

LIFELINE PROVISIONS FOR EXTENDED OVERWATER OPERATIONS

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It has been brought to our attention that during approval for extended overwater operations in accordance with the provisions of FAR Part 121.291(b) the operator could not show how the lifelines could be used to enable occupants to stay on the wings after ditching. FAR Part 121.161, with certain exceptions, requires compliance with FAR Part 25.1411(g) (Formerly CAR 4b.645(e) regarding lifelines to be installed and attached to each side of the fuselage so that they can be used to enable occupants to stay on the wings after ditching. General Counsel's interpretation of FAR Part 121.161 is that all landplanes currently used in extended overwater operations, with the exception of those specifically mentioned, are required to meet the ditching provision of FAR Part 25, including FAR Part 25.1411(g)(1) and (2), regardless of when they were type certificated.

- a. An acceptable means of complying with the requirements of FAR Part 25.1411(g)(2) is to attach the outboard end of the lifeline to a ring or hook located on the upper out board section of the wing or other equivalent means approved by engineering.
- b. It is requested that Principal Operations Inspectors determine that their assigned Part 121 certificate holders who engage in extended overwater operations meet the requirements of FAR Part 121.161.