



Federal Aviation Administration

Memorandum

Date: August 7, 2019

To: Rick Domingo, Executive Director, Flight Standards Service, AFX-1

From: Regulatory Consistency Communication Board (RCCB)

Subject: 100% Replacement of Parts During Maintenance

This memo is provided as an update to the 100% replacement of parts issue submitted by the Aeronautical Repair Station Association (ARSA) to the RCCB.

ISSUE: ARSA seeks to confirm whether 100% replacement of parts during maintenance of an article that is not an aircraft, an aircraft engine, a propeller, a propeller hub, a propeller blade, or a free manned balloon is allowed under FAA regulations. ARSA asserts that FAA regulations do not prohibit the replacement of all parts in an article during a single maintenance visit. Further ARSA asserts that there is no regulatory prohibition on using any combination of new parts from the original DAH/PAH, PMA parts, “serviceable” parts, owner-operator produced parts, or maintenance-fabricated parts during that maintenance action. There are no regulatory limits on the number of parts that can or should be replaced during maintenance. Finally, should the FAA agree with ARSA’s assertion that 100% replacement of parts is allowed during maintenance, ARSA asks that AIR and FS develop guidance on compliance.

RESPONSE: The RCCB acknowledges the issues raised by ARSA regarding the 100% replacement of parts in an article during a single maintenance visit. FAA regulations do not specify the amount of parts that may be replaced on an article during a single maintenance visit. Accordingly, the FAA will actively explore developing guidance and whether a legal interpretation is appropriate. FS intends to propose guidance recommending a process that repair facilities and maintenance personnel should follow when performing tasks that may result in the 100% replacement of parts of an article in a single maintenance visit. This process would likely address and be in accord with the requirements of § 43.13, Performance rules (general), paragraphs (a) and (b), which state as follows:

- (a) Each person performing maintenance, alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance shall use the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques,

and practices acceptable to the Administrator, except as noted in § 43.16. He shall use the tools, equipment, and test apparatus necessary to assure completion of the work in accordance with accepted industry practices. If special equipment or test apparatus is recommended by the manufacturer involved, he must use that equipment or apparatus or its equivalent acceptable to the Administrator.

(b) Each person maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on will be at least equal to its original or properly altered condition (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

If you have any questions regarding this memorandum, please contact the Aircraft Maintenance Division at (202) 267-1675.