

Memorandum

Date:

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To:

All Regional Flight Standards Division Managers All Regional Technical Standards Branch Managers

From:

David E. Cann, Manager, Aircraft Maintenance Division, AFS-300

Prepared by:

Robert D. Moten, AFS-340, x73813

Subject:

The Use of Technical Orders (TO) and the Alteration of Data Plates

The following three issues were submitted for clarification of repair station practices with regard to using Technical Orders, and the alteration of data plate information. There appears to be some confusion since some district offices allow the practice while others prohibit it.

Q: Is it permissible for an appropriately rated repair station to approve for return to service a product/part/appliance on a FAA Form 8130-3, block 19, 14 CFR 43.9, using a Technical Order (TO) when there is no published manufactures' maintenance/overhaul manual? The repair station does not know eligibility or intended use.

A: Technical Orders can be used as a means to repair or overhaul a product, part, and appliance if the TO has been approved by an Aircraft Certification Office (ACO).

Q: Is it permissible for an appropriately rated repair station to alter the configuration of a product/part/appliance, using data contained in the manufacturer's maintenance/overhaul manual, and to alter the data plate part number to indicate the part number it was altered to, specific instructions for doing so are not addressed by the manufacturer? It also assumes that the maintenance instructions for the original and altered part numbers are both contained within the same manual and that only the dash numbers, not base numbers (Base # - Dash #) are changed.

A: No, if the instructions do not specifically state that the parts of a product/part/appliance are interchangeable then the alteration of the configuration is not acceptable. Likewise, for altering the dash number, this is also unacceptable.

Q: If second Q above is permissible, would a FAA Form 337 be required to record a major alteration, or minor alteration?

A: Question 2 is not permissible.

Please ensure all airworthiness inspectors in your region are aware of the above information. If there are additional questions please contact Robert (Bob) D. Moten at (202) 267-3813.