

RA 3104 – Air Traffic Management Equipment Approved Organization Scheme – Maintenance Records

Rationale

► *Air Traffic Management (ATM) Equipment Approved Organization Scheme (AAOS) organizations that support the UK MOD to install and / or provide ATM Equipment, and / or provide technical services that support ATM Equipment, are required to ensure they record and retain an Audit trail of Maintenance activities. Without these processes, there is a Risk that the performance and serviceability of ATM Equipment cannot be accurately established or traced, which may result in unsafe operating conditions. This Regulatory Article is intended to ensure adequate governance of Maintenance procedures, which will safeguard the serviceability and performance of ATM Equipment and provide an aid to engineering investigations.* ◀

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Regulation 3104(1)

Recording of Maintenance Work

3104(1) The ► **AAOS** ◀ organization **shall** record details of all Maintenance work carried out.

Acceptable Means of Compliance 3104(1)

Recording of Maintenance Work

1. Records **should** contain basic details of all serialized components installed to ensure traceability.
2. Maintenance records pertinent to the equipment or services **should** refer to the revision status of the documentation used.
3. ► **All Maintenance activity should be signed and dated, either physically or electronically.** ◀
 - a. ► ◀
 - b. ► ◀

Guidance Material 3104(1)

Recording of Maintenance Work

4. Properly executed and retained records provide information essential in controlling unscheduled and scheduled Maintenance and troubleshooting to eliminate the need for re-inspection and rework. The prime objective is to have secure and easily retrievable records with comprehensive and legible contents.
5. ► **Electronic and hand-written signatures will be considered as legally equivalent.** ◀

Regulation 3104(2)

Retention of Maintenance Records

- 3104(2) The ► **AAOS** ◀ organization **shall** retain ► ◀ Maintenance records. ► ◀
- a. ► ◀
 - b. ► ◀
 - c. ► ◀

**Acceptable
Means of
Compliance
3104(2)**

Retention of Maintenance Records

6. ▶◀
7. ▶ Maintenance records **should** be categorized and retained as follows: ◀
 - a. **Category A.** Documents that contain information that is required to maintain an Audit trail of key events that could affect the ▶ performance ◀ of the equipment through its life. The documents **should** be retained for the life of the equipment in MOD service plus 5 years.
 - b. **Category B.** Documents that contain information that is required to maintain an Audit trail of key events for the period that the documented work could affect the ▶ performance ◀ of the equipment. The document **should** be retained until the work it records has been ▶ superseded ◀ by documented work subsequently carried out.
 - c. **Category C.** These documents contain no ▶ performance related ◀ information required to maintain an Audit trail, but may be required for later reference. These documents **should** be retained for a minimum of 12 months and then at the discretion of the ▶ designated MOD authority. ◀
 - d. **Category D.** Retain at the discretion of the designated MOD authority.
8. ▶ The method used to record Maintenance work **should** ensure that the record will be stored safely, securely and be accessible throughout the required retention period.
9. If any Maintenance records are lost, destroyed or otherwise incomplete or unavailable, the designated MOD authority **should** be informed.
10. When an AAOS organization terminates its operation, all retained Maintenance records **should** be returned to the MOD. ◀

**Guidance
Material
3104(2)**

Retention of Maintenance Records

11. ▶◀
12. Reconstruction of lost or destroyed records can be ▶ completed ◀ by reference to other records which reflect the time in service, research of records maintained by Repair facilities and reference to records maintained by individual technicians (eg training records), etc. ▶ Once finished ◀ and the record is still incomplete, the ▶ AAOS organization ◀ may make a statement in the new record describing the loss and establishing ▶ a ◀ best estimate of the time in service.
13. ▶ MAM-P¹ and MAM-D² contain guidance that may be applicable to the retention of Maintenance records. ◀

¹ ▶ Refer to the Manual of Maintenance Airworthiness – Process (MAM-P).

² Refer to the Manual of Maintenance Airworthiness – Documentation (MAM-D). ◀