

## U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.469

National Policy

Effective Date: 5/8/18

Cancellation Date: 5/8/19

# SUBJ: OpSpecs/MSpecs D088 and D089, Maintenance Time Limitations

**1. Purpose of This Notice.** This notice provides guidance and addresses inconsistencies recorded within Operations Specifications (OpSpecs)/Management Specifications (MSpecs):

- D088, Maintenance Time Limitations Authorization; and
- D089, Maintenance Time Limitations Section.

**2.** Audience. This notice is intended for principal maintenance inspectors (PMI) who provide oversight of certificate holders/program managers authorized by OpSpec/MSpec D072, Aircraft Maintenance—Continuous Airworthiness Maintenance Program (CAMP) Authorization, to use an aircraft maintenance CAMP, and in conjunction have issued either D088 or D089.

**3.** Where You Can Find This Notice. You can find this notice on the MyFAA employee website 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) website at http://fsims.faa.gov. This notice is available to the public at http://www.faa.gov/regulations\_policies/orders\_notices.

# 4. Background.

**a.** Within this notice, the term "CAMP operator" refers to certificate holders/program managers with OpSpec/MSpec D072 CAMP authorization. These entities are Title 14 of the Code of Federal Regulations (14 CFR):

- Part 121 certificate holders;
- Part 135 certificate holders subject to part 135, § 135.411(a)(2), and those certificate holders subject to § 135.411(a)(1) who choose to maintain their aircraft under a CAMP under § 135.411(b); and
- Part 91 subpart K (part 91K) program managers who choose to be subject to the airworthiness program provided under part 91, § 91.1411.

**b.** Time limitations or standards for determining time limitations required by § 91.1015 and 14 CFR part 119, § 119.49 apply only to CAMP operators. Inspection tasks and intervals for certificate holders/program managers who maintain aircraft under §§ 91.1109 and 135.411(a)(1),

including aircraft subject to an Approved Aircraft Inspection Program (AAIP) under § 135.419, are included as part of their approved inspection programs authorized by D073 and the additional maintenance requirements authorized by D101, D102, D103, and D104, as applicable.

**c.** The term "standards for determining time limitations" is the basis for reliability programs authorized by OpSpec/MSpec D074 or D075 and is outside the scope of this notice. While reliability programs are a means to meet §§ 91.1015 and 119.49, they are outside the scope of this notice. This notice is intended specifically for CAMP operators with time limitations authorized by OpSpec/MSpec D088 or D089.

**d.** CAMP operators with time limitations not covered by a full or partial reliability program must:

- Develop their own comprehensive time limitations,
- Design the time limitations to support their operation,
- Place the time limitations in their time limitations manual/document,
- Submit their time limitations to the FAA, and
- Ensure the exact version of their time limitations manual/document in effect is accurately identified within the applicable OpSpec/MSpec D088 or D089 table.

#### 5. Discussion.

**a.** Manual/Document Content. The time limitations manual/document is designed by the operator to manage their operational risks. Its performance and effectiveness must be monitored and adjusted accordingly by their Continuing Analysis and Surveillance System (CASS).

**b.** Recording the Manual/Document Name and Date. The exact version of the time limitations manual/document in effect at any given time must be clear and evident to the CAMP operator, the FAA, and any other inspecting organizations (e.g., Department of Defense (DOD), National Transportation Safety Board (NTSB), etc.).

c. Contrary Version Recording. The Air Carrier Maintenance Branch (AFS-330) has received reports and confirmed that inappropriate variations currently exist in the recording of the manual/document name and date within the maintenance time limitations OpSpecs/MSpecs. A CAMP operator may not refer to the Original Equipment Manufacturer (OEM) documents, such as the Aircraft Maintenance Manual (AMM), Maintenance Review Board Report (MRBR), or Maintenance Planning Document (MPD), as their time limitations manual/document. In addition, referring to an Internet-based tracking system as the time limitations manual/document is not acceptable. These variations are contrary to 14 CFR and FAA-published guidance. Examples include the following variations:

Aircraft	Manual/Document	Manual/Document
M/M/S	Name and Number	Date
	<ul> <li>References to the OEM MPD.</li> <li>References to the OEM MRBR.</li> <li>References to AMM Chapters 4 or 5 inspections.</li> <li>References to the OEM Time Limits/Maintenance Checks (TLMC)</li> <li>References to an Internet-based tracking system.</li> </ul>	<ul> <li>"As Revised."</li> <li>"As Amended."</li> <li>"Or Later," "Or Latest."</li> <li>"Subsequent."</li> <li>"Current Revision."</li> <li>Multiple dates for a single manual/document name and number.</li> </ul>

## Table 1. Sample OpSpec/MSpec D088/D089 Table—Inappropriate Version Recordings

#### 6. Policy.

**a.** CASS. Time limitations are an integral part of a CAMP and, as such, are subject to the applicable CASS requirements of § 91.1431; part 121, § 121.373; and § 135.431. The CASS must continually measure, analyze, and assess the performance and effectiveness of the entire CAMP. The FAA expects CAMP operators to take appropriate action to address deficiencies in their CAMP, including their time limitations.

**b. OpSpecs D088 and D089 Issuance.** The time limitations manual/document is designed by the operator, and its effectiveness is their responsibility. FAA Order 8900.1, Volume 3, Chapter 18, Section 6, Parts D and E Maintenance Operations Specifications/Management Specifications/Letters of Authorization, only requires OpSpec/MSpec paragraphs D088 and D089 be issued to those operators subject to D072. Amendments to OpSpec/MSpec D088 or D089 must be accomplished as described in § 119.51 (parts 121 and 135) or § 91.1017 (part 91K). Principal inspectors (PI) must use Order 8900.1, Volume 3, Chapter 64, Section 1, Evaluate Proposed Adjustments to Task Intervals/Time Limitations for Maintenance Programs, to evaluate the proposed adjustments to task intervals/time limitations authorized by D088 or D089. The current editions of Advisory Circular (AC) 120-16, Air Carrier Maintenance Programs, and AC 120-79, Developing and Implementing an Air Carrier Continuing Analysis and Surveillance System, provide FAA guidance and expectations of CAMP programs and CASS systems, respectively.

**7.** Action. Within 60 calendar-days from the effective date of this notice, PMIs who provide oversight of certificate holders/program managers authorized for either D088 or D089 must:

- Ensure D088 or D089 authorizations are only issued with D072 CAMP authorizations.
- Verify CAMP operators subject to D072 include in their CAMP a time limitations manual/document that meets the guidance/policy depicted in Order 8900.1, Volume 3, Chapter 64, Section 1.
- Verify the operator's time limitations manual/document is accurately referenced in the OpSpec/MSpec.
- If necessary, notify the CAMP operator by letter and issue an amended D088 or D089, as applicable. The CAMP operator's current time limitations manual/document name and

number (if assigned) must be accurately recorded. The effective date must be clear within the OpSpec/MSpec.

Aircraft	Manual/Document	Manual/Document
M/M/S	Name and Number	Date
Self-explanatory.	CAMP operator's time limitations manual/document name and number (if assigned).	List the date of the current revision of the manual.

**8. Disposition.** This notice emphasizes information contained in Order 8900.1. Direct questions regarding this notice to the Air Carrier Maintenance Branch (AFS-330) at 202-267-1675.

John di Kumon

John S. Duncan Executive Director, Flight Standards Service