

Safety Attribute Inspection (SAI) Data Collection Tool
6.2.1 Maintenance Duty Time Limitations (AW)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

- To ensure the certificate holder provides policies, instructions, and information that maintenance personnel do not exceed duty time limitations.

Objective (FAA oversight):

- To determine if the certificate holder's Maintenance Duty Time Limitations process meets all applicable requirements of Title 14 of the Code of the Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Maintenance Duty Time Limitations process incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Maintenance Duty Time Limitations process.

Specific Instructions:

- Intentionally left blank.

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

- SRRs:
 - 121.135(a)(1)
 - 121.135(b)(1)
 - 121.135(b)(2)
 - 121.135(b)(3)
 - 121.377

Related CFRs & FAA Policy/Guidance:

- Related CFRs:
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- FAA Policy/Guidance:
Intentionally Left Blank

SAI Section 1 - Procedures Attribute

Objective: Procedures, instructions, and information are documented methods for accomplishing a process. The certificate holder's policies should establish their compliance posture. Policies may be stand-alone statements, or they may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Maintenance Duty Time Limitations process.
3.	Review the certificate holder's Maintenance Duty Time Limitations process to ensure it contains the policies, procedures, instructions and information necessary for personnel to perform their duties and responsibilities with a high degree of safety.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Maintenance Duty Time Limitations process meet the specific regulatory and FAA policy requirements:	
1.1.	Does the certificate holder document instructions and information necessary to relieve each person performing maintenance or preventative maintenance within the United States for a period of at least: SRRs: 121.135(a)(1); 121.377	
1.1.1	24 consecutive hours during any seven consecutive days? SRRs: 121.377 <i>Related Design JTIs:</i> 1. Check that the certificate holder specifies how it shall relieve each person performing maintenance or preventative within the United States from duty for a period of at least 24 consecutive hours during any seven consecutive days. <i>Sources:</i> 121.377 <i>Interfaces:</i> 1.3.7(AW); 1.3.14(AW); 4.2.1(AW); 6.1.1(OP); 7.1.1(AW)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.1.2	Or the equivalent within any one calendar month? SRRs: 121.377 <i>Related Design JTIs:</i> 1. Check that the certificate holder specifies how they will surveill contract maintenance organizations within the United States to ensure that those organizations are complying with 121.377.	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<i>Interfaces: 1.3.7(AW); 1.3.11(AW); 7.1.1(AW)</i>	
1.2.	Does the certificate holder document instructions and information requiring that any person performing maintenance or preventive maintenance functions for it within the United States is relieved from duty for a period of at least: SRRs: 121.135(a)(1); 121.377	
1.2.1	24 consecutive hours during any seven consecutive days? SRRs: 121.377 <i>Related Design JTIs:</i> 1. Check that the certificate holder specifies how it shall relieve each person performing maintenance or preventative within the United States from duty for a period of at least 24 consecutive hours during any seven consecutive days. <i>Sources: 121.377</i> <i>Interfaces: 1.3.7(AW); 1.3.14(AW); 4.2.1(AW); 6.1.1(OP); 7.1.1(AW)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.2	Or the equivalent thereof within any one calendar month? SRRs: 121.377	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder's manual contain general policies for the Maintenance Duty Time Limitations process that comply with the SRRs? SRRs: 121.135(b)(1); 121.377	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)? SRRs: 121.135(b)(3)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Maintenance Duty Time Limitations process? SRRs: 121.135(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Maintenance Duty Time Limitations process? SRRs: 121.135(a)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI Section 1 - Procedures Attribute Drop-Down Menu	
1.	No procedures, policy, instructions or information specified.
2.	Procedures or instructions and information do not identify (who, what, when, where, how).
3.	Procedures, policy or instructions and information do not comply with CFR.
4.	Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5.	Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6.	Procedures, policy or instructions and information unclear or incomplete.
7.	Documentation quality (e.g., unreadable or illegible).
8.	Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.	Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.	Other.

SAI Section 2 - Controls Attribute

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the system to ensure that the most important policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

Tasks

To meet this objective, the inspector must accomplish the following tasks:

1. Review the control questions below.
2. Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Maintenance Duty Time Limitations process:	
1.1.	Is there a control or controls in place to ensure that the certificate holder relieves the mechanics from duty in accordance with their policies, instructions, and information?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Is there a control or controls in place to ensure that the certificate holder maintains and utilizes work schedules to track maintenance personnel duty time?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder have a documented method for assessing the impact of any changes made to the controls in the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI Section 2 - Controls Attribute Drop-Down Menu	
1.	No controls specified.
2.	Documentation for the controls do not identify (who, what, when, where, how).
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.

SAI Section 3 - Process Measurement Attribute

Objective: Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the process measurement questions below.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Maintenance Duty Time Limitations process include the following process measurements:	
1.1.	Is there a process measurement or process measurements that would identify if the certificate holder failed to relieve maintenance personnel from duty in accordance with their Maintenance Duty Time policies and procedures?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.2.	Is there a process measurement or process measurements that would identify if the certificate holder failed to maintain and utilize work schedules to track maintenance personnel duty time in accordance with its Maintenance Duty Time policies and procedures?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Is there a process measurement or process measurements that would reveal if the certificate holder's policy, procedures, instructions, and information were not followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Does the certificate holder document its process measurement results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder use its process measurement results to improve its programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI Section 3 - Process Measurement Attribute Drop-Down Menu
1. No process measurements specified.
2. Documentation for the process measurements does not identify (who, what, when, where, how).
3. Inability to identify negative findings.
4. No provisions for implementing corrective actions.
5. Ineffective follow-up to determine effectiveness of corrective actions.
6. Resources requirements (personnel, facilities, equipment, technical data).
7. Other.

SAI Section 4 - Interfaces Attribute

Objective: Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different areas within the certificate holder's system must be consistent and complement each other. For the interfaces to be effectively managed, the certificate holder's system should identify and document the interfaces.

Tasks

	To meet this objective, the inspector must accomplish the following tasks:	
1.	Review the interfaces associated with the (element name) process that have been identified along with the individual questions in section 1, Procedures, of this DCT.	
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.	

Questions

	To meet this objective, the inspector must answer the following questions: Note: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.	
1.	Does the certificate holder's system properly address the interfaces that are identified along with the questions in section 1, Procedures of this DCT?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder document a method for assessing the impact of any changes to the associated interfaces within the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI Section 4 - Interfaces Attribute Drop-Down Menu	
1.	No interfaces specified.
2.	The following interfaces not identified within the Certificate Holder's manual system:
3.	Interfaces listed are inaccurate.
4.	Specific location of interfaces not identified within the manual system.
5.	Other

SAI Section 5 - Management Responsibility & Authority Attributes

Objective: The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Identify the person who has overall responsibility for the Maintenance Duty Time Limitations process.
2.	Identify the person who has overall authority for the Maintenance Duty Time Limitations process.
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder clearly identify who is responsible for the quality of the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Does the certificate holder's manual include the duties and responsibilities of those who manage the work required by the Maintenance Duty Time Limitations process? SRRs: 121.135(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Maintenance Duty Time Limitations process? SRRs: 121.135(a)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the certificate holder clearly and completely document the responsibility for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
6.	Does the certificate holder clearly and completely document the authority for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
7.	Does the certificate holder clearly and completely document their qualification standards for the person having responsibility for the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
8.	Does the certificate holder clearly and completely document their qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
9.	Does the certificate holder clearly and completely document the procedures for delegation of authority for the Maintenance Duty Time Limitations process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI Section 5 - Management Responsibility & Authority Attributes Drop-Down Menu
1. Not documented.
2. Documentation unclear.
3. Documentation incomplete.
4. Other.