



AIRWORTHINESS

ADVISORY

CIRCULAR

CIVIL AVIATION AUTHORITY OF BOTSWANA

CAAB Document AAC-005

**CERTIFICATION OF
MAINTENANCE/ AIRCRAFT
MAINTENANCE RELEASE
CERTIFICATE TO SERVICE**

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1. PURPOSE

This guidance material details the operator/owner responsibilities for the issuing of aircraft maintenance release certificate to service which shall be issued after aircraft maintenance prior to flight as well as after maintenance on components.

2. STATUS OF THIS ADVISORY CIRCULAR

This Airworthiness Advisory Circular is an original issuance.

3. EFFECTIVE DATE

This Airworthiness Advisory Circular becomes effective immediately.

4. APPLICABILITY

This guidance material is applicable to Aircraft Maintenance Organisations, Air Operator Certificate holders, aircraft owners, pilots and aircraft maintenance engineers as well as Flight Safety Inspectors.

5. RELATED REGULATIONS

Copies may be obtained from the Government Printer.

- Civil Aviation (Airworthiness) Regulations
- Civil Aviation (Approved Maintenance Organization) Regulations.
- Civil Aviation (Air Operator Certification and Administration) Regulations.

6. RELATED PUBLICATIONS

For further information on this subject, operators are advised to review the following ICAO publications -

- Annex 7 – Aircraft Nationality and Registration Marks
- Doc 9760 – Airworthiness Manual
- BARs / AICs / AENs

Copies may be obtained from Document Sales Unit, ICAO, 999 University Street, Montreal, Quebec, Canada H3C 5H7.

7. DEFINITIONS AND ACRONYMS

7.1 The following definitions are used in this circular:

‘Competent authority’ means a Civil Aviation Authority.

‘Compliance with all other maintenance and operator requirements’ means making an appropriate entry in the aircraft technical log, checking for compliance with type design standards, modifications, repairs, airworthiness directives, life limitations and condition of the aircraft component plus information on where, when and why the aircraft was grounded.

‘Serious hazard to flight safety’ means any instance where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning, electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An airworthiness directive overdue for compliance is also considered a hazard to flight safety.

Advisory Circulars (ACs) are intended to provide advice and guidance to illustrate a means, but not necessarily the only means, of complying with the regulations, or to explain certain regulatory requirements by providing informative, interpretative and explanatory material. Where a regulation contains the words “prescribed by the Authority,” the AC may be considered to prescribe a viable method of compliance, but status of that “prescription” is always “guidance” (never regulation).

'Suitable release certificate' means a certificate which clearly states that the aircraft component is serviceable; that clearly specifies the approved organisation releasing the said component together with details of the authority under whose approval the approved organisation works including the approval or authorisation reference.

7.2 The following acronyms are used in this circular

AC	Advisory Circular
AMO	Approved Maintenance Organisation
AOC	Air Operator Certificate
BARs	Botswana Aviation Requirements
CARs	(Botswana) Civil Aviation Regulations
CRS	Certificate of Release To Service
CAAB	Civil Aviation Authority of Botswana
ICAO	International Civil Aviation Organization
MRC	Maintenance Release Certificate
PIC	Pilot – in - Command

8. BACKGROUND

- 8.1 Botswana Civil Aviation (Airworthiness) Regulations (BCARs) stipulates that any aircraft operating for commercial purposes which has been duly registered and for which a certificate of airworthiness has been issued under those Regulations shall not fly unless a maintenance release certificate has been issued for it under the Civil Aviation (Approved Maintenance Organisations) Regulations, if that aircraft, a part of that aircraft or any of its equipment has been overhauled, repaired, replaced, modified, maintained or been subjected to an inspection.
- 8.2 The BCARs relating to Air Operator Certification requires that the Pilot-in-Command (PIC) of a commercial aircraft shall not operate an aircraft unless the PIC is in possession of a valid maintenance release certificate to indicate that any maintenance, preventative maintenance or inspections performed on the aircraft have been satisfactorily performed and appropriately documented.
- 8.3 This is to ensure that the PIC is made aware that all required maintenance on the aircraft has been completed and of all defects in the aircraft have been rectified and certified, that no maintenance is scheduled to take place during the proposed flight.
- 8.4 The Air Operator Certificate holder shall ensure that the PIC of the aircraft has reviewed the maintenance section of the aircraft technical log and determined that any maintenance performed has been appropriately documented. A certificate of release to service is necessary before flight, at the completion of any defect rectification, whilst the aircraft operates a flight between scheduled maintenance checks.

9. ACTIVITY DESCRIPTION

- 9.1 When satisfied that all aircraft maintenance required has been properly carried out and signed for, a maintenance release certificate to service shall be issued:
1. By appropriate certifying staff on behalf of the Approved Maintenance Organisation (AMO); or
 2. Except for complex maintenance tasks listed in Appendix 1, by certifying staff in compliance with the personnel licensing requirements; or
 3. Pilot-owner in accordance with Appendix 3 of this guidance material.
- 9.2 In the case of a release to service under 9.1(2) the certifying staff may be assisted in the execution of the maintenance tasks by one or more persons under his direct and continuous control.
- 9.3 A maintenance release certificate to service shall contain basic details of the maintenance carried out on an aircraft, the date such maintenance was completed and:
1. The identity, including approval reference of the AMO and certifying staff issuing such a certificate; or
 2. In the case of subparagraph 9.1(2) certificate of release to service, the identity and if applicable license number of the certifying staff issuing such a certificate.

NOTE: This Maintenance Release Certificate should not be confused with the action that must be taken by the operator to give evidence that the aircraft is airworthy and fit to undertake a specific flight.

NOTE: In all the cases, this maintenance release to service (for the aircraft or for the component) means only that the work ordered by the customer (being most of the time the aircraft operator) has been completed satisfactory by the AMO. It does not mean that the work ordered by the customer was sufficient to ensure the airworthiness of the aircraft or the component. The responsibility to get the aircraft airworthy or to install on-board only airworthy components remains with the aircraft operator.

- 9.4 In addition to the mandatory information as required in the BCARs (AMO), the aircraft maintenance release certificate should contain the following statement:
- (a) *'Certifies that the work specified except as otherwise specified was carried out in accordance with BCAR (AMO) and in respect to that work the aircraft is considered ready for release to service'*.
 - (b) For a Pilot-owner, a Maintenance Release Certificate to service should contain the following statement:

'Certifies that the limited pilot-owner maintenance specified except as otherwise specified was carried out in accordance with BCAR (Airworthiness) and in respect to that work the aircraft is considered ready for release to service'.

- 9.5 The maintenance release certificate to service should relate to the task specified in the manufacturer's or operator's instruction or the aircraft maintenance programme which itself may cross-refer to a manufacturer's/operator's instruction in a maintenance manual, service bulletin etc.

- 9.6 The date such maintenance was carried out should include when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/landings etc., as appropriate.
- 9.7 When extensive maintenance has been carried out, it is acceptable for the maintenance release certificate to service to summarise the maintenance so long as there is a unique cross-reference to the work-pack containing full details of maintenance carried out. Dimensional information should be retained in the work-pack record.
- 9.8 The person issuing the maintenance release certificate to service should use his normal signature except in the case where a computer release to service system is used. In the latter case the CAAB will need to be satisfied that only the particular person can electronically issue the release to service. One such method of compliance is the use of a magnetic or optical personal card in conjunction with a personal identity number (PIN) known only to the individual, which is keyed into the computer. A certification stamp is optional.
- 9.9 At the completion of all maintenance, owners, certifying staff, operators and maintenance organisations should ensure they have a clear, concise, legible record of the work performed.
- 9.10 In the case of a 9.1(2) release to service, certifying staff should retain all the records necessary to prove that all requirements have been met for the issuance of a maintenance release certificate to service.

Issuing the maintenance release certificate when not all required maintenance is completed

- 9.11 Notwithstanding paragraph 9.10 in the case of incomplete maintenance, such fact shall be entered in the aircraft maintenance release certificate to service before the issuance of such certificate.
- 9.12 Being unable to establish full compliance with paragraph 9.10 means that the maintenance required by the aircraft owner or continuing airworthiness organization/operator could not be completed due either to running out of available aircraft maintenance downtime for the scheduled check or by virtue of the condition of the aircraft requiring additional maintenance downtime.
- 9.13 The aircraft owner or continuing airworthiness organization/operator has the responsibility for ensuring that all required maintenance has been carried out before flight. Therefore an aircraft owner or continuing airworthiness organization/operator should be informed and agree to the deferment of full compliance with paragraph 9.11. The maintenance release certificate to service may then be issued subject to details of the deferment, including the aircraft owner or continuing airworthiness organization/operator authorisation, being endorsed on the certificate.
- 9.14 If a maintenance release certificate to service is issued with incomplete maintenance, a record should be kept stating what action the mechanic, supervisor and certifying staff should take to bring the matter to the attention of the relevant aircraft owner or continuing airworthiness organization/operator so that the issue may be discussed and resolved with the aircraft owner or continuing airworthiness organization/operator.
- 9.15 A certificate of release to service shall not be issued in the case of any known non-compliance which poses a serious hazard to flight safety.

10. MAINTENANCE RELEASE CERTIFICATE TO SERVICE OF A COMPONENT

- 10.1 A maintenance release certificate to service shall be issued at the completion of any maintenance on an aircraft or component whilst off the aircraft. The authorised maintenance release certificate that has been issued in accordance with *Appendix 2* constitutes the aircraft component release to service.
- 10.2 When an approved organisation maintains an aircraft component for use by the organization, a form such as at *Appendix 2* may not be necessary depending upon the organisation's internal release procedures, however all the information normally required as in the *Appendix 2* Form should be adequately detailed in the maintenance release certificate to service.

11. PILOT-OWNER AUTHORISATION

- 11.1 The pilot-owner is the person who owns or jointly owns the aircraft being maintained and holds a valid pilot license with the appropriate type or class rating.
- 11.2 For any privately operated aircraft of simple design with a maximum take-off mass of less than 2730 kg, glider and balloon, the pilot-owner may issue the certificate of release to service after limited pilot owner maintenance listed in *Appendix 3*.
- 11.3 Limited pilot-owner maintenance shall be defined in the aircraft Maintenance Programme.
- 11.4 The maintenance release certificate to service must be entered in the log books and contain basic details of the maintenance carried out, the date such maintenance was completed and the identity and pilot licence number of the pilot-owner issuing such a certificate.
- 11.5 The pilot-owner should hold a valid pilot license issued or validated by CAAB for the aircraft type being maintained.
- 11.6 A pilot-owner should only issue a certificate of release to service for maintenance performed by the pilot-owner and after demonstrating the competence to carry out such maintenance tasks.

12. CERTIFICATION OF MAINTENANCE PERFORMED BY AN APPROVED MAINTENANCE ORGANIZATION

- 12.1 A certificate of release to service shall be issued by appropriately authorized certifying staff on behalf of the AMO when it has been verified that all maintenance ordered has been properly carried out by the organisation, taking into account the availability and use of the maintenance data and that there are no non-compliances which are known that pose a serious hazard to flight safety. A certificate of release to service shall be issued before flight at the completion of any maintenance. All the maintenance related information should be retained in the work-pack record.
- 12.2 New defects or incomplete maintenance work orders identified during the above maintenance shall be brought to the attention of the aircraft operator for the specific purpose of obtaining agreement to rectify such defects or completing the missing elements of the maintenance work order. In the case where the aircraft operator declines to have such maintenance carried out under this paragraph, paragraph (12.7) is applicable.

- 12.3 The purpose of the certificate is to release assemblies/items/components/parts (hereafter referred to as 'item(s)') after maintenance and to release maintenance work carried out on such items under the approval of a competent authority and to allow items removed from one aircraft/aircraft component to be fitted to another aircraft/aircraft component.
- 12.4 The certificate referenced in *Appendix 2* is called the authorized release certificate. The certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for items from the manufacturer/maintenance organisation to users. The certificate is not a delivery or shipping note. It can only be issued by organisations approved by the particular competent authority within the scope of the approval.
- 12.5 The certificate may be used as a rotatable tag by utilising the available space on the reverse side of the certificate for any additional information and dispatching the item with two copies of the certificate so that one copy may be eventually returned with the item to the maintenance organisation. The alternative solution is to use existing routable tags and also supply a copy of the certificate. Under no circumstances may a certificate be issued for any item when it is known that the item has a defect considered a serious hazard to flight safety.
- 12.6 A certificate should not be issued for any item when it is known that the item is unserviceable except in the case of an item undergoing a series of maintenance processes at several AMOs and the item needs a certificate for the previous maintenance process carried out for the next AMO to accept the item for subsequent maintenance processes. As mentioned at Block 13, a clear statement of limitation should be endorsed in Block 13.

NOTE: Aircraft may not be released using the certificate


- 12.7 By derogation from paragraph (12.1), when the approved organisation is unable to complete all maintenance ordered, it may issue a certificate of release to service within the approved aircraft limitations. The approved organisation shall enter such fact in the aircraft maintenance release certificate to service before the issue of such certificate. The purpose of the certificate is to release assemblies/items/components/parts (hereafter referred to as 'item(s)') after maintenance and to release maintenance work carried out on such items under the approval of a competent authority and to allow serviceable items removed from one aircraft/aircraft component to be fitted to another aircraft/aircraft component

13. OPERATOR'S TECHNICAL LOG SYSTEM

- 13.1 Normally the maintenance release certificate constitutes an aircraft technical log entry by operators.
- 13.2 In the case of commercial air transport an operator shall use an aircraft technical log system containing the following information for each aircraft:
1. information about each flight, necessary to ensure continued flight safety, and;
 2. the current aircraft certificate of release to service, and;
 3. the current maintenance statement giving the aircraft maintenance status of the:
 - i) Due date for next scheduled maintenance;
 - ii) Out of phase maintenance and its due date.

The exception will only be in the event that the CAAB agreed to the maintenance statement being kept elsewhere, and;

4. all outstanding deferred defects rectifications that affect the operation of the aircraft, and;
 5. Any necessary guidance instructions on maintenance support arrangements.
- 13.3 The aircraft technical log system and any subsequent amendment shall be approved by the CAAB.
- 13.4 An operator shall ensure that the aircraft technical log is retained for a minimum period as required in the regulations. Details of the operator's technical log system are given in *Appendix 4*.


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For/Civil Aviation Authority of Botswana



End of Advisory Circular

APPENDIX 1

COMPLEX MAINTENANCE TASKS

The following constitutes the complex maintenance tasks referred to in 5. 2

1. The modification, repair or replacement by riveting, bonding, laminating, or welding of any of the following airframe parts:
 - (a) A box beam;
 - (b) A wing stringer or chord member;
 - (c) A spar;
 - (d) A spar flange;
 - (e) A member of a truss-type beam;
 - (f) The web of a beam;
 - (g) A keel or chine member of a flying boat hull or a float;
 - (h) A corrugated sheet compression member in a wing or tail surface;
 - (i) A wing main rib;
 - (j) A wing or tail surface brace strut;
 - (k) An engine mount;
 - (l) A fuselage longeron or frame;
 - (m) A member of a side truss, horizontal truss or bulkhead;
 - (n) A seat support brace or bracket;
 - (o) A seat rail replacement;
 - (p) A landing gear strut or brace strut;
 - (q) An axle;
 - (r) A wheel; and
 - (s) A ski or ski pedestal, excluding the replacement of a low-friction coating.

2. The modification or repair of any of the following parts:
 - (a) Aircraft skin, or the skin of an aircraft float, if the work requires the use of a support, jig or fixture;
 - (b) Aircraft skin that is subject to pressurization loads, if the damage to the skin measures more than 15 cm (6 inches) in any direction;
 - (c) A load-bearing part of a control system, including a control column, pedal, shaft, quadrant, bell crank, torque tube, control horn and forged or cast bracket, but excluding: -
 - (i) the swaging of a repair splice or cable fitting, and

- (ii) the replacement of a push-pull tube end fitting that is attached by riveting; and
- (d) Any other structure, not listed in (1) that a manufacturer has identified as primary structure in its maintenance manual structural repair manual or instructions for continuing airworthiness.

APPENDIX 2

COMPONENT RELEASE CERTIFICATE

1. CAAB		2. Model CAA FORM [AAT] Authorised Release Certificate/Airworthiness Approval Tag Civil Aviation Administration			3. System Tracking Ref., No.	
4. Organisation Name and Address:					5. Work Order, Contract or Invoice Number	
6. Item	7. Description	8. Part #	9. Eligibility (Installer must check eligibility with applicable technical data)	10. Quantity	11. Serial/Batch Number	12. Status/Work Number
13. Remarks						
14. Certifies that the items identified above were manufactured in conformity to: <input type="checkbox"/> approved design data and are in condition for safe operation <input type="checkbox"/> non-approved design data specified in block 13				19. <input type="checkbox"/> BCAR Reg. 19 (Airworthiness) Release to Service <input type="checkbox"/> other regulation specified in Block 13 Certifies that unless otherwise specified in block 13 (or attached), the work identified in Block 12 and described in block 13, above was accomplished in accordance with CAAB airworthiness regulations and in respect to that work, the item(s) is (are) approved for return to service.		
15. Authorised Signature:		16. Approval/ Authorisation Number		20. Authorised Signature		21. Approval/Certificate Number:
17. Name (Typed or Printed):		18. Date (m/d/y):		17. Name (Typed or Printed):		23. Date (m/d/y):

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APPENDIX 3

LIMITED PILOT - OWNER MAINTENANCE

The following constitutes the limited pilot maintenance referred to in paragraph 9 provided; it does not involve complex maintenance tasks and is carried out in accordance with Civil Aviation (Airworthiness) Regulations:

1. Removal, installation of wheels.
2. Replacing elastic shock absorber cords on landing gear.
3. Servicing landing gear shock struts by adding oil, air, or both.
4. Servicing landing gear wheel bearings, such as cleaning and greasing.
5. Replacing defective safety wiring or cotter keys/pins.
6. Lubrication not requiring dis-assembly other than removal of non-structural items such as cover plates, cowlings, and fairings.
7. Making simple fabric patches not requiring rib stitching or the removal of structural parts or control surfaces. In the case of balloons, the making of small fabric repairs to envelopes (as defined in, and in accordance with, the balloon manufacturers' instructions) not requiring load tape repair or replacement.
8. Replenishing hydraulic fluid in the hydraulic reservoir.
9. Refinishing decorative coating of fuselage, balloon baskets, wings tail group surfaces (excluding balanced control surfaces), fairings, cowlings, landing gear, cabin, or cockpit interior when removal or disassembly of any primary structure or operating system is not required.
10. Applying preservative or protective material to components where no disassembly of any primary structure or operating system is involved and where such coating is not prohibited or is not contrary to good practices.
11. Repairing upholstery and decorative furnishings of the cabin, cockpit, or balloon basket interior when the repairing does not require disassembly of any primary structure or operating system or interfere with an operating system or affect the primary structure of the aircraft.
12. Making small simple repairs to fairings, non-structural cover plates, cowlings, and small patches and reinforcements not changing the contour so as to interfere with proper air flow.
13. Replacing side windows where that work does not interfere with the structure or any operating system such as controls, electrical equipment, etc.
14. Replacing safety belts.
15. Replacing seats or seat parts with replacement parts approved for the aircraft, not involving disassembly of any primary structure or operating system.
16. Trouble shooting and repairing broken circuits in landing light wiring circuits.
17. Replacing bulbs, reflectors, and lenses of position and landing lights.
18. Replacing wheels and skis where no weight and balance computation is involved.

19. Replacing any cowling not requiring removal of the propeller or disconnection of flight controls.
20. Cleaning of balloon burner pilot and main nozzles in accordance with the balloon manufacturer's instructions.
21. Replacement or adjustment of non-structural standard fasteners incidental to operations.
22. The interchange of balloon baskets and burners on envelopes when the basket or burner is designated as interchangeable in the balloon type certificate data and the baskets and burners are specifically designed for quick removal and installation.
23. Updating self-contained, front instrument panel-mounted Air Traffic Control (ATC) navigational software databases (excluding those of automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)) provided no disassembly of the unit is required and pertinent instructions are provided. Prior to the unit's intended use, an operational check must be performed.

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APPENDIX 4

OPERATOR'S TECHNICAL LOG SYSTEM

1. For commercial air transport the operator's aircraft technical log is a system for recording defects and malfunctions during the aircraft operation and for recording details of all maintenance carried out on an aircraft between scheduled base maintenance visits. In addition, it is used for recording flight safety and maintenance information the operating crew needs to know.
2. Cabin or galley defects and malfunctions that affect the safe operation of the aircraft or the safety of its occupants are regarded as forming part of the aircraft log book where recorded by another means.
3. The operator's aircraft technical log system may range from a simple single section document to a complex system containing many sections but in all cases it should include the information specified for the example used here which uses a 5 section document / computer system:

Section 1: Should contain details of the registered name and address of the operator the aircraft type and the complete international registration marks of the aircraft.

Section 2: Should contain details of when the next scheduled maintenance is due, including, if relevant any out of phase component changes due before the next maintenance check. In addition this section should contain the current maintenance release certificate to service (CRS), for the complete aircraft, issued normally at the end of the last maintenance check.

NOTE: *The flight crew does not need to receive such details if the next scheduled maintenance is controlled by other means acceptable to the competent authority.*

Section 3: Should contain details of all information considered necessary to ensure continued flight safety. Such information includes:

- i.) The aircraft type and registration mark.
- ii.) The date and place of take-off and landing.
- iii.) The times at which the aircraft took off and landed.
- iv.) The running total of flying hours, such that the hours to the next scheduled maintenance can be determined. The flight crew does not need to receive such details if the next scheduled maintenance is controlled by other means acceptable to the CAAB.
- v.) Details of any failure, defect or malfunction to the aircraft affecting airworthiness or safe operation of the aircraft including emergency systems, and any failure, defect or malfunctions in the cabin or galleys that affect the safe operation of the aircraft or the safety of its occupants that are known to the commander.

Provision should be made for the commander to date and sign such entries, including, where appropriate, the nil defect state for continuity of the record.

Provision should be made for a CRS following rectification of a defect or any deferred defect or maintenance check carried out. Such a certificate appearing on each page of this section should readily identify the defect(s) to which it relates or the particular maintenance check as appropriate.

- vi.) The quantity of fuel and oil uplifted and the quantity of fuel available in each tank, or combination of tanks, at the beginning and end of each flight; provision to show, in the same units of quantity, both the amount of fuel planned to be uplifted and the amount of fuel actually uplifted; provision for the time when ground de-icing and/or anti-icing was started and the type of fluid applied, including mixture ratio fluid/water.
- vii.) The pre-flight inspection signature.

In addition to the above it may be necessary to record the following supplementary information:

- i) The time spent in particular engine power ranges where use of such engine power affects the life of the engine or engine module. These are two examples thereof.
- ii) the number of landings where landings affect the life of an aircraft or aircraft component.
- iii) flight cycles or flight pressure cycles where such cycles affect the life of an aircraft or aircraft component.

Section 4: Should contain details of all deferred defects that affect or may affect the safe operation of the aircraft and should therefore be known to the aircraft commander. Each page of this section should be pre-printed with the operator's name and page serial number and make provision for recording the following:

- (i) a cross reference for each deferred defect such that the original defect can be identified in the particular section 3 sector record page.
- (ii) the original date of occurrence of the defect deferred.
- (iii) brief details of the defect.
- (iv) details of the eventual rectification carried out and its CRS or a clear cross-reference back to the document that contains details of the eventual rectification.

Section 5: should contain any necessary maintenance support information that the aircraft commander needs to know. Such information would include data on how to contact maintenance engineering if problems arise whilst operating the routes etc.

NOTE 1: Where Section 3 is of the multi-sector 'part removable' type then such 'part removable' sections should contain all of the foregoing information where appropriate.

NOTE 2: Section 3 should be designed such that one copy of each page may remain on the aircraft and one other copy may be retained on the ground until completion of the flight to which it relates.

NOTE 3: *The lay-out of Section 3 should be divided to show clearly what is required to be completed after flight and what is required to be completed in preparation for the next flight.*

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