

MATRIX AFTER REVIEW ON DRAFT CIVIL AVIATION (AMO) REGULATIONS 2024

No.	Reg. No.	Regulation Title	REGULATION	Stakeholders Comments	KCAA Comment	Final Regulation Text	Remarks if any
1.		Table of content	First Schedule Second Schedule Third Schedule		Schedule missing	First Schedule Second Schedule Third Schedule	Table of content amended to include schedules content
1.	2	Definitions	“State of Registry” means the State on whose registry an aircraft is registered;		Lacked clarity	“State of Registry” means the State on whose register an aircraft is entered;	Revised for clarity
2.	3(2)	Reg 3. Application	(2) Despite the provision of sub regulation (1), these Regulations do not prevent the maintenance organization from performing maintenance on an aircraft which is not under the responsibility of the		New sub regulation (2) to include Annex 8 section 6.2 (note)	(2) Notwithstanding the provision of sub regulation (1), these Regulations do not prevent the maintenance organization from performing maintenance on an aircraft which is not under the responsibility of the Authority, including aircraft not registered in any Contracting State provided that the AMO meets the requirements of the	New sub-regulation added to comply with Annex 8 section 6.2 (note)

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			Authority, including aircraft not registered in any Contracting State provided that the AMO meets the requirements of the state under whose jurisdiction the aircraft may be.			state under whose jurisdiction the aircraft may be.	
3.	4(4,5 &6)	4. Approval Certificate and Scope of approval.	Regulation 4 Sub-regulation (4,5) and (6), “(4) An AMO certificate shall contain the information as set out in the Second Schedule of these regulations. (5) The AMO Certificate shall be in a format prescribed in the Second Schedule of these regulations. (6) The Scope of Approval shall contain the information as set	The second schedule does not contain the information on AMO certificate, the format of the AMO certificate and Information on Scope of Approval.	Accepted	The second Schedule amended and inserted in the final draft	Included the schedule

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			out in the Second Schedule of these regulations.”				
4.	8. (1)	8. Validity and renewal of the certificate—	8. (1) A certificate issued to an AMO shall be valid for a period of twelve months from the date of current issue or a shorter period specified by the Authority unless—	8(1) A certificate issued to an AMO shall be valid for a period of twenty-Four months (24) from the date of current issue or renewal unless a shorter period is specified by the Authority or:	Accepted	8. (1) A certificate issued to an AMO shall be valid for a period of twenty four (24) months from the date of current issue or a shorter period specified by the Authority unless—	Nil
5.	8(1)(c)	Validity and renewal of the certificate.	(c) the AMO suspends operations for more than 180 continuous days.	N/A	Deleted. Not required by Annex 8	Deleted	Deleted. Deleted. Not required by Annex 8
6.	8 (3)	8. Validity and renewal of the certificate	8 (3) An application for renewal of a maintenance organization approval certificate shall be made on a	Recommends that an application for AMO renewal be made at least 30 days before the	Not Accepted	8 (3) An application for renewal of a maintenance organization approval certificate shall be made on a form prescribed by the Authority at least sixty days	The proposed timeline are for the Authority to plan and commit resources to

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			form prescribed by the Authority at least sixty days before the certificate expires.	certificate expires.		before the certificate expires.	the upcoming tasks.
7.	8 (4)	8 Validity and renewal of the certificate	(4) Where a request for renewal is made after the expiry of a maintenance organization approval certificate, the application procedure provided for in regulation 6 shall apply.	Reg. 8 (4) This regulation is punitive in nature as it doesn't consider reasons as to why the application was made after expiry. An application for renewal of an AMO certificate could be due to a Force majeure which had a direct impact on the certificate holder hence the application should be determined on	Partially Accepted	8 (4) Where a request for renewal is made six or more months after the expiry of a maintenance organization approval certificate, the application procedure provided for in regulation 6 shall apply.	renewal is made six or more months after the expiry.

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				a case by case basis without subjecting the applicant to fresh certification			
8.	10(1)	(10) Changes to the AMO and approval certificate amendments.			Subdivided into 1&2 Sub reg. 2 becomes 3		Numbering changed for flow and clarity.
9.		10. Changes to the AMO and approval certificate amendments.	10 (2) An AMO shall provide notification to the Authority for approval at least 30 days prior to effecting the changes on:	Reg. 10 – the timelines for notification should be reconsidered as circumstances for change vary for the different options provided. Can it be also looked at and synchronized with Reg 49 in the Airworthiness set.	Accepted	(2) An AMO shall provide notification to the Authority for approval/acceptance prior to effecting the changes on:	Deleted '30 days'

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				This regulation is punitive in nature as it doesn't consider that apart from change in the name of the AMO, additional locations of the organization and items of the AMO procedures manual the other changes as enumerated in 2 (a-g) are out of control of the AMO certificate holder hence the certificate holder. Hence a prescriptive penalty should not be imposed. The regulation should be			

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				worded as follows: 10 (2) An AMO shall provide notification to the Authority within 30 days of effecting such changes on: —			
10.	10 (5)	10. Changes to the AMO and approval certificate amendments.	(5) A maintenance organization approval certificate may be suspended by the Authority if changes in items under sub-regulation (2) have been made by the AMO without notifying the Authority.	10(5) Regulation is punitive as the AMO certificate holder is not in a position to predict some of the changes enumerated in regulation 10 (2) above	Not Accepted	(5) A maintenance organization approval certificate may be suspended by the Authority if changes in items under sub-regulation (2) have been made by the AMO without notifying the Authority.	Regulation 10 (5) Upheld original text.
11.	10(6)a &b	10. Changes to the AMO and approval certificate amendments.			Subreg. 6a&b becomes 7 and 8		Numbering changed for flow and clarity.
12.	13 (1)	13AMO Capability	13(1)Except for functions that	13. (1) Except for functions that are	Accepted	Except for functions that are contracted out, each	Replaced 'Provide' with

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			are contracted out, each Certificated AMO shall provide facilities, equipment, material, technical data, processes, housing, and trained personnel so that the scope of approval as appropriate to the class, rating or limitation held or applied for, can be performed as required.	contracted out, each Certificated AMO shall demonstrate to the authority access to facilities, equipment, material, technical data, processes, housing, and trained personnel so that the scope of approval as appropriate to the class, rating or limitation held or applied for, can be performed as required.		Certificated AMO shall demonstrate to the Authority access to facilities, equipment, material, technical data, processes, housing, and trained personnel so that the scope of approval as appropriate to the class, rating or limitation held or applied for, can be performed as required.	'demonstrate access to'
13.	17 (7)	17. Facilities	17 (7) For ongoing maintenance of aircraft, aircraft hangars shall be available and large enough to accommodate	17 (7) For ongoing maintenance of aircraft, aircraft hangars shall be available and large	Not Accepted	(7) For ongoing maintenance of aircraft, aircraft hangars shall be available and large enough to accommodate and enclose the largest aircraft the AMO is rated for,	Nil

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			and enclose the largest aircraft the AMO is rated for, during maintenance activities. ¹⁷	enough to accommodate and enclose at least 90 % of the largest aircraft the AMO is rated for, during maintenance activities”		during maintenance activities.	
14.	18(8)	18. Equipment, tools and material	(8) Except as provided in sub-regulation (6), in the case of foreign manufactured tools, equipment and test equipment, the standard provided by the county of manufacture may be used if approved by the Authority.	18 (8) Except as provided in sub-regulation (6), in the case of foreign manufactured tools, equipment and test equipment, the standard provided by the county of manufacture may be used if approved accepted by the Authority.	Accepted	(8) Except as provided in sub-regulation (6), in the case of foreign manufactured tools, equipment and test equipment, the standard provided by the country of manufacture may be used if accepted by the Authority.	Replaced ‘approved’ with ‘accepted’
15.	19(8)a	19. AMO personnel and training requirement	(8) (a) The maintenance and certifying personnel shall receive		Improve on clarity	(8) (a) The maintenance and certifying personnel shall receive continuation training <u>biennially</u> to ensure that	Changed ‘each two year period’ to ‘biennially’

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			continuation training each two year period to ensure that such staff have up-to-date knowledge of relevant technology, change in standard of aircraft or aircraft component maintained, organizational procedure and human factor issues.			such staff have up-to-date knowledge of relevant technology, change in standard of aircraft or aircraft component maintained, organizational procedure and human factor issues.	
16.	19(8)b	19.AMO personnel and training requirement	Notwithstanding the period prescribed in (8)(a) Provided that the manufacturer or training organization has provided a shorter or longer period, the time prescribed will be applicable.		Enhance clarity	Notwithstanding the period prescribed in (8)(a) where the manufacturer or training organization has provided a shorter or longer period, the time prescribed will be applicable.	Revised for clarity

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17.	21 (3-9)	21 Qualifications and responsibilities of AMO Personnel.	AMO Regulation 21 {3-9[b]} Qualifications of HOB & HOL Maintenance (Managers)	Seven years' experience requirement for managers should be reduced to five (5) years.	Not Accepted	at least seven (7) years' experience in maintenance of operating aircraft in an approved organization.	Retained the seven(7) years
18.	21(3)	21. Qualifications and responsibilities of AMO Personnel.	(b) at least seven (7) years' experience in maintenance of operating aircraft in an approved organization (c) At least three (3) years in the capacity of returning aircraft to service on similar classes and ratings for which the AMO has applied for or is approved; and (d) have successfully completed a supervisory or management	Requirements not clear	Amended	(b) at least seven (7) years' experience in maintenance of operating aircraft in an approved organization including three (3) years in the capacity of returning aircraft to service on similar classes and ratings for which the AMO has applied for or is approved; and (c) have successfully completed a supervisory or management training Acceptable to the Authority.	-Combined (b) and (c) to enhance clarity. -(d) changed to (c)

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			training Acceptable to the Authority.				
19.	21(7)(b)(c)	21. Qualifications and responsibilities of AMO Personnel.	(b) OEM or Approved training as applicable on engine, components or specialized classes and ratings applied for or approved; (c) at least seven (7) years' experience in maintaining engines, components or specialized classes and ratings applied for or approved, including three (3) years in the capacity of issuing maintenance release; and	Qualification of Workshop manager was stated to be too restrictive and may be unattainable	Requirements amended to include 'the most complex'	(b) OEM or Approved training as applicable on the most complex engine, components or specialized classes and ratings applied for or approved; (c) at least seven (7) years' experience in maintaining the most complex engines, components or specialized classes and ratings applied for or approved, including three (3) years in the capacity of issuing maintenance release; and	Included 'the most complex' to make the qualification requirement implementable.
20.	21(9)	21. Qualifications and responsibilities of AMO Personnel.	(a) a licensed Aircraft maintenance engineer or;	Requirements too restrictive, yet the Quality manager does not utilize the	Accepted	(a) a licensed Aircraft maintenance engineer or ; degree or diploma in aeronautical engineering;	Combined subregulation "a" and "b" to make licence

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			(b) degree or diploma in aeronautical engineering;	license privileges			requirement an option and not mandatory
21.	24(7)	24. Training of maintenance and certifying staff.	24 (7) All maintenance and certifying personnel of the AMO shall receive sufficient continuous training in each two year period to ensure that such staff have up-to-date knowledge of relevant technology, change in standard of aircraft or aircraft component maintained, organizational procedure and human factor issues.	To include EWIS (Electrical wiring and Interconnecting Systems) and FTS (Fuel Tank Safety) in the training that are mandatory.	Not Accepted	24 (7) All maintenance and certifying personnel of the AMO shall receive sufficient continuous training in each two year period to ensure that such staff have up-to-date knowledge of relevant technology, change in standard of aircraft or aircraft component maintained, organizational procedure and human factor issues.	These specific trainings are not mandatory for all types of aircraft. It will be punitive for operators of aircraft that it does not apply.

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22.	29(11)	29. Capability list	An AMO shall retain the approved capability list and self-evaluation for every two years from the date accepted by the accountable Executive.			An AMO shall review the approved capability list and self-evaluation every two years.	Revised wordings for clarity
23.	33(1)	33. Maintenance Release.	A maintenance release shall be completed and signed to certify the maintenance work performed have been completed satisfactorily and in accordance with approved data and the procedure described in the maintenance organization procedures manual.			A maintenance release shall be completed and signed to certify that the maintenance work performed have been completed satisfactorily and in accordance with approved data and the procedure described in the maintenance organization procedures manual.	Inserted 'that'
24.	33(11)	33. Maintenance Release.	The person issuing the Maintenance Release to Service			The person issuing the Maintenance Release to Service shall use a full	Revised to include 'preferably'

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			shall use a full signature and a certification stamp.			signature and a certification stamp where applicable.	
25.	35 (3)	35. Airworthiness and technical data.	35. (3) The AMO shall ensure availability of adequate up to date technical data and Airworthiness data such as but not limited to—		Amended text to comply with doc 9760	35 (3) The AMO shall establish procedures to ensure that it either holds or has access to adequate up-to date technical data and Airworthiness data available such as but not limited to —	complied with doc 9760
26.	36(2) f	36. Occurrence Reporting.	other pertinent information that is necessary more complete identification, determination of seriousness or corrective action.		Typo error	other pertinent information that is necessary for complete identification, determination of seriousness or corrective action. 1.	Replaced 'more' with 'for'
27.	39 (2)	39.Requirements for Application.	39 (2) An application for exemption shall be submitted not less than sixty days before the proposed effective date, to	39 (2) – The prescription of timelines especially such like “not less than sixty days” adds no value to the procedure. It	Not Accepted	39 (2) An application for exemption shall be submitted not less than sixty days before the proposed effective date, to obtain timely review.	Timelines are critical to the Authority especially for planning purposes.

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			obtain timely review.	is even considered one-sided when the timelines for the result of application is not prescribed.			
28.	44(b)	44. Access for inspection	(b). ensure that the Authority is granted unrestricted access to any organisation or facilities that it has contracted for services associated with maintenance for aircraft for aircraft, engines, components or specialized maintenance.			(b). ensure that the Authority is granted unrestricted access to any organisation or facilities that it has contracted for services associated with maintenance for aircraft, engines, components or specialized maintenance.	Remove repetition (for aircraft)
29.	47.	47. Display of certificate.	47. A holder of an AMO certificate shall display to the public a valid certificate issued to			47. A holder of an AMO certificate shall display a valid certificate issued to the organization at all times.	Removed 'to the public'

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			the organization at all times.				
30.	50 (2)	50 Change of Address.	50. (2) A person who does not notify the Authority of the change in the physical address within the time frame specified in sub-regulation (1) shall not exercise the privileges of the certificate or authorization.	50 (2) – Like in Reg. 10 above, the inferred enforcement action is prohibitive and certainly not proportionate to the infringement.	Not Accepted	50. (2) A person who does not notify the Authority of the change in the physical address within the time frame specified in sub-regulation (1) shall not exercise the privileges of the certificate or authorization.	Nil
31.	56 (3)	56. Aeronautical user fees	(3) If, after that payment has been made, the application is withdrawn by the applicant or otherwise ceases to have effect or is refused, the Authority, shall not refund the payment made.	Reg. 56 (3) – The provisions of this sub-regulation are unreasonable and tantamount to regulating unfair practices, especially when an application has been	Not Accepted	56 (3) If, after that payment has been made, the application is withdrawn by the applicant or otherwise ceases to have effect or is refused, the Authority, shall not refund the payment made.	Nil

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				withdrawn before it has been reviewed. This and other provisions for payment are administrative and need not be included in regulations.			
32.	60	60. Appeals to the tribunal	60. A person aggrieved with the decision of the Authority under these Regulations may within twenty one days of such decision appeal to the Tribunal.	Reg. 60 – Appeals to the tribunal. Why is there a limitation of 21 days within which to appeal? There are various cases that would necessitate an appeal for review and this limitation would not apply to any threshold.	Not accepted	60. A person aggrieved with the decision of the Authority under these Regulations may within twenty one days of such decision appeal to the Tribunal.	Nil