



## INSPECTION AUTHORIZATION - ARE YOU ACTIVELY ENGAGED?

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LET'S NOT  
MEET BY  
ACCIDENT

Well. Here it is the end of the year and I've been **working at the speed of government**, to answer an issue that came out four months ago, so the way I figure it I'm right on time.

The issue exploded last March when some IA's were not renewed by the Friendly Aviation Administration (FAA) because they did not meet the requirements of 14 CFR part 65.91 (c) (2) which states in part that to be eligible for an Inspection Authorization you have to have been actively engaged for at least the 2 year period before the date he applies in maintaining aircraft that are certificated and maintained in accordance with this chapter. Many IA's have been renewed based on their attendance at an 8 hr. recurrent training seminar and nothing else. This is just flat out wrong and many applicants and FAA Inspectors are guilty of not following the regulations.

Lets look at what it takes by the rule to get your IA renewed.

Abbreviated - You must present evidence in March to the FAA that you still meet the requirements of 65.91 C 1-4 which are: 1. Hold a current and effective A&P Certificate. 2. Been actively engaged for the last 2 years. 3. Have a fixed base of operations where you can be located. 4. Have available the tools and equipment, and data to properly inspect airplanes, powerplants, and propellers.

Additionally, You must have completed one of the following activities for each

Year: 1. Performed at least one annual inspection for each 90 days. 2. Performed at least two major repairs or alterations for each 90 days. 3. Performed or supervised at least one progressive inspection. 4. Attended and completed an 8 hr. IA refresher course. 5. Passed an oral exam on IA privileges given by an FAA Inspector.

**Remember**, You only have to complete **one** of the above items for renewal and **also** meet **all** of the 65.91 requirements for the original issuance of your IA.

Are you with me so far? If you're a sharp IA and I know you guys and ladies are, you noticed that there is absolutely nothing that has changed in the regulations regarding renewal of IA's.

In my 21 years of watching the wheels of bureaucracy turn I have come to the conclusion that the FAA's business policy should be "**If it's Not Broke, We'll Fix it Until it is**". In many cases the agency tries to fix something that desperately needs fixing and by the time the original plan is put on paper and butchered by the writers and attorneys it sometimes comes out worse than the original product. Having experienced that tragedy I am proud to say the agency shocked me by not goofing up this IA renewal issue. They could have easily turned it into a nightmare that would have caused the lose of IA privileges' for lots of deserving A&P mechanics. In fact, what they did was exactly what needed to be done.

## ARE YOU ACTIVELY ENGAGED? - continued

They revised the FAA Inspectors guidance. FAA Order 8900.1, Vol. 5, Chap. 5. They did this because there was never anything wrong with the rule, the problem was that the term actively engaged was too ambiguous for FAA Inspectors to apply properly and consistently across the country. Believe it or not FAA Inspectors are not hatched out of a single mold in Oklahoma City, each one is a unique individual with different and varying backgrounds and experiences. So, to fix the problem the FAA gave us a little more guidance including some examples of what they consider actively engaged. However, in the process they clearly left it up to the Inspector to make the decision on that little part about actively engaged. Isn't that a new concept!! Hire Inspectors with extensive experience and backgrounds so they can make intelligent and rational decisions and then let them make decisions all by their selves. Wow, what will they think of next.

Here is some good information that came out in the NPRM that's worth saving: **Actively Engaged means:** an active role in exercising the privileges of an airframe and powerplant mechanic certificate in the maintenance of civil aircraft. Applicants who inspect, overhaul, repair, preserve, or replace parts on aircraft or who supervise (i.e. direct and/or inspect) those activities are actively engaged. Technical instructors or people that instruct at a FAA part 147 AMT school are also considered actively engaged.

IA's that are employed in a position that does not require a tool box flash light and mirror need to be prepared to show the FAA Inspector proof that you are actively engaged. That proof might be in the form of employment records showing performance or supervision of aircraft maintenance, return to service documents, and or copies of maintenance record entries.

### More good things to know about IA renewal:

- ▶ None of the requirements of 14 CFR part 65.91 (C) 1-4 May be waived by an Aviation Safety Inspector.
- ▶ The Inspector may contact the applicants employer to verify the part 65.91 requirements
- ▶ The number of annual inspections and/or major repairs or alterations may not be mixed.
- ▶ If you use an eight hour recurrent training course to renew you must provide proof of attendance.
- ▶ If you did not have enough activity and did not attend a renewal course you must subject yourself to an oral exam with an FAA Inspector. You may not exercise the privileges of your IA until you have passed the oral exam. The inspector will question you about your IA activity during the time it was not legally in effect and will take enforcement action against you if you have signed anything off with your IA during that period.
- ▶ The requirements above apply to each of the two years that your IA card is effective.

**MY ADVISE:** (Free) Do not let your IA expire unless you are retiring. Remember how hard that IA test was.

Document all activity that involves use of your IA. Even if you don't need it to renew it makes a great record for the future in case you have to prove what you did or did not do. This documentation could be as simple as a \$2.00 spiral notebook.

If in doubt about your eligibility for renewal, call your local FAA Flight Standards District Office and talk to an Airworthiness Inspector, he/she will be glad to coach you. And do it before your IA expires.

And one last thing - You guys are the checks and balances of good, safe maintenance, so always do the right thing, even when no one is watching.