July 18, 1994

Robyn O. Faber

[redacted]

Dear Ms. Faber:

This is in response to your letter requesting an interpretation of 14 CFR 91.4O9 (d)(4). Your question relates to the discontinuation of a progressive inspection program, and the triggering date for measuring when the next 100-hour inspection is due. In particular, you requested interpretation of the language referring to the last complete inspection under the progressive inspection program.

Our review of the relevant section leads to the conclusion that the 100-hour inspection would be due within 100 hours of the techs time at the number four progressive inspection, the one completing the yearly cycle. The progressive inspection program is intended to substitute for the otherwise applicable 100-hour and annual inspection requirements. Only when the full cycle of inspection has been completed is there an assurance that all aspects of the aircraft have been inspected in a manner equivalent to the 100-hour and annual requirements.

Richard D. McCurdy
Attorney