



Federal Aviation Administration

Memorandum

Date: December 17, 2009

To: See Distribution

From: Mark R. Schilling, Acting Manager, Rotorcraft Directorate,
Aircraft Certification Service, ASW-100 *Mark R. Schilling*

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Subject: Policy Statement Concerning Life Limits and Instructions for
Continued Airworthiness for Rotorcraft

Memo No.: ASW-100-09-003

Regulatory References: 14 CFR Part 29, Appendix A, paragraph A29.4 and
14 CFR Part 27, Appendix A, paragraph A27.4

Summary

The purpose of this policy statement is to clarify that certain life-limited items, in addition to those specifically required by 14 CFR section 27.571 or 29.571, should be included in the Airworthiness Limitations Section (ALS) of the Instructions for Continued Airworthiness (ICA) for rotorcraft.

Applicability

Appendix A of both 14 CFR part 27 and part 29 states that the ALS must set forth each mandatory replacement time, structural inspection interval, and related structural inspection procedure approved under § 27.571 or § 29.571, as applicable.

Relevant Past Practice

Historically, the Rotorcraft Directorate and Aircraft Certification Offices who manage rotorcraft type certificates have approved and included in the ALS additional life-limited components not approved under § 27.571 or § 29.571. This has been done not only to highlight the importance of these life limits, but also to require that the life limits for these items be identified and observed. These life-limited items include DOT-approved

pressurized cylinders such as oxygen and nitrogen bottles whose structural failure could have catastrophic consequences. These life-limited items may be approved by the FAA, another regulatory agency, or by another airworthiness authority with which we have a bilateral agreement.

Some have questioned this practice based on the language in Appendix A, §§ A27.4 and A29.4. They interpret these provisions to mean that only items approved under §§ 27.571 or 29.571 should be included. In the preamble to the final rule however, the Agency's response to several comments showed a broader intent for this regulation when we stated that we were retaining the proposed language¹ "... except that the mandatory replacement times, mandatory inspection intervals, and related procedures are specified as those associated with structural integrity – including those approved under current Sec. XX.571."² Therefore, while the requirement specifically includes those items approved under §§ 27.571 or 29.571, we have never been limited to only those items.

Policy

Other mandatory replacement times, mandatory inspection intervals, and related procedures *associated with structural integrity* are appropriate for inclusion in the ALS. However, to help clarify that other life limits can be included in the ALS, we are currently processing a rulemaking proposal to delete "approved under [§ 27.571 or § 29.571, depending on the section]" and to insert "required for type certification" in Appendix A for both A27.4 and A29.4.

Effect of Policy

Three comments were received during the proposed policy statement public comment period. None of the comments necessitated revision to the basis of this policy statement. A copy of the public comments disposition table will be posted to the Regulatory and Guidance Library along with a copy of this final policy statement memorandum.

The general policy stated in this document is not intended to constitute a new regulation. However, this policy should be followed when it is applicable to a specific project. Proposed deviations from this policy must be coordinated with the policy issuing office using an issue paper.

Applicants should anticipate that certificating officials will follow this policy when making findings of compliance. Even though this policy does not require the FAA to

¹ In Proposal 8-67 for Part 27 and Proposal 8-80 for Part 29 dealing with Appendix A for those Parts, we stated that they were proposed to be "substantially identical to the proposed new Appendix F to Part 23" and in proposed F23.4, we stated: "That section must set forth each mandatory replacement time, inspection interval, and related procedure established during certification for the airplane or any part thereof." Note: The final rule was incorporated as Appendix G to part 23 and not Appendix F to part 23.

² 45 FR 60154, 60161(Sec. XX.4), September 11, 1980.

follow it in the same manner as we would be required to follow a regulation, this policy is how the FAA expects to deal, generally, with placing items in the ALS of the ICAs for rotorcraft.

Implementation

This policy discusses compliance methods that should be applied to type certificate, amended type certificate, supplemental type certificate, and amended supplemental type certificate programs.

Finally, if there are questions on items to be included in the ALS section of the ICA, you should contact the Rotorcraft Directorate for guidance.

Point of Contact

If there are any questions concerning this policy statement, please contact Mr. Uday Garadi, ASW-111, at 817-222-5123.

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