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RE: Comments on Notice of Proposed Rulemaking (NPRM)
Mechanic Certification: Inspection Rating and Recent Experience Requirements
Docket No.: [FAA-2026-6671](#)
91 FR 39906, July 1, 2026

Dear Mr. Barron,

The Aircraft Electronics Association ([AEA](#)) and Aeronautical Repair Station Association ([ARSA](#)) ("the associations") represent design, production, operating, and maintenance certificate holders.

All civil aviation aircraft depend upon individuals certificated under [14](#) CFR¹ part [65](#) to perform maintenance, preventive maintenance, and alterations required and authorized by part [43](#).

The associations appreciate the opportunity to provide clarity to the agency's proposal.

(I) General Comments

The associations support the agency's desire to reduce both individual and administrative costs and harmonize the inspection authorization (IA) with the other requirements of a mechanic's certificate. However, the goal can be accomplished without changing the authorization to a rating.

(II) Background

The government was originally the only person with authority to perform annual inspections on aircraft and to inspect and approve for return to service following major

¹ Unless otherwise noted, all regulatory references are to Title [14](#) of the Code of Federal Regulations.



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repairs and major alterations. As explained in the agency's preamble, the inspection authorization for those unique inspections was transferred to the industry in 1957.

On December 30, 1954, the Bureau issued a notice of proposed rulemaking, published in the *Federal Register* (20 FR 232) and circulated as Civil Air Regulations Draft Release No. 54-27 to amend Parts 1, 18, 24, 43, and 52 of the Civil Air Regulations. One of the proposals was to eliminate the requirement that the annual inspection of general aircraft only be accomplished by a representative of the Administrator. The objective was to simplify the procedure for the inspection and return to service of non-air carrier aircraft. That required industry to assume the responsibility for the continued airworthiness of such aircraft.

Thus, after the final rule in July 1957, the IA became the method for industry to perform the governmental function of annual aircraft inspections and inspections of and approvals for return to service of major repairs and major alterations.

(III) It is a Privilege Not a Rating

Inspection is a function of maintenance; thus, the IA confirms specific authority, it is inappropriate to make it a rating. The authority is to be conferred only on the most active, experienced, and capable mechanics with both airframe and powerplant ratings. As the agency's preamble states:

While not a rating under § 65.73, certificated mechanics may be eligible to receive an IA, which grants privileges beyond those associated with the mechanic certificate and its A&P ratings

The associations propose the agency merely adjust the current regulations to remove the requirement to renew the authority. The renewal would be replaced with the requirement for the mechanic with inspection authorization to keep records showing active engagement, capability to perform the tasks, and the authorizations undertaken.

This method would achieve the same objectives as the agency's notice. It would ensure only currently active mechanics retain authority to perform the activities formerly performed by the agency. It would save more time and money for the agency and the industry because the current IA holders would not have to exchange their certificates.

Appendix A contains the associations' proposed regulatory changes and compares those changes with the agency's proposal.

(IV) Active Engagement

Moving the IA to a rating does not address the underlying confusion over the term "active engagement" that was supposedly resolved by the [2010 policy](#). For a mechanic certificate to remain effective under § 65.15(a), all mechanics must be able to show compliance with § 65.[83](#).

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Active engagement under § 65.[83](#) ensures the individual is working in the aviation maintenance arena. It includes individuals using the privileges of the part 65 certificate, as well as those engaged by repair stations or air carriers to perform or supervise maintenance tasks. The policy explains that active engagement in maintenance activity may include both full- and part-time employment as well as occasional participation, regardless of employment status.

The ability to hold an inspection authority is dependent upon the knowledge, professionalism, and consistent application by the individual of the knowledge and capabilities in the aviation maintenance arena. It is not dependent upon the amount of time performing maintenance functions. The activities described in § 65.[93](#) today (four annual inspections or major repairs or alterations, or one progressive inspection, or attend 8 hours of refresher training) indicates the nature and extent of the maintenance activities expected by the agency. The expectation is that an actively engaged mechanic will spend at least 8 hours dedicated to maintaining the inspection authorization.

Unfortunately, the agency introduced what appeared to be an additional requirement for applicants of inspection authorization in § 65.91(c)([2](#)) with the words “been actively engaged, for at least the 2-year period before the date he applies, in maintaining aircraft certificated and maintained in accordance with this chapter”, an active engagement *already required* by § 65.[83](#). To remove future controversy over the term, the associations recommend the agency tie the requirement of all mechanics wishing to exercise *any* privileges under § 43.[3](#) to be actively engaged under § 65.[83](#) to the IA’s eligibility.

(V) Records of Active Engagement

As the agency discussed in the preamble, in 1977, objections to the need to keep records of the work performed and approved for return to service were based upon the perceived burden on the mechanic. The agency’s proposal also required extra records to be kept by the mechanic, rather than a copy of the maintenance or inspection record required by §§ 43.[9](#) or 43.[11](#).

The agency can request a mechanic certificate applicant or holder to establish compliance with § 65.[83](#) at any time. If that person is unable to provide evidence of compliance through maintenance records or other means, the agency could deem the certificate ineffective.

The privileges afforded mechanics with IA must be aligned with the ability of the agency to provide oversight in the most efficient and effective manner. The perception that the industry would be burdened by a requirement to show compliance that has existed for decades is problematic. A mechanic with the authority to perform actions originally exercised by the agency must be able to show the active engagement required by

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§ 65.[83](#) plus the activities required to maintain the authorization status. The requirement to keep records is inherent to those responsibilities.

Maintaining a copy of the § 43.[9](#) or § 43.[11](#) record issued by a mechanic with inspection authorization imposes little burden in 2026. Snapping a picture of the record provided to the owner of the article or product or making duplicate entries takes little time or effort. There is no need to add a requirement that the mechanic with IA keep a separate record from the required maintenance or inspection record under §§ 43.[9](#) and 43.[11](#). Evidence of employment for those mechanics providing technical or executive supervision for an air carrier or a repair station would also be easily obtained by the agency or the applicant/certificated mechanic. The agency has access to the repair station or air carrier's rosters and the mechanic has proof of employment through pay stubs or bank records.

(VI) Economics

The associations agree with the agency's estimate of cost savings and encourage more savings by keeping the IA on the mechanic's certificate rather than making it a rating.

The agency merely adds costs to the agency and the industry by requiring replacement certificates for those holding inspection authorization today. The authorization remains valid and the mechanic merely needs to adhere to the new regime going forward. Persons in the process of obtaining authorization after the rule is finalized would be required to show compliance with the slight changes associated with passing the written knowledge test that will be incorporated by reference.

(VII) Conclusion

The associations agree with the concepts proposed by the agency. The need to renew an IA can be removed provided the agency obtain the ability to determine compliance with the basic requirements of a mechanic's certificate and can easily verify the work being performed by the holder of an IA.

The associations do not agree that an IA should become a rating. There is no need for that amount of change to the regulatory scheme created when the government turned the aircraft inspections and approvals for return to service of major repairs and alterations over to the industry.

The mechanics that qualify for the special authorization must be the best in the business of aviation maintenance. They must first be actively engaged to retain the effectiveness of the mechanic certificate. Next, they must be capable of performing tasks in areas that cannot be exercised by mechanics. Finally, they must be willing and able to provide evidence of their qualifications whenever requested. The privilege to perform vital annual inspections and to ensure major repairs and alterations are performed properly should remain separate from the airframe and powerplant certificate, not become a rating.

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What the Rule Says Now	Proposed by AEA and ARSA
<u>§ 65.91 Inspection authorization.</u> (a) An application for an inspection authorization is made on a form and in a manner prescribed by the Administrator. (b) An applicant who meets the requirements of this section is entitled to an inspection authorization. (c) To be eligible for an inspection authorization, an applicant must— (1) Hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating, each of which is currently effective and has been in effect for a total of at least 3 years; (2) Have been actively engaged, for at least the 2-year period before the date he applies, in maintaining aircraft certificated and maintained in accordance with this chapter; (3) Have a fixed base of operations at which he may be located in person or by telephone during a normal working week but it need not be the place where he will exercise his inspection authority; (4) Have available to him the equipment, facilities, and inspection data necessary to properly inspect airframes, powerplants, propellers, or any related part or appliance; and (5) Pass a written test on his ability to inspect according to safety standards for returning aircraft to service after major repairs and major alterations and annual and progressive inspections performed under part 43 of this chapter. (6) An applicant who fails the test prescribed in paragraph (c)(5) of this section may not apply for retesting until at least 90 days after the date he failed the test.	<u>§ 65.91 Inspection authorization.</u> (a) An application for an inspection authorization is made on a form and in a manner prescribed by the Administrator. (b) An applicant who meets the requirements of this section is entitled to an inspection authorization. (c) To be eligible for an inspection authorization, an applicant must— (1) Hold an effective mechanic certificate under § 65.15(a) with both an airframe and powerplant ratings that have been in effect for at least 3 years; (2) Have been actively engaged under § 65.83 for at least the 24-calendar month period before the date of application; (3) Have a fixed base of operations where the mechanic is available in person or by telephone during a normal working week, but it need not be the location where the privileges of the inspection authorization will be exercised; (4) Have available the housing, facilities, equipment, and inspection data necessary to inspect the product, appliance, or component part in accordance with part 43; (5) Receive an endorsement from a representative of the Administrator that the requirements of § 65.91(c)(1) through (4) have been met and the person has not attempted the inspection authorization written test required by § 65.91(c)(6) within the previous 90 days; and (6) Within 30 days of receiving the endorsement set forth in paragraph (c)(5) of this section, pass a written test, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certifications Standards (incorporated by reference, see § 65.23). (d) An applicant who fails the test prescribed in paragraph (c)(6) of this section may not apply for retesting until at least 90 days after the date of the failed test.



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§ 65.92 Inspection authorization: Duration.

- (a) Each inspection authorization expires on March 31 of each odd-numbered year. However, the holder may exercise the privileges of that authorization only while he holds a currently effective mechanic certificate with both a currently effective airframe rating and a currently effective powerplant rating.
- (b) An inspection authorization ceases to be effective whenever any of the following occurs:
- (1) The authorization is surrendered, suspended, or revoked.
 - (2) The holder no longer has a fixed base of operation.
 - (3) The holder no longer has the equipment, facilities, and inspection data required by § 65.91(c) (3) and (4) for issuance of his authorization.
- (c) The holder of an inspection authorization that is suspended or revoked shall, upon the Administrator's request, return it to the Administrator.

§ 65.92 Inspection authorization: Duration.

- (a) An inspection authorization ceases to be effective whenever any of the following occurs:
- (1) The authorization is surrendered, suspended, or revoked.
 - (2) The holder no longer has a fixed base of operation.
 - (3) The holder no longer has the equipment, facilities, and inspection data required by § 65.91(c)(3) and (4) for issuance of the authorization.
 - (4) The mechanic is no longer actively engaged under § 65.83.
- (b) The holder of an inspection authorization that is suspended or revoked shall, upon the Administrator's request, return it to the Administrator.
- (c) Except as provided in paragraph (d) of this section, no person may exercise the privileges of the inspection authorization unless within the previous 12 calendar months one of the following activities has been completed:
- (1) Performed at least four annual inspections;
 - (2) Performed at least eight major repairs or major alterations, including any combination thereof;
 - (3) Performed or supervised and approved at least one progressive inspection in accordance with standards prescribed by the Administrator;
 - (4) Attended and successfully completed a refresher course, acceptable to the Administrator, of not less than 8 hours of instruction; or
 - (5) Passed an oral test by an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of applicable regulations and standards is current.
- (d) A person does not have to meet the requirements of paragraph (c) of this section to exercise the privileges of the inspection authorization during the 12 calendar months following original issuance of the inspection authorization. Replacement of a mechanic certificate for a mechanic



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	certificate with an inspection authorization is not considered an original issuance of the inspection authorization. (e) A certificated mechanic with an inspection authorization who does not meet the requirements set forth in paragraph (c) of this section may not exercise the privileges of the authorization, until they have: (1) Attended and successfully completed a refresher course(s), acceptable to the Administrator, of not less than 8 hours of instruction; or (2) Passed an oral test from an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of the applicable regulations and standards is current. (f) A certificated mechanic with inspection authorization who completes the requirements of paragraph (e) of this section is deemed to have completed the requirements of paragraph (c) of this section. (g) A certificated mechanic with inspection authorization must maintain records to demonstrate active involvement under § 65.83 and completion of the requirements in paragraphs (c)(1) through (5) or (e) of this section, as applicable, and present them to a representative of the Administrator upon request. The records must be retained for at least 2 years.
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§ 65.93 Inspection authorization: Renewal.

(a) Except as provided in paragraph (d) of this section, to be eligible for renewal of an inspection authorization for a 2-year period an applicant must present evidence during the month of March of each odd-numbered year, at the responsible Flight Standards office, that the applicant still meets the requirements of § 65.91(c)(1) through (4). In addition, during the time the applicant held the inspection authorization, the applicant must show completion of one of the activities in paragraphs (a)(1) through (5) of this section by March 31 of the first year of the 2-year inspection authorization period, and completion of one of the five activities during the second year of the 2-year period:

(1) Performed at least one annual inspection for each 90 days that the applicant held the current authority; or

(2) Performed at least two major repairs or major alterations for each 90 days that the applicant held the current authority; or

(3) Performed or supervised and approved at least one progressive inspection in accordance with standards prescribed by the Administrator; or

(4) Attended and successfully completed a refresher course, acceptable to the Administrator, of not less than 8 hours of instruction; or

(5) Passed an oral test by an FAA inspector to determine that the applicant's knowledge of applicable regulations and standards is current.

(b) The holder of an inspection authorization that has been in effect:

(1) for less than 90 days before the expiration date need not comply with paragraphs (a)(1) through (5) of this section.

(2) for less than 90 days before March 31 of an even-numbered year need not comply with paragraphs (a)(1) through (5) of this section for the first year of the 2-year inspection authorization period.

(c) An inspection authorization holder who does not complete one of the activities set forth in § 65.93(a) (1) through (5) of this section by March 31 of the first year of the 2-year inspection authorization period may not exercise inspection authorization privileges after March 31 of the first year. The inspection authorization holder may resume exercising inspection

§ 65.93 Inspection authorization: Privileges and Limitations.

(a) The holder of an inspection authorization may—

(1) Inspect and approve for return to service (except any aircraft maintained in accordance with a continuous airworthiness maintenance program under parts 91, 121, 129, or 135 of this chapter) the accomplishment of a major repair or major alteration performed in accordance with part 43 of this chapter, if the work was done in accordance with technical data approved by the Administrator; and

(2) Perform an annual or perform or supervise a progressive inspection according to §§ 43.13 and 43.15 of this chapter.

(b) When exercising the privileges of an inspection authorization the holder shall keep it available for inspection by the aircraft owner, the mechanic submitting the inspection, repair, or alteration for approval (if any), and shall present it upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer.

(c) A certificated mechanic with an inspection authorization may exercise the privileges of that authorization only while holding a mechanic certificate with both airframe and powerplant ratings that are effective in accordance with §§ 65.15(a), the holder is actively engaged under § 65.83, and is qualified under § 65.81.

(e) If a certificated mechanic with an inspection authorization changes the fixed base of operation required by § 65.91(c)(3), the responsible Flight Standards office or International Field Office for the area in which the new base is located must be notified, in writing, before exercising the privileges of the inspection authorization.



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authorization privileges after passing an oral test from an FAA inspector to determine that the applicant's knowledge of the applicable regulations and standards is current. An inspection authorization holder who passes this oral test is deemed to have completed the requirements of § 65.93(a)(1) through (5) by March 31 of the first year. (d) A person who qualifies for the relief prescribed in § 61.40 of this chapter is eligible to renew an expired inspection authorization under this section, provided the requirements of § 61.40 of this chapter are met.	
<u>§ 65.95 Inspection authorization: Privileges and limitations.</u> (a) The holder of an inspection authorization may— (1) Inspect and approve for return to service any aircraft or related part or appliance (except any aircraft maintained in accordance with a continuous airworthiness program under part 121 of this chapter) after a major repair or major alteration to it in accordance with part 43 [New] of this chapter, if the work was done in accordance with technical data approved by the Administrator; and (2) Perform an annual or perform or supervise a progressive inspection according to §§ 43.13 and 43.15 of this chapter. (b) When he exercises the privileges of an inspection authorization the holder shall keep it available for inspection by the aircraft owner, the mechanic submitting the aircraft, repair, or alteration for approval (if any), and shall present it upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer. (c) If the holder of an inspection authorization changes his fixed base of operation, he may not exercise the privileges of the authorization until he has notified the responsible Flight Standards office or International Field Office for the area in which the new base is located, in writing, of the change.	



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Agency's Proposed Language	AEA and ARSA Proposed Language	Reasons for Differences
<u>§ 43.7(b)</u> The holder of a mechanic certificate may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 65 of this chapter.	The change is acceptable whether the agency issues a rating or leaves the IA as a privilege of an experienced mechanic with airframe and powerplant ratings.	
<u>§ 61.40</u> Relief for U.S. Military and civilian personnel who are assigned outside the United States in support of U.S. Armed Forces operations.	The change is acceptable whether the agency issues a rating or leaves the IA as a privilege of an experienced mechanic with airframe and powerplant ratings.	
(a) Application for a certificate and appropriate rating, or for an additional rating, under this part must be made on a form and in a manner prescribed by the Administrator. Each person who applies for airmen certification services to be administered outside the United States or for any certificate or rating issued under this part must show evidence that the fee prescribed in appendix A of part 187 of this chapter has been paid.	The change is acceptable whether the agency issues a rating or leaves the IA as a privilege of an experienced mechanic with airframe and powerplant ratings.	
<u>§ 65.19</u> (a) Except as specified in paragraph (b) of this section, an applicant for a written, oral, or practical test for a certificate and rating, or for an additional rating under this part, may apply for retesting— (1) After 30 days after the date the applicant failed the test; or (2) Before the 30 days have expired if the applicant presents a signed statement from an airman holding the certificate and rating sought by the applicant, certifying that the airman has given the applicant additional instruction in each of the subjects failed and that the airman considers the applicant ready for retesting. (b) An applicant who fails the written test for an inspection rating prescribed by § 65.75(b) of this part may not apply for retesting until at least 90 days after the date of the failed test.	<u>§ 65.91(d)</u> An applicant who fails the test prescribed in paragraph (c)(5) of this section may not apply for retesting until at least 90 days after the date of the failed test.	The associations do not believe the inspection authorization should be a rating; rather, it must remain a privilege afforded only the most experienced and knowledgeable mechanics.
<u>§ 65.71 Eligibility requirements: General</u> (b) Inspection Rating. To be eligible for an inspection rating on a person's mechanic certificate, a person must—	<u>§ 65.91 Inspection authorization.</u> (a) An application for an inspection authorization is made on a form and in a manner prescribed by the Administrator. (b) An applicant who meets the requirements of this section is entitled to an inspection authorization. (c) To be eligible for an inspection authorization, an applicant must—	



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(1) Hold a mechanic certificate with both an airframe rating and a powerplant rating currently effective in accordance with § 65.15(a) of this part and has been in effect for a total of at least 3 years; (2) Have been actively engaged, for at least the 24 calendar month period before the date of application, in maintaining aircraft certificated and maintained in accordance with this chapter; (3) Have a fixed base of operations where he may be located in person or by telephone during a normal working week but it need not be the location where the privileges of the inspection rating will be exercised; (4) Have available to him the equipment, facilities, and inspection data necessary to inspect airframes, powerplants, propellers, or any related part or appliance properly; and (5) Comply with the sections of this subpart that apply to the rating the applicant seeks.	(1) Hold an effective mechanic certificate under §§ 65.15(a) with both an airframe and powerplant ratings that have been in effect for at least 3 years; (2) Have been actively engaged under § 65.83 for at least the 24-calendar month period before the date of application; (3) Have a fixed base of operations where the mechanic is available in person or by telephone during a normal working week but it need not be the location where the privileges of the inspection authorization will be exercised; (4) Have available the housing, facilities, equipment, and inspection data necessary to inspect the product, appliance, or component part in accordance with part 43; (5) Receive an endorsement from a representative of the Administrator that the requirements of § 65.91(c)(1) through (4) have been met and the person has not attempted the inspection authorization written test required by § 65.91(c)(6) within the previous 90 days; and (6) Within 30 days of receiving the endorsement set forth in paragraph (c)(5) of this section, pass a written test, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certifications Standards (incorporated by reference, see § 65.23). (d) An applicant who fails the test prescribed in paragraph (c)(6) of this section may not apply for retesting until at least 90 days after the date of the failed test.	The intent of (c)(1) is the same, we believe the agency mistyped the “and”; it should be “that”. The mechanic must have held both an airframe and powerplant rating for at least three years. The requirement for active engagement in (b)(2) must be directly tied to the language that keeps the mechanic certificate effective. Removed gender-oriented language in (b)(3) by reorganizing the requirement.
<u>§ 65.73 Ratings</u> (c) A certificated mechanic with an inspection authorization valid on [EFFECTIVE DATE OF THE FINAL RULE] is entitled to a replacement mechanic certificate with an inspection rating. (d) A certificated mechanic with an inspection authorization that was valid on [EFFECTIVE DATE OF THE FINAL RULE] that has not obtained a replacement mechanic certificate as described in paragraph (d) of this section may not exercise the privileges of an inspection rating after [24 MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE]. After this date, a person may resume exercising the privileges of an inspection rating once they have obtained a mechanic certificate with an inspection rating and comply with the limitations and recent experience requirements prescribed in §§ 65.81(b) and 65.83(b).		If the inspection authorization remains, this will be unnecessary.



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<u>65.75 Knowledge requirement.</u>	See related sections	Did not move the requirements from an authorization.
<u>§ 65.81 Privileges and limitations.</u> (b) Inspection Rating Limitations. (1) A certificated mechanic with an inspection rating may exercise the privileges of that rating only while he holds a mechanic certificate with both airframe and powerplant ratings that are effective in accordance with § 65.15(a). (2) A certificated mechanic with an inspection rating may not exercise the privileges of the rating if that person does not meet the requirements of § 65.71(b)(3) and (4). (3) If a certificated mechanic with an inspection rating changes his fixed base of operation required by § 65.71(b)(3), he must notify, in writing, the responsible Flight Standards office or International Field Office for the area in which the new base is located before exercising the privileges of the inspection rating. <u>65.83 Recent experience requirements</u> (1) A person may not exercise the privileges of the inspection rating unless they have been actively engaged in maintaining aircraft certified and maintained in accordance with this chapter for the 24-calendar month period prior to when they exercise their inspection rating privileges. (2) Except as provided in (b)(3) and (7) of this section, no person may exercise the privileges of the inspection rating unless within the previous 12 calendar months one of the following activities has been completed: (i) Performed at least four annual inspections; (ii) Performed at least eight major repairs or major alterations, including any combination thereof; (iii) Performed or supervised and approved at least one progressive inspection in accordance with standards prescribed by the Administrator; (iv) Attended and successfully completed a refresher course, acceptable to the Administrator, of not less than 8 hours of instruction; or (v) Passed an oral test by an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards	<u>§ 65.92 Inspection authorization: Duration.</u> (a) An inspection authorization ceases to be effective whenever any of the following occurs: (1) The authorization is surrendered, suspended, or revoked. (2) The holder no longer has a fixed base of operation. (3) The holder no longer has the equipment, facilities, and inspection data required by § 65.91(c) (3) and (4) for issuance of his authorization. (4) The mechanic is no longer actively engaged under § 65.83. (b) The holder of an inspection authorization that is suspended or revoked shall, upon the Administrator's request, return it to the Administrator. (c). Except as provided in paragraph (d) of this section, no person may exercise the privileges of the inspection authorization unless within the previous 12 calendar months one of the following activities has been completed: (1) Performed at least four annual inspections; (2) Performed at least eight major repairs or major alterations, including any combination thereof; (3) Performed or supervised and approved at least one progressive inspection in accordance with standards prescribed by the Administrator; (4) Attended and successfully completed a refresher course, acceptable to the Administrator, of not less than 8 hours of instruction; or (5) Passed an oral test by an FAA inspector, which includes the aeronautical knowledge subject areas contained in the	The language differences between the agency's proposal and the associations are minor—the main issue is the unnecessary move of the authorization to a rating. Simply removing the requirement for “renewal” and replacing it with the need to keep records of active engagement and the specific activities that keep the authorization effective is enough. The agency's use of verbiage that differs from § 65.83 is what brings ambiguity to the requirement for active engagement. A mechanic that fails to be actively engaged makes the basic certificate ineffective, ergo, the inspection authorization is ineffective. The associations directly link the two sections in § 65.92(a)(4).



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Agency's Proposed Language	AEA and ARSA Proposed Language	Reasons for Differences
(incorporated by reference, see § 65.23), to determine that the applicant's knowledge of applicable regulations and standards is current. (3) A person does not have to meet the requirements of paragraph (b)(2) of this section to exercise the privileges of the inspection rating during the 12 calendar months following original issuance of the inspection rating. Replacement of a mechanic certificate for a mechanic certificate with an inspection rating under § 65.73(d) or (e) is not considered an original issuance of the inspection rating. (4) A certificated mechanic with an inspection rating who does not meet the requirements set forth in paragraph (b)(2) of this section may not exercise the privileges of the rating, until they have: (i) Attended and successfully completed a refresher course(s), acceptable to the Administrator, of not less than 8 hours of instruction; or (ii) Passed an oral test from an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of the applicable regulations and standards is current. (5) A certificated mechanic with inspection rating who completes the requirements of paragraph (b)(4) of this section is deemed to have completed the requirements of paragraph (b)(2) of this section. (6) A certificated mechanic with inspection rating must maintain records to demonstrate completion of the recent experience requirements in paragraphs (b)(1) through (b)(4) of this section, as applicable, and present them to a representative of the Administrator upon request. The records must be retained for at least 2 years. (7) If a person holds a valid inspection authorization on [EFFECTIVE DATE OF THE FINAL RULE], the person is not required to meet the requirements of paragraph (b)(2) until [SIX MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE].	Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of applicable regulations and standards is current. (d) A person does not have to meet the requirements of paragraph (a) of this section to exercise the privileges of the inspection authorization during the 12 calendar months following original issuance of the inspection authorization. (e) A certificated mechanic with an inspection authorization who does not meet the requirements set forth in paragraph (a) of this section may not exercise the privileges of the authorization, until they have: (1) Attended and successfully completed a refresher course(s), acceptable to the Administrator, of not less than 8 hours of instruction; or (2) Passed an oral test from an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of the applicable regulations and standards is current. (f) A certificated mechanic with inspection authorization who completes the requirements of paragraph (b) of this section is deemed to have completed the requirements of paragraph (a) of this section. (g) A certificated mechanic with inspection authorization must maintain records to demonstrate active engagement under § 65.83 and completion of the requirements in paragraphs (a)(1) through (5) or (c) of this section, as applicable, and present them to a representative of the Administrator upon request. The records must be retained for at least 2 years.	The need for the last sentence in proposed (3), "Replacement of a mechanic certificate for a mechanic certificate with an inspection authorization under § 65.73(d) or (e) is not considered an original issuance of the inspection authorization" would not be needed if the agency retains the authorization rather than a rating. Holders of inspection authorizations should keep records of their activities or employment showing compliance with § 65.83 as well as the activity required to keep the inspection authorization effective. The mechanics that qualify and receive an inspection authorization must be held to a higher standard as they are taking on a higher responsibility that can only be confirmed through records. Paragraphs associated with turning in or replacing certificates would not be required if the privilege remains an authorization rather than a rating.
<u>§ 65.88 Inspection rating; additional privileges.</u> A certificated mechanic with an inspection rating may—	<u>§ 65.93 Inspection authorization: Privileges and Limitations.</u> (a) The holder of an inspection authorization may—	The associations replaced the original § 65.93 Inspection Authorization: Renewal with privileges and limitations.



RE: Comments on Notice of Proposed rulemaking (NPRM)
Docket No.: FAA-2026-6671
Appendix A – AEA/ARSA Proposal

Agency's Proposed Language	AEA and ARSA Proposed Language	Reasons for Differences
(a) Inspect and approve for return to service any aircraft or related part or appliance (except any aircraft maintained in accordance with a continuous airworthiness maintenance program under parts 91, 121, 129, or 135 of this chapter) after a major repair or major alteration to it in accordance with part 43 of this chapter, if the work was done in accordance with technical data approved by the Administrator; and (b) Perform an annual inspection, or perform or supervise a progressive inspection according to §§ 43.13 and 43.15 of this chapter. <u>§ 65.89 Display of certificate.</u> (a) Each person who holds a mechanic certificate shall keep it within the immediate area where he normally exercises the privileges of the certificate and shall present it for inspection upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer.	(1) Inspect and approve for return to service (except in accordance with a continuous airworthiness maintenance program under parts 91, 121, 129, or 135 of this chapter) the accomplishment of a major repair or major alteration performed in accordance with part 43 of this chapter, if the work was done in accordance with technical data approved by the Administrator; and (2) Perform an annual or perform or supervise a progressive inspection according to §§ 43.13 and 43.15 of this chapter. (b) When exercising the privileges of an inspection authorization the holder shall keep it available for inspection by the aircraft owner, the mechanic submitting the inspection, repair, or alteration for approval (if any), and shall present it upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer. (c) A certificated mechanic with an inspection authorization may exercise the privileges of that authorization only while holding a mechanic certificate with both airframe and powerplant ratings that are effective in accordance with §§ 65.15(a), the holder is actively engaged under § 65.83 and is qualified under § 65.81. ((e) If a certificated mechanic with an inspection authorization changes the fixed base of operation required by § 65.71(b)(3), the responsible Flight Standards office or International Field Office for the area in which the new base is located must be notified, in writing, before exercising the privileges of the inspection authorization.	The work is inspected and approved for return to service, not the aircraft. The associations are providing language that aligns with the authority in part 43 and the language of § 43.9, which makes it clear that the approval for return to service is only <i>for the work performed</i>. Paragraph (c) needs to be directly tied to the requirements of every mechanic—remaining actively engaged <i>and</i> qualified to perform the tasks.
<u>§ 91.409(d)(1)</u> A certificated mechanic eligible to exercise the privileges of an inspection rating, a certificated airframe repair station, or the manufacturer of the aircraft to supervise or conduct the progressive inspection;		No need to change part 91 if the agency keeps the privilege instead of a rating.
<u>§ 147.5(b)(2)</u> A description of the manner in which the school's curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated airframe or powerplant rating, or both, under subpart D of part 65 of this chapter;		The associations have no objection to this change.