

REVIEW OF ALTERNATIVE METHODS OF COMPLIANCE (AMOC) TO AIRWORTHINESS DIRECTIVES PROCEDURE

1. OBJECTIVE

This chapter provides the guidance for the aviation safety inspector to perform review of alternative methods of compliance (AMOC) to airworthiness directives (AD).

2. GENERAL

According to “Regulation for Aircraft Airworthiness Certification (06-01A) “Article 28”, this procedure explains how to manage requests for alternative methods of compliance (AMOC) to airworthiness directives (AD). This procedure shows how to:

- A.** Advise AMOC requesters whether an AMOC is necessary,
- B.** Identify who can approve an AMOC request,
- C.** Correctly approve or deny an AMOC request,

3. DEFINING AN AMOC

A.An AMOC is a different way, other than the one specified in an AD, to address an unsafe condition on an aircraft, aircraft engine, propeller or appliance. An AMOC must provide an acceptable level of safety.

B.In this job function, we use the term AMOC to refer to an CAA-approved alternative method of compliance or a change in compliance time.

4.WHY AN AMOC IS NECESSARY OR DESIRABLE.

A.An AMOC may be necessary or desirable for many reasons:

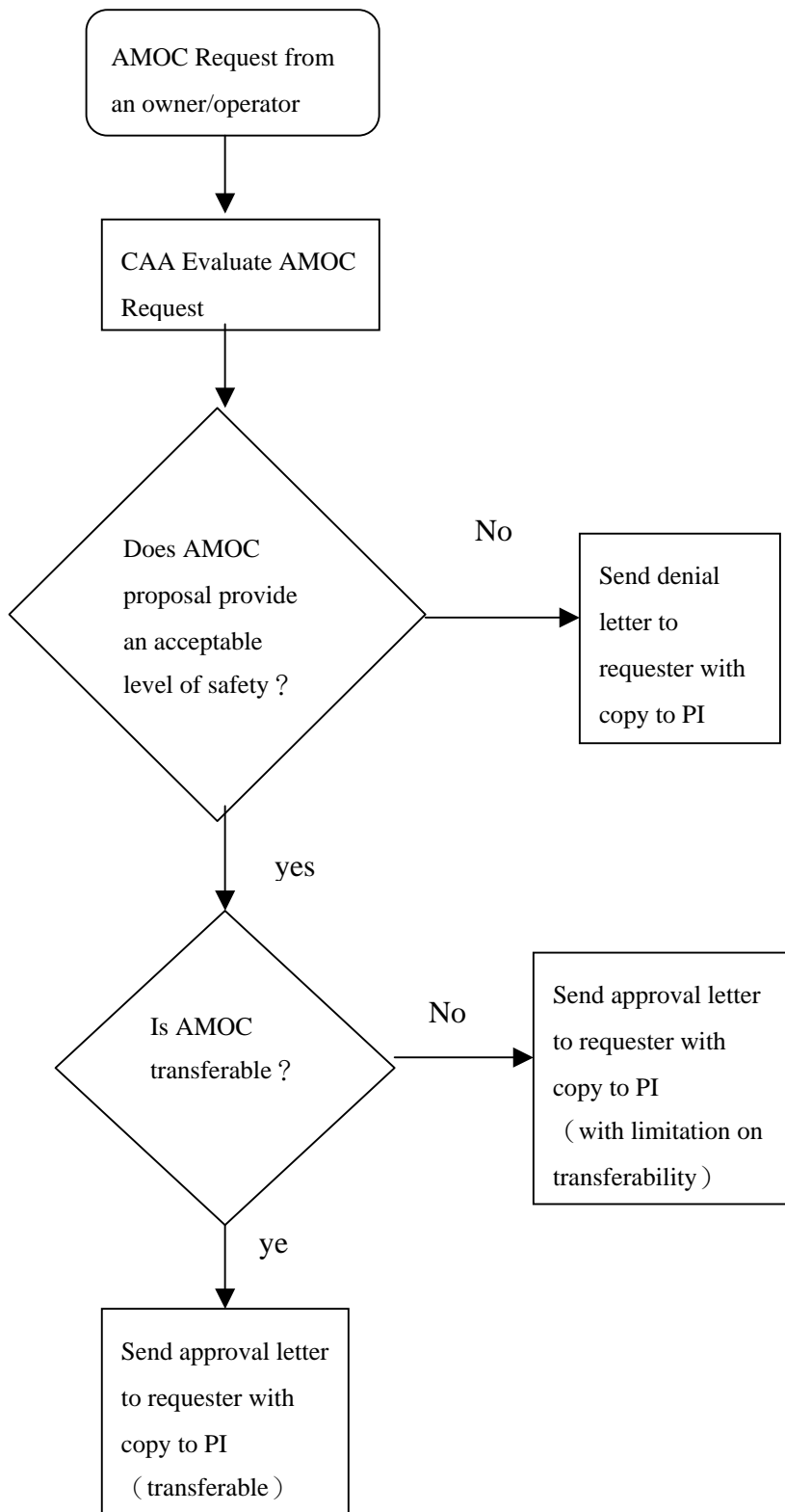
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- (1) To accomplish AD actions in a way that better suits an owner/operator's business processes.
- (2) Because existing modifications, alterations, or repairs to an aircraft make compliance with AD procedures difficult or impossible.
- (3) To use later revisions of service documents referred to in an AD.
- (4) Because if an owner/operator removed or added a part, it is now difficult or impossible for them to comply with the AD, or
- (5) Because a superseded or revised AD invalidates previous AMOCs to the original AD or AD version.

5. THE AMOC APPROVAL PROCESS.

CAA allows an owner/operator to propose an AMOC to an AD, if the proposal provides an acceptable level of safety. The AMOC approval processes see figure 1 below.

AMOC Approval Processes



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A. Pre-Application Stage

Refer to the "Certification Issuance Procedure" for the specific tasks in this phase.

B. Formal Application Stage

(1) The applicant/requester should apply the application to the CAA.

(2) As authorized in the AD, the requester should submit a letter proposing an

AMOC, including the following information:

- (a) Their name and complete mailing address,
- (b) The affected aircraft, aircraft engine, propeller, or appliance. The model designation, and serial number,
- (c) The AD number and specific AD paragraph(s) to which the proposal applies, and
- (d) A complete and detailed description of the AMOC proposal, including (where applicable):
 - Part names,
 - Part numbers,
 - Part serial numbers,
 - A damage description,
 - Existing or affected modifications,
 - Existing or affected alterations,
 - Existing or affected repairs,
 - Inspections due (including inspection intervals),
 - Pictures and drawings, and
 - Any other necessary details.
- (e) If the requester wants to change their airplane/rotorcraft flight manual, instruct them to submit the affected sections of the manual and the proposed changes.
- (f) Substantiating data showing why we should decide that the proposed AMOC corrects the unsafe condition with an acceptable level of safety. Some examples of substantiating data are:
 1. Data proving that a different inspection method will produce the same results as the inspection method in the AD.

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2. Analysis showing that a previously modified, altered, or repaired structure
in the area addressed by the AD redirects the load paths to eliminate the potential for cracking identified in the AD.
3. AMOC approval document approved by the civil aviation authority of the State of Design of the aircraft.

C. Document Compliance Stage

- (1) The CAA assigns an aviation safety inspector to evaluate the AMOC request.
- (2) The aviation safety inspector should ensure that the proposal provides an acceptable level of safety. When reviewing an AMOC proposal, the aviation safety inspector should consult with the requester's PI as well as other inspectors for help evaluating any unique fleet or operational characteristics.
- (3) Determining Whether AMOCs Should Transfer.

If the AMOC proposal provides an acceptable level of safety, and we are inclined to approve it, the engineer should next determine if the AMOC is transferable. A transferable AMOC is not strictly tied to the requester/holder. It follows an aircraft, aircraft engine, propeller or appliance to any new owners. The holder of a transferable AMOC document can give or sell the document to someone else. Aviation safety inspector must be careful when determining transferability, and not make transferable AMOCs that are tied to:

- (a) A particular maintenance program schedule,
- (b) Procedures, facilities, or processes *unique* to the owner/operator
- (c) The particular way the aircraft is flown,
- (d) An operational practice,
- (e) The FAA allowing continued operation with unrepaired damage, such as corrosion or cracks,

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(f) Recurring inspections.

(g) Any other factors *unique* to the owner/operator.

D. Certification Stage

The on-site evaluation may be conducted when deemed necessary to identify the compliance status of the AMOC application.

E. Notification of Approval.

If approving the AMOC, the CAA must send an approval letter to the requester, plus a copy to the requester's PI. The letter to the requester must, as a minimum:

- (1) Clearly state the AD number and specific paragraph(s) of the AD to which the AMOC applies.
- (2) Specify the model designation or other limiting factor (such as serial number or part number) to which the AMOC applies. Avoid open-ended AMOCs whenever possible. They should not apply to future or not-yet-manufactured aircraft, aircraft engines, propellers, or appliances.
- (3) Refer to the substantiating data offered as the basis for approving the AMOC.
- (4) Identify any restrictions on the AMOC, such as applicability, serial numbers, special procedures, facilities, processes, or time limitations.
- (5) State if the AMOC is transferable.

E. Denying an AMOC.

If the proposal does not provide an acceptable level of safety, then the CAA must send a denial letter to the requester, plus a copy to the requester's PI.

6. REFERENCES.

- (1) FAA Order 8110.103 - Alternative Methods of Compliance (AMOC)

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(2) CAA's Regulations For Aircraft Airworthiness Certification and Maintenance Management (06-01A)

(3) CAA's Procedure No.8, ISSUANCE PROCEDURE OF AIRWORTHINESS DIRECTIVES