March 17, 1995

Mr. Jerry L. Rhein
C/o Midcoast Little Rock, Inc.
P.O. Box 1149
Little Rock, Arkansas 72203

Re: Interpretation of Federal Aviation Regulation (FAR) 65.93(a) (2)

Dear Mr. Rhein:

This is response to your letter of March 10, 1995, requesting an interpretation of FAR Section 65.93(a) (2). Specifically, you wanted to know whether that section required that you perform either eight major repairs or eight major alterations in order to qualify for renewal of an Inspection Authorization (IA) under FAR Section 65.93(a) (2), or could you perform a combination of eight major repairs and major alterations and meet the qualifications for renewal.

In your specific case, you state that you performed three major repairs and five major alterations. It is the opinion of this office that you have met the requirements necessary for renewal of your IA under FAR Section 65.93(a)(2). An individual, who has held an IA for an entire year, may perform either eight major repairs, eight major alterations, or a combination of eight major repairs and major alterations and qualify for renewal under FAR Section 65.93(a)(2). By way of example, qualification for renewal under FAR Section 65.93(a)(2) could be accomplished by combining five major repairs and three major alterations, or seven major alterations and one major repair, or any other combination totaling eight major repairs and alterations.

Furthermore, qualification for renewal of your IA under FAR Section 65.93(a)(2) is dependent on having performed a total of eight major repairs, eight major alterations, or a combination of eight major repairs and major alterations during the previous year--they could all be performed in one ninety-day quarter or spread out over all four ninety-day quarters, or a combination thereof.

We trust this responds to your request.

Lynette Word
Assistant Chief Counsel
Southwest Region