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## Aviation Safety

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### Memorandum

Date:

To: All Flight Standards Service Employees

From: Rick Domingo, Executive Director, Flight Standards Service

Subject: Use of Video and Communication Technology (VCT)

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This memorandum describes the relationship between Video and Communication Technology (VCT) and existing regulations and Orders. VCT can be more cost effective, improve timeliness, and reduce FS and industry resource burdens.

**VCT defined:** Any tool or equipment which enable video, audio, and communication systems through internet, cellular, or satellite connections for live streaming or recording data for viewing.

Current FS Orders and Federal Aviation Administration (FAA) regulations do not prohibit FS or industry use of VCT in fulfilling the requirements, and no specific guidance is necessary to enable its use. When evaluating an applicant, certificate-holder's or designee's procedures to use VCT, or when evaluating your own use of VCT, aviation safety inspectors (ASIs) should apply critical thinking and interdependence to foster consistent decisions for the proper use of VCT.

Industry may identify ways to use VCT in the fulfillment of their responsibilities, or propose methods that the FAA could use VCT. FS may not mandate the use of VCT. When VCT is accomplished by an ASI, the ASI must use government furnished equipment (reference FAA Order 1370.121). Finally, the ASI should not retain any Industry proprietary information or recordings once the activity is complete (reference FAA Order 1600.75).

The following considerations may assist you in evaluating proposed use of VCT. For applicant, certificate-holder, and designee use of VCT, it is their responsibility to comply with the relevant regulations when using VCT. If the use of VCT is not appropriate, the activity should be conducted in person.

**General Considerations for the responsible FS Office When Considering VCT Use**

- A.** How can VCT be used to supplement current FAA and Industry policy/procedures?
- a. Use of VCT may enhance processes and procedures, or may be an alternate method of accomplishing a given task.
  - b. Consider the overall assessment of risk, and the role of VCT with current FAA and Industry policy/procedures.
  - c. In evaluating FAA use of VCT, consider the certificate holder's experience level of the activity being viewed remotely and their history of compliance associated with the activity.
- B.** Can the use of VCT accomplish the task?
- a. What is the activity to be accomplished, and what characteristics are important to accomplish it?
  - b. VCT may have limitations that might render its use unsuitable for certain FS activities. For instance, consider the impact of the absence of physical senses (touch, sight, sound, smell).
  - c. The use of VCT in real-time enables the Aviation Safety Inspector (ASI) to direct the activity in response to observed conditions, while the use of recorded "after-the-fact" activities enables asynchronous activities that can be advantageous with different time zones.
  - d. Consider the VCT coverage and quality, as it relates to the activity to be accomplished.
- C.** Are individuals qualified and are proper tools available?
- a. What equipment is needed, for whom?
  - b. Do individuals have the ability to use the equipment as intended to accomplish the activity? Is specific training necessary?
- D.** Can VCT be confirmed to be current and authentic? The use of VCT should ensure that the activity is performed where, and when, it is intended.

We appreciate the opportunity to assist you. If you have any additional questions regarding this memorandum, please contact the Aircraft Maintenance Division at [9-AWA-AFS-300-Correspondence@faa.gov](mailto:9-AWA-AFS-300-Correspondence@faa.gov) or call (202) 267-1675.

