

APPENDIX A**EASA Supplement**

To The

OTTO Quality/Repair Station Manual

OTTO

2 East Main Street
Carpentersville, IL 60110

FAA REPAIR STATION NO.: OGYR627Y

This supplement does not form part of the FAA FAR-145 Repair Station Manual.

Compliance with this EASA Supplement combined with the ongoing FAA FAR-145 Repair Station Manual forms the basis for OTTO's European Aviation Safety Agency (EASA) Part-145 approval. The enclosed material outlines OTTO's obligations for EASA Part-145 approval as specified in the EASA MAG guidance.

List of Effective Pages:

OTTO's QRSM will always be revised in entirety. See Section 5 of the OTTO Quality/Repair Station Manual. OTTO will comply, and if required, revise our OTTO Quality/Repair Station Manual within ninety (90) calendar days of the applicable MAG notification.

Amendment Procedure:

See Section 5 (Document Control) for policies and procedures governing changes/amendments to this supplement and/or the Quality/Repair Station Manual. Within section 5, responsibilities for coordination and notification to the FAA (along with EASA if applicable) are outlined. OTTO understands that omissions to the above may result in the revocation of FAA and/or EASA approval.

Introduction:

Since 2000, OTTO has become the major source for the supply of various flight grips deployed throughout the world. Many of our OEMs have required that OTTO also become capable of repairing the grips we manufacture. By statement of this document, OTTO understands and intends its continued conformance to FAR Part 145 and 43.

Accountable Manager's Commitment Statement:

This Supplement in conjunction with OTTO's Approved FAA FAR 145 Quality/Repair Station Manual (Document # 1QA000001) defines the organization and procedures upon which the condition of the EASA approval is based. By my signature, the applicable procedures which govern the process for any/all work done under the conditions of the EASA Part-145 approval will be adhered to. It is also understood that the above noted procedures will not override the necessity of compliance with any additional requirements supplied by the EASA. OTTO also understands that EASA will issue an Approval Certificate and our repair station in an EASA published list whilst the EASA is satisfied that the procedures are being followed and work standards remain maintained. The fact of failure to comply with EASA requirements (or failure to perform according to FAA FAR 145 documentation) may result in revocation of certification is understood. OTTO will make sure that this statement is always signed by the current Accountable Manager to ensure continuous EASA Part-145 approval.

I fully support and approve this program.



Scott Bolanowski, Director of Quality Systems

4-1-21

Date

Approval Basis and Limitation

OTTO understands and agrees that all work will be performed in accordance with our current FAA FAR 145 Repair Station Rating of "Limited Accessory." No work will be conducted which exceeds this distinction. However, OTTO understands that if the above is deviated, solely on a case-by-case basis, approval must be obtained via the JMCB.

APPENDIX A**Access by EASA and FAA**

As stated in Section 17 (Internal Quality Audits) of the OTTO Quality/Repair Station Manual, outside audits, by any bodies (i.e. suppliers, customer, regulatory, FAA and EASA) are welcomed at any time. OTTO accepts investigation and enforcement relevant EU regulations and EASA procedures; OTTO as well, will cooperate with these actions.

Work Orders/Contracts

In accordance with OTTO's Quality/Repair Station Manual, OTTO will receive a separate contract for each repair request. Upon receipt, that contract is reviewed. And although OTTO's customer remains responsible for ultimate clarification of contract verbiage, any ambiguities are clarified with the customer prior to the commencement of the repair. Once the repairs are concluded, they will be checked against the customer repair request to ensure conformance.

Approved Design and Repair Data

OTTO is the OEM for the item being repaired. Our repair station will operate as follows:

- Product will be flagged for repair,
- Initial consult will be done to corroborate customers need for repair (see example of Repair Station Matrix in Appendix B),
- In-depth consult will be done to check for specific reasons for repair need, as well as any other undocumented (by customer) requirements for repair (see example of RMA in Appendix B),
- Once applicable AD's and SB's have been verified, a detailed repair procedure will be provided to the repair station via an OTTO W/O (see example of Router Appendix B),
- Repairs, and acceptance of repairs (with appropriate tagging), will be conducted prior to release (see example of 8130 on page VII of Appendix A, and example of an ATP in Appendix B).

Communication of the above stated repairs will be communicated through the OTTO RMA (in accordance with OTTO document 2QA000034) and W/O systems. In cases where customer approval is required prior to commencement of the repair, it shall be obtained.

For the fact that OTTO is the design approval holder, our repair data shall be deemed automatically approved. Products are not considered critical (flight safety), so resultant data shall not be sent to EASA for approval.

Airworthiness Directives

In accordance with Section 9 (Process Control) of the Quality/Repair Station Manual...only those products which are controlled via OTTO's ERP system, with the designation of "FAA" may be repaired. Controlled items will all contain revision controlled drawings, specifications, and equipment available to company personnel required for repair. Any additions to this list will be distributed to the FAA upon initiation of the change. The FAA Repair Station Capabilities list, or products which OTTO is allowed to repair, will be kept on OTTO's ERP system.

Prior to commencement of repair, OTTO understands the responsibility (specifically given to the OTTO QA department via Repair Work Order direction) to ensure the applicable AD's are current and verified. Once any/all applicable AD's are known, the Repair Work order will be amended for repair completeness. Ultimately, OTTO will provide a statement in Section 12 of the 8130-3 Tag indicating that the above action was, or was not, concluded.

Release and Acceptance of Components

OTTO understands and agrees that all work will be performed in accordance with our current FAA FAR 145 Repair Station Rating of "Limited Accessory." No work will be conducted which exceeds this distinction. OTTO is the OEM for Components. Repair components used for repair will be new, and will never use used components. Once all product deemed repairable is completed, the rules governing the issuance of an 8130-3 tag will apply (in accordance with OTTO document 3QA000042). See attached example of a proposed 8130-3 tag for EASA Part 145 use.

APPENDIX A**Release and Acceptance of Components (con't)**

Specifically for EASA Repair, the following note will be applied in Section 12:

“OTTO certifies that the work specified in Block 11/12 was carried out in accordance with EASA Part-145 and in respect to that work, the component is considered ready for release to service under EASA Part 145 Approval Number 145.6100”

If there is a conflict between the AD and the customer’s requirements, and the end result means that the AD was not accomplished, it shall be documented on the applicable 8130. All details referring to the AD, service bulletins, and/or approved data will be referenced in block 12.

8130 tags Blocks 13a-13e shall not be used.

Details to “other regulation specified” noted in Block 14a, will be provided in Block 12. OTTO also understands that the only two cases where this applies are as follows:

- Maintenance was not carried out
- Cases where particular maintenance requirement was only EASA approved, and not FAA approved.

Authorized Signature Approval of 8130-3 tags is solely enforced by OTTO’s current roster of Certified Airmen Inspectors, or those holding a valid Repairman Certificate.

Certificate of Airworthiness (C of A) Validity

Does not apply to OTTO’s Limited Accessory rating.

Release of Aircraft After Maintenance

Does not apply to OTTO’s Limited Accessory rating.

Reporting of Unairworthy Conditions

In accordance with Section 13 (Control of Non-conforming Product), the following rules will apply:

If finished goods are found to be out of specification, the Director of Quality, or delegate, will determine severity of issue and if necessary, recall Finished Goods from customer.

Defects that are determined to be unairworthy, the Director of Quality Systems, or delegate, will report such situations immediately (within 72 hours), in writing, to EASA, the aircraft/component design organization, and the customer or operator.

At a minimum, the notification will include the following:

- Aircraft Registration Number
- Type, make, and model of the article
- Date of discovery of the failure, malfunction, or defect
- Nature of the failure, malfunction, or defect
- Time since last overhaul
- Apparent cause of the failure

Above notification will take place using the following mediums:

- EASA online platform,
- Occurrence Reporting Form
- FAA Service Difficulty Report or FAA SUP report.

In addition, any unairworthy condition shall follow the rules set forth in EASA Part 145, specifically requiring the use and proper distribution of EASA Form 44.

Product dispositioned for scrap shall be conspicuously marked, or positively controlled, until physically deemed unusable.

APPENDIX A**Quality Monitoring System**

Comprehensive, planned and documented internal quality audits are carried out at least once a year. The internal quality audits verify the effectiveness of the quality system, and verifies that the quality activities comply with the established, planned arrangements. With sufficient notice, outside audits, by any bodies (i.e. suppliers, customers, regulatory) are welcomed at any time.

Audits (both process and product) are scheduled on the basis of the status and importance of the activity. Process and product audits will be required on each product line (both controls and communications) within the above stated schedule. In addition to the applicable standards, Internal Audits are designed to meet contractual and/or regulatory requirements. Audits are conducted by individuals independent of the area being audited. Management having responsibility for the audited area, shall review, agree, and correct any deficiencies highlighted by the audit within an agreed time period. This will encompass all internal departments, as well as, OTTO's FAA Repair Station. OTTO will repair only those items for which we are the OEM. Detailed procedures used for the initial build of product are to also be used for the repair orders. This process will ensure that a safe product will be delivered according to the compliance guidelines set forth in 14 CFR, Part 43, Part 45, and special EASA conditions.

Nonconforming conditions are followed up as a result of corrective action. The corrective action process will be in accordance with Section 14, Corrective Action.

Provision of Hangar Space for Aircraft Maintenance

Does not apply to OTTO's Limited Accessory rating.

Contracted Maintenance

OTTO is the OEM for the item being repaired – there will be no contracted maintenance used in the repair of any returned item.

Human Factors

The Director of Quality Systems shall be the Accountable Manager for the company's FAA Repair Station. The duties include maintaining an adequate and knowledgeable staff to plan, perform, supervise, and inspect the work being performed. The Director of Quality Systems may delegate all duties to qualified persons; however, such delegation does not relieve the Director of Quality Systems of the overall responsibility.

Although company governing policies and procedures are included within the company handbook, individual departmental managers shall also be responsible for; but not limited to:

- Ensuring that all staff is adequately qualified experienced and trained to perform their assigned tasks, which includes:
 - The monitoring of employee performance to ensure not only acceptable performance, but also includes the well-being of the employee from not being over-worked.
 - OTTO's safety culture
 - Overall company communication protocol
 - Teamwork building
 - Professionalism and integrity
- The quality of work performed by personnel within their respective departments.
 - Including Human Error.
- Initiating, implementing and maintaining work instructions for their departments.
 - Various procedures exist that allow for detection and rectification of maintenance errors which may endanger the safe operation of an aircraft. In addition, alternate procedures govern that personnel are trained to ensure an understanding of the Human Factors principles. These training sessions are recorded and maintained in the individual personnel file.

APPENDIX A

Human Factors (con't)

- Ensuring that all staff are familiar with, and have ready access to company and departmental procedures, and that the relevant procedures are effectively implemented.
- The provision and maintenance of an infrastructure required to achieve product conformity. This infrastructure includes;
 - buildings, workspaces and associated utilities (including temperature, humidity, cleanliness, lighting),
 - process equipment (both hardware and software),
 - supporting services (such as transport or communication), and
 - identification of resources to support operation and maintenance of the product.

Air Carrier Line Stations

Not Applicable.

Work Away From a Fixed Location

Not Applicable.



Quality & Repair Station Manual - Appendix A

Example of a completed FAA Form 8130-3

1. Approving Civil Aviation Authority/Country: FAA/United States		2. AUTHORIZED RELEASE CERTIFICATE FAA Form 8130-3, AIRWORTHINESS APPROVAL TAG			3. Form Tracking Number: XXXXXXXXXX	
4. Organization Name and Address: OTTO ENGINEERING INC., 2 E MAIN ST., CARPENTERSVILLE, IL 60110					5. Work Order/Contract/Invoice Number: OGYR627Y	
6. Item:	7. Description:	8. Part Number:	9. Quantity:	10. Serial Number:	11. Status/Work:	
1	XXXXXXXXXX	XX-XXXX	1	N/A	REPAIRED	
12. Remarks: AIRWORTHINESS APPROVAL-ARTICLE REFERENCE CUSTOMER REPAIR ORDER: XXXXXXXX REFERENCE CUSTOMER P/N: XXXXXXXX REFERENCE CUSTOMER SERIAL NUMBER: XXXXXXXX REPAIRED IN ACCORDANCE WITH OTTO RMA XXXXXXXX ATTACHED FULL DETAILS HELD ON OTTO WO XXXXXX INSPECTED / ACCEPTED TO OTTO ATP XXXXXXXX AS OF THIS DATE NO AD'S APPLICABLE - NOTED REPLACEMENT PARTS DO NOT HOLD PMA REPAIR DATE CODE: XXXX OTTO certifies that the work specified in block 11-12 was carried out in accordance with EASA Part-145 and in respect to that work the component is considered ready for release under EASA Part-145 approval number 145-6100.						
13a. Certifies the items identified above were manufactured in conformity to: <input type="checkbox"/> Approved design data and are in a condition for safe operation. <input type="checkbox"/> Non-approved design data specified in Block 12.			14a. <input checked="" type="checkbox"/> 14 CFR 43.9 Return to Service <input checked="" type="checkbox"/> Other regulation specified in Block 12 Certifies that unless otherwise specified in Block 12, the work identified in Block 11 and described in Block 12 was accomplished in accordance with Title 14, Code of Federal Regulations, part 43 and in respect to that work, the items are approved for return to service.			
13b. Authorized Signature:		13c. Approval/Authorization No.:	14b. Authorized Signature:		14c. Approval/Certificate No.: OGYR627Y	
13d. Name (Typed or Printed):		13e. Date (dd/mmm/yyyy):	14d. Name (Typed or Printed):		14e. Date (dd/mmm/yyyy):	
User/Installer Responsibilities						
It is important to understand that the existence of this document alone does not automatically constitute authority to install the aircraft engine/propeller/article. Where the user/installer performs work in accordance with the national regulations of an airworthiness authority different than the airworthiness authority of the country specified in Block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts aircraft engine(s)/propeller(s)/article(s) from the airworthiness authority of the country specified in Block 1. Statements in Blocks 13a and 14a do not constitute installation certification. In all cases, aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown.						

FAA Form 8130-3 (02-14)

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