

Perform Air International Inc.
Quality Control Manual
Section II
Procedure: II.18 Procedure for Electronic Recordkeeping

Revision	Revision Date	Revision Change
N/I	07/15/14	Initial Release/Re-release
1	03/31/17	Revision to 5.8 for clarification of procedure.
2	09/10/24	<i>Revised 5.8 electronic/digital signature</i>

1.0 Purpose:

To provide basis for maintaining an Electronic Recordkeeping System in compliance with FAA AC 120-78 (as revised) and FAA Operations Specification A025. This information is available to all individuals with access to the PAI System.

2.0 Scope:

The PAI System as it pertains to Electronic Recordkeeping.

3.0 Responsibility:

- 3.1** The maintenance of this procedure is the responsibility of the Quality Assurance Manager.
- 3.2** It is the responsibility of the Information Technology Department to maintain the Electronic Recordkeeping System and ensure all required securities are in place and functioning.
- 3.3** The Information Technology Department is responsible to ensure the integrity of each computer workstation and control the level of access available to system users through authorized permissions.
- 3.4** It is the responsibility of every department manager to control and monitor the disposition of records in accordance with the Record Retention Table.

4.0 Definitions:

- 4.1 Authentication:** The means by which a system validates an authorized user's identity. These may include a password, a personal identification number (PIN), a cryptographic key, or badge swipe.
- 4.2 Electronic Recordkeeping System:** A system of record processing in which records or documents are entered, stored, and retrieved electronically by a computer system rather than in the traditional hard copy form.
- 4.3 Operations Specifications:** A legal document issued by the Federal Aviation Administration providing the limitations of authority for a repair station or other agency.

5.0 Procedure:

- 5.1** Perform Air International Inc. ensures all electronic records are secure via the Electronic Security Procedure (RSM I.12). This procedure provides security to prevent internal

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Quality Control Manual
Section II

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intrusions and prevents information from being altered in any unauthorized way and directs user authentication through personal identification code usage/access.

- 5.2** The PAI System will be periodically reviewed through internal audit to ensure the integrity of the system. This audit will consist of document sampling and testing of individual access and edit capabilities.
- 5.3** All records are retained at intervals prescribed in the Records Retention Table (RSM Attachment, Att. 52.07).
- 5.4** At any time the FAA or NTSB may request review of any records contained in the PAI System. These requests will be fulfilled as required and the data will be provided in the format the agency requests (i.e. hard copy, email, memory stick, etc...).

Note: All electronic or printed copies of records provided to the FAA and/or NTSB shall be certified via letter to the FAA and signed by an individual authorized to act on behalf of the Repair Station as true and accurate reproductions of the original work document.

- 5.5** Perform Air International Inc. does not perform maintenance functions directly on aircraft (i.e. on-wing) and therefore does not incorporate direct instructions to facilitate the transfer of records during aircraft ownership transfer. In the event an aircraft owner/operator requests records associated with the transfer of an aircraft ownership, Perform Air International Inc. will provide records in the format requested by the owner/operator.
- 5.6** In accordance with the Maintenance, Preventive Maintenance or Alteration for a Certificate Holder Procedure (RSM I.07), Perform Air International Inc. will ensure all computerized records are transmitted in accordance with applicable regulatory requirements to aircraft operators, customers or their authorized representatives.
- 5.7** All personnel are trained on the electronic/computer requirements of their specific job functions during indoctrination training. Perform Air International Inc.'s Secure Computing Policy is available to all employees via QSM.22 located on each user's desktop link to the Quality System Manual.
- 5.8** *Perform Air International Inc. may use digital or wet-ink signatures for return to service documents. The signature methodology chosen shall be based on Customer request. The PAI System will be updated as needed to accommodate the requested signature type. Utilization of digital signatures for airworthiness release documents shall comply with FAA AC 120-78 and 8130-21, as revised.*

6.0 Records:

- 6.1** Records Retention Table (Att.52.07)