accepted to satisfy this requirement. The transfer of a repair station/maintenance organization that has a non-

conformance history within a 2-year period of the scheduled transfer date will not occur until both the FAA and the ANAC are satisfied with the corrective actions.

- 5.1.9 If there are any outstanding or pending violations that may result in an enforcement action, the transfer can occur only after the violation is resolved or mitigated.
- 5.1.10 The FAA Coordinator (AFS-300), FAA Coordinator (IFO), and ANAC Foreign 145 Group (GCAC) may meet to exchange information and accept the transfer of surveillance responsibilities.
- 5.1.11 The FAA or the ANAC may provide additional internal or external clarifications, briefings, joint inspections, or on-the-job training as necessary.

NOTE: The FAA National Coordinator and the ANAC GCAC shall review a repair station/maintenance organization that has regulatory exemptions on a case-by-case basis to verify if the organization is still covered by the MIP with the relief granted by the exemption.

5.2 14 CFR Part 145, Subpart B MIP Understanding. Pursuant to 14 CFR part 145, § 145.51(c), the FAA may issue a repair station certificate to a repair station located outside the United States if, in addition to meeting the other requirements in 14 CFR part 145, it meets the necessity requirements specified in that section. Under 14 CFR part 145, § 145.53(b), if the repair station is located in a country with which the United States has a BASA, the FAA may find that the repair station meets the requirements of 14 CFR part 145 based on a certification from the CAA of that country. An understanding of this regulation is important to ensure clear communication when transitioning to the MIP. The following applies to maintenance organizations located in Brazil.

- 5.2.1 Any maintenance facility located in Brazil that was certificated by the FAA prior to the date of entry into force of the MIP, but that does not hold an RBAC 145 maintenance organization certificate, may continue to exercise the privileges of its 14 CFR part 145 certificate with the understanding that the FAA will continue independent regulatory oversight, certificate renewal, and continued monitoring.
- 5.2.2 Any maintenance facility located in Brazil that was certificated by the FAA prior to the date of entry into force of the MIP, and also holds an RBAC 145 maintenance organization certificate, may continue to exercise the privileges of its 14 CFR part 145 certificate under direct FAA oversight until the date of expiration of that certificate. After the expiration of the certificate, oversight of the repair station will be performed in accordance with the provisions of the MIP when the repair station applies for certificate renewal.
- 5.2.3 Any maintenance facility located in Brazil that is issued an initial repair station certificate under 14 CFR part 145, but that does not hold an RBAC 145 maintenance organization certificate, after the date of entry into force of the MIP may exercise the privileges of its 14 CFR part 145 certificate with the

understanding that the FAA will continue independent regulatory oversight, certificate renewal, and continued monitoring.

5.3 RBAC 145.53 (b)-I MIP Understanding. Pursuant to RBAC 145 § 145.53(b)-I, the ANAC may issue a maintenance organization certificate if the maintenance organization is located in a country with which Brazil has a bilateral agreement for the certification of maintenance organizations. The ANAC may find that the maintenance organization meets the requirements of RBAC 145 based on a certification from the CAA of that country. An understanding of this regulation is important to ensure clear communication when transitioning to a MIP. The following applies to maintenance organizations located in the United States.

5.3.1 Any maintenance organization located in the United States that applies for initial maintenance organization certification under RBAC 145 after the date of the last written notice for entry into force, as described in the MIP, Section 1.2, will be covered under the MIP and the MAG. The certification will be conducted under RBAC 145.53 (b)-I and the MIP.

5.3.2 Maintenance organizations that originally applied to, or were certificated by, the ANAC prior to the date of the last written notice for entry into force, as described in the MIP, Section 1.2, will transition to certification activities under RBAC 145.53 (b)-I and the MIP within 2 years. Such maintenance organizations may continue to exercise the privileges of its RBAC 145 certificate until the date of expiration of that certificate. After the expiration of the certificate, certificate renewal will be processed in accordance with the MIP.

5.4 Manual Supplement Requirements. In order to ensure that the regulatory requirements in 14 CFR Part 145/RBAC 145 concerning manuals continue to be met, the FAA and ANAC expect that existing repair stations/maintenance organizations located in the other authority's country will need to supplement their approved manuals. Once a determination is made that a manual supplement is required, the FAA and ANAC shall use Section B or C of the MAG in approving the supplement.

5.4.1 The FAA Supplement to the MOM (see the MAG, Section C) must be conditionally approved by the ANAC on behalf of the FAA prior to the transfer. The FAA may accept the approval or conduct additional review of the maintenance organization's MOM or the FAA Supplement depending upon the FAA's confidence in the training the ANAC received.

5.4.2 The ANAC Supplement to the RSM (see the MAG, Section B) must be conditionally approved by the FAA on behalf of ANAC prior to the transfer. The ANAC may accept the approval or conduct additional review of the repair station's RSMs or the ANAC Supplement depending upon the ANAC's confidence in the training that the FAA received.

- 5.5 Certificate Expiration Date.** A minimum of 6 months validity should be remaining on the certificate before the certificate surveillance is transferred. Once the certificate is transferred, the surveillance for the next renewal must contain the applicable Special Conditions.
- 5.6 Exchange of Records.** The FAA and the ANAC shall exchange the last 2 years of repair station/maintenance organization certification and surveillance records. These records will include copies of the written correspondence, corrective action plans, and acceptance letter(s) for items that were identified during the past 2 years of surveillance. The FAA and the ANAC shall ensure that the records indicate that the repair stations/maintenance organizations are in compliance at the time of transfer.
- 5.6.1 The FAA Coordinator (IFO) shall transfer the following records to the ANAC Foreign 145 Group prior to the transfer:
- a. Current edition of FAA Form 8310-3, Application for Repair Station Certificate and/or Rating.
 - b. Current copy of FAA Form 8000-4, Air Agency Certificate.
 - c. Current copy of OpSpecs.
 - d. Copy of the repair station letter titled *Notification of the Transfer of Surveillance under a BASA/MIP*.
 - e. Copy of the letter titled *Acknowledgement of Surveillance Responsibility* to the ANAC that includes requesting ANAC surveillance responsibility for FAA repair stations located in Brazil.
 - f. Copy of the letter titled *Completion of Transfer under a BASA/MIP*.
 - g. Copies of the written correspondence, corrective action plans, and acceptance letter(s) for items identified during the past 2 years of surveillance.
 - h. Copy of the hazardous material (hazmat) letter, if applicable.
 - i. Copy of the Capability List (CL), if applicable.
 - j. Copy of the current FAA-approved Contracted Maintenance Functions, if applicable.

NOTE: The ANAC Foreign 145 Group will send these records to GTVA, who is responsible for the surveillance of 14 CFR part 145 repair stations.

- 5.6.2 The responsible FAA FS office shall transfer a copy of the ANAC Supplement to the FAA Coordinator (AFS-300), who will provide the ANAC Supplement to the ANAC Foreign 145 Group prior to the transfer.

- 5.6.3 The ANAC Foreign 145 Group shall transfer the following records to the FAA Coordinator (AFS-300):
- a. Current copy of applicant's initial or renewal request for RBAC 145 maintenance organization certification.
 - b. Current copy of the ANAC maintenance organization Certificate (form F-900-71).
 - c. Current copy of the ANAC Operation Specifications (form F-900-72).
 - d. Copy of the maintenance organization letter titled *Notification of the Transfer of Surveillance under a BASA/MIP*.
 - e. Copy of the letter titled *Acknowledgment of Surveillance Responsibility* that includes requesting FAA surveillance responsibility for an ANAC maintenance organization located in the United States.
 - f. Copy of the letter titled *Completion of Transfer under a BASA/MIP*.
 - g. Copies of the written correspondence, corrective action plans, and acceptance letter(s) for items identified during the last surveillance cycle.
 - h. Current copy of the Capability List (CL), if applicable.
 - i. Copy of the current ANAC Subcontracted Maintenance Functions, if applicable.
 - j. Copy of current RBAC 145 maintenance organization list in accordance with RBAC 145.221-I(b).
- 5.6.4 The ANAC Foreign 145 Group shall provide the FAA Supplement to the FAA Coordinator (AFS-300) prior to the transfer.

6.0 RATING ALIGNMENT. The ratings and limitations of the repair station/maintenance organization must be aligned for the FAA and the ANAC to have equivalent surveillance responsibilities.

7.0 FAA AND ANAC RESPONSIBILITIES/ACTIONS. The FAA and the ANAC shall conduct surveillance of repair stations/maintenance organizations to ensure regulatory compliance. In order to promote continued understanding and compatibility with each other's maintenance surveillance systems, the FAA and the ANAC need to consult and share information to mitigate risks associated in aviation.

7.1 Terms of the MIP. Under the terms of the MIP, the FAA and the ANAC shall:

- a. Follow the initial certification procedures in the MAG for all initial repair station/maintenance organization applications dated after the date of the last written notice of entry into force required by the MIP, Section 1.2.
- b. Provide recommendations for the initial certification, renewal, and amendment of maintenance organization/repair station certificates.
- c. Perform surveillance and provide reports regarding the findings of potential non-compliance raised against the specific maintenance regulation(s) at issue and any regulatory differences identified in the MIP Special Conditions, following the procedures outlined in the MAG.
- d. Conditionally approve the maintenance organizations’/repair stations’ supplements as described in the MAG.
- e. Follow the applicable procedures as specified in the MAG.

7.2 Reciprocal Acceptance of Findings of Compliance. The FAA and the ANAC shall accept each other’s inspections and monitoring of maintenance organizations and repair stations for findings of compliance with their respective requirements and the basis for the issuance and continued validity of certificates.

7.3 Accident/Incident Investigation Request. Paragraph 3.6 of the MIP stipulates that the FAA and the ANAC shall exchange, on request and in a timely manner, any information regarding accidents/incidents involving civilian aeronautical articles.

7.4 Cooperation in Internal Quality Assurance Activities. To promote continued understanding and compatibility with each other’s maintenance systems, the FAA and the ANAC shall consult and share information on internal quality assurance programs. For this purpose, the FAA and the ANAC focal points should communicate to exchange internal audit reports and schedules to allow for mutual attendance as observers in each other’s activities. They should also discuss significant safety findings and reports on matters pertaining to the MIP.

7.4.1 Internal Quality Assurance Data and Requested Information. The FAA and ANAC shall, upon either Authority’s request and without prejudice to the discretionary power of the FAA and the ANAC, provide appropriate information regarding the summary of internal audit reports.

7.4.2 Involvement as Observers. In order to assist the FAA and the ANAC in planning and managing each other’s internal inspection visit schedules and teams, the FAA and ANAC shall notify each other in writing at least two (2) months in advance indicating which audits to attend as observers.

7.4.3 Onsite Observation. The FAA or the ANAC onsite observations should include opening and closing briefings. The visit may include observations of inspections,

surveillance responsibilities, and verification that the procedures in the MIP are being followed. The respective coordinator shall receive a copy of any identified items, concerns, or noted observations in the written report within 45 days after the closing briefing.

7.5 Continued Confidence in the Administration of the MAG. The FAA and the ANAC shall continue to demonstrate effective surveillance according to the agreed procedures defined in the MAG. In particular, the FAA and the ANAC shall:

- a. Have the right to participate in each other's sampling inspections.
- b. Ensure that regulated entities provide access to the FAA and the ANAC for SIS audit activities.
- c. Make the reports from the sampling inspections applicable to the MIP available to the other Authority.
- d. Make the appropriate personnel available to participate in the SIS audits.
- e. Make the maintenance organization's records and inspection reports, including the results of completed enforcement actions, available to the other Authority.
- f. Provide interpretive assistance where necessary at their office during the review of internal maintenance organization records and documentation.
- g. As applicable, assist each other in closure of any findings from inspections.
- h. Ensure sampling inspections are risk-based from analysis and objective criteria, without prejudice to the discretionary power of the Authorities.

7.5.1 The FAA and the ANAC shall notify each other at the earliest opportunity in the event that either the FAA or the ANAC is not able to meet a requirement in the MIP. In the event the FAA or the ANAC believes that technical competency is no longer adequate, the FAA and the ANAC shall consult and propose a written action plan, including any necessary rectification activities, in order to address deficiencies.

7.5.1.1 Either the ANAC or the FAA may propose to suspend the surveillance and oversight assistance provided by the other authority under the MIP.

7.5.1.2 If either the FAA or the ANAC proposes to suspend the surveillance and their respective oversight responsibilities, it must discuss this at the first opportunity for a joint confidence-building measure.

7.5.1.3 The proposed suspension must be in the form of a written report, outlining the conditions not met in the MIP and must include a timeframe and recommended corrective actions to enable the suspension

to be lifted, or other explanation of why surveillance should be suspended.

7.5.1.4 The proposal must also include a timeframe and recommended corrective actions to have the suspension removed.

7.5.2 In the event that the FAA and the ANAC do not rectify deficiencies within the timeframe specified in the action plan, either the FAA or the ANAC may address the matter during periodic meetings, as specified in paragraph 3.0 of the MIP.

7.6 Technical Consultations and Meetings. To ensure the MAG remains effective over time, both the FAA and ANAC shall consult annually to discuss any issues in the implementation of the MIP and to discuss any enhancements. This will include a discussion of technical issues and the resolution of technical disagreements.

7.6.1 The annual meeting should rotate between the United States and Brazil, unless otherwise arranged.

7.6.2 Meeting attendees should include the offices responsible for the technical coordination and implementation of this guidance. For the FAA, this would be the FAA Coordinator (AFS-300) and the FAA Coordinator (AFS-54). For the ANAC, this would be GTNO, GCAC, and the Foreign 145 Group. Additional officials of the FAA and the ANAC may address the meeting agenda items.

7.6.3 At the discretion of the joint leadership, staff and representatives of other appropriate organizations may participate.

7.6.4 The host is responsible for meeting minutes and action items tracking.

7.6.5 Subgroups should participate at the meetings to address specific technical issues and make recommendations for amendments to the MIP or revisions to the MAG.

7.6.6 The subgroups from the FAA and the ANAC shall report a consolidated SIS audit summary identifying systemic issues and the status of the SIS audit actions during the meeting. The subgroups shall make any recommendations to the FAA National Coordinator and the ANAC GCAC.

7.7 Unimpeded Access. The FAA and the ANAC shall assist each other in gaining unimpeded access to the maintenance organization's certificated or non-certificated contractors/subcontractors under its jurisdiction.

7.8 Pursuant to the FAA regulations, the FAA may undertake investigations and enforcement in accordance with the FAA rules and directives.

7.9 Pursuant to the ANAC regulations, the ANAC may undertake investigations and enforcement in accordance with the ANAC rules and directives.

8.0 SAMPLING INSPECTION SYSTEM (SIS).

8.1 Objective of a SIS Audit. The purpose of SIS audits is to establish the open communication and continued confidence in the ability to meet the requirements of the MIP and to ensure consistent application of the MAG procedures by the aviation authorities. The SIS audits must focus on the application of Special Conditions. It may also be used to document risks associated with the equivalent regulations that are beyond the scope of the Special Conditions.

8.1.1 The SIS audit should start with either the FAA or the ANAC and may include maintenance facilities selected by risk-based decision-making.

8.1.2 A SIS audit benefits the FAA, the ANAC, and industry in understanding the differences between 14 CFR part 145 and the RBAC 145 regulations for repair stations/maintenance organizations and any procedural differences associated with implementation of the MIP.

8.1.3 The FAA and the ANAC shall assist each other in gaining unimpeded access to repair stations/maintenance organizations, including responding to requests for additional information from repair stations/maintenance organizations that cite security issues. If the repair station/maintenance organization requires additional information because of security issues, it should promptly notify the FAA or the ANAC to provide additional information. It is incumbent upon the repair station/maintenance organization to provide unimpeded access to all work areas having civil aviation application.

8.1.4 A consolidated SIS audit summary identifying systemic issues and the status of closure actions shall be reported by the FAA National Coordinator and the ANAC GCAC to the joint leadership. The FAA report generated by the FAA Coordinator (AFS-54) will contain the status of the FAA SIS audits in Brazil with findings and any recommendations. The ANAC report generated by the GCAC will contain the status of the ANAC SIS audits in the United States with findings and any recommendations. The coordinators' signatures on the SIS audit forms indicate review of the form and understanding of the findings. This also gives the coordinators an opportunity to add any comments regarding the findings.

8.1.5 No fees are charged to the repair station/maintenance organization for a SIS audit or any investigation performed.

8.2 SIS Audit Team Composition. Each SIS Audit Team should consist of at least one experienced, qualified inspector. Additional personnel may be added to the team for familiarization and/or standardization.

8.2.1 The FAA IFO management will determine team leaders/members for SIS audits performed in Brazil.

- 8.2.2 The ANAC GCAC should determine team leaders/members for SIS audits performed in the United States. They will be accompanied by the FAA Coordinator (AFS-300), or his or her designee.
- 8.2.3 The appropriate in-country host, FAA Coordinator (AFS-300), or GCAC personnel must accompany the SIS Audit Team during the SIS audit to ensure consistency and standardization.

NOTE: The appropriate headquarters coordinator may accompany the SIS Audit Team during the visit to ensure cooperation and communication in the interpretation or application of maintenance standards or regulations. It is highly recommended that the hosting country inspector, who is responsible for the repair stations/maintenance organizations, join the SIS Audit Team for the visit.

8.3 SIS Audit Annual Schedule.

- 8.3.1 The FAA Coordinator (IFO) shall propose a sampling audit schedule in Brazil, per FAA Order 8900.1, that shall be coordinated with ANAC GCAC.
- 8.3.2 ANAC GCAC shall propose a sampling audit schedule in the United States using risk-based evaluations that shall be coordinated with the FAA National Coordinator, who will provide the GCAC with the appropriate FAA Coordinator (AFS-300) regional contact.
- 8.3.3 The SIS audits should ensure that the MAG procedures are being followed. The frequency of the audits may vary based on risk assessments or may be established on a rotational basis.
- 8.3.4 The FAA and the ANAC coordinators should notify each other 90 days prior to a SIS audit. This will allow sufficient time for scheduling and assigning appropriate resources for travel. If the schedule changes during the year, the FAA and the ANAC shall provide at least a 60-day notice.
- 8.3.5 If the SIS audit includes a repair station/maintenance organization, the name of each organization will be included in the schedule.
- 8.3.6 The use of the appropriate checklist detailed in the MAG, Section A, Appendix A-3, will assist in determining confidence in each authority's ability to meet the terms of the MIP and MAG. Upon completion of the visit, copies of the checklist will be shared between the FAA and the ANAC as a source of information useful for trend analysis and in determining future SIS audits.
- 8.3.7 Supplementary visits by a SIS Audit Team may be necessary.

8.4 Selection of SIS Audit Sites to Visit. SIS Audit Teams will visit FAA or ANAC offices that have surveillance of maintenance organizations covered under the MAG provisions. The following are examples of criteria used when selecting locations and/or maintenance organizations to visit:

- a. Reports of non-compliance by maintenance organizations, occurrences, incidents, or accidents.
- b. Previous sampling audit reports that indicate particular concerns.
- c. Recent changes in staffing, growth, downsizing, newly certificated, financial distress, labor unrest, or other associated risks.
- d. Internal FAA or ANAC risk analysis programs, as applicable.

NOTE: The FAA will utilize the SIS Risk Decision Tool (SRDT) located in FAA Order 8900.1.

8.5 ANAC SIS Audits in the United States. An SIS audit may be performed at a responsible FS office and/or at any 14 CFR part 145 repair station located in the United States that also holds an RBAC 145 maintenance organization certificate.

- 8.5.1 The ANAC SIS Audit Team should conduct an in-briefing and out-briefing to the FAA Coordinator (AFS-300) and the responsible FS office. The briefing will cover the purpose of the SIS audit, any recent changes in the MAG, prior lessons learned, and SIS audit corrective actions procedures.
- 8.5.2 The audit team should perform and document the SIS audit of the responsible FS office in accordance with these MAG procedures.
- 8.5.3 The audit team should coordinate with the FAA Coordinator (AFS-300) to ensure it has resolved any discrepancies or identified items discovered during the SIS audit. The FAA Coordinator (AFS-300) shall document and forward the corrective actions to the ANAC SIS Audit Team Lead for acceptance.
- 8.5.4 The FAA PI and the FAA Coordinator (AFS-300) are highly encouraged to participate in the briefings and accompany the ANAC during the visit to a maintenance organization.
- 8.5.5 ANAC SIS Audits of a responsible FS office. The ANAC SIS Audit Team should start the SIS audit using the *SIS Audit on FAA* job aid (see Section A, Appendix A-3). The SIS audit should focus on the FAA processes, procedures, and surveillance in support of the MIP.
 - 8.5.5.1 The FAA will provide releasable, relevant individual inspector training records for review, and will make available for interviews any individuals responsible for surveillance.
 - 8.5.5.2 The FAA will provide access to releasable, relevant FAA surveillance records, reports, findings, enforcements, and corrective actions for repair stations that hold an RBAC 145 maintenance organization certificate.

- 8.5.5.3 As appropriate and when possible, the FAA should also make available FAA staff to assist the ANAC in reviewing the above files and assist with interviews.
- 8.5.5.4 The FAA Coordinator (AFS-300) will coordinate any corrective actions with the ANAC SIS Audit Team Lead.
- 8.5.5.5 The ANAC SIS Audit Team shall outbrief the FAA office and its management regarding the results of the SIS audits. The briefing should disclose all identified items. Before leaving, the ANAC SIS Audit Team shall provide the FAA Coordinator (AFS-300) and the responsible FS office management a signed copy of the completed SIS audit forms.
- 8.5.5.6 The FAA Coordinator (AFS-300) will forward a copy of all signed SIS audit forms to the FAA National Coordinator.
- 8.5.5.7 The responsible FS office must document and correct the identified items listed on the signed *SIS Audit on FAA* job aid in accordance with the procedures established in FAA Order 8900.1.
 - a. The FAA shall address the identified items no later than 90 days after the visit.
 - b. The responsible FS office shall provide a memorandum to the FAA Coordinator (AFS-300) regarding the responsible FS office's closure of the SIS audit items.
 - c. When the FAA Coordinator (AFS-300) considers that all identified items are satisfactorily addressed, he or she shall provide the ANAC a report informing closure of SIS audit items no later than 90 days after the visit.
- 8.5.5.8 If the corrective actions provided by the FAA are not considered acceptable, the ANAC (GCAC) shall inform the FAA Coordinator (AFS-300) no later than 60 days after the answer provided by the FAA.
- 8.5.5.9 The FAA Coordinator (AFS-300) should coordinate with the responsible FS office to ensure the closure of all items identified.
- 8.5.5.10 The ANAC GCAC shall provide written correspondence to the FAA Coordinator (AFS-300) when the corrective actions are considered acceptable.
- 8.5.6 ANAC SIS Audit at an RBAC 145 Maintenance Organization. The ANAC SIS Audit Team may complete SIS audits by sampling maintenance organizations using the *SIS Audit RBAC 145* job aid.
 - 8.5.6.1 The ANAC SIS Audit Team Lead and the FAA representative shall discuss any findings noted during the audit and agree on a timetable for

corrective actions. Corrective actions are expected to be completed within 90 days.

- 8.5.6.2 The maintenance organization shall be debriefed by the ANAC SIS Audit Team Lead to ensure expectations are conveyed and understood. The ANAC SIS Audit Team Lead shall provide a copy of the signed *SIS Audit RBAC 145* job aid to the responsible FS office. The responsible FS office shall provide the maintenance organization with the formal communication of the findings with a timeframe for corrective actions.
- 8.5.6.3 The authority shall ensure the maintenance organization takes action on all identified findings and substantiate/report all SIS audit corrective actions to the FAA in a timely manner.
- 8.5.6.4 In certain circumstances, and subject to the nature of the findings, the FAA may request to extend the 90-day period. The FAA Coordinator (AFS-300) shall communicate with the ANAC SIS Audit Team Lead.
- 8.5.6.5 When the corrective actions are acceptable to the responsible FS office, it shall communicate with the FAA Coordinator (AFS-300), who shall then inform the ANAC SIS Audit Team Lead. The ANAC Audit SIS Team Lead shall review and notify the FAA Coordinator (AFS-300) if the corrections are acceptable.
- 8.5.7 If the RBAC 145 maintenance organization fails to correct the identified items, or fails to provide the responsible FS office with an acceptable corrective action plan within the established timeframe, the responsible FS office may recommend non-approval to the ANAC using the *ANAC MIP Audit Report*.
 - 8.5.7.1 The report will be marked “other” and include the following statement in the comment field: “SIS audit corrective actions not acceptable.” Outstanding identified items that are not satisfactorily addressed must be documented on the report.
 - 8.5.7.2 The responsible FS office shall forward the report recommending non-approval to the FAA Coordinator (AFS-300), who shall communicate the issues to the ANAC Foreign 145 Group for additional actions.
 - 8.5.7.3 The ANAC Foreign 145 Group shall take appropriate action as necessary.
 - 8.5.7.4 If subsequent corrective actions are submitted and considered acceptable to the responsible FS office, it shall forward the corrective actions with another recommendation to close the SIS audit on the *ANAC MIP Audit Report* to the FAA Coordinator (AFS-300). The report will be marked “other” and include the following statement in the comment field: “SIS audit corrective actions or a corrective action plan was submitted and is

acceptable.” The FAA Coordinator (AFS-300) shall send the *ANAC MIP Audit Report* to the ANAC SIS Audit Team Lead. The ANAC Audit SIS Team Lead shall review and notify the FAA Coordinator (AFS-300) if the corrections are acceptable. Follow the established procedures in the paragraph 8.5.6.5.

8.5.8 ANAC SIS Audit Closure Actions. The FAA Coordinator (AFS-300) shall review the SIS audit job aids and corrective actions. A copy of the SIS audit job aids and corrective actions/accepted corrective action plan should be forwarded to the ANAC SIS Audit Team Lead within 90 days after the visit.

8.5.8.1 Once all corrective actions are acceptable, the ANAC SIS Audit Team Lead shall close out the corrective action and provide closure correspondence to the ANAC Foreign 145 Group.

8.5.8.2 The responsible FS office shall document and complete the necessary follow-up actions for the items listed on the *SIS Audit RBAC 145* job aid.

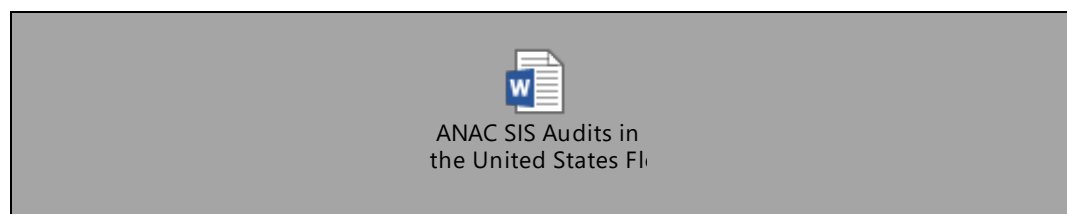
8.5.8.3 The responsible FS office shall notify the maintenance organization that the ANAC SIS Audit corrective actions are acceptable and closed.

8.5.8.4 The ANAC Foreign 145 Group shall monitor the closure of the findings and provide a report/analysis to the GCAC.

8.5.8.5 Based on the SIS audit analysis, the GCAC shall communicate with GTNO, which will coordinate with the FAA National Coordinator to make any necessary revisions to the MAG.

8.5.8.6 Additionally, based on the SIS audit analysis, ANAC Foreign 145 Group and AFS-300 shall make any necessary or appropriate changes to training/briefings.

8.5.9 ANAC SIS Audits in the United States Flow Chart.



8.6 FAA SIS Audits in Brazil. A SIS audit may be performed at the ANAC Offices and/or at any RBAC 145 maintenance organization located in Brazil that holds a 14 CFR part 145 certificate. The FAA Coordinator (IFO) shall establish a SIS audit schedule based on risk. The FAA National Coordinator shall concur with the sampling audit schedule prior to its submission to the ANAC (submit to the ANAC Foreign 145 Group). Review the MAG SIS audit forms and the repair station office file prior to the inspection.

- 8.6.1 The FAA SIS Audit Team should conduct an in-briefing and out-briefing to the GCAC and ANAC Office inspectors. The briefing will cover the purpose of the SIS audit, any recent changes in the MAG, prior lessons learned, and SIS audit corrective actions procedures.
- 8.6.2 The FAA SIS Audit Team performs and documents the SIS audits of the ANAC Offices in accordance with these MAG procedures.
- 8.6.3 The FAA SIS Audit Team Lead coordinates with the ANAC Foreign 145 Group to ensure it has resolved any discrepancies or identified items discovered during the SIS audit. The ANAC Foreign 145 Group shall document and forward the corrective actions to the FAA Coordinator (IFO) for acceptance.
- 8.6.4 The ANAC inspector and the ANAC GCAC are highly encouraged to participate at the briefings and at any visit to a repair station.
- 8.6.5 FAA SIS Audit at an ANAC Office. The FAA SIS Audit Team should start the SIS audit using the *SIS Audit on ANAC* job aid (see Section A, Appendix A-3). The SIS audit should focus on the ANAC processes, procedures, and surveillance in support of the MIP.
 - 8.6.5.1 The ANAC shall provide releasable, relevant individual inspector training records for review, and shall make available for interviews any individuals responsible for surveillance.
 - 8.6.5.2 The ANAC shall provide access to releasable, relevant ANAC surveillance records, reports, findings, enforcements, and corrective actions for maintenance organizations that hold 14 CFR part 145 certificates.
 - 8.6.5.3 As appropriate, and when possible, the ANAC should also make available ANAC staff to assist the FAA in reviewing the above files and to assist with interviews.
 - 8.6.5.4 The ANAC Foreign 145 Group shall coordinate any corrective actions with the FAA SIS Audit Team Lead.
 - 8.6.5.5 The FAA SIS Audit Team shall outbrief the ANAC office and its management regarding the results of the SIS audit. The briefing should disclose all identified items. Before leaving, the FAA SIS Audit Team shall provide the ANAC Foreign 145 Group with a signed copy of the completed SIS audit forms.
 - 8.6.5.6 The ANAC Foreign 145 Group shall document and complete the necessary follow-up actions for items listed in the *SIS Audit of ANAC* job aid and provide written correspondence to the FAA Coordinator (IFO) within 90 days of the audit.

- 8.6.5.7 If the corrective actions provided by the ANAC are not considered acceptable, the FAA Coordinator (AFS-54) shall inform the ANAC Foreign 145 Group no later than 60 days after the answer provided by the ANAC.
- 8.6.5.8 The FAA Coordinator (AFS-54) shall provide written correspondence to the ANAC Foreign 145 Group when the corrective actions are considered acceptable.
- 8.6.5.9 Once the audit is complete and acceptable corrective actions have been received from the ANAC, the FAA SIS Audit Team Lead shall forward a copy of the audit package, including the job aid used, to the FAA Coordinator (AFS-54).
- 8.6.5.10 The SIS Audit Team Lead/SIS Audit Team member, or PI, shall follow guidance in FAA Order 8900.1 for Program Tracking and Reporting Subsystem (PTRS) entry requirements.

NOTE: The ANAC should use its information control system to document the findings and corrective actions.

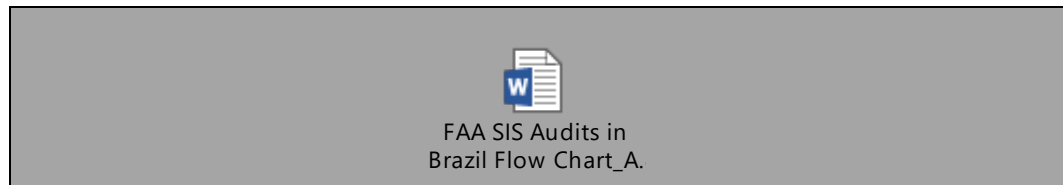
- 8.6.6 FAA SIS Audit at a 14 CFR Part 145 Repair Station Facility. The FAA SIS Audit Team may complete SIS audits by sampling repair stations using the *SIS Audit 14 CFR part 145* job aid (Section A, Appendix A-3).
 - 8.6.6.1 The FAA SIS Audit Team Lead and ANAC representative shall discuss any findings noted during the audit and agree on a timetable for corrective actions. Corrective actions are expected to be completed within 90 days.
 - 8.6.6.2 The repair station must be debriefed by the FAA SIS Audit Team Lead to ensure expectations are conveyed and understood. The FAA SIS Audit Team Lead shall provide a copy of the signed *SIS Audit 14 CFR part 145* job aid to the ANAC Office. The ANAC Office shall provide the repair station with the formal communication of the findings with a timeframe for corrective action(s).
 - 8.6.6.3 The authority shall ensure the maintenance organization takes action on all identified findings and substantiate/report all SIS audit corrective actions to the ANAC in a timely manner.
 - 8.6.6.4 In certain circumstances, and subject to the nature of the finding, the ANAC Office may request to extend the 90-day period. The ANAC Foreign 145 Group shall communicate with the FAA SIS Audit Team Lead.
 - 8.6.6.5 When the corrective actions are acceptable to the ANAC, the ANAC Foreign 145 Group shall inform the FAA SIS Audit Team Lead. The

FAA SIS Audit Team Lead shall review and notify the ANAC Foreign 145 Group if the corrective actions are acceptable.

- 8.6.7 If the repair station fails to correct the identified items, or fails to provide the ANAC Office with an acceptable corrective action plan within the established timeframe, the ANAC Office may recommend a non-approval to the ANAC Foreign 145 Group using the *FAA MIP Audit Report* (Section C, Appendix C-1).
 - 8.6.7.1 The report will be marked “other” and include the following statement in the comment field: “SIS audit corrective actions not acceptable.” Outstanding identified items that are not satisfactorily addressed must be documented on the report.
 - 8.6.7.2 The ANAC Foreign 145 Group shall forward the report recommending a non-approval to the FAA SIS Audit Team Lead for additional actions.
 - 8.6.7.3 The FAA SIS Audit Team Lead or PI shall take appropriate action as necessary.
 - 8.6.7.4 If subsequent corrective actions are submitted and considered acceptable to the ANAC inspector, the ANAC Office shall forward the corrective actions with another recommendation to close the SIS audit on the *FAA MIP Audit Report* (Section C, Appendix C-1) to the ANAC Foreign 145 Group. The report will be marked “other” and include the following statement in the comment field: “SIS audit corrective actions or a correction action plan submitted and is acceptable.” The ANAC Foreign 145 Group shall send the *FAA MIP Audit Report* to the FAA Team Lead. The FAA SIS Audit Team Lead shall review and notify the ANAC GCAC if the corrective actions are acceptable. Follow the established procedures in paragraph 8.6.6.5.
- 8.6.8 FAA SIS Audit Closure Action. The ANAC Foreign 145 Group shall review the SIS audit job aids and all corrective actions. A copy of the SIS audit job aids and corrective actions/accepted corrective action plans shall be forwarded to the FAA SIS Audit Team Lead within 90 days after the visit.
 - 8.6.8.1 Once all corrective actions are acceptable, the FAA SIS Audit Team Lead shall close out the corrective action and provide closure correspondence to the FAA Coordinator (AFS-54), who shall follow guidance in FAA Order 8900.1.
 - 8.6.8.2 The SIS Audit Team Lead/SIS Audit Team member, or PI, shall follow guidance in FAA Order 8900.1 for SAS entry requirements.
 - 8.6.8.3 The ANAC Office shall document and complete the necessary follow-up actions for items listed on the *SIS Audit 14 CFR part 145* job aid.

- 8.6.8.4 The ANAC Office shall notify the repair station that the FAA SIS audit corrective actions are acceptable and closed.
- 8.6.8.5 The FAA Coordinator (AFS-54), following the guidance in FAA Order 8900.1, shall monitor the closure of the findings and provide an annual report/analysis to the FAA National Coordinator.
- 8.6.8.6 Based on the SIS audit analysis, the FAA National Coordinator and the GTNO shall coordinate to make any necessary revisions to the MAG.
- 8.6.8.7 Additionally, based on the SIS audit analysis, AFS-300 and GCAC shall make any necessary or appropriate changes to training/briefings.

8.6.9 FAA SIS Audits in Brazil Flow Chart.



- 9.0 INDEPENDENT INSPECTIONS.** In accordance with the MIP, the FAA and the ANAC may conduct independent inspections of maintenance organizations/repair stations when warranted by specific safety concerns. The FAA and the ANAC shall coordinate with each other regarding any independent inspections. The FAA and the ANAC shall inform each other of the outcome of an independent inspection within 15 days after the inspection.
- 9.1 Independent Inspection Factors.** AFS-300 or the ANAC SPO may request an independent inspection based on the following risk factors:
- a. Specific safety concerns resulting from a SIS audit.
 - b. A safety-related issue, such as an incident, accident, or complaint.
 - c. Failure to comply with the MIP.
 - d. Downgrade of an International Aviation Safety Assessment (IASA) from a Category 1 to a Category 2.
 - e. Other associated risk decision tools.
- 9.2** The FAA's IASA program, determines whether another country's oversight of air carriers that operate, or pursue to operate into another country, or codeshare with a country's air carrier, complies with safety standards established by International Civil Aviation Organization (ICAO). The program focuses on the country's ability to adhere to international aviation standards and recommended practices contained in ICAO annexes.

If Brazil is downgraded from a Category 1 to a Category 2, the risks identified by failing to meet the aircraft maintenance oversight standards may affect the MIP or could impose increased surveillance. The FAA and the ANAC shall take the following actions:

- 9.2.1 The FAA (AFS-300) and the ANAC SPO shall discuss the results of the assessment and shall conduct a risk assessment and action plan to mitigate any safety concerns. The FAA and the ANAC may also conduct a joint risk assessment to determine the severity of the downgrade and any systemic issues.
- 9.2.2 In the event risks are associated with the continued confidence of either country to implement the MIP, the FAA or the ANAC may immediately place initial certifications under the MIP and MAG procedures on hold. They should remain on hold until compliance and risks are mitigated appropriately, recognizing, however, that the FAA or ANAC may be obligated to continue to process these applications outside of the MIP and MAG.
- 9.2.3 The FAA and the ANAC may perform increased surveillance using the SIS audit procedures in the applicable MAG.
- 9.2.4 Depending on the results of the SIS audit and identified risk imposed on air carriers, the FAA or the ANAC may temporarily heighten the surveillance frequency or conduct independent inspections to mitigate the risk for certifications, renewals, and amendment of certificates.

10.0 ENFORCEMENT ACTIONS. The FAA and the ANAC shall provide, subject to applicable laws and regulations, mutual cooperation and assistance in any investigation or enforcement proceedings of any alleged or suspected violation of any law or regulation under the scope of the MIP. The FAA and the ANAC shall inform each other of any enforcement action taken. All enforcement actions taken are subject to regular joint reviews. The surrender, suspension, or revocation of a repair station/maintenance organization certificate may result in additional surveillance and certificate management duties by the respective FAA and ANAC.

10.1 The FAA adheres to a Compliance Program in lieu of taking enforcement actions in certain circumstances. The Compliance Program is described in the current edition of FAA Order 8000.373, Federal Aviation Administration Compliance Program.

10.2 The ANAC utilizes progressive mechanisms of enforcement as established in the Resolution n° 472/2018, from preventive measures to punitive sanctions. The Resolution n° 472/2018, available only in Portuguese, may be found at:
http://www.anac.gov.br/assuntos/legislacao/legislacao-1/resolucoes/2018/resolucao-no-472-06-06-2018/@@@display-file/arquivo_norma/RA2018-0472.pdf.

10.3 Title 14 CFR part 145 Repair Stations Located in Brazil. If an RBAC 145 maintenance organization's certification is subject to a surrender, suspension, or revocation action, the ANAC shall immediately notify the FAA. Based on any finding

that results in surrender, suspension, or revocation of the RBAC 145 maintenance organization's certification, the ANAC shall submit an *FAA MIP Audit Report* (Section C, Appendix C-1) and will include the factual evidence detailing the events and nature of the actions. The ANAC Foreign 145 Group shall immediately forward the report to the FAA Coordinator (IFO). The FAA Coordinator (IFO) and the ANAC Foreign 145 Group shall discuss the surrender, suspension, or revocation and notify the FAA Coordinator (AFS-54).

- 10.3.1 A 14 CFR part 145 repair station surrendering its RBAC 145 maintenance organization certificate, without the intention of surrendering its 14 CFR part 145 certificate, would no longer be covered under the MIP.
- 10.3.2 Upon notification by the ANAC of a suspension or revocation of an RBAC 145 maintenance organization certificate, the FAA shall determine appropriate action for possible non-compliance of regulations. Fees per 14 CFR part 187 may not be assessed for FAA enforcement-related expenses.
- 10.3.3 If an ANAC finding/discrepancy results in the reduction of an RBAC 145 maintenance organization's capabilities, the FAA shall take appropriate action. The ANAC shall notify the FAA upon re-establishing previously removed ratings in a timely manner.
- 10.3.4 The FAA PI shall make an entry into SAS and take appropriate action if 14 CFR part 145, §145.53(b), requirements are no longer met based on an RBAC 145 maintenance organization's certificate being subjected to a surrender, suspension, or revocation.
- 10.3.5 After the enforcement action has been completed and the result is a suspension, surrender, or revocation, the FAA IFO manager (or delegate) shall notify the Transportation Security Administration (TSA). The FAA may provide the TSA with the name, location, and repair station POC. The email address FRS@tsa.dha.gov must be used to notify the TSA.

10.4 RBAC 145 Maintenance Organizations Located in the United States. If a U.S.-based 14 CFR part 145 certificate is subject to a surrender, suspension, or revocation action, the FAA shall immediately notify the ANAC. Based on any finding that results in surrender, suspension, or revocation of the 14 CFR part 145 certificate, the FAA shall submit an *ANAC MIP Audit Report* (Section B, Appendix B-2) and shall include the factual evidence detailing the events and nature of the actions. The FAA shall immediately forward the report to the ANAC Foreign 145 Group. The ANAC Foreign 145 Group and the FAA Coordinator (AFS-300) shall discuss the surrender, suspension, or revocation.

- 10.4.1 When a 14 CFR part 145 certificate is suspended or revoked, the RBAC 145 maintenance organization certificate will be automatically suspended or revoked since the RBAC 145 capability is based on the 14 CFR part 145 capability.

- 10.4.2 Upon notification by the FAA of a suspension or revocation of a 14 CFR part 145 repair station certificate, the ANAC Foreign 145 Group shall take the appropriate actions to update the certification status of the RBAC 145 maintenance organization. In addition, the ANAC Foreign 145 Group shall open an investigation to determine appropriate action for possible non-compliance of RBAC 145 maintenance organization requirements.
- 10.4.3 If an FAA finding/discrepancy results in the reduction of 14 CFR part 145 ratings, the same reduction will be applicable to the ANAC RBAC 145 maintenance organization. In such cases, the ANAC shall investigate any significant safety issues and take appropriate action.
- 10.4.4 The ANAC Foreign 145 Group shall take appropriate action if any RBAC 145 section 145.53(b)-I requirements are not met based on a 14 CFR part 145 repair station's certificate being subjected to a surrender, suspension, or revocation.
- 11.0 NON-PAYMENT OF FEES.** The FAA or the ANAC may suspend or deny any application for certification service in the event of non-payment of required fees until such time the fees are paid. For the FAA and the ANAC, fees may not be charged for expenses related to a SIS audit.
- 11.1** For the FAA, fees may not be charged for expenses related to enforcement investigations (refer to FAA Order 8900.1).
- 11.2** For the ANAC, fees will be charged if additional (recurrent) audits are necessary to be performed during the enforcement investigations.
- 12.0 APPEALS.** A repair station/maintenance organization may appeal the suspension or revocation of its certificate. Appeals of FAA enforcement actions are made in accordance with 14 CFR part 13. Appeals of ANAC enforcement actions are made in accordance with the administrative process as per the ANAC Resolution n° 472/2018.

Appendix A-1 FAA and ANAC Contacts

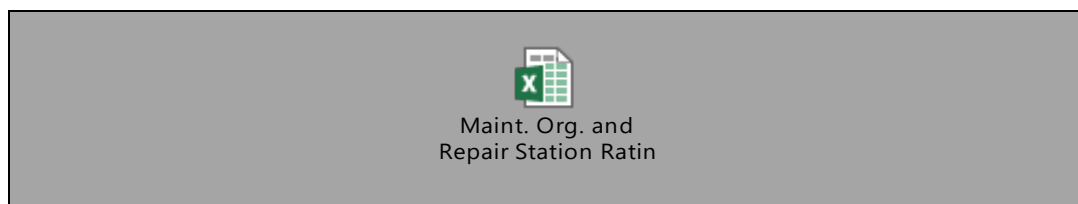
**Table A-1
FAA and ANAC Contacts**

FAA	POC TITLE	EMAIL
	FAA National Coordinator	9-awa-afs-intl-coordinator@faa.gov
	FAA Coordinator (IFO)	9-MIA-IFO-Brazil-ANAC-MIP@faa.gov
	FAA Coordinator (AFS-300)	9-awa-afs-intl-coordinator@faa.gov
	FAA Aircraft Certification Office (AIR-400)	9-AWA-AVS-AIR400@faa.gov
ANAC	Continuing Airworthiness Certification Branch - GCAC	gcac@anac.gov.br
	ANAC Foreign 145 Group	foreign145@anac.gov.br
	Operational Rules Technical Branch – GTNO	gtno.spo@anac.gov.br
	Aeronautical Products Design Certification Branch - GCPP (contact for obtaining approval of technical data for alterations/modifications)	pst@anac.gov.br

Appendix A-2

Rating Comparison Matrix

- 1.0 RATING COMPARISON MATRIX.** The matrix is for information only and is provided to assist in the comparison of 14 CFR part 145 repair station and RBAC 145 maintenance organization ratings for proper alignment under the MIP. Every effort will be made to communicate with the repair stations and the maintenance organizations to achieve alignment of ratings and limitations.
- 1.1 Title 14 CFR Part 145 Repair Stations Located in Brazil.** A covered 14 CFR part 145 repair station's certificate scope of ratings may not exceed the scope of ratings of the RBAC 145 maintenance organization certificate. However, this scope may be reflected in different ratings and limitations, according to the equivalency table below. Repair station class ratings will not be authorized in Brazil under the MIP.
- 1.2 Maintenance Organization and Repair Station Rating Comparison Matrix.**







- 1.3 Test and Inspections of Air Traffic Control (ATC) Transponders, Altimeters, and Altitude-reporting Equipment Installed on U.S.-registered Aircraft Located in Brazil in Accordance with 14 CFR part 91, §91.411 and §91.413.** When the maintenance organization does not hold the equivalent ANAC RBAC 145 airframe ratings, the FAA shall issue or amend the 14 CFR part 145 OpSpec A003 to include these aircraft under the FAA's appropriate ratings as long as the maintenance organization holds an ANAC rating for such equipment.
- 1.4 RBAC 145 Maintenance Organizations Located in the United States.** The RBAC 145 certificate scope of ratings is limited to the scope and ratings contained in the 14 CFR part 145 certificate and OpSpecs issued by the FAA. The ANAC will issue an RBAC 145 certificate, which will make reference to the 14 CFR part 145 OpSpecs, as the limitation for the ANAC certification.

Appendix A-3

Sampling Inspection System (SIS) Job Aids

Table A-3
SIS Job Aids

SIS JOB AIDS		
SIS Audit on FAA	The ANAC uses this job aid to conduct a SIS audit at a responsible FS office.	 SIS Audit on FAA_Appendix A-3.x
SIS Audit RBAC 145	The ANAC uses this job aid to conduct SIS audits at RBAC 145-certificated maintenance organizations located in the United States.	 SIS Audit on RBAC 145_Appendix A-3.xl
SIS Audit on ANAC	The FAA uses this job aid to conduct a SIS audit at the ANAC Offices.	 SIS Audit on ANAC_Appendix A-3
SIS Audit 14 CFR part 145	The FAA uses this job aid to conduct a SIS audit at 14 CFR part 145-certificated repair stations located in Brazil.	 SIS Audit on 14 CFR part 145_Appendix /

Section B –RBAC 145 Maintenance Organizations Located in the United States

1.0 INTRODUCTION. This section of the MAG provides procedures for the initial application, renewal, or amendments of a maintenance organization certificate under the provisions of the MIP applicable to maintenance organizations located in the United States.

1.1 Basic Eligibility. To issue an ANAC maintenance organization certificate to an organization located in the United States using the provisions of the MIP, ANAC shall ensure the following:

- a. The applicant holds a valid 14 CFR part 145 certificate to operate as an approved repair station in accordance with 14 CFR part 145. The ANAC ratings and limitations are dependent on the 14 CFR part 145 repair station ratings and limitations. The level of capability authorized under the ANAC ratings or limitations shall not exceed the 14 CFR part 145 ratings and limitations, except for procedures described and approved in the ANAC Supplement.
- b. The applicant demonstrates that the certificate rating is necessary to maintain Brazil-registered aircraft and/or aeronautical articles for fitment on a Brazil-registered aircraft. This may be in the form of a Letter of Intent (LOI) from a Brazilian operator, a maintenance organization, lessor contract, or a recent work order in case of continuation.
- c. The applicant pays the fees imposed by the ANAC.
- d. The provisions of the MIP and the conditions as outlined in this Section B of the MAG have been met.
- e. The applicant has been made aware of and has sufficient knowledge of the MIP, MAG, and ANAC regulations.

NOTE: The applicant for a maintenance organization certificate shall hold a 14 CFR part 145 certificate (which may include additional fixed locations, satellite repair stations, or line maintenance stations, if applicable) located within the territories of the United States. The locations must be under the surveillance of the FAA. The ANAC will not certify maintenance facilities outside of the territories of the United States.

1.2 Terms and Explanation of Special Conditions. The following terms and explanations apply to Section B of the MAG.

- a. ANAC (F-143-11). The pre-application form (for initial application only).

- b. ANAC (F-143-13). The application form for a maintenance organization certificate with all the attachments (for initial, renewal, and amendment to certification).
- c. ANAC Supplement. The ANAC Supplement to the FAA RSM should have detailed procedures to describe how the ANAC Special Conditions will be complied with and the other necessary procedures in accordance with this MAG. The ANAC Supplement should follow the format headings as given in the example in Section B, Appendix B-1 in this MAG. Any revisions to the ANAC Supplement must be submitted to the FAA for approval prior to performing operations under the revised procedures. The procedures used in the performance and certification of maintenance should be reflected accurately in the manuals.
- d. Application. Application for initial, renewal, and amendments to an RBAC 145 maintenance organization certificate under the provisions of the MIP must be submitted to the responsible FS office in a form and manner acceptable to the ANAC. Details on the documents' submission for application can be found in Section B, Appendix B-3.
- e. Capability List (CL). A document that, in addition to OpSpecs, lists the articles on which the maintenance organization may perform maintenance and the respective authorized scope of work.
- f. Letter of Intent (LOI). RBAC 145 requires that the applicant show the necessity for a maintenance organization certificate. The demonstration of this necessity must be in the form of an LOI from a Brazilian operator or a maintenance organization indicating its intention to engage the applicant for the maintenance of Brazilian aircraft and/or aircraft components intended for fitment on a Brazilian aircraft; or a recent work order (in case of continuation).
- g. Privileges of the Maintenance Organization. A maintenance organization may maintain only aircraft or aircraft components for which it is approved at the locations identified in the RBAC 145 certificate, 14 CFR part 145 OpSpecs, and CL. Work away from a fixed location will be allowed if the procedures are described in the ANAC Supplement and authorized in FAA OpSpecs D100.

NOTE: The ANAC shall issue a certificate making reference and relying on the 14 CFR part 145 OpSpecs and CL.

- h. Suspension, Revocation, or Surrender. The MIP permits reliance on each other's surveillance systems to the greatest extent possible. In the event of a revocation or suspension of a U.S.-based 14 CFR part 145 certificate, the ANAC RBAC 145 certificate becomes invalid due to not meeting the conditions specified in the MIP.

1.3 The ANAC may deny renewal, revoke, or suspend a maintenance organization certificate if the 14 CFR part 145 certificate becomes invalid. The responsible FS office or FAA Coordinator (AFS-300) is responsible for notifying ANAC Foreign 145 Group if the 14 CFR part 145 certificate is suspended, surrendered, or revoked.

1.4 The actions taken by the FAA and the ANAC to address the suspension, revocation, or surrender of a maintenance organization's certificate is detailed in Section A of the MAG.

1.5 ANAC Contacts. The Foreign 145 Group, a subgroup of GTOM, is responsible for certification of foreign maintenance organizations and their certificate management. It can be contacted at the following address:

National Civil Aviation Agency of Brazil (ANAC)

GTOM

Setor Comercial Sul - Quadra 09 - Lote C - Edifício Parque Cidade Corporate - Torre A
Brasília (DF)

CEP: 70.308-200

e-mail: foreign145@anac.gov.br

2.0 CERTIFICATION APPLICATION PROCESSES. This part provides detailed information, relevant to the FAA, ANAC, and an applicant, for the initial, renewal, and amendment application of a maintenance organization certificate. An applicant, as referred to in this section, may be an organization applying for an initial maintenance organization certificate or an existing maintenance organization applying for continuation. The steps for the application processes are illustrated in the diagrams contained within this section. An applicant should be familiar with Section B of the MAG to understand the processes and responsibilities involved in the initial, renewal, or amendment application for a maintenance organization certificate.

3.0 INITIAL APPLICATION. The initial maintenance organization application process is carried out over the following five phases:

- a. Phase 1: Pre-application.
- b. Phase 2: Formal application.
- c. Phase 3: Document Compliance.
- d. Phase 4: Demonstration and Inspection.
- e. Phase 5: Certification.

3.1 During the initial inquiry, the applicant should arrange a meeting with the FAA and familiarize itself with the current editions of the MIP and MAG.

3.2 Pre-application. To proceed with the pre-application, the applicant is required to submit to the FAA the ANAC Form F-143-11 for the pre-application phase, as indicated in Section B, Appendix B-3, and discuss the certification requirements and application process per the MAG procedures.

- 3.2.1 During the pre-application meeting, the applicant and the FAA should establish a timeframe for the certification process and communicate the certification expectations and requirements.
- 3.2.2 The applicant should inform the FAA at the earliest opportunity of its decision to proceed or to withdraw the application. Failure to do so within 60 days of its submitting the pre-application form will render the application null and void.
- 3.2.3 The FAA shall review the pre-application submission for eligibility.

3.3 Formal Application. To proceed to the formal application phase, the applicant is required to submit the ANAC Form F-143-13 to the FAA for the formal application phase as indicated in Section B, Appendix B-3.

- 3.3.1 The FAA shall review the formal application submission to ensure completeness and acceptability. This should include an initial review of the proposed ANAC Supplement in comparison with the sample as indicated in Section B, Appendix B-1.
- 3.3.2 The ANAC Supplement, along with the RSM, sets forth the organizational structure of the maintenance organization and its procedures to meet the requirements equivalent to RBACs 145 and 43. The ANAC Supplement example in Section B, Appendix B-1, must be customized to the maintenance organization's procedures and accurately describe how the maintenance organization meets the ANAC Special Conditions and applicable procedures established in the MAG.
- 3.3.3 The ANAC Supplement must be conditionally approved by the FAA prior to the maintenance organization conducting any maintenance, preventive maintenance, or alterations under its certificate. It also must be amended as necessary to keep the information contained therein up to date. Any revisions or amendments to the ANAC Supplement must also be conditionally approved by the FAA prior to the maintenance organization performing the operations under the revised procedures. Incorporated references in the ANAC Supplement must always be current.
- 3.3.4 Once the submission is verified, the FAA shall make copies of the following completed forms/documents and forward them to the ANAC Foreign 145 Group for review:
 - a. ANAC Pre-Application Form (Form F-143-11).
 - b. ANAC Application Form (with attachments) (Form F-143-13).

NOTE: Upon review and satisfaction that the applicant is eligible for RBAC 145 certification under the MIP, the ANAC Foreign 145 Group shall notify and instruct the applicant to make the necessary payment for the applicable fees.

3.3.5 After ANAC Foreign 145 Group confirms the fee payment, it shall inform the responsible FS office to continue with the process and shall provide the certificate number. The responsible FS office shall give the applicant the certificate number and advise the applicant that it must be used only for the creation of forms/tags to support the final certification.

NOTE: During this process, the FAA Coordinator (AFS-300) should be informed of the status of the application.

3.4 Document Compliance. The FAA shall review all the submitted documents and, in particular, shall conduct a thorough review of the draft ANAC Supplement in accordance with Section B, Appendix B-1. The FAA shall contact the applicant for any corrections that may be required.

3.5 Demonstration and Inspection. Upon reviewing the documents submitted by the applicant, the FAA shall perform an inspection at the applicant's facility to verify compliance with the ANAC regulatory differences identified in the ANAC Special Conditions and that the applicable procedures established in this MAG have been met. The FAA should also verify the repair station's continued compliance with 14 CFR parts 43 and 145.

3.5.1 Additional procedures or changes to the ANAC Supplement may be required based upon the results of the demonstration and inspection phase.

3.5.2 The FAA inspection of the applicant will be carried out in accordance with the *ANAC MIP Audit Report*, and a recommendation by the FAA will be provided within the same report.

3.5.3 All identified items noted during the inspection are corrected by the applicant and verified by the FAA. In addition, any discrepancies in the application package found after the inspection must also be corrected by the applicant and verified by the FAA.

3.5.4 The FAA shall ensure closure of any corrective action(s) before recommending the initial certification.

3.5.5 If the applicant fails to correct the deficiencies within the timeframe that the FAA allows (normally 90 days), the FAA should terminate the application process and provide a non-recommendation to the ANAC Foreign 145 Group using the *ANAC MIP Audit Report*.

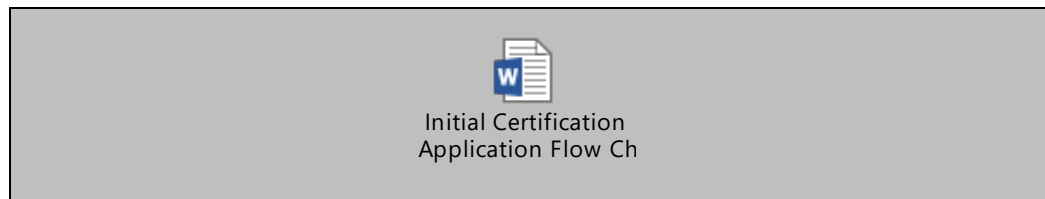
3.5.6 In the event of unusual circumstances, the FAA Coordinator (AFS-300) may notify the ANAC Foreign 145 Group to extend the period upon mutual agreement only if the applicant demonstrates the ability and willingness to correct the noted deficiencies.

3.6 Certification. When satisfied that the applicant is in compliance with all the ANAC regulatory differences identified in the ANAC Special Conditions and 14 CFR parts 43

and 145, and that the applicable procedures established in this MAG have been followed, the FAA shall issue a recommendation through the *ANAC MIP Audit Report*. The FAA shall forward the application package, including the summary of discrepancies found and corrective actions accepted, to the ANAC Foreign 145 Group.

- 3.6.1 The ANAC Foreign 145 Group shall review the recommendation and application package forwarded by the FAA to verify compliance with the MIP and equivalence with RBAC 43 and RBAC 145. Any issues arising from this review shall be resolved with the responsible FS office.
- 3.6.2 The ANAC shall proceed with the issuance of the certificate for the maintenance organization upon verification that the application is acceptable.
- 3.6.3 The ANAC shall send the original certificate to the applicant and shall provide the FAA with a copy of the certificate issued to the maintenance organization.
- 3.6.4 After the responsible FS office receives the copy of the certificate, it shall issue the approval letter for the ANAC Supplement to the maintenance organization.
- 3.6.5 Once the applicant receives the certificate for the maintenance organization and the Supplement approval letter, the applicant may then exercise the privileges of the certification.

3.7 Initial Certification Application Flow Chart.



- 4.0 **RENEWAL APPLICATION OF A CERTIFICATE.** An application for the renewal of an ANAC maintenance organization certificate must be submitted in a form and manner acceptable to the ANAC.
- 4.1 **ANAC Certificate.** The maintenance organization certificate is valid for 24 months. It is recommended that the renewal package be submitted 120 days prior to the expiration of the maintenance organization certificate. This will allow a sufficient processing time.
 - 4.1.1 To initiate the renewal application, the maintenance organization must submit the relevant documents for the renewal as indicated in Section B, Appendix B-3, to the responsible FS office. The maintenance organization must also make the applicable fee payment as notified by the ANAC.
 - 4.1.2 Any revisions or amendments to the ANAC Supplement must be submitted to the responsible FS office for approval.

NOTE: Submission of the ANAC Supplement is not required if there were no revisions or amendments since the last approval of this document.

- 4.1.3 The ANAC maintenance organization is required to demonstrate the continuing necessity for the maintenance organization certificate. In order to demonstrate this continued necessity, the maintenance organization is required to provide:
 - a. An LOI from a Brazilian operator or maintenance organization, or
 - b. A recent work order demonstrating that the Brazilian certificate is being used.
- 4.1.4 The responsible FS office, upon receiving the renewal application, shall notify and forward a copy of the ANAC application form (Form F-143-13) and the demonstration of necessity to the ANAC Foreign 145 Group.
- 4.1.5 The ANAC Foreign 145 Group, upon verification that the maintenance organization is eligible for renewal, shall notify and instruct the applicant to make the necessary payment for the fees applicable to the renewal application.

4.2 Continued Compliance and FAA Recommendation. The MIP allows the FAA to perform inspections on behalf of the ANAC in accordance with the procedures established in this MAG to verify continued compliance with 14 CFR parts 43 and 145 and the ANAC regulatory differences identified in the ANAC Special Conditions.

- 4.2.1 The FAA surveillance must include all the ANAC Special Conditions every 12 months. The FAA must also ensure the maintenance organization is in continued compliance with 14 CFR parts 43 and 145 and the ANAC regulatory differences identified in the ANAC Special Conditions, and that the applicable procedures established in the MAG have been met.
- 4.2.2 The maintenance organization must correct all discrepancies, findings, or identified items found during the FAA's surveillance are satisfactorily addressed within the timeframe allowed by the FAA. This can be achieved by the maintenance organization implementing corrective actions that are acceptable to the FAA, or the maintenance organization having in place a corrective action plan that is accepted by the FAA.

NOTE: The FAA may recommend a non-certification for the maintenance organization if discrepancies, findings, or identified items were not satisfactorily addressed in a timely manner.

- 4.2.3 When satisfied that the applicant is in compliance with all applicable regulations in 14 CFR parts 43 and 145, the ANAC regulatory differences identified in the ANAC Special Conditions, and that the applicable procedures established in the MAG have been met, the FAA shall issue a recommendation through the *ANAC MIP Audit Report* (Section B, Appendix B-2) and forward the renewal application package to the ANAC Foreign 145 Group.

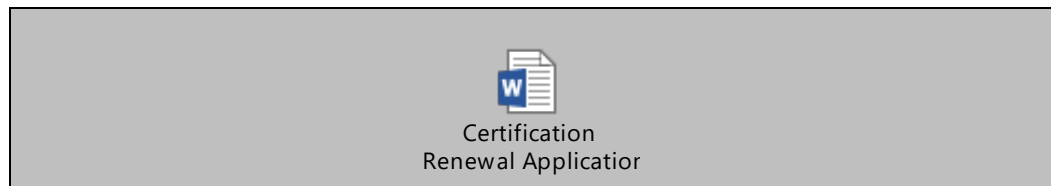
4.3 Issuance of Certificate. The period of validity for a maintenance organization certificate is 24 months from the expiration of the previous certificate.

4.3.1 The ANAC Foreign 145 Group shall review the recommendation and renewal application package forwarded by the FAA to verify compliance with the ANAC regulatory differences identified in the ANAC Special Conditions and equivalence with RBAC 43 and RBAC 145. Any issues arising from this review shall be resolved with the responsible FS office.

4.3.2 Upon verifying that the application is acceptable and the applicant made the fee payment, the ANAC Foreign 145 Group shall proceed with the renewal of the maintenance organization certificate by issuing a new certificate and sending it to maintenance organization.

4.3.3 The ANAC Foreign 145 Group shall provide the responsible FS office with a copy of the renewed maintenance organization certificate issued to the applicant. The FAA will issue a new supplement approval letter, if necessary.

4.4 Certificate Renewal Application Flow Chart.



5.0 CHANGE/AMENDMENT APPLICATION PROCESS. The ANAC requires the maintenance organization to notify the FAA to request an approval to make the following changes at least 30 days before the changes take place:

- a. Name of the organization.
- b. Location of the organization's main place of business.
- c. Accountable Manager.

NOTE: Changes of ratings, limitations, and addition of bases do not require notification to the ANAC, but do require notification to the FAA because the RBAC 145 certificate limitations and addresses are based on the 14 CFR part 145 OpSpecs.

5.1 Change/Amendment Application. To initiate the change/amendment application process, the maintenance organization is required to submit a request to the FAA in a format acceptable to the FAA. A suggested list of relevant documents for changes/amendments is indicated in Section B, Appendix B-3. The maintenance organization must also make the applicable fee payment as notified by the ANAC.

- 5.1.1 The FAA shall notify the ANAC on the application of change/amendment by the maintenance organization and forward a copy of the ANAC Application Form (Form F-143-13) to the ANAC Foreign 145 Group.
- 5.1.2 A change/amendment may incur a fee. The ANAC shall notify and instruct the maintenance organization to make the necessary payment for the fees applicable upon receiving notification from the FAA regarding a change/amendment application.

5.2 Compliance Verification and Recommendation. Depending on the change/amendment, the FAA may be required to perform an on-site inspection to verify that the maintenance organization remains in compliance with 14 CFR parts 43 and 145 and the ANAC regulatory differences identified in the ANAC Special Conditions, and that the applicable procedures established in the MAG have been met.

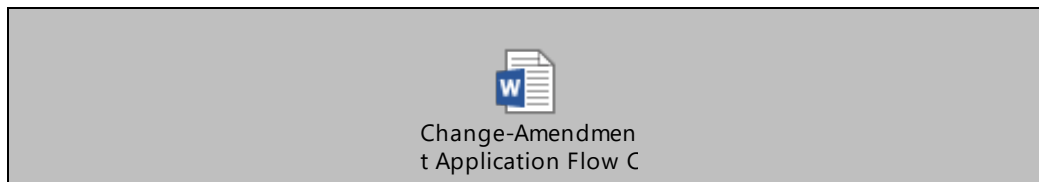
- 5.2.1 The FAA shall perform an on-site inspection of the maintenance organization for changes/amendments that will affect or alter the formed basis of the original certification (e.g., location, facilities, equipment, and/or addition of ratings).
- 5.2.2 All identified items noted during the inspection must be corrected by the maintenance organization and be verified by the FAA. In addition, any discrepancies in the change/amendment application package must also be corrected by the maintenance organization and be accepted by the FAA.
- 5.2.3 The FAA shall ensure that all identified items noted during the inspection and any discrepancies in the application package found after the inspection are corrected before recommending the approval for the changes/amendments.
- 5.2.4 If the applicant fails to correct the deficiencies within the timeframe that the FAA allows, the FAA should terminate the change/amendment application process and notify the ANAC Foreign 145 Group.
- 5.2.5 When satisfied that the maintenance organization is in compliance with 14 CFR parts 43 and 145 and the ANAC regulatory differences identified in the ANAC Special Conditions, and that the applicable procedures established in the MAG for the proposed changes/amendments have been met, the FAA shall issue a recommendation through the *ANAC MIP Audit Report* and forward the change/amendment application package to the ANAC Foreign 145 Group via email.

NOTE: For a change/amendment that did not require an on-site inspection, the *ANAC MIP Audit Report* is still required to be submitted to the ANAC Foreign 145 Group.

5.3 Approval and Issuance of Certificate. Subject to the type of changes/amendments applied for by the RBAC 145 maintenance organization, the ANAC may issue a new RBAC 145 maintenance organization certificate to reflect such changes/amendments.

- 5.3.1 The ANAC Foreign 145 Group shall review the recommendation and change/amendment application package forwarded by the FAA to verify compliance with the regulatory differences identified in the Special Conditions and equivalence with RBAC 43 and RBAC 145. Any issues arising from this review shall be resolved with the responsible FS office.
- 5.3.2 For changes/amendments that require the issuance of a new maintenance organization certificate, the ANAC shall proceed with the issuance of the new certificate upon verification that the application is acceptable and the fee payment is made by the applicant. The ANAC shall send the certificate to the maintenance organization.
- 5.3.3 The ANAC Foreign 145 Group shall provide the responsible FS office with a copy of the new maintenance organization certificate issued to the maintenance organization.
- 5.3.4 For changes/amendments that do not require the issuance of a new maintenance organization certificate, the ANAC Foreign 145 Group shall provide an official acknowledgement on the approval of such changes upon verification that the application is acceptable.
- 5.3.5 Once the applicant receives the change/amendment maintenance organization certificate or written acknowledgement from the ANAC, it can implement the proposed changes/amendments.

5.4 Change/Amendment Application Flow Chart.



6.0 CONSIDERATIONS ABOUT THE ANAC SMS SPECIAL CONDITION.

6.1 Safety Management System (SMS) Special Condition Compliance. The MIP, Appendix 1, item 2.0, Special Condition (8), identifies the ANAC requirement for a maintenance organization to establish, implement, and maintain an SMS in a form acceptable to the ANAC. The requirements of 14 CFR part 5 have been considered equivalent to the SMS requirements established in RBAC 145, section 145.214-I. Therefore, FAA validation of a maintenance organization's participation in the FAA SMS Voluntary Program will be considered the equivalent of ANAC acceptance per RBAC 145.214-I. The maintenance organization is expected to implement the SMS program by utilizing the FAA SMS Voluntary Program.

6.2 Implementation Timeframe. An RBAC 145 maintenance organization that is

certificated in the United States will have 2 years after the date the MIP enters into force to implement the SMS. This timeframe is valid for new applicants and for RBAC 145 maintenance organizations already certificated by the ANAC in the United States. After this timeframe, the RBAC 145 certificate will be issued only to maintenance organizations that have demonstrated compliance with the ANAC SMS Special Condition.

- 6.3 ANAC/FAA Collaboration.** During the implementation of the SMS by the maintenance organizations, the ANAC Foreign 145 Group can be contacted by the FAA PI to clarify any issues regarding the acceptance of the SMS program proposed by the maintenance organization.

7.0 SIGNIFICANT SAFETY ISSUES.

- 7.1** In the event that a significant safety issue is identified by the FAA, a recommendation of non-certification of the maintenance organization may be issued by the FAA. This will occur if the maintenance organization is not able to take corrective actions or provide a corrective action plan that is acceptable to the FAA.

- 7.2 Continued Validity of a Certificate.** Unless the maintenance organization certificate has previously been suspended, revoked, surrendered, superseded, , or expired by virtue of exceeding any expiration date that may be specified in the certificate, the continued validity of the certificate is dependent upon:

- a. The FAA's 14 CFR part 145. The validity of the 14 CFR part 145 certificate and OpSpecs issued/granted to the maintenance organization;
- b. ANAC Special Conditions. The maintenance organization remaining in compliance with the regulatory differences identified in the ANAC Special Conditions as listed in Appendix 1 of the MIP; and
- c. MAG Procedures. The procedures established in this MAG have been met.

- 7.3 Notification to the ANAC.** The responsible FS office shall notify the ANAC Foreign 145 Group if the maintenance organization does not meet the aforementioned conditions for its maintenance organization certificate to remain valid. Enforcement actions referenced in Section A, paragraph 10.0, may be taken against the maintenance organization.

- 8.0 FAA RESPONSIBILITIES.** The FAA is responsible for performing annual surveillance and oversight of the principal place of business of each maintenance organization certificate based in the United States and its territories. This includes the verification of documents for compliance and approval of the ANAC Supplement to the RSM. The ANAC remains responsible for the issuance or renewal of the maintenance organization certificate.

8.1 Administrative Duties. The FAA is the POC for maintenance organizations based in the United States and its territories. All regulatory matters concerning the maintenance organizations will be managed by the FAA, unless otherwise stated by the ANAC.

8.1.1 The FAA Coordinator (AFS-300) will be the POC for inquiries from the ANAC on a maintenance organization in the United States and its territories. The contact information can be found in Section A, Appendix A-1. In the event that the FAA Coordinator (AFS-300) is not able to provide a response to the query from the ANAC, he or she may refer the ANAC to the responsible FS office that provides safety oversight of the maintenance organization. It is recommended that the ANAC Foreign 145 Group be copied in all the correspondence on RBAC 145 certificate matters.

8.1.2 The responsible FS office that provides safety oversight of the maintenance organization shall establish communication via email with the FAA Coordinator (AFS-300) for inquiries on RBAC 145 certificate matters. The FAA Coordinator (AFS-300) should contact the ANAC Foreign 145 Group if issues cannot be resolved.

8.2 Safety Oversight and Surveillance. The FAA shall ensure that oversight and surveillance of maintenance organizations are carried out in accordance with the schedule planned by the FAA.

8.2.1 For the purpose of processing an application for initial, renewal, and/or amendment to the maintenance organization certificate, the FAA PI is responsible for reviewing the documents (as listed in Section B, Appendices B-2 and B-3) submitted by the applicant to ensure proper submission and completion. The responsible FS office shall forward the necessary documents to the ANAC Foreign 145 Group. The ANAC Foreign 145 Group shall review the application to verify the eligibility or continued necessity by the applicant.

8.2.2 The ANAC Supplement, in conjunction with the latest revision of the RSM, defines the maintenance organization's procedures to comply with the equivalent RBAC 43 and RBAC 145 regulations. The FAA shall review and, if it is found acceptable, conditionally approve the ANAC Supplement per the example listed in Section B, Appendix B-1. The List of Effective Pages (LEP) will be used to document the approval of the ANAC Supplement. In addition, the approval of the ANAC Supplement will be in the form of a letter to inform the maintenance organization on the approval or rejection of its ANAC Supplement. The letter will address the title, date, and revision number of the ANAC Supplement. If the ANAC Supplement is rejected, the responsible FS office shall provide a detailed explanation of the deficiencies and advise the maintenance organization not to perform any maintenance under the ANAC certificate.

- 8.2.3 The FAA shall verify that the maintenance organization complies with the regulatory differences identified in the MIP Special Conditions and 14 CFR parts 43 and 145 by conducting an inspection or a series of inspections, which must be completed within a 1-year cycle. Verification of compliance with the ANAC MIP Special Conditions must be conducted at least once every year prior to the recommendation for renewal of the maintenance organization certificate.
- 8.2.4 The responsible FS office shall document surveillance on the ANAC MIP Special Conditions in the *ANAC MIP Audit Report* (listed in Section B, Appendix B-2). This report will be the means by which the FAA will provide any recommendations to the ANAC.
- 8.2.5 The FAA's SAS Custom Data Collection Tool (CDCT) will be used each year to document the maintenance organization inspection for the ANAC Special Conditions. The *ANAC MIP Audit Report* (see Section B, Appendix B-2) should be uploaded into the CDCT.
- 8.2.6 For all discrepancies and findings identified during the course of the FAA's oversight and surveillance of the maintenance organization, the responsible FS office shall ensure that the discrepancies and findings are recorded and communicated to the maintenance organization for corrective actions to be taken. The FAA shall ensure that the deficiencies identified are satisfactorily addressed within a reasonable timeframe. The FAA's acceptance of the corrective actions taken or corrective action plans must be recorded and officially documented in the form of written correspondence to the maintenance organization.
- 8.2.7 The responsible FS office updates the SAS Configuration Module 1 *Vitals Information* for the maintenance organization and ensures the ANAC certificate number and renewal date is documented.
- 8.2.8 U.S.-based repair stations with OpSpec D107 Line Maintenance Authorizations must list all line stations performing maintenance on Brazilian air carriers. These line stations will be considered a maintenance organization's secondary base limited to line maintenance.

NOTE: Maintenance organizations' secondary bases that are limited to line maintenance may be authorized only within the United States, and those locations must currently have authorization for U.S. air carriers.

8.3 Recordkeeping. The FAA must ensure that all records documenting the safety oversight of maintenance organizations are retained by the agency for at least 5 years. The records to be retained are the following:

- a. Approval for the ANAC Supplement to the RSM.
- b. Maintenance organization inspection records.

- c. Written correspondence from the FAA to the maintenance organization accepting the corrective actions or corrective action plan.
- d. SIS audit written correspondence to the maintenance organization of findings and corrective actions.
- e. Copies of applicable FAA OpSpecs.

8.4 Suspension, Revocation, or Surrender of a Certificate. In the event the maintenance organization's 14 CFR part 145 certificate, OpSpecs, or associated ratings and limitations is surrendered by the maintenance organization, or suspended or revoked by the FAA, the RBAC 145 maintenance organization certificate would become invalid.

- 8.4.1 The responsible FS office that has safety oversight of the affected maintenance organization shall immediately notify the FAA Coordinator (AFS-300), who shall immediately notify the ANAC Foreign 145 Group of this occurrence.
- 8.4.2 Enforcement actions referenced in Section A may be taken against the maintenance organization.
- 8.4.3 For any other non-compliance resulting in FAA enforcement actions, such as civil penalties and/or letters of warning to the maintenance organization, the responsible FS office shall notify the FAA Coordinator (AFS-300), who shall immediately notify the ANAC GCAC.

8.5 Recommendation and Coordination. The ANAC relies on the recommendation by the FAA to issue or renew the maintenance organization certificate under the conditions of the MIP. Based on its surveillance and oversight, the FAA may recommend approval or non-approval for the maintenance organization certificate.

- 8.5.1 The responsible FS office shall provide the ANAC Foreign 145 Group the recommendation for the issuance or renewal of the RBAC 145 maintenance organization certificate through the *ANAC MIP Audit Report* (see Section B, Appendix B-2).
- 8.5.2 The responsible FS office shall forward copies of all written correspondence addressing the accepted corrective actions/corrective action plans for items found during the FAA's surveillance to the ANAC Foreign 145 Group for review.
- 8.5.3 For situations that require the amendment and/or issuance of the 14 CFR part 145 certificate, OpSpecs, and maintenance organization certificate at the same time, the issuance of the affected certificates should be coordinated. The responsible FS office shall coordinate with the ANAC Foreign 145 Group about amendments and/or changes to the certificate.

8.6 Maintenance Organization SMS Requirements.

- 8.6.1 The MIP, Appendix 1, item 2.0 (8), requires the ANAC requirement for a maintenance organization to establish, implement, and maintain an SMS in a form acceptable to the ANAC. The maintenance organization may develop an SMS program by utilizing the FAA SMS Voluntary Program. The maintenance organization should work with the local responsible FS office in conjunction with the FAA SMS Program Office for the development of its SMS system.
- 8.6.2 When the FAA SMS Program Office determines that the maintenance organization is in good standing with the FAA SMS Voluntary Program, it shall issue the SMS Validation Letter.
- 8.6.3 The responsible FS office shall update the SAS Vitals to show that the maintenance organization is in good standing with the SMS Voluntary Program. The responsible FS office shall notify the FAA Coordinator (AFS-300).
- 8.6.4 The FAA Aviation Authority Coordinator shall notify the ANAC Foreign 145 Group that the SMS Voluntary Program has been validated.
- 8.6.5 Revisions to the SMS program will be submitted by the maintenance organization to the responsible FS office for coordinating acceptance with the FAA SMS Program Office.

8.7 Airworthiness Verification Certificate (CVA) (Former Annual Maintenance Inspection (IAM)).

- 8.7.1 A maintenance organization certificated in accordance with RBAC 145 and holding airframe ratings may choose to develop procedures in the ANAC Supplement to perform and declare the Airworthiness Verification Certificate (CVA) for Brazilian-registered aircraft as part of its regular airworthiness review.
- 8.7.2 In such cases, the responsible FS office that has safety oversight of the maintenance organization shall evaluate if the CVA procedures described in the ANAC Supplement are the same procedures specified in the example of the ANAC Supplement provided in Section B, Appendix B-1. Procedures different from the example of the ANAC Supplement will require an ANAC evaluation and will delay the ANAC Supplement approval process.

9.0 ANAC RESPONSIBILITIES. Under the MIP, the ANAC is responsible for the issuance or renewal of maintenance organization certificates, with consideration given to the FAA recommendation. The FAA shall provide technical assistance by performing safety oversight and surveillance of these maintenance organizations.

9.1 Administrative Duties. The FAA is the POC for maintenance organizations based in the United States and its territories. However, the ANAC should provide the necessary assistance to the FAA with regard to RBAC 43 and RBAC 145 regulatory matters under the MIP.

- 9.1.1 The ANAC GTNO is the POC for the FAA for RBAC 43 and RBAC 145 regulatory matters under the MIP.
- 9.1.2 The ANAC 145 Foreign Group shall be the POC for the FAA regarding maintenance organizations in United States.
- 9.2 RBAC 145 Application Review/Fee Payment Notification.** The ANAC Foreign 145 Group is responsible for performing a review to ensure that the applicant meets the criteria to apply for a maintenance organization certificate.
- 9.2.1 Upon being notified by the responsible FS office that an application for an initial, renewal, and/or amendment for a maintenance organization certificate has been received, the ANAC Foreign 145 Group shall verify the eligibility or continued necessity by the applicant.
- 9.2.2 Once verified that the applicant meets the criteria, the ANAC Foreign 145 Group shall obtain the certificate number for the new applicant and create a new record in the ANAC file registry. The registry at ANAC Safety Oversight Management System is generated automatically after registry.
- 9.2.3 The ANAC Foreign 145 Group shall contact and instruct the applicant on the applicable fees and how payment should be made. The instructions for a fee payment can also be obtained at <https://www.gov.br/anac/en/topics/aircraft/f0a7-certificacao-anac-de-organizacao-de-manutencao-om-fora-do-brasil-anac-maintenance-organization-certification-outside-brazil>.
- 9.2.4 If the applicant does not meet the criteria to apply for the maintenance organization certificate, the ANAC Foreign 145 Group shall notify the FAA Coordinator (AFS-300) in a timely manner and provide the reason for rejection.
- 9.3 FAA Recommendation Review and Certificate Issuance Coordination.** The ANAC Foreign 145 Group is responsible for reviewing the recommendation by the responsible FS office for the purpose of issuing or denying the maintenance organization certificate.
- 9.3.1 Upon receiving the *ANAC MIP Audit Report* and substantiating documents, the ANAC Foreign 145 Group shall review the information provided to verify that the applicant meets the requirements of the RBAC 43 and RBAC 145 regulations.
- 9.3.2 The ANAC Foreign 145 Group may request additional information about the maintenance organization from the FAA or may request the FAA to verify areas of discrepancies identified during the recommendation review to support the processing of the application.
- 9.4 Maintenance Organization SMS Requirements.**
- 9.4.1 With respect to the SMS requirements, the ANAC Foreign 145 Group, upon receiving the FAA's notification that the maintenance organization's FAA SMS

Voluntary Program has been validated, shall record this information in the ANAC file registry.

- 9.4.2 For the initial SMS acceptance, the FAA Coordinator (AFS-300) shall send the maintenance organization SMS program documentation to the ANAC Foreign 145 Group. Such documentation comprises all manuals submitted for SMS initial acceptance. The ANAC shall sample some documentation for review in order to check adherence with RBAC 145 SMS requirements and provide feedback to the FAA Coordinator (AFS-300) as necessary.

9.5 FAA Recommends Certification.

- 9.5.1 Upon verifying that the applicant meets the requirements to be granted the RBAC 145 maintenance organization certificate, the ANAC Foreign 145 Group shall proceed to verify that the applicable fee has been paid.
- 9.5.2 Once the applicable fee payment has been made, the RBAC 145 maintenance organization certificate can then be processed and issued.
- 9.5.3 The ANAC Foreign 145 Group shall retain and file all documents submitted for the maintenance organization accordingly.

9.6 FAA Recommends Non-certification.

- 9.6.1 In some cases, the review for an initial application concludes that the applicant does not meet the equivalent requirements of the RBAC 43 and RBAC 145 regulations despite the opportunity given by the FAA to the applicant to amend its documents or procedures. In such cases, the ANAC Foreign 145 group shall close out the application.
- 9.6.2 If the applicant is already an existing holder of a maintenance organization certificate, the ANAC Foreign 145 Group shall review the reason for non-certification by the FAA and will proceed with enforcement actions, if necessary.
- 9.6.3 If there were fee payments made for the issuance of a maintenance organization certificate that is not recommended for approval, fees will not be refunded since the application process started and the ANAC initiated the application analysis, even if the certificate was not issued.

- 9.7 Certificate Issuance Coordination.** The ANAC Foreign 145 Group shall email the maintenance organization certificate to the applicant. The ANAC Foreign 145 Group will also send a copy of the certificate to the applicant and to the responsible FS office. For situations that require the amendment and/or issuance of the 14 CFR part 145 certificate, OpSpecs, and RBAC 145 maintenance organization certificate at the same time, the issuance of the affected certificates should be coordinated. The ANAC Foreign 145 Group shall coordinate with the FAA Coordinator (AFS-300) about amendments and/or

changes to the certificate.

- 9.8 Suspension, Revocation, or Surrender of a Certificate.** In the event that the 14 CFR part 145 certificate, OpSpecs, or associated ratings and limitations cease to remain valid per the requirements in 8.4 in this Section B, the responsible FS office shall notify the ANAC Foreign 145 Group.

NOTE: During this process, the FAA Coordinator (AFS-300) will be informed of the status of the suspension, revocation, or surrender of a certificate.

- 9.8.1 The ANAC Foreign 145 Group shall write officially (by letter) to the Accountable Manager of the maintenance organization to inform him or her of the suspension of its maintenance organization privileges until further notice. ANAC shall notify the responsible FS office.
- 9.8.2 Upon being notified by the FAA for any other non-compliances resulting in FAA enforcement actions, such as civil penalties and/or letters of warning mailed out to maintenance organizations, the ANAC shall conduct an investigation. If necessary, the ANAC shall take enforcement action(s) against the maintenance organization.

- 9.9 SIS Audits.** Complete SIS audits per the MAG, Section A.

- 9.10 Airworthiness Verification Certificate (CVA) (Former Annual Maintenance Inspection (IAM)) Oversight.**

- 9.10.1 In cases when a maintenance organization that is certificated in accordance with RBAC 145 has procedures approved in the ANAC Supplement to perform and declare the CVA for Brazilian-registered aircraft, the ANAC retains the responsibility to verify if the maintenance organization properly executed the CVA functions and may sample records or choose them based on reports received from the operators or based on investigations.
- 9.10.2 Evaluations may be performed remotely or during the SIS audits in the United States, and the ANAC shall contact the maintenance organization if additional information is required. In cases when it is confirmed that the maintenance organization does not present the capability to perform these activities, the ANAC shall require a revision of the ANAC Supplement for the removal of CVA-related procedures.

Appendix B-1

Guidance and Instructions for Developing the ANAC Supplement

1.0 PURPOSE OF THE ANAC SUPPLEMENT.

- 1.1** The purpose of the ANAC Supplement is to set forth the procedures, means, and methods of the maintenance organization to comply with the relevant RBAC 43 and RBAC 145 requirements and the MIP requirements.
- 1.2** Compliance with its contents will ensure compliance with the relevant RBAC 43 and RBAC 145 requirements and the MIP requirements, which is a prerequisite to obtaining and retaining the maintenance organization certificate.
- 1.3** When developing the ANAC Supplement, it is important to ensure that it is customized to each organization to demonstrate compliance. It should not merely contain policy statements.
- 1.4** The ANAC Supplement should address the following:
 - a. What must be done?
 - b. Who should do it?
 - c. When must it be done?
 - d. Where must it be done?
 - e. How must it be done?
 - f. Which procedure(s)/form(s) should be used?
- 1.5** References to the RSM/QCM are acceptable to reduce redundant procedures as long as the references are clearly identified and the ANAC Special Conditions are fulfilled in the RSM/QCM.
- 1.6** The organization's quality system must include an evaluation of compliance with the regulatory differences identified in the ANAC Special Conditions.
- 1.7** The contents of the ANAC Supplement must follow the format headings and contain the information as stated in the example of the ANAC Supplement given below. The required contents that do not apply to the maintenance organization's operations must be included in the ANAC Supplement and stated as *Not Applicable*.

2.0 EXAMPLE OF AN ANAC SUPPLEMENT TO THE REPAIR STATION'S MANUAL.





Example of an
ANAC Supplement_1

Appendix B-2

RBAC 145 Certification Application Package

For the purpose of applying for a maintenance organization certificate, the following list of documents, as applicable, must be submitted.

Table B-2
ANAC Forms and Websites

FORM NUMBER	TITLE	URL
ANAC (Form F-143-11)	Pre-application Form	https://sistemas.anac.gov.br/certificacao/Form/Form.asp
ANAC (Form F-143-13)	Application Form for RBAC 145 Certification	https://sistemas.anac.gov.br/certificacao/Form/Form.asp
N/A	ANAC MIP Audit Report	 ANAC MIP Audit Report_Appendix B-
ANAC Special Conditions	ANAC Special Conditions Cross Reference	 ANAC Special Conditions Cross Re

Appendix B-3

Reference Documents

Table B-3
Summary of Forms/Documents to be Submitted for RBAC 145 Certification

INITIAL APPLICATION:

Pre-application Phase

ANAC (Form F-143-11) Pre-application for RBAC 145 Maintenance Organization Certification.

Formal Application Phase

ANAC (Form F-143-13) Application Form for RBAC 145 Certification with the following attachments:

- a. Copy of the current FAA 14 CFR part 145 certificate and OpSpecs.
- b. FAA 14 CFR part 145 repair station Capability List (CL) (if applicable).
- c. ANAC Supplement (if required).
- d. Management Personnel summary. At least Accountable Manager.
- e. Letter of intent or demonstration of necessity.
- f. Contracted Functions (if applicable).

RENEWAL AND CHANGE/AMENDMENT APPLICATION:

ANAC (Form F-143-13) Application Form for RBAC 145 Certification with the following attachments:

- a. Copy of the current FAA 14 CFR part 145 certificate and OpSpecs.
- b. FAA 14 CFR part 145 repair station Capability List (CL) (if applicable).
- c. ANAC Supplement (if revised).
- d. Management Personnel summary. At least Accountable (if changed).
- e. Letter of intent or demonstration of necessity (for renewal).
- f. Contracted Functions (if applicable).
- g. Periodic Report (for renewal).

Section C –14 CFR part 145 Repair Stations Located in Brazil

1.0 INTRODUCTION. This section of the MAG provides **procedures** for initial application, renewal, or amendment of a repair station certificate under the provisions of the MIP applicable to FAA-certificated repair stations located in Brazil.

2.0 BASIC ELIGIBILITY. To issue an FAA 14 CFR part 145 certificate to a repair station located in Brazil using the provisions of the MIP, the FAA must ensure the following.

- a. The applicant holds a current ANAC RBAC 145 certificate in Brazil. The FAA ratings and limitations are dependent on the RBAC 145 ratings and limitations. The level of capability authorized under the FAA ratings or limitations may exceed the scope of the ratings and limitations of the RBAC 145 maintenance organization certificate only to the extent specified below if the RBAC 145 maintenance organization meets applicable 14 CFR part 145 requirements to perform the work.
 1. Altimeter and ATC Transponder Tests and Inspections (14 CFR part 43, Appendix E and F). If the ANAC Operations Specifications do not authorize testing of altimeter systems and transponders, then the FAA OpSpec may authorize performing the 14 CFR part 43, Appendix E and F, tests and inspections if the maintenance organization meets the requirements in 14 CFR part 145 to perform the testing.
 2. RBAC 145.205 does not have regulations governing operations under 14 CFR parts 125 and 129. Therefore, compliance with maintenance, preventive maintenance, and alterations performed for certificate holders under 14 CFR part 125, and for foreign air carriers or foreign persons operating a U.S.-registered aircraft in common carriage under 14 CFR part 129, will be accomplished under the FAA OpSpecs.
 3. FAA issuance of a specialized services rating requires FAA approved data that is not part of a manufacturer's maintenance manual or ICA. In general, a limited rating for specialized service is issued for work that cannot be accomplished under an existing rating. The FAA shall identify the specific data on OpSpecs, thereby authorizing the repair station to perform the specialized service. The repair station will contact the GTOM, and together with the ANAC Foreign 145 group, will coordinate with the FAA Coordinator (IFO).
 4. The ANAC issues OpSpecs for ANAC type-certificated aircraft/engines/propellers. If the ANAC Operations Specifications do not authorize maintenance of foreign-registered aircraft/engines/propellers that have

an FAA TC, the FAA OpSpecs may authorize the maintenance of the aircraft/engines/propellers not listed on the ANAC Operation Specifications.

- b. The applicant has demonstrated that the certificate and rating is necessary to maintain or alter U.S.-registered aircraft and/or aeronautical articles to be installed on U.S.-registered aircraft, or foreign-registered aircraft operating under the provisions of 14 CFR part 121 or part 135, and articles for use on those aircraft.
- c. The applicant pays the fees imposed by the FAA in accordance with 14 CFR part 187, as described in the current edition of AC 187-1, Flight Standards Service Schedule of Charges Outside the United States, and the terms of the MIP. The FAA Coordinator (IFO) may be contacted at the following:

Miami International Field Office
FAA Miami AFS-57
2895 SW 145th Ave., Suite 221
Miramar, FL 33027 USA
Tel. # +1-954-641-6700
Fax: # +1 954-641-6720
Email: 9-MIA-IFO-Brazil-ANAC-MIP@FAA.GOV

- d. The provisions of the MIP and the conditions in the MAG have been met.
- e. The applicant has been made aware of and has sufficient knowledge of the MIP, MAG, and FAA regulations.

3.0 TERMS AND EXPLANATIONS OF SPECIAL CONDITIONS. The following terms and explanations apply to Section C of the MAG.

- a. Capability List (CL). The CL, as required by RBAC 145.215, should be in a format that identifies any difference in approval of ANAC articles from FAA articles and shall identify the level of capability authorized to perform the specific maintenance, preventive maintenance, or alterations on each article. (Example: overhaul, repair, inspect, test, *FAA only.) If using a CL, the list is authorized in FAA OpSpec A003.
- b. Capability List Revisions. The FAA CL may be revised and articles added by the repair station only after it has performed a self-evaluation in accordance with 14 CFR § 145.215(c). These revisions do not require prior approval. The FAA Coordinator (IFO) is responsible for repair station certificates. The revised CL must be submitted to the FAA Coordinator (IFO) and copied to the ANAC Foreign 145 Group.
- c. FAA Form 8310-3, Application for Repair Station Certificate and//or Rating. This form is required for initial, renewal, and change/amendment to the certificate or OpSpecs. Instructions for completing the form are included with the form.

- d. FAA Form 8400-6, Pre-application Statement of Intent (PASI). This form is completed by an applicant and used only for initial certification.
- e. FAA MIP Audit Report. This report is completed by the ANAC to document surveillance and recommendations of the repair station to the FAA. The ANAC is required to complete this report for each initial, renewal, and change/amendment to the 14 CFR part 145 repair station certificate or OpSpecs. SIS audit corrective actions may also be documented on this report to recommend closure of the SIS audit items to the FAA.
- f. FAA Supplement to the MOM. The FAA Supplement to the MOM, if determined to be required, must have detailed procedures describing how to comply with the 14 CFR part 145 differences identified in the FAA Special Conditions and how the applicable procedures established in this MAG will be met. Any revision to the FAA Supplement must be conditionally approved by the ANAC prior to the repair station performing operations under the revised procedures. See Section C, Appendix C-2 for additional requirements.
- g. Hazardous Materials (Hazmat) Letter. If the repair station and/or its contractors and subcontractors perform a job function that concerns transportation of dangerous goods (i.e., hazmat), the repair station must train its employees to the hazmat standards, as required by 14 CFR § 145.165(a). A letter from the repair station certifying that the appropriate employees have been trained (as outlined in the current edition of the ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air, as specified in Annex 18, and technical instructions in Doc 9284) is required to be submitted to the ANAC. If the repair station is involved in the loading or handling, including shipping and receiving, of dangerous goods for or on behalf of a 14 CFR part 121 or part 135 operator, the repair station's employees must be trained in accordance with the air carrier's hazmat training program. See 14 CFR § 145.165(b).
- h. Notification of Hazmat Authorizations. For RBAC 145 maintenance organizations holding repair station certificates that perform maintenance on aircraft operated under 14 CFR parts 121 or 135, they must acknowledge receipt of the 14 CFR part 121 or part 135 operator notification of its authority or prohibition to carry hazmat in accordance with 14 CFR §145.206.
- i. Repair Station Personnel Roster (Roster). The roster must identify those individuals authorized to perform maintenance on Brazilian-registered aircraft and U.S.-registered aircraft as referenced in 14 CFR §145.51(a).
- j. Repair Station Vital Information. The Repair Station Vital Information provides valuable data to the FAA for certification and/or for amending the certificate and OpSpecs. The job aid is used for initial certification, renewal, and to request a change in operations. The job aid should be completed by the repair station and submitted to the FAA Coordinator (IFO).

- k. Showing of Necessity. Section 145.51(c)(1) requires that the applicant for a repair station certificate and rating located outside of the United States must show that the repair station certificate and/or rating is necessary for maintaining or altering U.S.-registered aircraft; or foreign-registered aircraft operated under the provisions of 14 CFR part 121 or part 135; and articles for use on these aircraft. The applicant should provide a written statement attesting to § 145.51(c)(1) in a format acceptable to the FAA. The acceptable formats include descriptive emails with or without attachments, fax, and/or printed letter(s).
 - 1. The showing of necessity can be demonstrated for § 145.51(c)(1) by the following or similarly worded statement from an applicant:
 - a. “[Insert Name] intends to pursue current or future business relationships, which requires an FAA certificate or rating to maintain or alter U.S.-registered aircraft and articles for use on U.S.-registered aircraft, or foreign-registered aircraft operated under the provisions of 14 CFR part 121 or part 135, and articles for use on these aircraft.”
 - b. Additionally, if a repair station applies for an added rating, it is required to meet the requirement of § 145.51(c)(1). The repair station does not need to meet §145.51(c)(1) when adding products to an existing rating or articles to a Capabilities List.
 - l. Work Away. A repair station may perform work away for special circumstances or on a recurring basis to support U.S.-registered aircraft or aircraft components for the fitment onto U.S.-registered aircraft. The following conditions apply:
 - 1. The repair station certificate will cover additional fixed locations or line maintenance authorizations located within Brazil. The fixed locations must be under surveillance by the ANAC.
 - 2. Work outside of Brazil that is expected to take more than 30 days should be pre-authorized by the FAA.
 - 3. The responsibility for the ANAC to conduct surveillance yearly applies only to locations within Brazil.

4.0 INITIAL APPLICATION PROCESS. This section of the MAG provides information for initial certification for obtaining a 14 CFR part 145 repair station certificate. The application process is illustrated in the diagram contained below in paragraph 4.7, Initial Application Flow Chart. An applicant should be familiar with Section C of the MAG to understand the processes and responsibilities involved in the initial approval.

4.1 The initial repair station application process consists of the following five phases:

- a. Phase 1: Pre-application.
- b. Phase 2: Formal Application.
- c. Phase 3: Design Assessment.
- d. Phase 4: Performance Assessment.
- e. Phase 5: Administrative Functions.

4.1.1 Initial Inquiry. The applicant should arrange a preliminary meeting with the ANAC office and discuss the certification requirements. During the pre-application phase, the applicant should familiarize itself with the current editions of the following:

- a. The MIP.
- b. The MAG, specifically, Section C.
- c. Title 14 CFR parts 43 and 145.
- d. The FAA's AC 187-1.

4.1.2 Authorized Additional Locations. ANAC RBAC 145 maintenance organizations with additional fixed locations, located within Brazil, will need an evaluation during the application phase.

- a. If the ratings are identical, they qualify for issuance of OpSpec A101, Additional Fixed Locations.
- b. If they do not have the same ratings, they qualify as a "Satellite" and a new application, with new certificate number, will apply, regardless of location. The satellite will operate under the managerial control of the parent (managerial control) ANAC maintenance organization.
- c. The term *line station* is a common term among civil aviation authorities, while the FAA uses the term *line maintenance authorization* when it authorizes line stations in a repair station's OpSpecs under 14 CFR part 145. These terms are synonymous when applied under the terms of the MIP. Line maintenance authorizations are listed in OpSpec D107 for 14 CFR part 145 repair stations.

4.2 Pre-application. To proceed with the initial application, the applicant should submit to the ANAC GTOM the relevant initial application documents for pre-application as indicated in Section C, Appendix C-1, Table C-1.2.

- 4.2.1 During the pre-application meeting, the applicant and the ANAC GTOM establish a timeframe for the certification process and communicate the certification expectations and requirements.
- 4.2.2 The applicant should inform the ANAC GTOM at the earliest opportunity on its decision to proceed or to terminate the application. Failure to do so within 60 days will terminate the application.
- 4.2.3 The ANAC GTOM shall review the pre-application form (FAA Form 8400-6) for eligibility. Blocks 1 through 5 of FAA Form 8310-3 must be completed.

4.3 Formal Application. To proceed to the formal application phase, the applicant shall submit to the ANAC GTOM the applicable documents listed in Section C, Appendix C-1, Table C-1.2, Initial Application Documents, Formal Application.

- 4.3.1 The ANAC GTOM shall review the formal application to ensure completeness and acceptability. This will include an initial review of the proposed FAA Supplement, if determined to be required, in comparison with the example in Section C, Appendix C-2.
 - 4.3.1.1 The FAA Supplement, along with the MOM, sets forth the structure and procedures of the repair station to meet the requirements of 14 CFR part 145. If required, the FAA Supplement (as seen in the example in Section C, Appendix C-2) must be customized to the repair station procedures and accurately describe how the repair station meets the 14 CFR part 145 differences identified in the FAA Special Conditions and how the applicable procedures established in this MAG will be followed.
 - 4.3.1.2 Instructions and a sample of the FAA Supplement are contained in Section C, Appendix C-2.
- 4.3.2 Once the submission is verified, the ANAC GTOM shall make copies of the following completed forms and forward to the ANAC Foreign 145 Group, which shall forward them to the FAA's FAA Coordinator (IFO) for review.
 - a. FAA Form 8400-6.
 - b. FAA Form 8310-3.
 - c. Necessity Statement.
 - d. Repair Station Vital Information (Section C, Appendix C-1).
 - e. Hazmat Letter. If the repair station does not perform hazmat job functions, the letter should indicate that this condition does not apply.
- 4.3.3 The FAA Coordinator (IFO) shall provide the certificate number to the ANAC Foreign 145 Group, which shall forward it to the ANAC GTOM. The ANAC

GTOM shall provide the applicant the certification number and advise the applicant that it must be used only for the creation of forms/tags to support the final certification.

NOTE: The FAA Coordinator (IFO) must ensure that any specific aircraft, aircraft engine, and/or propeller an applicant requests to include on its CL is type-certificated by the FAA prior to the issuance of the FAA OpSpecs with such articles.

4.4 Design Assessment. The ANAC GTOM shall review all submitted documents and shall conduct a thorough review of any FAA Supplement in accordance with the MAG, Section C, Appendix C-2. The ANAC GTOM shall contact the applicant for any corrections.

4.5 Performance Assessment. Upon reviewing the documents submitted by the applicant, the ANAC shall perform an inspection at the applicant's facility to verify compliance with the 14 CFR part 145 differences identified in the FAA Special Conditions and that the applicable procedures established in this MAG have been followed, and also continued compliance with RBACs 43 and 145.

4.5.1 Verify that the procedures in the FAA Supplement, if applicable, will be followed. Additional procedures or changes to the FAA Supplement may be required based upon the results of the demonstration and inspection phase.

4.5.2 If the ANAC GTOM discovers deficiencies in the application package, or after conducting an audit, it shall ensure closure of any corrective action(s) before recommending the initial certification.

4.5.3 If the applicant fails to correct the deficiencies within the timeframe (the ANAC normally allows 30 days), the ANAC GTOM may terminate the application process and recommend non-approval to the FAA.

4.5.4 In the event of unusual circumstances, the ANAC Foreign 145 Group may notify and discuss an extension with the FAA Coordinator (IFO) if the applicant demonstrates an ability and willingness to correct the noted deficiencies. The extension must be mutually agreed upon.

4.6 Certification. When satisfied that the applicant is in compliance with all FAA regulatory differences identified in the FAA Special Conditions and RBAC 145 regulations, and that the applicable procedures established in this MAG have been followed, the ANAC GTOM will recommend approval using the *FAA MIP Audit Report* located in Section C, Appendix C-1, Table C-1.1. The ANAC GTOM shall send the application package to the ANAC Foreign 145 Group, which will send it to the FAA Coordinator (IFO).

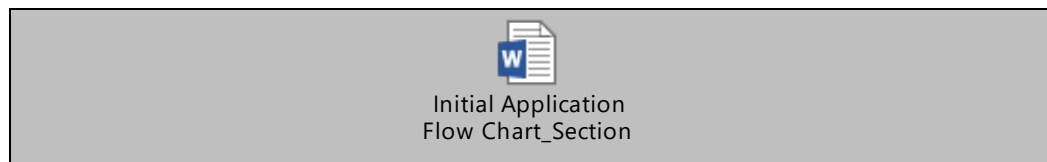
4.6.1 The FAA Coordinator (IFO) shall review the completed package and send an invoice to the applicant for the fees described in AC 187-1, applicable to the certification. Once the fees are paid, the FAA Coordinator (IFO) shall issue the

repair station certificate and OpSpecs to the repair station, and will notify the TSA.

- 4.6.2 The FAA Coordinator (IFO) shall provide the ANAC Foreign 145 Group with a copy of the repair station certificate and OpSpecs.
- 4.6.3 After the ANAC GTOM office receives the copy of the certificate, it shall issue the approval letter for any FAA Supplement to the repair station and record the approval on the RSM LEP. A copy of the FAA Supplement and approval letter will be forwarded to the FAA during initial certification or for significant changes to the repair station's operating procedures.
- 4.6.4 Once the applicant receives the certificate, OpSpecs, and Supplement approval letter, if applicable, it may then exercise the privileges of the certificate.
- 4.6.5 The expiration date will be printed on the certificate. The ANAC GTOM should receive the request to renew the repair station certificate at least 120 days prior to the expiration date to allow sufficient time to renew.

NOTE: Depending on the location of the maintenance organization, the TSA may contact the applicant for security requirements.

4.7 Initial Application Flow Chart.



5.0 RENEWAL APPLICATION PROCESS. An application for the renewal of the 14 CFR part 145 certificate must be submitted in a form and manner acceptable to the FAA. To allow sufficient processing time, it is recommended that the renewal package be submitted to ANAC GTVA 120 days prior to the expiration date of the 14 CFR part 145 certificate. The repair station certificate will be issued for 12 months. The Renewal Flow Chart in paragraph 5.4, below, illustrates the necessary steps for the renewal.

5.1 Renewal. The repair station must submit the applicable renewal application documents listed in Section C, Appendix C-1, Table C-1.2.

- 5.1.1 Only authorized persons listed in OpSpec A007, Designated Persons, may sign Block 5 of FAA Form 8310-3.
- 5.1.2 The FAA Supplement, if required, must reflect current procedures and activities. Any revisions must be submitted to the ANAC GTVA for conditional approval.

5.1.3 Repair Station Vital Information. This information is used by the FAA Coordinator (IFO) to populate the OpSpecs and the SAS. The Repair Station Vital Information is used at each renewal to verify the data and to update any changes since the last renewal. This is also used for any new request of OpSpec authorizations.

5.2 Continued Compliance and ANAC Recommendation. The MIP allows the ANAC to perform audits on behalf of the FAA in accordance with the procedures established in this MAG to verify continued compliance with FAA regulatory requirements, as identified in the FAA Special Conditions and RBAC 145.

5.2.1 When the ANAC GTOM is satisfied that the repair station is in compliance with all FAA regulatory differences identified in the FAA Special Conditions and RBAC 145 regulations, and that the applicable procedures established in this MAG have been met, it will recommend approval using the *FAA MIP Audit Report* located in Section C, Appendix C-1, Table C-1.1. The ANAC GTOM shall forward the renewal application package to the ANAC Foreign 145 Group, which will send it to the FAA Coordinator (IFO).

5.2.2 Corrective action plans must be submitted to the ANAC GTVA in the allowable time period and must properly address all discrepancies and identified items.

5.2.3 The ANAC GTVA may recommend a non-approval to the FAA Coordinator (IFO) if the discrepancies or identified items were not satisfactorily addressed in a timely manner, or if the ANAC GTVA has not accepted a corrective action plan using the *FAA MIP Audit Report* located in Section C, Appendix C-1, Table C-1.1.

5.3 Issuance of the Certificate. Once satisfied with the renewal package and the ANAC GTVA recommendation, the FAA Coordinator (IFO) shall send an invoice to the repair station for the applicable fees and will send a copy of the invoice to ANAC Foreign 145 Group.

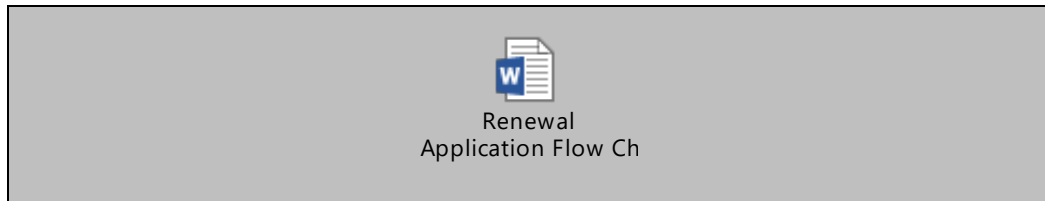
5.3.1 AC 187-1 describes these fees.

5.3.2 Once the repair station settles the fees, the FAA Coordinator (IFO) shall issue the repair station the certificate and any revised OpSpecs, and send the ANAC Foreign 145 Group the copies of the certificate and OpSpecs.

NOTE: The FAA Coordinator (IFO) shall ensure that any specific aircraft, aircraft engine, and/or propeller an applicant requests to include on its CL is type-certificated by the FAA prior to the issuance of the FAA OpSpecs with such articles.

NOTE: Any revisions made to the OpSpecs will be reflected in the current OpSpecs table of contents.

5.4 Renewal Application Flow Chart.



6.0 CHANGE/AMENDMENT APPLICATION PROCESS. To apply for an amendment to the certificate or OpSpecs, the repair station should refer to the Change/Amendment Flow Chart in paragraph 6.5 below. The repair station should notify the ANAC GTOM 30 days in advance of any proposed changes.

6.1 Conditions. The following conditions will require the repair station to notify the ANAC GTOM when it seeks a change/amendment to the repair station certificate or OpSpecs:

- a. Name Change of the repair station (OpSpec A001).
- b. Change in ownership.
- c. Change of location or mailing address (OpSpec A001).
- d. Change or amend ratings (OpSpec A003).
- e. Change or amend summary of special authorization and limitation (OpSpec A004).
- f. Change to the Accountable Manager (OpSpec A007).
- g. Use of electronic maintenance records, electronic maintenance signature, or electronic maintenance organization /FAA Supplement (OpSpec A025).
- h. Adding or deleting an additional fixed location (OpSpec A101).
- i. Authorization to perform work away from main facility on a recurrent basis. This is required only if the work is part of everyday business rather than under a special circumstance (OpSpec D100).
- j. Adding or revising the Line Maintenance Authorization. Documentation for the necessity from a U.S. air carrier must include the make and model/series of aircraft (OpSpec D107).

6.2 Change/Amendment Application. The repair station must submit the applicable documents in Section C, Appendix C-1, to the ANAC GTOM.

- 6.2.1 Depending on the request, the FAA Supplement may need an amendment submitted along with other applicable documents. See Section C, Appendix C-2, for required FAA Supplement procedures.

- 6.2.2 Repair Station Vital Information. Only the applicable sections that apply to the amendment or OpSpecs request should be updated.
- 6.2.3 Depending on the request, the ANAC GTOM/GTV A may have to perform an on-site audit.
- 6.2.4 Subject to the type of change/amendment applied for by the repair station, the FAA Coordinator (IFO) may issue an amended FAA Form 8000-4 or revised OpSpecs to reflect such a change/amendment.
- 6.2.5 Any revision made to the OpSpecs will be reflected in the current OpSpec table of contents.

NOTE: The repair station records, including the superseded OpSpecs, must be kept by the FAA IFO for 5 years after the repair station has become inactive.

- 6.2.6 The application must contain a proof of necessity if adding a new rating, in accordance with 14 CFR § 145.51(c).

6.3 Change/Amend Requirements. The requirements for changes/amendments to a certificate are explained below.

- 6.3.1 Change of Location or Mailing Address. The ANAC GTOM shall review the application and may authorize continued work while the applicant moves to another facility. The applicant should provide a written contingency plan to the ANAC GTOM. If only the mailing address changed, complete the FAA Form 8310-3, Blocks 1, 2, and 5. For Block 2, mark “other” and insert the mailing address change.
- 6.3.2 Change in Ownership. When the amendment to a certificate involves a change in ownership, the following apply:
 - a. If the sale or transfer of assets (e.g., financial takeover) does not significantly affect or alter the former basis of the original certification in regards to employees, facilities, equipment, or daily operation of the repair station, only a new application is required for an amendment to the existing certificate.
 - b. In situations that involve a change in ownership that affect or alter the basis of the original certification (e.g., location, facilities, or personnel) or disrupts the work creating inherent risk due to the sale, the ANAC GTOM/GTV A may have to perform an on-site audit and approve the maintenance organization revisions prior to making a recommendation to the FAA Coordinator (IFO). The new owner should propose a written contingency plan to the ANAC GTOM for the transition of the significant changes.
 - c. The new owner should request in writing to the ANAC GTOM for the issuance of a new certificate number, or to request to keep the existing certificate number.

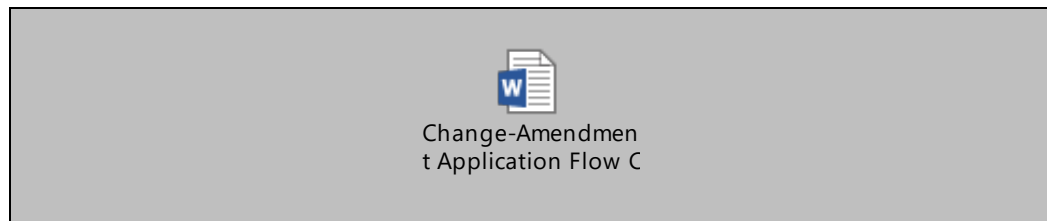
1. If the new owner's written request is to keep the existing certificate number, the repair station will continue to exist with an amended certificate. The owner should clearly understand the liability for the work performed under previous management. The new owner should also understand the potential release of information under the Freedom of Information Act (FOIA) (refer to 5 U.S.C. 552) before receiving permission to retain the existing certificate number.
 2. If the new owner's written request is for obtaining a new certificate number, the repair station should provide a written contingency plan describing the transition to the new certificate number and a planned date for the surrender of the old certificate. This will ensure maintenance entries for current and future maintenance releases reflect the proper certificate number.
- 6.3.3 Contracted Maintenance Function. When the repair station seeks to add or delete a subcontracted maintenance function, the request is made to the ANAC GTOM for evaluation and a recommendation for approval. FAA Form 8310-3 will be forwarded to the FAA Coordinator (IFO) for final approval. As applicable, during the next FAA renewal, a current list of approved maintenance functions must be included on FAA Form 8310-3.

6.4 Compliance, Verification, and ANAC Recommendation. The ANAC GTOM/GTVA may perform an on-site inspection of changes to the repair station that could affect or alter the former basis of the original certification (e.g., location, facilities, equipment, and/or addition of ratings) to ensure compliance with all FAA regulatory differences identified in the FAA Special Conditions and RBAC 145 regulations, and that the applicable procedures established in this MAG have been met.

- 6.4.1 The repair station must ensure that all identified discrepant items noted during the inspection are corrected and agreed upon by the ANAC GTOM/GTVA.
- 6.4.2 If the repair station fails to correct the deficiencies within the allotted timeframe by the ANAC GTOM (normally 60 days), the ANAC GTOM shall terminate the change/amendment application process and notify the ANAC Foreign 145 Group, which shall then inform the FAA Coordinator (IFO).
- 6.4.3 When satisfied that the repair station is in compliance with all FAA regulatory differences identified in the FAA Special Conditions and RBAC 145 regulations, and that the applicable procedures established in this MAG have been met for the proposed change/amendment, the ANAC GTOM shall issue a recommendation to the ANAC Foreign 145 Group, which shall then inform the FAA Coordinator (IFO) using the *FAA MIP Audit Report* located in Section C, Appendix C-1, Table C-1.1.

NOTE: The FAA must ensure that any specific aircraft, aircraft engine, and/or propeller an applicant requests to include on its CL is type-certificated by the FAA prior to the issuance of the FAA OpSpecs with such articles.

6.5 Change/Amendment Application Flow Chart.



- 7.0 ANAC RESPONSIBILITIES.** Under the MIP, the ANAC is responsible for performing annual surveillance and oversight of the 14 CFR part 145 repair stations (certificated as main and satellite facilities as expressed as business address on the FAA Form 8000-4) based in Brazil. This includes the verification of documents for compliance and conditional approval of the FAA Supplement to the MOM if a supplement has been determined to be required. The FAA remains responsible for the issuance or renewal of the repair station certificate and OpSpecs.

NOTE: This section is applicable only to FAA repair stations covered under the MIP.

- 7.1 Administrative Duties.** The flow charts in Section C illustrate the steps for initial, renewal, and amendments to the repair station certificate. The introduction in Section C contains the basic eligibility requirements and additional explanations of forms and terms used in the MAG. Additional responsibilities are contained in the actual certification procedures in this section. The ANAC is the POC for repair stations based in Brazil. The ANAC shall provide technical assistance to the FAA through frontline management of all regulatory matters, unless otherwise stated by the FAA.

- 7.1.1 For the purpose of processing an application for initial, renewal and/or amendment to the repair station certificates, the ANAC inspector shall review the documents (as listed in Section C, Appendix C-1) submitted by the applicant to ensure proper completion.
- 7.1.2 The ANAC shall forward copies of all documents (as listed in Section C, Appendix C-1) to the FAA for review. If required, the FAA Supplement, including any revisions, is required to be forwarded to the FAA only during initial certification or for significant changes to the repair station's operating procedures.
- 7.1.3 The ANAC Foreign 145 Group is the POC for inquiries from the FAA on repair stations located in Brazil. In the event the ANAC Foreign 145 Group is not able to provide a response to the query from the FAA, it may refer the FAA to the ANAC

GTVA inspector who is responsible for safety oversight of the repair station. It is recommended that the FAA Coordinator (IFO) be copied on all correspondence on 14 CFR part 145 significant matters.

- 7.1.4 The ANAC shall obtain a statement from the repair station demonstrating the necessity. If the repair station is unable to establish the necessity, the ANAC shall advise the repair station that the FAA may renew the certificate based on its previous statement of necessity. If, at the time of its next renewal, the repair station is still unable to show necessity, it could jeopardize the eligibility for renewal.
- 7.1.5 The ANAC shall review and, if found acceptable, approve any FAA Supplement per the example listed in Section C, Appendix C-2. The FAA Supplement, in conjunction with the latest revision of the MOM, defines the repair station's procedures, organizational charts, duty positions, quality system, and training requirements to comply with the 14 CFR part 145 regulations. The approval of the FAA Supplement will be on the MOM's LEP and in the form of a letter to the organization. The letter will address the title, date, and revision number of the MOM. If the FAA Supplement is rejected, the ANAC GTOM/GTVA inspector shall provide a detailed explanation of the deficiencies and advise the repair station not to perform any maintenance under the FAA certificate. The MOM will be made available to the FAA when warranted.

7.2 Safety Oversight and Surveillance. The ANAC shall ensure that oversight and surveillance on repair stations is carried out in accordance with the ANAC surveillance schedule.

- 7.2.1 The ANAC must verify that the repair station complies with RBAC 145 by conducting an audit or a series of audits, which must be completed within a 1-year cycle. Verification of compliance with FAA regulatory differences identified in the FAA Special Conditions, and that the applicable procedures established in this MAG are met, must be conducted during the 1-year cycle prior to making a recommendation for renewal of the repair station certificate.
- 7.2.2 Ensure the work performed under repair station ratings and limitations do not exceed the maintenance organization certificate and scope of work, except as described in Section C, paragraph 2.0(a).
- 7.2.3 The ANAC shall ensure all discrepancies and findings identified during the course of the ANAC's oversight and surveillance of the repair station are recorded and communicated, and that the proper corrective actions are taken. The ANAC shall ensure that the deficiencies identified are satisfactorily addressed within a reasonable timeframe. The ANAC's acceptance of the corrective actions taken, or the corrective action plans, shall be recorded and officially documented on written correspondence to the repair station. The ANAC shall ensure final corrective

actions listed in a corrective action plan are tracked and closed in a timely manner.

7.3 Recordkeeping. The ANAC shall ensure that all records documenting the safety oversight on repair stations are retained for at least 5 years. The following records shall be retained by the ANAC:

- a. ANAC approval of the FAA Supplement to the MOM, if required.
- b. Maintenance organization audit records and nonconformance reports.
- c. FAA MIP audit records.
- d. Copies of current repair station certificates and OpSpecs.
- e. Written correspondence from the ANAC to the repair station accepting the corrective actions or corrective action plans.
- f. SIS audit written correspondence to the repair station accepting the corrective actions or corrective action plans.
- g. Original FAA Form 8400-6 and FAA Form 8310-3.

7.4 Recommendation and Coordination. The FAA relies on the recommendation by the ANAC to issue the repair station certificate under the conditions of the MIP. Based on its surveillance and oversight, the ANAC may recommend approval or non-approval for the repair station certificates.

7.4.1 The ANAC GTOM/GTVA inspector shall ensure that all discrepancies, findings, and identified items are satisfactorily addressed prior to the recommendation. For initial FAA certification and transfer of the surveillance of certificates, the ANAC audit schedule for the maintenance organization must be current and the audit must not have any unresolved findings.

7.4.2 The ANAC GTOM/GTVA inspector shall provide a recommendation on the *FAA MIP Audit Report* provided in Section C, Appendix C-1. The report must be signed, dated, and include a recommendation to the FAA. Copies of all accepted corrective actions or corrective action plans must be included. All documents will be sent to the attention of the FAA PI at the FAA Coordinator (IFO).

7.4.2.1 For initial certification, a summary of discrepancies and corrective actions that originated during the certification process will be included.

7.4.2.2 A separate *FAA MIP Audit Report* is required during initial certification for each additional fixed location and line station.

7.4.2.3 For changes/amendments that do not require an on-site audit, the *FAA MIP Audit Report* is still required to be submitted to the FAA Coordinator (IFO) for the recommendation.

- 7.4.2.4 The ANAC GTOM/GTVA shall complete the *FAA MIP Audit Report* recommending non-approval for applications in which the applicant does not meet the requirements of the MIP despite the opportunity given to correct the deficiencies.
- 7.4.2.5 The ANAC GTOM/GTVA shall complete the *FAA MIP Audit Report* recommending non-approval for any findings that may result in revocation, limitation, or suspension, in whole or in part, of the maintenance organization certificate. The ANAC recommendation of non-approval shall be immediately forwarded to the attention of the FAA coordinator (IFO). Additional information can be found in Section A, paragraph 10.0, Enforcement Actions.
- 7.4.3 For situations that require the amendment and/or issuance of the repair station certificate and the maintenance organization certificate at the same time, the issuance of the affected certificates should be coordinated. The FAA Coordinator (IFO) and the assigned ANAC GTOM/GTVA shall coordinate to ensure that the amendments and/or changes to the certificate will take effect at the approximate same time.

8.0 FAA RESPONSIBILITIES. Under the MIP, the ANAC is responsible for rendering technical assistance to the FAA through surveillance and oversight of repair stations based in Brazil, including the verification of documents for compliance and conditional approval of the FAA Supplement to the MOM, if required. The FAA remains responsible for the initial, renewal, and/or amendment of the repair station certificate and OpSpecs with consideration given to the ANAC recommendation. The FAA remains the final authority on all matters relating to the repair station certificate.

8.1 Administrative Duties.

- 8.1.1 The flow charts in Section C illustrate the steps for initial, renewal, and amendments to the repair station certificate. The introduction in Section C contains the basic eligibility requirements and additional explanations of forms and terms used in the MAG. The ANAC is the POC for repair stations based in Brazil. The ANAC will provide technical assistance to the FAA on all regulatory matters, unless otherwise stated by the FAA. The ANAC shall provide the necessary assistance with regard to RBAC 145 regulatory matters.
- 8.1.2 The ANAC Foreign 145 Group is the POC for inquiries on repair stations located in Brazil. In the event the ANAC Foreign 145 Group is not able to provide a response to the query, it may refer to the ANAC inspector who is responsible for safety oversight of the repair station. The FAA Coordinator (IFO) should be included in all correspondence with significant concerns.

- 8.2 Title 14 CFR Part 145 Application Review.** The FAA PI shall perform a review to ensure that the applicant meets the criteria to apply for and hold the repair station certificate. The FAA may deny an application in accordance with 14 CFR part 145, §145.51(e).
- 8.2.1 For the purpose of processing an application for initial, renewal, and/or amendment to the repair station certificate, the ANAC inspector is responsible for reviewing the documents (listed in Section C, Appendix C-1) submitted by the applicant to ensure proper completion. The ANAC shall forward the necessary documents to the FAA for review and to verify the eligibility or continued necessity by the applicant.
- 8.2.2 The FAA Coordinator (IFO) shall review the documents (listed in Section C, Appendix C-1) to verify the documents are complete and acceptable. It is not necessary for the FAA to review the FAA Supplement. The FAA may request a copy of the MOMs when warranted.
- 8.2.3 If the documents are incomplete or unsatisfactory, the FAA Coordinator (IFO) prepare a letter or email to the ANAC Foreign 145 Group indicating the deficiencies.
- 8.2.3.1 Deficiencies in the renewal application package must be discussed with the ANAC as soon as possible and corrected prior to the issuance of the repair station certificate.
- 8.2.3.2 The *FAA MIP Audit Report* (Section C, Appendix C-1) must be completed by the ANAC for initial, renewal, and any change/amendment requiring a recommendation by the ANAC. A separate *FAA MIP Audit Report* is required during initial certification for each additional fixed location and line station that utilizes the 14 CFR part 145 privileges.
- 8.2.4 The Repair Station Vital Information (Section C, Appendix C-1) contains all the required information for SAS configuration data input. Input this information into SAS and/or verify as necessary.
- 8.2.5 For transfer of surveillance of repair station certificates under the MIP, review additional guidance in FAA Order 8900.1. If a procedure in FAA Order 8900.1 guidance conflicts with the MAG, the MAG takes precedence.
- 8.3 ANAC Recommendation.** The FAA Coordinator (IFO) is responsible for reviewing the recommendation by the ANAC for the purpose of issuing or denying the issuance of the repair station certificate.

8.3.1 ANAC Recommends Renewal Approval.

- 8.3.1.1 For renewal of the certificate, repair station corrective actions or a corrective action plan must be accepted by the ANAC within the allotted timeframe.
- 8.3.1.2 The corrective action(s) or corrective action plans must be submitted in conjunction with the *FAA MIP Audit Report*. This data is an important tool in the continued support of ANAC surveillance activities. This data should not be used to oppose corrective actions previously accepted by the ANAC. The FAA Coordinator (IFO) may request additional data or communicate follow-up actions with the ANAC to support the processing of the application.
- 8.3.1.3 The FAA Coordinator (IFO) shall renew a repair station certificate only after the ANAC has accepted the corrective actions or an acceptable corrective action plan.
- 8.3.1.4 If necessary, the FAA Coordinator (IFO) may issue an amended repair station certificate for 90 days for additional corrective actions. This would apply only to newly certificated repair stations 1 year from the original (new) certification. In such cases, the extension should be issued only with the ANAC concurrence. Once the corrective actions are satisfactory to both the FAA and the ANAC, the FAA Coordinator (IFO) shall renew the certificate for the remaining months in order to maintain the alignment of the certificates for the next renewal.

8.3.2 ANAC Recommends Non-Approval. If the repair station does not meet all applicable requirements based on the ANAC surveillance and oversight, the ANAC may recommend non-approval.

- 8.3.2.1 The *FAA MIP Audit Report* will be used for the ANAC recommendation of a non-approval.
- 8.3.2.2 The FAA Coordinator (IFO) shall review the reason for non-approval and determine any significant safety issues. The FAA Coordinator (IFO) shall take appropriate action as necessary.
- 8.3.2.3 If an ANAC finding/discrepancy results in the reduction of the RBAC 145 maintenance organization capabilities, the FAA Coordinator (IFO) shall investigate any significant safety issues.
- 8.3.2.4 Any ANAC finding resulting in an ANAC surrender, suspension, or revocation of an RBAC 145 maintenance organization certificate must be expeditiously communicated to the FAA Coordinator (AFS-54). See Section A, paragraph 10.0, Enforcement Actions.

- 8.4 Issuance of OpSpecs.** The FAA issues OpSpecs that align with the RBAC 145 ratings and limitations. The ANAC shall perform direct surveillance of the FAA ratings in accordance with the MIP. The FAA does not issue ratings and limitations that exceed the ANAC ratings and scope of work, except as specified in Section C, paragraph 2.0(a). The cross-reference chart (listed in Section A, Appendix A-2) may be used to assist in the alignment.
- 8.4.1 The Ratings and Limitations paragraph (OpSpec A003) contains the authorized FAA ratings (limited airframe, engine, etc.). The make/model of complete type-certificated articles should be listed. The FAA does not issue ratings and limitations that exceed the RBAC 145 maintenance organization authorized scope of work as prescribed in the maintenance organization Operations Specification issued by ANAC, except as specified in Section C, paragraph 2.0(a).
- 8.4.2 The OpSpec A003 limitation column should state: “Limited to ANAC certificate and operations specifications approved scope of work.”
- 8.4.2.1 An exception to the ratings and limitations alignment applies to 14 CFR part 91, §§ 91.411 and 91.413 tests and inspections, if the RBAC 145 maintenance organization does not hold the appropriate airframe rating, specialized service rating, or an RBAC Radio Class 3 and/or Instrument Class 1 rating. In this case, the FAA may issue or amend OpSpec A003 and add these aircraft in the limitations under the Limited Radio and/or Limited Instrument rating. This will authorize on-wing test and inspections for U.S.-registered aircraft. This is authorized in Section C, paragraph 2.0(a).
- 8.4.2.2 As indicated in Section C, paragraph 2.0(a), the ANAC issues Operation Specifications only for ANAC type-certificated aircraft/engines/propellers. If the ANAC Operations Specifications do not authorize maintenance of aircraft/engines/propellers that have an FAA TC, the FAA OpSpecs may authorize the maintenance of the aircraft/engine/propeller not listed on the ANAC Operation Specifications. In such cases, the FAA shall issue OpSpec paragraph A003 with the appropriate limited rating.
- 8.4.2.3 The FAA shall recognize ANAC secondary bases that are issued Operations Specifications only if they are located in Brazil and under the direct surveillance of the ANAC.
- 8.4.2.4 The *Repair Station Vital Information* job aid (listed in Section C, Appendix C-1), along with the Operations Specifications issued by the ANAC, can be used to validate OpSpecs.

8.5 Issuance of the 14 CFR Part 145 Certificate. When all of the documents are reviewed and found to meet all applicable requirements, and the repair station has settled the appropriate fees per 14 CFR part 187, the following will be accomplished:

- a. FAA Form 8310-3, Blocks 6 through 10, shall be completed by the FAA.
 1. In Block 6, insert “Refer to the applicable *FAA MIP Audit Report* completed by the ANAC under the MIP” and reference any other applicable relevant information.
 2. In Block 8, “Date of Inspection” will be the date the ANAC signed the *FAA MIP Audit Report*.
- b. Upload a copy of the completed *FAA MIP Audit Report* into the SAS Data Collection Tool (DCT). The written correspondence documenting the ANAC acceptance of corrective actions may also be uploaded.
- c. Document reimbursable expenses and settle the appropriate fees in accordance with AC 187-1.
- d. The FAA Coordinator (IFO) will complete the SAS DCT for Peer Group H (FAA repair stations outside the territories of the United States and under an agreement) and update the Vitals Information as required.
- e. Complete FAA Form 8000-4, paying particular attention to the following: Under the ratings, ensure the following statement is entered on the FAA Form 8000-4, “*Subject to the U.S.-Brazil BASA-MIP.*” This statement must be used to identify the repair stations that are certificated under the MIP and 14 CFR part 145, § 145.53(b).
- f. Send the originally signed FAA Form 8000-4 and the repair station OpSpecs to the repair station. Electronic scanned copies may be electronically sent to expedite certification as long as the originals are mailed.
- g. Forward copies of the certificate and OpSpecs to the ANAC Foreign 145 Group.
- h. Notify the TSA when an initial repair station certificate is issued. The FAA IFO manager (or delegate) will notify the TSA and may provide the TSA with the name, location, and repair station POC. The email address is FRS@tsa.dhs.gov.
- i. Retain all records on repair station certificate management per the FAA record retention policy.

8.6 SIS Audits. Complete SIS audits per the MAG, Section A.

9.0 FAA ANNUAL INSPECTIONS.

- 9.1** Title 49 U.S.C § 44733(e) specifies that the FAA Administrator shall ensure that 14 CFR part 145 repair stations located outside the United States are inspected annually by FAA safety inspectors, without regard to where the repair stations are located, in a manner consistent with United States' obligations under international agreements.
- 9.2** The assigned FAA principal inspector shall open a SAS CDCT to document this inspection requirement and will follow SAS guidance in FAA Order 8900.1.

Appendix C-1

FAA Forms and Required Documents

For the purpose of meeting the MAG procedures for a 14 CFR part 145 certificate, the following forms and documents are available at the following websites or embedded into the MAG, as applicable.

Table C-1.1
FAA Forms and Websites




Form Name/Number	Title/Instructions	URL
FAA Form 8310-3	Application for Repair Station Certificate and/or Rating	http://www.faa.gov/forms
FAA Form 8400-6	Preapplication Statement of Intent (PASI)	
FAA Form 8070-1	Service Difficulty Reporting (SDR) reporting system online	http://av-info.faa.gov/sdrx/Default.aspx
FAA MIP Audit Report	ANAC completes the report for initial, renewal, change/amendment, or other purposes for the 14 CFR part 145 recommendations	 FAA MIP Audit Report_Appendix C-
Repair Station Vital Information Job Aid	Vital information the repair station supplies	 Repair Station Vital Information Job Aid
FAA Special Conditions	FAA Special Conditions List	 FAA Special Conditions_Append

Table C-1.2
Summary of Forms/Documents from Applicant

INITIAL APPLICATION DOCUMENTS

Preapplication

1. FAA Form 8400-6, Preapplication Statement of Intent (PASI).
2. FAA Form 8310-3, Application for Repair Station Certificate and/or Rating. Blocks 1 through 5 completed.
3. Statement of Necessity for 14 CFR part 145 certificate.
4. Hazmat Letter.

Formal Application

1. FAA Supplement to the maintenance organization manuals, if required.
2. Completed *Repair Station Vital Information* job aid.
3. Copy of the current RBAC 145 maintenance organization certificate (Form F-900-71) and its operations specifications (Form F-900-72).
4. Copy of the Capability List (CL), as required by RBAC 145.215 (if applicable).

RENEWAL APPLICATION DOCUMENTS

1. FAA Form 8310-3, Application for Repair Station Certificate and/or Rating. Check Block 2 “other” for renewal of certificate.
2. Copy of the current RBAC 145 maintenance organization certificate (Form F-900-71) and its operations specifications (Form F-900-72).
3. Statement of Necessity for 14 CFR part 145 certificate.
4. Updated *Repair Station Vital Information* job aid.
5. Hazmat Letter.** Required if changes to name, location, ownership, or added or amended rating.
6. FAA Supplement to the maintenance organization manuals.**
7. Copy of the Capability List (CL).**

**Denotes documents to be submitted if a change has occurred since the last renewal.

CHANGE/AMENDMENT APPLICATION DOCUMENTS

1. FAA Form 8310-3, Application for Repair Station Certificate and/or Rating. (Amend the certificate, change in name, change in ownership, change in location or housing/facility, change in ratings, addition of line station, change in mailing address.)
2. Copy of the current RBAC 145 maintenance organization certificate (Form F-900-71) and its operations specifications (Form F-900-72).
3. Statement of Necessity for 14 CFR part 145 certificate.**
4. *Repair Station Vital Information* job aid.**
5. Hazmat Letter.** Required if changes to name, location, ownership, or added or amended rating.
6. FAA Supplement to the maintenance organization manuals.**
7. Copy of the Capability List (CL).**
- 8.

**Denotes documents that may require submission depending on the request.

Appendix C-2

Guidance and Instructions for the Development of the FAA Supplement

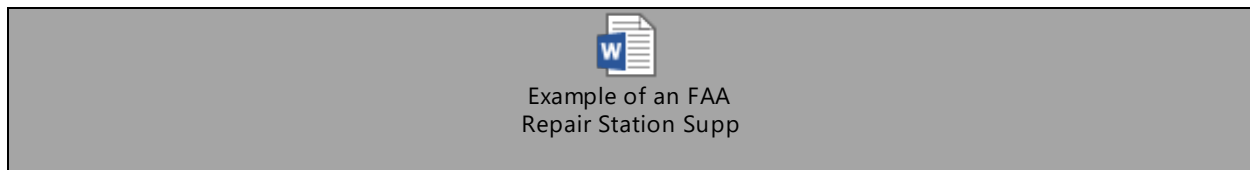
- 1.0 FAA SUPPLEMENT TO THE MOM.** For most repair station certificate applications covered under the MIP, an FAA Supplement to the MOM will be required in accordance with 14 CFR part 145, §§ 145.207 and 145.209. The FAA Supplement to the MOM must be written in a manner that explains repair station operations and must not merely contain policy statements. The procedures set forth in the FAA Supplement describe the methodology used to document and carry out policy. The FAA Supplement example in this appendix is a guide to assist in developing customized procedures for the maintenance organization.
- 1.1** Written procedures should explain, as applicable:
- a. What must be done?
 - b. Who must do it?
 - c. When must it be done?
 - d. Where must it be done?
 - e. How must it be done?
 - f. Which procedure(s)/form(s) are used?
- 1.2** The format of the FAA Supplement should include the contents in this appendix. Contents required under 14 CFR part 145, § 145.209 that do not apply to the type of operations must still be included in the FAA Supplement, but should be stated as such. The FAA Supplement and the MOM must be maintained in the English language.
- 1.3** To reduce redundant procedures, it is permissible to refer to the relevant section of the MOM, provided the references are clearly identified and satisfy the FAA Special Conditions and the applicable procedures established in this MAG.
- 1.4** The procedures shall include audits for the FAA Special Conditions and the applicable procedures established in this MAG.
- 1.5** The FAA Supplement must be amended as necessary to reflect current operations. Any amendment to the supplement must be conditionally approved by the ANAC prior to performing operations under the revised procedures. References incorporated in the FAA Supplement must be current.

- 1.6** The table below lists the safety attributes to be considered when developing the FAA Supplement.

Table C-2
Safety Attributes to Consider

Responsibility	A clearly identifiable, qualified, and knowledgeable person who is accountable for the quality of a process.
Authority	A clearly identifiable, qualified, and knowledgeable person who has the authority to set up and change a process.
Procedures	Documented methods to accomplish a process.
Controls	Checks and restraints designed into a process to ensure a desired result.
Process Measurements	Used to validate a process and identify problems or potential problems in order to correct them.
Interfaces	Interactions between processes that must be managed in order to ensure a desired outcome.
Safety Ownership	The measure of understanding the individual has regarding how his or her performance of safety-related duties contributes to the safety performance of the element.

2.0 EXAMPLE OF AN FAA REPAIR STATION SUPPLEMENT TO THE MOM.



Section D – Entry into Force and Termination

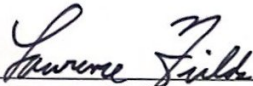
- 1.0** This Maintenance Agreement Guidance shall enter into force on the date that the MIP enters into force.
- 2.0** This Maintenance Agreement Guidance shall remain in force until terminated. Either Party may terminate this Maintenance Agreement Guidance at any time by providing sixty (60) days' notice in writing to the other Party. Termination of this Maintenance Agreement Guidance will not affect the validity of activity conducted thereunder prior to termination.

Section E - Authority

The FAA and the ANAC agree to the provisions of this Maintenance Agreement Guidance as indicated by the signature of their duly authorized representatives.

Federal Aviation Administration
Department of Transportation
United States of America

National Civil Aviation Agency
Brazil

 6/15/23

Lawrence Fields **Date**
Acting Executive Director
Flight Standards Service (AFX-1)
FAA

 6/15/23

Bruno Diniz Del Bel **Date**
Superintendent,
Head of Department of Flight Standards (SPO)
ANAC