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

Office of the Chief Counsel

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

MAY - 4 2016

Mr. Craig Easter
President
P.O. Box 2064
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Weatherford, OK 73096

Re: Clarification regarding correcting aircraft maintenance records required by 14 CFR 91.417(a)(2), documenting compliance with airworthiness directives under 14 CFR 91.417(a)(2)(v), removing unauthorized comments in an aircraft's maintenance records under 14 CFR part 43, and documenting completion of 100-hour inspection required by 14 CFR 91.409(b)

Dear Mr. Easter:

This is in response to your letter, addressed to the Chief Counsel and dated December 15, 2015,[1] requesting confirmation of your views on four issues: (1) whether you may correct an error in an aircraft's records involving incorrect total time or time since overhaul by marking out the error and including a single entry with corrected times; (2) whether an individual may rely on a "blanket AD compliance" statement to show compliance with all applicable airworthiness directives; (3) an appropriate means to remove comments in an aircraft's records made by an individual who is not authorized to make maintenance record entries; and (4) whether "100 hr" inspection sign offs may be made only in the aircraft logbook or must also be made in the engine and propeller logbooks.

As explained below, I have forwarded your request to the FAA's Flight Standards Service to advise you on your first and third questions because the FAA's regulations do not dictate how errors in aircraft records may be corrected. Your understanding of "blanket AD compliance" statements is incorrect, and such a statement would not satisfy 14 CFR 91.417. Finally, you are correct that the results of a100-hour inspection must be documented only in the aircraft's maintenance records.

1. Correcting errors in the aircraft's maintenance records

Your letter presents a hypothetical in which a mechanic makes an error in recording an aircraft's total time or time since overhaul because of a tachometer or hour meter change that does not start from zero and that error is propagated by succeeding mechanics until it is discovered, months or years later, during a logbook review. You inquire as to whether an error of this nature can be

[1] Although the letter is dated December 15, 2015, the letter's envelope indicates it was not posted until December 31, 2015. The Office of the Chief Counsel received the letter on January 7, 2016.

"corrected by 'single-line' out, marked out, covered up, or removed followed with an entry by an appropriately rated person containing the corrected times without contacting each individual previous mechanic (or certificate holder)."

An aircraft's registered owner or operator is required to keep records that contain, among other things, the following information:

> (i) The total time in service of the airframe, each engine, each propeller, and each rotor.
> (ii) The current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance.
> (iii) The time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis.

14 CFR 91.417(a)(2)(i)-(iii).

However, the FAA's regulations do not specify the means by which an aircraft's records must be corrected. I have forwarded your request to the Flight Standards Service to advise you on acceptable means for correcting the records required by 14 CFR 91.417.

2. Documenting compliance with airworthiness directives

Your letter states that "[a] 'blanket AD compliance' is usually found in an older AD listing, usually following an annual inspection where the author makes a statement similar to the following: 'All AD complied through this date' or 'All AD complied through revision X/X.'" Your letter also indicates that you "understand a record of this nature . . . may be used in future records as a method to show compliance [with] the AD [issued] to that date."

Section 91.417(a)(2)(v) requires a registered owner or operator to keep records containing "[t]he current status of applicable airworthiness directives (AD) and safety directives including, for each, the method of compliance, the AD or safety directive number and revision date."[2]

A "blanket statement" does not comply with the requirements of 14 CFR 91.417(a)(2)(v) because a registered owner or operator is required to keep records regarding each applicable AD; therefore, reliance on such a "blanket statement" is inappropriate. In addition, please note that 14 CFR 91.405 requires that the owner or operator of an aircraft ensure that maintenance personnel who accomplish the work required by an AD make the maintenance record entries required by 14 CFR 43.9.

3. Removal of comments by individuals who are not authorized to make maintenance records required by 14 CFR part 43.

Your letter indicates that individuals who are not authorized under part 43 are making entries in a maintenance logbook and states that you understand that "a record of this nature can be corrected by line out, mark out, cover up, removal."

[2] If the AD or safety directive involves recurring action, the record also must include the time and date when the next action is required. 14 CFR 91.417(a)(2)(v).

The FAA's regulations do not prescribe a method for removing unauthorized comments from a maintenance logbook. I have forwarded your request to the Flight Standards Service to advise you on acceptable means for removing unauthorized comments from an aircraft's maintenance records.

4. Whether a 100-hour inspection must be documented in engine and propeller logbooks.

You asked whether completion of the 100-hour inspection required by 14 CFR 91.409(b) must be documented in the aircraft's engine and propeller logbooks or just the aircraft's maintenance records.

Except for certain exceptions, "no person may operate an aircraft carrying any person (other than a crewmember) for hire, and no person may give flight instruction for hire in an aircraft which that person provides, unless within the preceding 100 hours of time in service the aircraft has received an annual or 100–hour inspection and been approved for return to service in accordance with part 43." 14 CFR 91.409(b).

A maintenance record entry documenting the completion of a 100-hour inspection is required only for the aircraft. My office answered a similar request for interpretation regarding annual inspections from Ted Stanley on March 4, 2015.[3] Because both annual inspections and 100-hour inspections are governed by 14 CFR 43.15(c) and because section 91.409(b)'s inspection requirement applies to the entire aircraft, the reasoning contained in the March 4, 2015 letter to Mr. Stanley applies to 100-hour inspections. If an owner or operator maintains separate logbooks for the aircraft's engine and propeller, it would be good practice for the holder of an inspection authorization to document the completion of a 100-hour inspection in those logbooks, but it is not required.

I hope this response has been helpful to you. If you have any additional questions or require further information, please feel free to contact my office at (202) 267-3073. This response was prepared by Sarah Sorg and Benjamin Berlin, both attorneys in the Regulations Division of the Office of the Chief Counsel, and coordinated with the Aircraft Maintenance Division (AFS-300) in the FAA's Flight Standards Service.

Sincerely,

Lorelei Peter
Assistant Chief Counsel for Regulations, AGC-200

Enclosure

[3] *See* Legal Interpretation , Letter to Mr. Ted Stanley, from Mark W. Bury, Assistant Chief Counsel for Regulations, AGC-200 (March 4, 2015) (addressing the annual inspection requirements). The March 4, 2015 letter is enclosed.

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Tuesday, December 15, 2015

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Request for legal Interpretation

Subject: Correction to inaccuracies in aircraft maintenance log books.

Topics: Mathematical errors, Blanket AD compliance, Comments, & Sign off of individual components.

History: Advisory Circular 43.9C does not contain information regarding corrections. AC-MaintRec.ptt A PowerPoint presentation prepared by FAA's Greg Knolting makes a blanket statement about aircraft maintenance records "If it doesn't say that you can't, then you can." (Slide 27). http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwif0_PKmYbKAhXF0iYKHU4YBHwQFggcMAA&url=http%3A%2F%2Fwww.flyafac.com%2Fdocuments%2FAC-MaintRec.ppt&usg=AFQjCNGn-slzsB190L4UilyViQlXqWTWdg&bvm=bv.110151844,d.eWE FAA legal interpretation FEB 16 2010 to Roger h. Benninger states near the end "a certificate holder should take action to correct an inaccurate record when the inaccuracy becomes apparent"

1. **Mathematical Errors:**

Some times during log book review an error in total time or time since overhaul is discovered. This is generally caused by a tachometer or hour meter change that does not start from 'zero' but can come from other sources as well. Typically what happens is one mechanic makes an error and then that error is followed by the succeeding mechanic in calculation of times, which can span years and hours of operation, adding or subtracting actual time from the aircraft causing a loss in continuity of time.

We understand a record of this nature can be corrected by 'single-line' out, marked out, covered up, or removed followed with an entry by an appropriately rated person containing the corrected times

without contacting each individual previous mechanic (or certificate holder) in order to correct those times.

2. **Blanket AD Compliance:**

A "blanket AD compliance" is usually found in an older AD listing, usually following an annual inspection where the author makes a statement similar to the following: "All AD complied through this date" or "All AD complied through revision X/X". We understand a record of this nature while not specifically listing an AD the author is taking responsibility for "ALL" AD's prior to his/her entry, and as such may be used in future records as a method to show compliance to the AD to that date.

3. **Comments:**

Comments come in lots of forms, from the simple "This airplane fly's great" to more serious matters such as an entry made by an insurance company with a statement like "The subject aircraft was involved in an incident/accident at any town, any state, on any date rendering it a total loss as not repairable within its insured value". These comments frequently are made by persons not authorized under Part 43 and do not contain all the elements of FAR 43.9. They are not a record used to show compliance with any FAR requirement. We understand a record of this nature can be corrected by line out, mark out, cover up, removal.

4. **Sign off of individual components:**

As a matter of industry practice the Airframe log book normally receives the "Annual" sign off, with the Engine log having the "100 hr" sign off, in recent years the Propeller has received its own log book with its "100 hr" sign off. While we believe this is good practice and gives clarity to the records of the aircraft, we can find no FAR's that requires a sign off for each individual component which is not a life limited component. In the past I have seen FAA inspectors try to imply that this 'good practice' is a matter of regulation. We understand the FAA should only enforce FAA regulations and orders not 'good practices'. Furthermore, that aircraft records have a hierarchy with the Airframe being at the top of that hierarchy and when an authorized airman is making a sign off for the complete aircraft, the signoff includes engine, propeller and its sub components.

Craig Easter

