

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

N 8900.716

National Policy

Effective Date:
11/1/24

Cancellation Date:
11/1/25

SUBJ: Title 14 of the Code of Federal Regulations (14 CFR) § 121.417 Ditching Drill Requirements

1. Purpose of This Notice. This notice provides policy, information, and direction regarding emergency drill requirements for ditching per Title 14 of the Code of Federal Regulations (14 CFR) § 121.417(c)(2)(i)(E).

2. Audience. The primary audience for this notice is Principal Operations Inspectors (POI) responsible for the oversight and approval of crewmember training and qualification programs conducted in accordance with 14 CFR part 121 subparts N and O or subpart Y. The secondary audience includes other Certificate Management Team (CMT) and certificate management office (CMO) Aviation Safety Inspectors—Operations (ASI-OP), ASI—Cabin Safety (ASI-CS), and other Flight Standards Service (FS) personnel.

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 and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>. Operators and the public can find this notice on the Federal Aviation Administration's (FAA) website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. Applicability. The information and policy contained in this notice are applicable to POIs responsible for the oversight and approval of crewmember training and qualification programs for the following:

- Title 14 CFR part 121 air carriers that train and qualify crewmembers in accordance with 14 CFR part 121 subparts N and O.
- Title 14 CFR part 121 air carriers that train and qualify crewmembers in accordance with 14 CFR part 121 subpart Y.
- Title 14 CFR part 135 air carriers/operators that are required by 14 CFR § 135.3(b) to train and qualify crewmembers in accordance with 14 CFR part 121 subparts N and O.
- Title 14 CFR part 135 air carriers/operators authorized in accordance with 14 CFR § 135.3(c) to train and qualify crewmembers in accordance with 14 CFR part 121 subparts N and O.
- Title 14 CFR part 135 air carriers/operators that train and qualify crewmembers in accordance with 14 CFR part 121 subpart Y.

5. Background. The Office of Safety Standards (OSS) has received several inquiries regarding how an operator meets the intent of 14 CFR § 121.417. The inquiries alluded to a varying understanding of “if applicable, including but not limited to, as appropriate.”

6. Discussion. In order to clearly understand the phrase “if applicable, including but not limited to, as appropriate,” the various elements of 14 CFR § 121.417 need to be discussed and clarified.

a. Definitions. The following provides clarification and references related to the terms utilized in this notice.

(1) Applicable. FAA Order 8900.1, Volume 1, Chapter 1, Section 2, Definitions, defines “applicable” as “capable or suitable for being applied” (e.g., applicable to the installed equipment on the aircraft).

(2) Appropriate. Order 8900.1, Volume 1, Chapter 1, Section 2 defines “appropriate” as “especially suitable or compatible; fitting” (e.g., appropriate to each required crewmember and their duties and responsibilities).

(3) Kind of Operation. Title 14 CFR § 110.2 defines “kind of operation” as “one of the various operations a certificate holder is authorized to conduct, as specified in its operations specifications, *i.e.*, domestic, flag, supplemental, commuter, or on-demand operations.”

(4) Crewmember. Title 14 CFR § 1.1 defines “crewmember” as “a person assigned to perform duty in an aircraft during flight time.”

b. Emergency Training. Title 14 CFR § 121.417(c) states, “Each crewmember must accomplish the following emergency training during the specified training periods, using those items of installed emergency equipment for each type of airplane in which he or she is to serve.” This statement indicates the mandatory requirement that crewmembers are trained in the use of all installed emergency equipment on the aircraft for the particular assignment of the crewmember.

(1) Title 14 CFR § 121.417(c)(2) further requires additional emergency drill requirements to be accomplished during initial training and once each 24 calendar months during recurrent training. Each crewmember must, per 14 CFR § 121.417(c)(2)(i), “Perform the following emergency drills and operate the following equipment.”

(2) The above statement denotes a mandatory requirement of training on installed emergency equipment. According to the definition in 14 CFR § 121.417(f)(7), “*Perform* means to satisfactorily accomplish a prescribed emergency drill using established procedures that stress the skill of the persons involved in the drill.” Thus, training is required, and a drill is to be accomplished to demonstrate competency of each crewmember.

c. Ditching. Title 14 CFR § 121.417(c)(2)(i)(E) states, “Ditching, if applicable, including but not limited to, as appropriate: (1) Cockpit preparation and procedures; (2) Crew coordination; (3) Passenger briefing and cabin preparation; (4) Donning and inflation of life preservers; (5) Use of life-lines; and (6) Boarding of passengers and crew into raft or a slide/raft pack.”

(1) Training is based on equipment that is installed on the aircraft. In accordance with 14 CFR § 121.417(a), “Each training program must provide the emergency training set forth in this section with respect to each airplane type, model, and configuration, each required crewmember, and each kind of operation conducted, insofar as appropriate for each crewmember and the certificate holder.”

(2) For example, if an air carrier has procedures for a water landing, whether it is planned or unplanned, a ditching drill for the crewmembers would meet the intent of the rule with the equipment installed on the aircraft. In accordance with 14 CFR § 121.417(c), “Each crewmember must accomplish the following emergency training...using those items of installed emergency equipment for each type of airplane in which he or she is to serve.” Doing so would ensure the highest level of safety for the traveling public.

Note: An exception may apply if the air carrier trains under an Advanced Qualification Program (AQP) and is issued a variance that allows an alternate means of compliance to the requirement.

7. Action. Principal inspectors (PI) must review this notice and complete the actions below.

a. Custom Data Collection Tool (C DCT). There are four National/Divisional (N/D) C DCTs available in the Safety Assurance System (SAS). Use the following Design and Performance N/D C DCTs to capture data for approved 14 CFR part 121 pilot and flight attendant training programs:

- 121.417 Emergency Training - Flight Crewmember Design Assessment (DA).
- 121.417 Emergency Training - Flight Crewmember Performance Assessment (PA).
- 121.417 Emergency Training - Flight Attendant Design Assessment (DA).
- 121.417 Emergency Training - Flight Attendant Performance Assessment (PA).

(1) Task Completion Timelines. Within 15 days of the effective date of this notice, PIs must add C DCTs to the Comprehensive Assessment Plan (CAP) and submit them for resourcing. The Design C DCT must be completed within 3 months and closed by January 31, 2025. The Performance C DCT must be closed by September 30, 2025, or earlier. In circumstances certificate holder (CH) training is not observable by the due date, PIs should adjust the due date to complete the Performance C DCT until observed.

Note: “Not Applicable” and “Not Observable” responses should be documented in detail with justification.

(2) Coordination. For questions regarding these specific C DCTs, PIs should coordinate with management to seek the assistance of the Office of Air Carrier Safety Assurance (ACSA) resources.

(3) Guidance. For additional assistance in loading the C DCT, refer to the SAS Quick Reference Card (Q-Card) Q3-10, Custom DCT: Using a National/Divisional Template, which can be found in the SAS Resource Guide (SRG) under the quick link “Q-Cards and Checklists.”

b. Additional Surveillance and Action. The POI is required to determine if additional surveillance is required or further air carrier action is necessary to address the potential increased risk. Possible additional actions may include retargeting the CAP to include accomplishing appropriate DAs or PAs, or reevaluating air carrier approvals or programs.

8. Disposition. We will incorporate the information in this notice into FAA documents or other appropriate guidance material before this notice expires. Direct questions or comments concerning the information in this notice to the Air Transportation Division (AFS-200) at 202-267-8166 or 9-AFS-200-Correspondence@faa.gov.

A handwritten signature in cursive script, appearing to read "Lawrence Fields", is shown above the printed name.

Lawrence Fields
Executive Director, Flight Standards Service