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Federal Department of the Environment, Transport,
Energy and Communications DETEC

Federal Office of Civil Aviation FOCA
Safety Division - Aircraft
Technical Organisations Zurich

CH-3003 Bern

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POST CH AG

by e-mail

Part 145 Maintenance Organisations
Aircraft Rated

Accountable Manager
Compliance Monitoring Manager

File: BAZL-323.00-1/9
Your reference: CH.145.0xxx
Zurich-Airport, 6 February 2023

Line maintenance, release to service privileges of B1 and B2 certifying staff

Dear Sir or Madam

It came to our attention, that line maintenance is often released to service by a B1 certifying staff only, while not holding the privileges of a B2 certifying staff.

With this letter we would like to draw your attention to the fact, that if in addition to the B1 tasks released to service by a B1 certifying staff, an additional release to service must be issued by a B2 certifying staff for the tasks falling under the privilege of a B2 certifying staff and not covered by the privileges of the B1 certifying staff.

As per article 66.A.20(a)(2) and (3) of commission regulation EU No 1321/2014, the following applies:

- (a) The following privileges shall apply:
2. A category B1 aircraft maintenance licence shall permit the holder to issue certificates of release to service and to act as B1 support staff following:
 - maintenance performed on aircraft structure, powerplant and mechanical and electrical systems,
 - work on avionic systems requiring only simple tests to prove their serviceability and not requiring troubleshooting. Category B1 includes the corresponding A subcategory.
 3. A category B2 aircraft maintenance licence shall permit the holder:
 - (i) to issue certificates of release to service and to act as B2 support staff for following:
 - maintenance performed on avionic and electrical systems, and
 - electrical and avionics tasks within powerplant and mechanical systems, requiring only simple

Federal Office of Civil Aviation FOCA
Oscar Koller
3003 Bern
Location: Operation Center 1, Zurich-Airport
Tel. +41 58 466 30 53, Fax +41 58 465 80 32
Oscar.Koller@bazl.admin.ch
<https://www.bazl.admin.ch/>



tests to prove their serviceability; and ...

Per GM 66.A.20(a) Privileges, the following definitions apply:

1. ...

Avionics system means an aircraft system that transfers, processes, displays or stores analogue or digital data using data lines, data buses, coaxial cables, wireless or other data transmission medium, and includes the system's components and connectors. Examples of avionics systems include the following:

- Autoflight;
- Communication, Radar and Navigation;
- Instruments (see NOTE below);
- In Flight Entertainment Systems;
- Integrated Modular Avionics (IMA);
- On-Board Maintenance Systems;
- Information Systems;
- Fly by Wire Systems (related to ATA27 'Flight Controls');
- Fibre Optic Control Systems.

NOTE: Instruments are formally included within the privileges of the B2 and B2L with system rating 'instruments'. However, maintenance on electromechanical and pitot-static components may also be released by a B1, B3 or L licence holder.

Simple test means a test described in approved maintenance data and meeting all the following criteria:

- The serviceability of the system can be verified using aircraft controls, switches, Built-in Test Equipment (BITE), Central Maintenance Computer (CMC) or external test equipment not involving special training.
- The outcome of the test is a unique go – no go indication or parameter, which can be a single value or a value within an interval tolerance. No interpretation of the test result or interdependence of different values is allowed.
- The test does not involve more than 10 actions as described in the approved maintenance data (not including those required to configure the aircraft prior to the test, i.e. jacking, flaps down, etc, or to return the aircraft to its initial configuration). Pushing a control, switch or button, and reading the corresponding outcome may be considered as a single step even if the maintenance data shows them separated.

Troubleshooting means the procedures and actions necessary, using approved maintenance data, in order to identify the root cause of a defect or malfunction. It may include the use of BITE or external test equipment.

For the definition of **Line Maintenance** refer to Annex (II Part 145) AMC1 145.A.10.

We therefore kindly require your organisation reviewing your internal procedures and practices and to amend as necessary these procedures to cover the intent of the aforementioned. This shall include any CAMO/operators interface procedures in particular those dealing with the release to service endorsed in the technical log system as applicable. In addition and as necessary, provide training/instruction to your B1 and B2 certifying staff in order to remind them of their release to service privileges and limitations. Please also refer to point 5 of the attached EASA policy document.

During the upcoming continuous surveillance audit(s), the FOCA will focus on the subject matter; however, should you require further clarification on the subject discussed, do not hesitate contacting your assigned FOCA inspector.

Thank you for your comprehension and cooperation in this matter.

Kind regards

Federal Office of Civil Aviation

Ulrich Jucker
Deputy Head of Section Technical
Organisations Zurich Section

Andreas Boss
Head of Technical Organisations Bern
Section

Enclosure(s):
– As mentioned