AMC2 ORO.AOC.110 Aircraft interoperability

Aircraft interoperability refers to the exchange of aircraft by operators belonging to the same holding or parent company. Aircraft interoperability may only be conducted between operators having their principal place of business in a Member State. Aircraft interoperability may only be conducted when the aircraft model is listed on the AOCs involved and if the aircraft is registered in an EASA Member State.

A condition to exchange an aircraft is that the aircraft registration mark is listed, or referred to on the AOCs involved. As a result all operators involved are responsible for managing the continuing airworthiness of the aircraft.

A primary operator should be appointed. The primary operator should be the operator holding the Certificate of Registration of the aircraft. The primary operator is the operator whose associated CAMO performs the continuing airworthiness management tasks for the aircraft (directly or by subcontracting) thus ensuring the aircraft to remain in a controlled environment.
The secondary operator is the operator exercising operational control of the aircraft from the primary operator. A secondary operator may not transfer operational control of the aircraft to another secondary operator.

The operator using the aircraft holds operational responsibility of the aircraft. Operational responsibility can only lie with one operator at a time. Operational responsibility lies with the primary operator unless the aircraft is operated by a secondary operator. It should always be clear under which AOC each flight (both revenue and non-revenue) is operated by means of a formal documented transfer.

Functioning reporting channels should be established between all operators involved to exchange information to ensure the operators are able to take their responsibility.
All operators involved should align their processes such as, but not limited to the pre-flight inspection and the Minimum Equipment List. As a minimum differences should be identified and accepted.

From a human factors point of view it is recommended that the operators take part in the configuration management process of the aircraft involved in order to minimise configuration differences such as cockpit and cabin lay-out.

To deal with the allocation of responsibilities and the transfer of the aircraft an aircraft interoperability agreement should be drafted between the operators involved to ensure that no flight takes place unless the aircraft is maintained in an airworthy condition.
All CAMO's involved are responsible for the continuing airworthiness of the aircraft under M.A.201(e).

The CAMO of the primary operator performs the continuing airworthiness management tasks (directly or by subcontracting) as described in M.A.708 therefore the aircraft remains in a controlled environment.

The CAMO of the secondary operator should be able to monitor the actions, decisions and recommendations of the CAMO of the primary operator.

In order to enable the primary operator to fulfill the responsibilities regarding continuing airworthiness management all operators involved should provide the primary operator with the necessary information. The primary operator should ensure that it receives the necessary information to execute the responsibilities as described in M.A.201.

The CAMO of the secondary operator should ensure through their quality assurance program that the CAMO of the primary operator can achieve equivalent airworthiness standards.
The agreement should address at least the following elements:

- allocations of responsibilities of the primary operator and the secondary operator(s);
- designation of aircraft model and registrations;
- lines of communication, including meeting structure;
- identification, development and amendment of the maintenance programme;
- modification process, including SB's and repairs (SB policies could be different for the secondary operator(s));
- contracted maintenance organisations (ensuring compliance with M.A.708(c));
- the aircraft technical log system to be used;
- defect control process, including which maintenance control organisation to contact;
- continuing airworthiness records;
- check flight procedures;
- mandatory occurrence reporting and the sharing of occurrence information;
- the involved CAMO's Internal audit programme should include the aircraft interoperability process;
- access to and involvement of the competent authority, and
- settlement of disputes.

AMC3 ARO.OPS.110 Aircraft interoperability
When an operator requests to have an aircraft listed, or referred to on its AOC while that aircraft is already listed on the AOC of another operator from another Member State, the competent authority should draft an agreement with the respective competent authority defining and/or confirming the tasks and responsibilities of each Member State.

This agreement should include the exchange of information between the State of Registry and the State(s) of Operator(s) in case of suspension or revocation of the Certificate of Airworthiness of the aircraft involved.