U.S. Department
of Transportation
**Federal Aviation
Administration**

Office of the Chief Counsel

**800 Independence Ave., S.W.
Washington, D.C. 20591**

MAR - 4 2015

Ted Stanley
Direct Flight, Inc.
[redacted]

Re: Clarification of 14 C.F.R. § 43.11(a) as it relates to annual inspections

Dear Mr. Stanley:

This is in response to your letter dated October 7, 2014, in which you requested a legal interpretation of 14 C.F.R. § 43.11(a). You specifically sought clarification on maintenance record entries as they relate to the performance of annual inspections. You stated that maintenance records are often found in the form of logbooks for the aircraft, engine, and propeller. You stated that some persons believe the holder of an inspection authorization who conducts an annual inspection under 14 C.F.R. § 91.409 should document the annual inspection in each of the respective logbooks for the aircraft, engine, and propeller, while other persons believe the holder of an inspection authorization should make a single entry documenting the performance of an annual inspection in the maintenance records for the aircraft. As explained below, we conclude that a maintenance record entry documenting the completion of an annual inspection is required only for the aircraft. However, the holder of an inspection authorization may also document the completion of an annual inspection in a maintenance logbook for equipment other than an aircraft, such as a logbook for the engine or propeller.

First, you asked if a maintenance record documenting the completion of an annual inspection is required of anything other than an aircraft. No, a maintenance record entry documenting the completion of an annual inspection is required only for the aircraft. Except as provided in § 91.409(c), § 91.409(a) requires an aircraft to receive an annual inspection in accordance with part 43. Section 43.15(c), which governs annual inspections, applies only to an aircraft. In particular, that provision requires a person performing an annual inspection to use a checklist that must include the scope and detail of items contained in appendix D to part 43, which applies to the whole aircraft (including the engine and propeller). Thus, only an aircraft receives an annual inspection; however, components of the engine and the propeller groups are inspected as part of that inspection. Appendix D, paragraphs (d) and (h), to part 43. Under § 43.11(a), a "person approving or disapproving for return to service an aircraft, airframe, aircraft engine, propeller, appliance, or component part after any inspection performed in accordance with part 91…shall make an entry in the maintenance record of that equipment containing" the

information prescribed in § 43.11(a)(1)-(7). Based on the fact that annual inspections apply only to the aircraft under §§ 91.409(a), 43.15(c) and appendix D to part 43, a person approving or disapproving for return to service an aircraft after an annual inspection performed in accordance with § 91.409(a) must make an entry in the maintenance record of "that equipment," *i.e.* that aircraft, in accordance with 43.11(a). Accordingly, only an aircraft is required to receive a maintenance record entry documenting the completion of an annual inspection.

Second, you asked if the holder of an inspection authorization may document the completion of an annual inspection for anything other than an aircraft. We interpret your question as asking whether the holder of an inspection authorization may document the completion of an annual inspection in a maintenance logbook for equipment other than an aircraft, such as a logbook for the engine or propeller. As explained above, the holder of an inspection authorization is required to document the completion of an annual inspection only for an aircraft. However, if multiple logbooks are maintained for the aircraft, the holder of an inspection authorization may document the completion of an annual inspection in each of the respective logbooks.

Section 91.417(a)(1) requires each registered owner or operator to keep a maintenance record for each aircraft (including the airframe) and each engine, propeller, rotor, and appliance of an aircraft. However, this section neither requires owners and operators to keep separate or individual records for each of these items, nor does it require them to consolidate those records in a single logbook. The FAA has acknowledged this in past guidance: "As a practical matter, many owners and operators find it advantageous to keep separate or individual records since it facilitates transfer of the record with the item when ownership changes." Advisory Circular 43-9 (June 8, 1998).

Thus, if an owner or operator maintains multiple logbooks for the aircraft, it would be good practice for the holder of an inspection authorization to document the completion of an annual inspection in each of the respective logbooks. If the holder of an inspection authorization chooses to document the completion of an annual inspection in a maintenance logbook for equipment other than an aircraft, he or she should make the record entry specific to the product. For example, if the holder of an inspection authorization chooses to document the completion of the annual inspection in the maintenance logbook for the propeller, he or she should document the following or a similarly worded statement—"I certify that this propeller has been inspected in accordance with an annual inspection and was determined to be in an airworthy condition." However, for the reasons explained above, the rules require the holder of an inspection authorization to document only that the aircraft has received an annual inspection. Also as noted above, an annual inspection of an aircraft includes inspecting the engine and propeller.

Finally, you had a number of questions in the event that the FAA requires separate annual inspections for an airframe, engine, and propeller. Because the FAA does not require separate annual inspections, we will not address those questions.

We appreciate your patience and trust that the above responds to your concerns. If you need further assistance, please contact my staff at (202) 267-3073. This response was prepared by Katie Patrick, Attorney, Regulations Division of the Office of the Chief Counsel, and coordinated with the Aircraft Maintenance Division of the Flight Standards Service.

Sincerely,

Mark W. Bury
Assistant Chief Counsel for Regulations, AGC-200