



Federal Aviation Administration

Memorandum

Date: October 5, 2012

To: All Directorate and ACO Managers

From: ^{fd} David W. Hempe, Manager, Aircraft Engineering Division, AIR-100 *SymCullen*

Prepared by: Randall Petersen, Engineering Procedures Office, AIR-110

Subject: Application of Extending the Limit of Validity for Part 25 Transport Airplanes Under Title 14, Code of Federal Regulations (14 CFR) 21.101

Advisory Circular (AC) 21.101-1A, *Establishing the Certification Basis of Changed Aeronautical Products*, identifies an “airframe life extension” of a transport category airplane as a significant product level change. Since the AC was published prior to the promulgation of Title 14 of the Code of Federal Regulations (14 CFR) 26.23, *Extended Limit of Validity (LOV)*; confusion was created about whether the application of LOV should also be categorized as an “airframe life extension.” This memorandum provides guidance on extending the LOV for part 25 transport airplanes and explains how this guidance will be clarified in the next revision of AC 21.101-1A.

Background:

AC 21.101-1A, Appendix A, page A-25 of the AC identifies an “airframe life extension” of a transport category airplane as a significant product level change. There has been confusion whether the application of LOV should be categorized as an “airframe life extension” in this context. This memorandum clarifies that AC 21.101-1A guidance for “airframe life extension” is not intended to apply to extending an LOV in accordance with 14 CFR 26.23. The FAA plans to clarify this point in the next revision of AC 21.101-1A.

Requirements: Establishing the Certification Basis:

Extending an LOV in accordance with 14 CFR 26.23 without a physical modification to the airplane is considered a “not significant” design change in accordance with AC 21.101. However, if extending the LOV requires a physical design change to the airplane, the design change is to be evaluated in accordance with 14 CFR 21.101. Use AC 21.101-1A for guidance to determine the level of significance of the design change and the corresponding certification basis.

For questions regarding compliance and application of regulatory standard 14 CFR 26.23 contained in this memorandum, contact Walt Sippel, Transport Standards Staff, Airframe and Cabin Safety Branch, ANM-115, at (425) 227-2774. For questions regarding application of 14 CFR 21.101, contact Randall Petersen, Certification Procedures Branch, AIR-111 at 202-385-6325.