

Interpretation 1992-36

FAD Digest of Interpretations:

FAR 91.417(a)(2)(ii); FAR 121.380(a)(2)(ii); FAR 135.439(a)(2)(ii)

An operator needs to maintain a record-keeping system that will substantiate the time that has accrued on a life-limited part; the operator must show with a sufficient degree of certainty that the time elapsed on a life-limited part is correct.

FAR 91.417(a)(2)(ii); FAR 121.380(a)(2)(ii); FAR 135.439(a)(2)(ii)

Although a complete audit trail tracing a life-limited part back to its origin is not needed for all life-limited parts, an audit trail is required where the operator's records are so incomplete that an accurate determination of the time elapsed on a life-limited part cannot be made.

FAR 91.417(a)(2)(ii); FAR 121.380(a)(2)(ii); FAR 135.439(a)(2)(ii)

The "current status" of a life-limited part is the total time on the life-limited part.

Source of Interpretation: Letter to Mr. Callahan from Kenneth P. Quinn, Chief Counsel, dated June 1, 1992.

This is in response to your letter of January 27 in which you asked the Federal Aviation Administration (FAA) to consider the concerns expressed to you by your constituent, Dr. John E. Cutts, and to provide you with our findings and views on the matter. Dr. Cutts is concerned that an interpretation of section 91.417 of the Federal Aviation Regulations (FAR), which he received recently from his local branch of the FAA, would adversely affect helicopter operators. That regulation addresses maintenance records for life-limited parts. Specifically, Dr. Cutts objects to any change in the interpretation of the term "current status" for a life-limited part that might require an audit trail back to the origin of the life-limited part.

FAR sections 91.417(a)(2)(ii), 121.380(a)(2)(ii), and 135.439(a)(2)(ii) require owners, operators, or certificate holders to keep records containing the current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance. As Dr. Cutts correctly notes in his letter, the current status of a life-limited part always has been interpreted as the total time on the life-limited part. The area of dispute is as to how an operator must demonstrate to the FAA that the recorded total time on the life-limited part is accurate.

Under these sections, the operator needs to maintain a recordkeeping system that will substantiate the time that has accrued on the life-limited part. A complete audit trail to the origin is not needed for all life-limited parts. However, it is the responsibility of the operator to substantiate that its recordkeeping system produces sufficient and accurate data to determine how the current status was obtained. The requirement is merely to show with a sufficient degree of certainty that the time elapsed on a life-limited part is correct.

FEDERAL AVIATION DECISIONS

An audit trail tracing a life-limited part back to its origin would be required only in those situations where the operator's records are so incomplete that an accurate determination of the time elapsed on the life-limited part could not be made. We would expect a request for such records to be the exception rather than the norm.

In his letter to you, Dr. Cutts requested a meeting with you, Admiral James B. Busey, Deputy Secretary of the Department of Transportation, and me, to discuss the issue he raised. We believe that the above information responds adequately to Dr. Cutts' concerns and that the meeting he requested is unnecessary at this time.

We trust that this information will allow you to respond to your constituent's concerns.