Federal Aviation Administration

Memorandum

Date: May 4, 2017

To: John S. Duncan, Director, Flight Standards Service (AFS-1) PATRICIA KIRKER WILLIAMS Digitally signed by PATRICIA KIRKER WILLIAMS Date: 2017.05.04 09:42:01 -04'00'

From: Timothy W. Shaver, Manager, Aircraft Maintenance Division (AFS-300) for

Prepared by: Daniel Reyes, Writer/Editor, Program Management and Information Branch (AFS-310)

Subject: Cancellation Request for Notice 8900.411 regarding OpSpecs A003.

Overview:
AFS-300 is requesting that Notice 8900.411 be immediately cancelled and removed from the applicable FAA repositories. There are discrepancies within this Notice and the required actions it states could inadvertently cause a Principal Inspector (PI) to perform duties outside of their authorization as an inspector.

The Background section of the notice informs the reader that Operations Specifications (OpSpec) paragraph A003 has been revised by removing the reference to the capability list (CL) from the Propeller Class 2 because the regulation only requires a list by make. Also, the drop down box under Limited Ratings has been amended to contain only those ratings list in § 145.61(b).

First discrepancy: The statement that the removal of the ability for a capability list drop down for propeller class 2 "because the regulation only requires a list by make" is in error.

- The option to use the capability list drop down for any class rating is not possible. Part 145, §145.215 only permits a limited-rated repair station to use a capability list.

Second discrepancy/concern: The removal of rating options under the limited rating section (§ 145.61(b)) of paragraph A003 is not the discrepancy, but in doing so, there are many repair stations OpSpecs that contain the ratings that were removed.

- This action will promote mass confusion to not only the repair stations and their capabilities, but also to the inspectors in discerning what ratings the repair stations are now working to.

Third discrepancy: In the Action section of the notice, PIs are directed to amend and re-issue the repair stations OpSpec paragraph A003 for those repair stations whose ratings differ from those contained in §§ 145.59 and 145.61, within 30 days of the published notice date.

- Under part 145, the air agency certificate and operations specifications are considered one document. To arbitrarily amend the OpSpecs without consent from the repair station is considered certificate action. Therefore, the inspectors would be required to follow processes identified in FAA Order 2150.3. For a notice to direct inspectors to amend repair stations OpSpecs promotes the inspector to perform duties not authorized under these circumstances.

Fourth discrepancy: The template for OpSpecs paragraph A003 rating drop down box previously contained powerplant, and is now engine under the limited rating section. Prior to this template revision, the ability to write text was an option. The template revision released in concert with this notice has eliminated the option for writable text.

- FAA inspectors are unable to change the limited ratings section in Safety Assurance System (SAS) under the Certificate Holder Operating Profile to support the action required by the notice. The limited rating drop down listing in SAS does not allow writable text to change the language from Limited Powerplant (L-PP) to Limited Engine (L-E). Currently, there is no interface between the new requirement directed by this notice and SAS automation.

Since its publication, Notice 8900.411 has caused numerous negative feedback and complaints. Per the Notice, field offices are concerned that all repair stations that have been issued a limited powerplant or class powerplant rating would have to have their air agency certificates amended to reflect limited *engines*, which would cause the repair station industry millions of dollars in advertisements and customer support to amend their air agency certificates to reflect Limited Engines instead of Limited Powerplant.

To address this issue, we are currently drafting a new Notice, which will take time to complete the QMS publication process. In the meantime, however, the current Notice 8900.411 needs to be removed from the FAA's internal and external repositories.

Concurrence
If you concur with the request, please acknowledge below:

Approve: _____

Disapprove: _____

Cc: Mark Hopkins, acting Manager, AFS-100