



SAIB: HQ-16-14
Date: March 28, 2016

SUBJ: Service, Replacement Times and Inspections

This is information only. Recommendations aren't mandatory.

Introduction

This Special Airworthiness Information Bulletin (SAIB) informs owners, operators, repair stations, and flight standard district offices that compliance with a new or revised airworthiness limitation section (ALS) issued by a design approval holder (DAH), or other entity, as a type design change is not mandatory for in-service aircraft operating pursuant to Title 14 of the Code of Federal Regulations (14 CFR) part 91, unless the aircraft owner/operator voluntarily incorporates the change, it is mandated by an airworthiness directive (AD) to resolve an unsafe condition or required by a previously agreed upon maintenance program.

Background

A product's type design includes the ALS (reference 14 CFR 21.31(c)). Any change to the ALS, whether a revision to the inspections/limits or a new ALS for products not originally certificated with an ALS, is considered a change to type design.

In cases where there are no current unsafe conditions, but the Federal Aviation Administration (FAA) or DAH finds through product service experience that changes in type design will contribute to the safety of the product, a DAH may submit appropriate design changes to the FAA for approval pursuant to 14 CFR 21.99(b). Installation or compliance with these FAA approved design changes is not retroactively mandatory for in-service aircraft, unless mandated by an AD or some other rulemaking action, since the type design and production of these aircraft predates the design change.

FAA legal counsel has confirmed that compliance with a manufacturer's inspection or other maintenance specified in an ALS section of a maintenance manual pursuant to 14 CFR 43.16 or inspection program approved under 14 CFR 91.403(c) does not mean compliance with the DAH's latest ALS. The only version of an ALS that is mandatory is the version that was included in the particular aircraft's type design when the aircraft was manufactured, or as amended by an AD. Therefore, the recent FAA approval of Cessna Aircraft Company Model 210 Service Manual, Section 2B – Airworthiness Limitations, dated February 10, 2014, is not mandatory for Cessna 210 airplane owners and operators because, to date, an AD has not been issued to require compliance with the new ALS.

You can download the legal interpretation on this subject from the following location:

[http://www.faa.gov/about/office_org/headquarters_offices/agc/pol_adjudication/agc200/interpretations/data/interps/2015/new-tennessee%20aircraft%20services%20-%20\(2015\)%20legal%20interpretation.pdf](http://www.faa.gov/about/office_org/headquarters_offices/agc/pol_adjudication/agc200/interpretations/data/interps/2015/new-tennessee%20aircraft%20services%20-%20(2015)%20legal%20interpretation.pdf)

Recommendations

Owners and operators are encouraged to perform the replacement times and inspections issued by a DAH throughout the life cycle of the aircraft to keep it in a safe flying condition. For products type

certificated and manufactured prior to a type design change establishing new or revised replacement time(s) and inspection(s), compliance with such recommendations is not an FAA requirement for in-service aircraft operating pursuant to 14 CFR part 91, unless the aircraft owner/operator voluntarily incorporates the design change, or it is mandated by an AD, other rulemaking action or a previously accepted maintenance program.

For Further Information Contact

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