

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.191

National Policy

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6/14/12

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6/14/13

SUBJ: Clarification of Terminology for Aircraft Maintenance Log

1. Purpose of this Notice. This notice provides policy clarification for the terminology “critical to the safety of flight” as used within Title 14 of the Code of Federal Regulations (14 CFR) part 121, § 121.701.

2. Audience. The primary audience for this notice is aviation safety inspectors (ASI), supervisors, and managers. The secondary audience includes Flight Standards branches and divisions in the regions and in headquarters (HQ).

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee Web site at https://employees.faa.gov/tools_resources/orders_notices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators can find this notice on the Federal Aviation Administration’s (FAA) Web site at <http://fsims.faa.gov>. This notice is available to the public at http://www.faa.gov/regulations_policies/orders_notices.

4. Background. The specific phrase “critical to the safety of flight” was added to the first sentence of § 121.701(a) in March 1, 1963, under the Bureau of Safety’s recodification program. The insertion of this phrase was not deemed to be a substantive change and was inserted to ensure that the maintenance log contained items that were essential to the safety of flight. Although the agency has not defined “critical to the safety of flight,” the intent of this verbiage is to require that observed or reported failures entered in the airplane log, as required by § 121.563, be corrected prior to operation.

5. Action. Section 121.701 requires any person who takes action in response to a reported or observed failure or malfunction to make a record of that action in the maintenance log of the aircraft. Section 121.701(a) states: “Each person who takes action in the case of a reported or observed failure or malfunction of an airframe, engine, propeller, or appliance that is critical to the safety of flight shall make, or have made, a record of that action in the airplane’s maintenance log.”

a. Onboard Maintenance Log. Section 121.701 establishes the onboard maintenance log as part of the required records for the aircraft. This regulation further requires the certificate holder to have a means to keep a record of the aircraft’s maintenance discrepancies. However, the scope of this regulation does not encompass all maintenance discrepancy corrective actions

as described in the procedures of the certificate holder's Continuous Airworthiness Maintenance Program (CAMP) (e.g., scheduled checks, deferrals, non-scheduled work recorded elsewhere in the maintenance records. The regulation specifically addresses only those discrepancies that are "critical to the safety of flight" that were reported and originally entered in the airplane log. This regulation is a performance-based regulation that affords the certificate holder a measure of flexibility to develop its own specific procedures to comply with the requirements of § 121.701.

b. Recording Requirements. The air carrier maintenance log entries should correspond to the maintenance recording requirements of 14 CFR part 43, § 43.9(b). Each pilot in command (PIC) shall ensure that all mechanical irregularities occurring during flight time are entered in the maintenance log at the end of that particular flight time consistent with § 121.563. The recording of other maintenance should be done following the procedures as contained in the certificate holder's maintenance program. Additionally, the record recording requirements of § 43.9(b) are consistent with the air carrier maintenance recordkeeping requirements of §§ 121.369(c) and 121.380(a) and (c).

6. Procedures.

a. Record of Corrective Action. The procedures used by the certificate holder to comply with § 121.701 must be outlined in their manuals and may be electronic. The procedures may use a full detailed description of the corrective action in the maintenance log or it may use a maintenance log reference to another document or record. In either case, adequate copies of the document or record of the corrective action taken must be readily accessible to the flightcrew within the flight compartment, whether the record is in the maintenance log itself or in another record that is referenced in the aircraft maintenance log. The means to achieve "readily accessible" may also be electronic.

b. Procedure Requirements. The performance-based language of §§ 121.369(c) and 121.701 provide the measure of flexibility to permit the certificate holder to develop their own specific procedures to comply with § 121.701. However, any procedures or systems used by the certificate holder to comply with § 121.701 must meet the two basic requirements:

- Any and all actions taken to correct a maintenance discrepancy that is "critical to the safety of flight" that was entered in accordance with § 121.563 must be entered in the aircraft maintenance log, or a reference to data acceptable to the Administrator.
- Adequate copies of the documentation of the action taken must be readily accessible to the flightcrew within the flight compartment.

(1) For complex maintenance actions that have many steps and inspections, such as an engine change or flight control replacement, it is not practical or required by § 121.701, to have each step annotated in the aircraft maintenance log. In order to meet the requirements of § 121.701 and facilitate documentation of maintenance actions and inspections, air carriers may incorporate varying methods (e.g., the use of "Non-Routine" work cards or published job cards) that can be considered as an extension of the aircraft maintenance log.

(2) In cases such as scheduled maintenance checks, it is permissible to make single or summary entries referencing the scheduled check. In these types of cases, all the routine and non-routine work actions would be recorded in the maintenance work package.

c. Certifications. Whichever method the air carrier has established within their manual, the procedures must include the following four certifications consistent with statutory considerations for operations with the highest degree of safety in the public interest.

- The work was performed in accordance with the requirements of your manual;
- All items required to be inspected were inspected by an authorized person who determined the work was satisfactorily completed;
- No known condition exists that would make the aircraft non-airworthy; and
- So far as the work performed is concerned, the aircraft is in condition for safe operation.

d. Handling Records. The FAA cannot require an air carrier to produce or keep records that a regulation or statute do not require. It is the air carrier's responsibility to develop procedures for administrative handling of aircraft records. The air carrier must clearly identify these requirements and procedures in their manual.

Note: The regulatory requirements as stated do not require that maintenance record entries be transcribed from one maintenance record to another (e.g., work card to the airplane logbook).

7. Disposition. We will not incorporate the information in this notice into FAA Order 8900.1, Flight Standards Information Management System (FSIMS). Direct questions concerning the information in this notice to the Aircraft Maintenance Division (AFS-300) at 202-385-6402.

for 

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