

Begin forwarded message:

From: "Michael Harkins" <MHarkins@aerotaxi.com>
Date: Fri Nov 12, 2010 10:53:31 AM Canada/Pacific
To: "Michael Harkins" <MHarkins@aerotaxi.com>
Subject: FAA to Restrict A & P Recognition - Please Forward on

FAA to Restrict A & P Recognition

SUBJECT:FAA to Restrict A & P Recognition

SUMMARY:The FAA has issued a policy which is intended to clarify the definition of "Actively Engaged" for purposes of issuing and renewing the A & P Inspector Authorization.

[[Federal Register](#)]

MAJOR HIGHLIGHTS:This FAA action proposes to clarify the term "actively engaged" for the purposes of application for and renewal of an inspection authorization, as contained in Flight Standards Management System Order 8900.1.

Of particular interest to AEA members is the criteria contained below:

Note:

Actively engaged means exercising the privileges of an airframe and powerplant mechanic certificate in the maintenance of civil aircraft. Applicants who are employed full-time in inspecting, overhauling, repairing, preserving, or replacing parts on aircraft are considered to be actively engaged.

Applicants who are employed or participate in inspecting, overhauling, repairing, preserving, or replacing parts on aircraft on a part-time or occasional basis will be evaluated by the ASI to determine whether the applicant is actively engaged. The ASI will evaluate the scope of part-time or occasional activity based on the type of maintenance activity, including any special expertise required, and the quantity of maintenance activity performed. To evaluate the scope of the part-time or occasional maintenance activity, the ASI will use evidence or documentation provided by the applicant showing inspection, overhauling, repairing, preserving, or replacing parts on aircraft.

Comments must be received on or before Dec. 6, 2010, through the Federal eRulemaking Portal: <http://www.regulations.gov>.

You may send comments identified by docket number FAA-2010-1060.

AEA COMMENTARY:

The Association is disappointed with this "labor saving" initiative.

For decades, the FAA, as well as industry, has been frustrated by the lack of career recognition of the Airframe and Powerplant mechanic. And now, the FAA proposes to remove this recognition from those who are in senior management positions with corporate flight departments, repair stations and air carriers who are not exercising their A & P privileges to "inspect, overhaul, repair, preserve, or replace parts on aircraft."

In an unprecedented addition, the FAA, while minimizing the recognition of publically employed A & P mechanics, has exempted its own employees from this flawed policy.

According to this proposal, because other FAA policy limits the type of maintenance that ASIs can perform (they may only exercise their IA on their personal, non-commercial aircraft), the FAA employees are exempt from this new policy, and "an ASI may renew an IA regardless of volume of maintenance work performed."

AEA encourages every member who may be affected by this policy to send comments to the FAA.

For More Information:

Contact Ric Peri, vice president of government and industry affairs for the AEA, by e-mail atricp@aea.net or by phone at 202-589-1144.