

# NOTICE

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

N 8900.512

### National Policy

Effective Date:  
5/17/19

Cancellation Date:  
5/17/20

**SUBJ:** Required OpSpecs/MSpecs/LOAs A002 and A003, and SAS Changes  
Related to Standardization of “Cargo” Definition

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**1. Purpose of This Notice.** This notice provides additional instructions and guidance related to Notice N 8900.464, OpSpec/MSpec/LOA A002, Definitions and Abbreviations, which expired on April 25, 2019. N 8900.464 announced a nonmandatory revision to operations specification (OpSpec)/management specification (MSpec)/Letter of Authorization (LOA) A002 and directed the reissuance of A002 for affected operators under Title 14 of the Code of Federal Regulations (14 CFR) parts 91 subpart K (part 91K), 121, 125, and 135, and part 125 Letter of Deviation Authority (LODA) holders. The revision added a definition for “cargo” in support of an air cargo safety initiative and aligned the Federal Aviation Administration’s (FAA) definition with the International Civil Aviation Organization’s (ICAO) definition. This notice reemphasizes the requirement to reissue A002 to affected operators and provides guidance for determining whether the cargo definition may also necessitate the reissuance of an operator’s OpSpec/MSpec/LOA A003, Aircraft Authorization, or require a change to the Vitals in the Safety Assurance System (SAS).

**2. Audience.** The primary audience for this notice is the Flight Standards Safety Assurance offices’ principal inspectors (PI) assigned oversight of operators conducting operations under parts 91K, 121, 125, and 135, and part 125 LODA holders. The secondary audience includes the Safety Standards and Foundational Business offices.

**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](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 FAA’s website at <http://fsims.faa.gov>. This notice is available to the public at [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).

**4. Background.** The term “cargo” is not defined in a universal manner within FAA publications. The terms “cargo,” “freight,” and “payload” are used interchangeably. Advisory Circular (AC) 120-27, Aircraft Weight and Balance Control, and AC 120-85, Air Cargo Operations, define cargo only as used in each respective AC. To standardize the term “cargo” and align the FAA definition with the ICAO definition found in ICAO Annex 9, Facilitation, the FAA added the term “cargo” to OpSpec/MSpec/LOA A002. Mail, baggage, and stores (i.e., Company Material (COMAT)) are stored in the cargo compartments of aircraft and the term

“cargo” was applied to all items located in these compartments. This misapplication of the term “cargo” led to differing authorizations and expectations within the FAA and aviation industry.

## **5. Guidance.**

### **a. Explanation of Changes.**

(1) Cargo Definition. N 8900.464 added the following definition to A002: “Cargo: Any property carried on an aircraft other than mail, stores, and accompanied or mishandled baggage.”

(2) Affected OpSpec/MSpec/LOA Templates. The definition of cargo identified above was added to the following OpSpec/MSpec/LOA A002 templates:

- MSpec A002 for part 91K.
- OpSpec A002 for part 121.
- OpSpec A002 for part 121/135.
- OpSpec A002 for part 125.
- OpSpec A002 for part 135.
- LOA A002 for part 125 A125 LODA holders.

**b. Documentation Accounting for Cargo, Mail, Baggage, and Stores.** Regardless of the terms used to identify items carried on the aircraft, the operator must account for them in the Weight and Balance (W&B) documentation prior to flight. Operators must load all items in conformance with approved procedures.

(1) Mail is defined as a separate term because it is carried in accordance with Title 39 of the United States Code (39 U.S.C.) chapter 54 and Title 49 U.S.C. chapter 419, which conform to the Universal Postal Union (UPU) Convention.

(a) The W&B calculations must use actual weights for mail shipments.

(b) For the purpose of W&B calculations, operators may choose to do one of the following:

- Include the mail weight as cargo, or
- Show the mail weight as a separate item in the load manifest.

(c) Operators must secure all mail in accordance with approved procedures.

(d) Mail may also require special cargo securing procedures. You will find the definition of “special cargo” in OpSpec/MSpec/LOA A002. For further information on special cargo, refer to AC 120-85.

(2) Baggage means personal property of passengers or crew carried on an aircraft by agreement with the operator, as defined in ICAO Annex 9. FAA inspectors should apply this definition when determining the classification of items carried in the aircraft.

(a) Baggage is a separate classification due to differences in the way an operator may choose to calculate the weight, as authorized in OpSpecs. The operator may use:

- Actual weights, and/or
- Survey weights as defined in AC 120-27.

(b) A mishandled bag is one that originally accompanied a passenger but, due to unintended circumstances, is now on a different aircraft.

**Note:** Baggage and mail do not require aircraft authorization for cargo in OpSpec A003. Generally, these items are loaded in a bulk compartment. Operators may also load baggage and mail in an approved unit load device (ULD) if the aircraft design approval authorizes ULDs.

**6. Action.** Inspectors should provide this notice to the operators for whom they are responsible and take the following actions, as applicable.

**a. Review Vitals in SAS.** Review the Vitals in SAS to ensure that “Carries Freight” is selected if OpSpec A003 authorizes cargo operations.

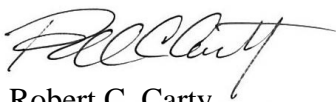
(1) If operators do not carry cargo, as defined in this notice, change OpSpec A003 to reflect passenger-only operations.

(2) If changing OpSpec A003 to remove cargo authorization, a change to the Vitals in SAS is required for proper scoping of the SAS tools.

**Note:** Until Flight Standards updates all documents to reflect the term “cargo,” consider “freight” and “cargo” as synonyms.

**b. Reissue A002.** The nonmandatory revision to A002 to include the definition for “cargo” was made available in the Web-based Operations Safety System (WebOPSS) with the publication of N 8900.464. Inspectors who have not already done so should reissue A002 to affected operators as soon as practical.

**7. Disposition.** We will incorporate the information in this notice into FAA Order 8900.1 before this notice expires. Direct questions concerning the information in this notice to the Aircraft Maintenance Division (AFS-300) at 202-267-1675.



Robert C. Carty  
Deputy Executive Director, Flight Standards Service