



**Jordan Civil Aviation Regulatory Commission**

**Guidance and Administrative Material 18-2512**

**Initial and Continued Validity of Foreign Maintenance Organization Acceptance**

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## Abbreviations

<b>CARC</b>	Civil Aviation Regulatory Commission
<b>CEO</b>	Chief Executive Officer
<b>JCAR</b>	Jordan Civil Aviation Regulations
<b>AWSD</b>	Airworthiness Standards Department
<b>ICAO</b>	International Civil Aviation Organization
<b>CAA</b>	Civil Aviation Authority
<b>ICT</b>	Information and Communication Technology
<b>CSDP</b>	Confidentiality, Security and Data Protection
<b>RSM</b>	Repair Station Manual
<b>HF</b>	Human Factor
<b>MOE</b>	Maintenance Organization Exposition
<b>NAA</b>	National Aviation Authority
<b>SMS</b>	Safety Management System



## 1. Introduction

To meet the intent of the ICAO Annex 6 Part 1 Chapter 8 Standard, some States have regulations to issue organizations approvals (Approved Maintenance Organizations (AMOs) or organizations performing maintenance under an accepted equivalent system) with or without an expiry date, but with requirements to maintain the continued validity of the approval.

Part 145 sets out matters relating to Part 145 Approved Maintenance Organizations (AMOs) including the requirements for approval under Part 145 and is supported by an Acceptable Means of Compliance (AMC)/Guidance Material (GM) document that provides guidance to Part 145 AMOs and prospective applicants. The Part 145 specifies the requirements that need to be met by an organization in order to gain an AMO Approval Certificate.

According to Part 145. 1 (I) (c ) and (d) any maintenance organization having their principal place of business in Jordan or in a foreign country may not conduct any maintenance activity on any civil aircraft or components of a civil aircraft under CARC safety oversight unless it is approved or accepted by CARC.

One such requirement required by AWS 24 is to conduct on-site surveillance to confirm that the organizations remain in compliance with the requirements and Standards. Due to travel restrictions and physical distancing requirements associated with COVID – 19 crisis, CAAs in many States are unable to perform on-site surveillance activities to ensure that organization approvals continue to remain valid.

### References:

1. JCAR Part 145.
2. Airworthiness Manual (Doc 9760)
3. Annex 19 (Safety Management)
4. ICAO Handbook for CAAs on the Management of Aviation Safety Risks related to COVID-19 (Doc 10144)
5. Safety management manual (9859)
6. Safety Oversight Manual (Doc 9734) Part A
7. AWS 05“Remote and Desktop Surveillance Activities”

## 2. Purpose

The purpose of developing this guidance procedure is initiate the acceptance process and to allow for the continuation of the validity of AMOs or organizations performing maintenance under an accepted equivalent system approval, where the continuation of the validity relies on the on-site surveillance activities required by CARC.

## 3. Distribution

This guidance procedure should be published on CARC official website. The holders of this guidance procedure are CARC airworthiness standards inspectors.

## 4. Amendments

This guidance procedure will be reviewed each time there is a regulation change and/ or CARC order(s) that affects it and as long as it is considered necessary by CARC.

Any amendment to this guidance procedure will go through CARC’s document control procedure; the amendment should be approved by the Chief Commissioner/CEO and becomes effective only after incorporation to this procedure and publishing it on CARC official website. Entry into force



and application of this Guidance Procedure shall enter into force on the twentieth day following that of its publication in CARC Official Website.

## 5. Applicability/Pre- requisites

This guidance applies to AMOs or organizations performing maintenance under an accepted equivalent system when:

- CARC has determined that the organization has a satisfactory regulatory compliance history; and
- continuation of approval of such organizations relies on the on-site surveillance activities required to be completed during COVID-19 period, by the CAAs issuing the approval; and
- CARC is unable to perform on-site surveillance activities due to COVID-19 crisis.

## 6. Operational context

- Maintenance organizations holding a valid acceptance and all the requirements for the continuation of the acceptance of the organization(s) have been met, except for CARC on-site surveillance.
- Management of the change to re-establish normal surveillance activities in an orderly way post COVID-19 contingencies need to be considered.
- The remote audit is limited to a period needed to continue operation and should be revoked once compliance with the standard can be achieved through normal surveillance activities.
- Using a risk-based approach, including the risk profile of organizations to determine which organizations are of greater risk or concerns and prioritize the resources and surveillance required for such organizations should be considered. In determining the risk profile of an organization, CARC is considering the following:
  - the organizations current levels of risk given the changing landscape of aviation operations.
  - changes in activity and/or capability during the COVID-19 crisis period.
  - the robustness of the organizations quality system.

## 7. Possible Mitigations and/ or solutions

In order to maintain an equivalent level of safety and to ensure that appropriate oversight is maintained in light of the rapidly changing conditions imposed by COVID-19, the following mitigations may be considered as illustrated by guidance procedure AWS 05:

- Desktop audits to assess the effectiveness of the procedures contained in the approved Maintenance Organization Exposition (MOE) and to ensure the availability of adequate systems for the planning, controlling and performance of maintenance.

Other systems/tools to remotely review documentation (e.g. maintenance and personnel training records, maintenance certifications, etc.) and address issues, which require interaction between the organization and CARC.

- Other interactive means such as remote interviews and inspections to assess the adequacy of the facilities, equipment, tools and materials, etc.
- Giving credit and/or recognize the surveillance activity performed by the State where the organization is based, which benefits from proximity and easier access to the organization; or
- delegating the on-site surveillance activity to the State the organization is based in.



## 8. Audit Planning

Audit planning will, at least in the first audits, take longer for the following reasons:

- to assess and document feasibility and risks with the auditee;
- to determine the different ICT used and how they will be used,
- to define the agenda that may need to accommodate dispositions different from an on-site audit (e.g. better definition of tasks by different team members to ensure auditors audit separately and make best use of time, more detailed definition of themes to be handled in different time slots which will require a better and previous understanding of the processes of the organization, etc.);
- to allow the organization to identify the people to be audited and ensure their availability at defined time;
- to preview a test on the use of ICT before the audit to confirm that there is a stable connection and people know how to use the technology.

The conclusions, after analyzing risks and opportunities, provide the basis for defining what processes to be audited under what ICT.

The auditor should confirm with the organization the feasibility of the remote audit method proposed at the program, based on the required ICT and his knowledge of the organization.

This includes the verification that the people involved will know how to use the tool. The auditor reviews the risk and opportunities determined in light of this specific audit and its objectives and may propose changes to the determined use of ICT. In case a high-risk situation is detected the audit should be on-site. All other potential situations should be addressed by appropriate measures to be reflected as needed in the audit plan. Despite using remote auditing methods, the confidence that the desired audit objectives will be reached must be kept.

The plan should clearly identify what, when and how the audit will be conducted.

## 9. Desktop/ Remote Audit Checklists

### 9.1 General

New information and communication technologies (ICT) have made remote auditing more feasible. As access to ICT has increased, remote auditing has become more commonly used.

This allows the auditor to communicate with people globally, accessing a wide range of information and data.

These techniques transform the way we work. These ICT open the opportunity to audit sites and people remotely, shortening distances, travel time and costs, reducing the environmental impact associated with audit travel, adapting audits to different organizational models. ICT can help to increase the size or quality of sampling in the audit process, when prepared, validated and used properly.

Audit checklist(s) have been developed that reflect the standards to be applied in the area being reviewed as required by AWS 05.

### 9.2 Requirements

To prepare for the use of ICT, all certification legal and customer requirements related to confidentiality, security and data protection should be identified and actions taken to ensure their effective implementation. This implies that both the auditor and the auditee agree with the use of ICT and with the measures taken to fulfil these requirements.

Evidence of agreements related to CSDP should be available. This evidence could be records, agreed procedures, or emails. The importance resides in having these CSDP criteria acknowledged by all participants.

Measures to ensure confidentiality and security should be confirmed during the opening meeting.

### 9.3 Use of Checklists

- (1) The auditor shall:
- (a) Once started, ask the host to explain how the system works;
  - (b) ascertain how personnel work with the system;
  - (c) evaluate the below information against the manual or standard and determine whether it meets the requirements;
  - (d) record examples of numbers, procedures, documents, drawings, and measuring and testing equipment in each area; and
  - (e) use the checklist to ensure that all aspects of the standards have been met.
- (2) The auditor shall not gain access to files or other company documents without the appropriate authorization.

### 9.4 Audit Conclusion

Audit report should clearly state the extent of use of ICT as well as the effectiveness of its use in achieving audit objectives. The report should indicate those processes that could not be audited and should have been audited on-site. This information is important for the decision process and subsequent audits.



## 10. Airworthiness Evaluation Checklist for the Acceptance of Foreign Maintenance Organizations under Desktop and Remote Audit concept(CARC Form 18-0357)

**Note:** In assessing an application for a Part 145 Acceptance certificate, CARC must have regard to, and be satisfied of, the following matters mentioned in Part 145 of JCARs:

- the exposition complies with the requirements specified in the Part 145 and Part M as applicable;
- the AMO's facilities, equipment, materials, maintenance data and tools are suitable for providing their proposed maintenance services, specialist maintenance and required training and comply with the Part 145 requirements;
- the applicant has nominated responsible managers who are appropriately qualified to hold the positions, quality manager and safety manager who are appropriately qualified to hold the positions in lieu with AWS 34.
- the applicant has demonstrated that the quality management system audit requirements will be carried out by someone other than the accountable manager or the responsible managers.
- the applicant is able to provide its proposed maintenance services, specialist maintenance and required training in accordance with its exposition and the requirements of Part 145.

		Remote Audit Check List			
Name of Organization:			Location:		
CARC Acceptance No:		Result			Remarks
	Item	SAT	UNSAT	N/A	
<b>A</b>	<b>Pre-audit</b>				
1	Review completed filled CARC applications Forms 18-0148 (FAMO) and 18-280( Jordanian customer).				
2	Review signed contract as per Part M provisions.				
3	Review approval certificate and organization's scope of activities.				
4	Review NAA / EASA audit reports (within the last 2 years including ) files for outstanding action items, history and correspondence.				
5	Review List of CS , SS and NDT for aircraft /component scope requested including manpower resources.				
6	Review the EASA MOE , FAA RSM or NAA exposition as applicable including the Capability List.				
7	Review evidence of compliance with regulatory, company training requirements and continuation training attendance listings iaw 145.30 (e) and 145.35 (e) requirements.				
8	Review self-audit showing compliance with Part 145 and Part M as applicable followed with statement signed by Part 145 Quality Assurance Manager.				
9	Review status of concessions granted during COVID-19 crisis attached with risk assessment.				
10	Review acceptance senior persons Forms and assessment against AWS 34.				
11	Potential use of video call “synchronous” for conducting interviews, guided site tours, documentary review with auditee participation.				

		Remote Audit Check List			
Name of Organization:			Location:		
CARC Acceptance No:		Result			Remarks
	Item	SAT	UNSAT	N/A	
<b>B</b>	<b>Off-site remote audit</b>				
1	Does the management's commitment to safety and quality formally expressed in a statement of the organization's safety policy?				
2	Does the management organizational chart show a clear structure of the personnel within the organization taking into consideration the scope of the personnel detailed in the exposition?				
3	Does the organizational chart show the Quality Manager and Safety Manager reporting directly to the Accountable Manager for all quality management and safety management related matters?				
4	Does the AMO have procedures for assessing and monitoring staffing requirements for line and/or base maintenance tasks including requirements for Certifying staff in lieu with AWS 37 and AWS 38?				
5	Does the organization have a clear description of its line maintenance and base maintenance capabilities at each location at which the AMO intends to provide maintenance services?				
6	Does the organization consider workplace health and safety aspects of facilities – for example, ventilation, working at heights, confined spaces, personal protective equipment, emergency showers, emergency eye baths, safety signage, evacuation plans, fire safety etc.?				
7	Does the organization identify a requirement for specific environmental conditions for the conduct of maintenance and demonstrate how they manage the environmental conditions within facilities, such as: - procedure for assessing when working environment deteriorates to unacceptable level-segregation of working spaces - specialist equipment				

	management - security access management procedures?				
8	Does the organization describe any special facilities for storage, such as: - segregation from unserviceable parts, equipment and tools - customer owned components - manufacturer's compliance requirements - security - ventilation - building maintenance - cleanliness protocols - materials - chemical storage - special signage - special storage and handling provisions required - dangerous goods?				
9	If tools are borrowed or leased, does the AMO have a Memorandum of Understanding or contract in place?				
10	Is the AMO's approved scope of maintenance defined by the Approval Certificate and the exposition approved by NAA match?				
11	Does the organization demonstrate how it ensures its capability is sufficient for the scope of work?				
12	Do the AMO procedures identify specific fabrication and/or repair of aeronautical products or repairs carried out on aircraft/systems?				
13	Does the exposition include NDT activities or special processes that are carried out internally and not necessarily included on the Approval Certificate?				
14	How the organization ensures employees have access to the part of the exposition relevant to their duties?				
15	Does the AMO have in place a procedure where changes are communicated to employees if changes are made that may affect their duties?				
16	Does the organization have information of value in determining if the applicant has provided sufficient evidence of compliance with the requirements for supplier evaluation and subcontract control procedure, commensurate with the size of the organization and the scope of work?				
17	Does the AMO have procedures to ensure subcontracted organizations are trained in the AMO's procedures (if required) and standards the subcontractor is required to meet?				



18	How the AMO inspects received aeronautical products to ensure they are acceptable and meet the requirements?				
19	Does the AMO have procedural inspection criteria?				
20	Does the AMO have a quarantine procedure for handling incoming supplies that do not satisfy the criteria for acceptance?				
21	Does the AMO clearly state control processes for identifying and dealing with suspect unapproved parts?				
22	Are storage facilities deemed suitable?				
23	Is there a documented procedure for the control of serviceable, unserviceable and suspect unapproved parts / components e.g. inspection /acceptance documentation / labelling / tagging/issue and return/disposal process etc.?				
24	Is there a control register for tools and equipment where maintenance data specifies these tools and equipment are necessary to measure specified values and dimensions such as torque figures etc. and require controlling in terms of servicing or calibration? Information on the accuracy and the standards used to verify the accuracy of the equipment should be kept?				
25	Is there a process/procedure for accepted alternative tooling and equipment to ensure performance is monitored and is satisfactory?				
26	Does the AMO exposition include or reference procedures for the calibration and testing of equipment and tools (such as any precision tools, gauges, scales, pressure gauges, torque wrenches, ammeters, ohmmeters, voltmeters and other electronic equipment etc.)?				
27	Does the AMO maintain a control register for all precision tooling and equipment together with a record of calibrations and standards used?				
28	Does the AMO have a system of tagging tools - loan tags, calibration tags, U/S tags etc.?				
29	Is there a procedure for lost tools?				
30	Are aircraft hangar and component workshop floors sealed to minimize dust generation?				



31	Do the AMO facilities provide protection from the weather elements to prevent the ingress of rain, hail, ice, snow, wind and dust etc. Aircraft hangars, component workshops and storage facility floors should be sealed to minimize dust generation?				
32	Does the AMO hold current maintenance data for the entire duration of the approved activities which are applicable to any specific aircraft, aeronautical product or process listed on the AMO's approval certificate?				
33	Do the AMO procedures specify the source, subscription, method(s) of access and how the AMO confirms the maintenance data is current to the class of aircraft or products being maintained?				
34	Does the AMO ensure all applicable maintenance data it uses is current for the latest revision when performing any maintenance activities?				
35	Does the AMO have a procedure in its exposition to ensure that the Instructions for Continuing Airworthiness that it controls are kept up-to-date?				
36	Do work orders specify the amendment status of the Instructions for Continuing Airworthiness to be used for that work?				
37	Does the AMO have appropriate, facilities, tooling, equipment, materials, data, records, personnel, training etc. to ensure the repair processes comply with the approved maintenance requirements?				
38	Do the handover procedures refer to the use of handover logs/continuation worksheets etc. to detail work completed and work to be performed?				
39	Does the AMO quality system have an audit process/checklist to ensure AMO compliance?				
40	Does the AMO have procedures for recording extensive or complex maintenance tasks which have the provision for separate entries and certifications as required including duplicate certifications when working on designated critical tasks?				



41	On completion of a Maintenance Check, are all work 'signed for' by the individual(s) carrying out the task and then verified and certified by appropriately authorized individual(s)?				
42	Do the AMO procedures consider technical records control for unscheduled maintenance tasks which are out of phase from any programmed maintenance check input?				
43	Does the AMO keep a copy of records in relation to the transfer, return, leasing or sale of an aircraft or aeronautical product involving the operator/customer?				
44	If the generated work order is not performed when required, is there a function for transfer/deferral as required? If a transfer/deferral occurs, is there a function to check the history of the event to review why the deferral occurred in the first instance and who completed the deferral?				
45	Does the AMO make clear what categories of deferral are acceptable?				
46	Does the AMO have a Deferred Items Register/record that forms part of the work pack?				
47	Are independent inspection items identified in accordance with prescribed procedures?				
48	Does the AMO have procedures which address control of subcontract works for the rectification of specific defects? For example, composite repair to a panel?				
49	Does the AMO state within its exposition the requirements of when a maintenance certification or CRS is issued? For example, before flight on the completion of any scheduled maintenance or defect certification. This applies when the work is carried out on base maintenance or line station.				
50	Who within the AMO is appropriately authorized on behalf of the AMO to complete maintenance certifications ?				
51	Are the certifications issued in accordance with the AMO procedures? As referred to by the AMO exposition and with availability and use of current maintenance data.				



52	Does each CRS issued by the AMO contain the details of the maintenance carried out, including the date such maintenance was completed and the identity of the authorized certifying individual(s)?				
53	Does the AMO ensure that, before its issue of certification authorizations to appropriately licensed individuals, the individual is competent with the process and procedures for completing operator documentation?				
54	Does the AMO have procedures requiring it to make and retain a copy of the records provided to the customer/operator?				
55	Does the AMO, as per a contractual agreement, provide the operator with a copy of all maintenance records as required to satisfy its maintenance responsibilities? Does this include a copy of the CRS for inclusion in the operator's records and in the Technical Log?				
56	Does the AMO reporting system enable the appropriate collection and evaluation of occurrence and defect reports including the assessment and extraction of those occurrences to be reported to CARC/operator/manufacture, as appropriate?				
57	Does the AMO identify a specific department responsible for control of the occurrence and defect reporting?				
58	Does the AMO receive aeronautical products from outside contractors? If yes, does the AMO have procedures for dealing with defective aeronautical products?				
59	Does the AMO utilize aeronautical product on a loan agreement? If yes, does the AMO have procedures to manage the loan process for the receipt and return of loaned items? If loaned aeronautical products are dispatched to another operator, are they accompanied by the original (or copy) paperwork?				
60	Does the organization have information of value in determining if the AMO has provided sufficient evidence of compliance with the requirements for the control of computer maintenance records system, commensurate with the size of the organization and the scope of work.				



61	Does the AMO specify the details of the system used for computer maintenance records?				
62	If maintenance certifications and CRS's are approved to be issued electronically, is there appropriate security of the system and backups?				
63	Does the AMO's exposition include the following information: company planning versus time available procedure; how the AMO takes into account the complexity of work and organization of shifts plus account of human performance limitations?				
64	Does the organization have Critical Control Systems by ensuring that verification of all critical control system tasks is completed by an independent individual?				
65	Does the AMO exposition include procedures that encourage maintenance personnel to identify tasks as potentially critical before an error occurs, thereby reducing the risk of maintenance errors?				
66	Do the AMO procedures take into consideration the utilization of its customer/operator procedures which are specific to their designated critical tasks?				
67	Do the AMO procedures include or reference the AMO's specific Maintenance Procedures, such as: <ul style="list-style-type: none"> <li>• NDT</li> <li>• Engine running</li> <li>• Aircraft pressure runs</li> <li>• Aircraft towing</li> <li>• Aircraft taxiing</li> <li>• Handling and control of waste materials</li> <li>• Scrapping of parts</li> <li>• Working away from main base/ workshop</li> </ul>				
68	Does the AMO have a reporting system which focuses on the detection and rectifying of maintenance errors that could result in a failure, malfunction, or defect endangering the safe operation of an aircraft if not performed properly?				
69	Are human factors and the normal limitations of human performance pro-actively considered during design or acceptance of maintenance process, procedures and documentation? This may				



	include design and readability of: - Task cards and work instructions - Procedures Manuals - SMS procedures and documentation				
70	Does the AMO have a production planning system that takes into account human performance limitations when planning maintenance, to ensure that the tasks may be carried out without undue haste and within the normal limits of human performance.?				
71	Do these procedures consider and allow for last minute (ad hoc) situations where the customer operator requests additional maintenance tasks?				
72	Does the AMO detail within its procedures for Line Maintenance, appropriate information for inspection of condition and acceptance for aeronautical products and specify the required documentation?				
73	Is there a system for control of shelf life materials and products?				
74	Are there adequate storage areas for the segregation and quarantining of products, as required ?				
75	Does the AMO's exposition also include a written SMS compliant with the requirements of paragraphs 145.65?				
76	Does the AMO have a procedure for conducting audits and a Quality Audit Program, Plan or Schedule that ensures all aspects of compliance with Part 145 are checked every 12 months?				
77	Does the exposition have a statement committing the organization to ensuring quality of the product it produces?				
78	Does the organization have independent auditors identified?				
79	Are there Audit checklists contained within the documented procedures?				
80	Does the organization have a documented audit procedure for conducting audits of aeronautical product suppliers and subcontractors?				
81	Does the exposition detail instructions or make reference to instructions that require the Quality Manager/Auditor to ensure that any remedial action taken is adequate?				



82	If appropriate actions cannot be taken, is it documented that the matter(s) should be brought to the attention of the Accountable Manager?				
83	Does the AMO have a procedure in their exposition that details how the AMO assesses all certifying employees for their competence, qualifications and capability to carry out their intended certifying duties ?				
84	If the AMO arranges for Manufacturer's and Other Maintenance Working Teams, not approved under Part 145 to provide the services for which the AMO is approved, Does the AMO maintain control of those services under their QMS, including conducting pre-contract audits, sample service audits and using a corrective action follow-up plan?				
85	How the AMO ensures that all employees have up-to-date knowledge of HF as it applies to their roles in the organization?				
86	Has the AMO developed and documented the content of its HF training program to meet the training needs of personnel performing the different functions within the organization using knowledgeable personnel and appropriate guidance material?				
87	Does the AMO have a documented policy requirement for HF continuation training as stated in 145.35 and a process to identify when employees requiring it are due?				
88	Is the HF continuation training of an appropriate duration in each two year period to cover all of the required content in relation to relevant quality and safety audit findings and other internal/external sources of information available to the organization on human errors in maintenance.?				
89	Does the AMO have a documented Safety management systems in place and implemented?				



		<b>Remote Audit Check List</b>		
<b>Name of Organization:</b>			<b>Location:</b>	
<b>CARC Acceptance No:</b>		<b>Result</b>		<b>Remarks</b>
	<b>Item</b>	<b>SAT</b>	<b>UNSAT</b>	
<b>C</b>	<b>Certification</b>			
1	Check applicable fees are paid?			(Invoice No)
2	Check CARC Form 18-0268 is filled and completed?			
3	Check closure of audit / outstanding finding.			(Audit Report AWS No)
4	Check acceptance certificate and organization's scope of approval accuracy?			
5	Check MOE supplement acceptance?			
<b>Assigned Inspector(s)</b>		<b>Signature</b>		<b>Date:</b>
<b>Chief Division</b>				
<b>Director Airworthiness Standards</b>				

