



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

ORDER
8120.18A

National Policy

SUBJ: Production Approval Holders (PAH) Who Rebuild or Alter Their Own Products or Articles Under 14 CFR 43.3(j)

1. Purpose of This Order. This order outlines the procedures that should be within a production approval holder's (PAH) FAA-approved quality system for rebuilding and altering products or articles under title 14, Code of Federal Regulations (14 CFR) 43.3(j), and for approving the return to service (RTS) of these products or articles in accordance with § 43.7(d). PAHs include holders of a production certificate (PC), parts manufacturing approval (PMA), and technical standard order authorization (TSOA). In addition, this order also describes the completion of Federal Aviation Administration (FAA) Form 8130-3, *Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag*, for the RTS of aircraft engines, propellers, or articles.

Note: Use of the word *should* throughout this order refers to a recommended practice. The associated activity is not a requirement; therefore, a record of completion is not required.

Note: This order is available to the public for information purposes only. Its content is not legally binding on the public in its own right and will not be relied upon by the Department as a separate basis for affirmative enforcement action or other administrative penalty. Public conformity with the guidance document is voluntary only; nonconformity will not affect rights and obligations under existing statutes and regulations.

2. Audience. FAA aviation safety inspectors (ASIs) and appropriately authorized employees, or representatives of FAA PAHs.

3. Where Can I Find This Order. You can find this order on the MyFAA website at [Orders & Notices](#) and on the Dynamic Regulatory System (DRS) website at [DRS](#).

4. What This Order Cancels. This order cancels FAA Order 8120.18, *Production Approval Holders (PAH) Who Rebuild or Alter Their Own Products Under 14 CFR 43.3(j)*, dated December 11, 2012.

5. Explanation of Policy Changes.

a. This revision incorporates policy and procedures on the use and completion of FAA Form 8130-3 for the RTS of aircraft engines, propellers, or articles rebuilt or altered by a PAH previously contained in FAA Order 8130.21H CHG 1, *Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag*, chapter 3;

and FAA policy memorandum AIR010-2019-DM-01, *Deviation to Orders, List of Orders Affect by Cancelled FAA Order 1350.15 Records, Organization, Transfer, and Destruction Standards*.

b. For policy on the completion of FAA Form 8130-3 for aircraft engines, propellers, or articles produced under 14 CFR part 21, *Certification Procedures for Products and Articles*, refer to FAA Order 8130.21J, *Completion of FAA Form 8130-3 under Part 21*.

c. For policy on the approvals for RTS for maintenance, preventative maintenance, and alterations performed under part 43, Maintenance, Preventive Maintenance, Rebuilding, and Alteration, refer to Advisory Circular (AC) 43-9, *Maintenance Records*, which describes

maintenance record-making and record-keeping requirements of part 43 and 14 CFR part 91, *General Operating and Flight Rules*. It also includes instructions for how to complete the form for this purpose.

6. Effective Date. The provisions of this change for this directive become effective sixty days from the date of signature.

7. Background.

a. Section 43.3(j) provides the manufacturer the privilege to rebuild or alter any product or article, which it manufactured under a type certificate (TC) or PC. This includes aircraft or articles manufactured by a TC holder under the legacy Approved Production Inspection System. This regulation allows for the rebuilding or alteration of article(s) that a PAH manufactures under a TSOA or PMA approval. Additionally, the PAH can perform any inspection required by part 91 or 14 CFR part 125, Certification and Operations: Aircraft Having a Seating Capacity of 20 or More Passengers or a Maximum Payload Capacity of 6,000 Pounds or More; and Rules Governing Persons on Board Such Aircraft, on aircraft it manufactured under a TC, or that it currently manufactures under a PC. Since this work is accomplished under a PAH's quality system manufacturing, ASIs are responsible for surveillance of this activity.

b. Section 43.7(d) specifically permits a PAH to approve for RTS product(s) or article(s) that the PAH has worked on under § 43.3(j). However, except for minor alterations, the work must have been done in accordance with FAA-approved technical data.

c. The use of FAA Form 8130-3 for RTS approval after rebuilding, altering, or inspecting its aircraft engine, propeller, or article is optional. However, the FAA recommends its use to help aviation authorities and industry trace the movement of product(s) or article(s) through the aviation system.

d. On October 1, 2015, the FAA published in the Federal Register the final rule, Changes to Production Certificates and Approvals Amendments.¹ The FAA's final rule codifies in § 21.137

¹ Changes to Production Certificates and Approvals, 80 Federal Register 59021 (Oct. 1, 2015) (to be codified at 14 CFR parts 21 & 45).

the practice of a PAH to rebuild and alter products or articles under 14 CFR 43.3(j) and approve the RTS of products or articles in accordance with § 43.7(d). The PAHs FAA-approved quality system will describe the procedures to rebuild and alter what they produce.

8. Procedures. The PAH's FAA-approved quality system will contain procedures that describe compliance with the requirements below:

a. The PAH's procedures for rebuilding and altering aircraft engine(s), propeller(s), or article(s) include requirements for incoming materials. The PAH should have a means to verify that the incoming product(s) or article(s) are produced under their production approval. When the product(s) or article(s) is received and identified, the PAH should segregate them from the new production of product(s) or article(s).

b. Ensure compliance with § 43.2(b) to require any product or article described as "rebuilt," if it has been disassembled; cleaned; inspected; repaired as necessary; reassembled; and tested to the same tolerances and limits as a new item, using either new parts or used parts that either conform to new part tolerances and limits or to FAA-approved oversized or undersized dimensions.

c. Ensure compliance with § 43.7(d) that authorizes the PAH to approve any product(s) or article(s) worked on under § 43.3(j) and make maintenance record entries for RTS in compliance with § 43.9 or § 43.11. However, the work must be done in accordance with FAA-approved technical data, except for minor alterations. If the work done is in support of developing an article that will be subsequently presented for certification testing, the technical data must be FAA-approved before the article or product is RTS. In all cases, an appropriately authorized employee or representative of the PAH must approve the RTS of products and articles. Each authorized employee or representative of the PAH should have experience with and thorough working knowledge of the FAA regulations, methods of compliance, policy, processes, and procedures applicable to the rebuilding and alteration of the PAH's products or articles. Refer to FAA Order 8300.16, *Major Repair and Alteration Data Approval*, for the types of FAA-approved technical data.

Note 1: Technical Business Process, AIR-002-035, Aircraft Certification Service (AIR) Compliance and Enforcement Process, or FAA Order 2150.3, *FAA Compliance and Enforcement Program*, will be used to process any noncompliance(s) identified.

Note 2: Issuing RTS approval documents for rebuild and alteration activities is not a designee function. Under some circumstances, the person authorized to issue the RTS approval documents is also an FAA designee. If so, that person must not approve the RTS in a designee capacity or record their designee number on any RTS document.

d. Ensure compliance with § 43.9, which includes appendix B to part 43 (recording of major repairs and alterations), and § 91.421 (rebuilt engine maintenance records) on the content, form, and disposition of maintenance, preventive maintenance, rebuilding, and alteration records. The associated record-making and record-keeping requirements are in §§ 43.9 and 91.417. The PAH identifies and completes the records required for RTS approval in compliance with § 43.9(a), which includes tracking the rebuild or alteration performed and who performed it. This

documentation method must become part of the FAA-approved quality system under § 21.137. For further guidance refer to AC 43-9, *Maintenance Record*.

e. Ensure compliance with § 43.11 regarding the content, form, and disposition of records for inspections required by part 91 or part 125.

f. Ensure compliance with § 43.13 regarding performance rules.

g. The PAH must identify the functional test equipment, acceptance or rejection parameters, inspection tools, and dimensional tolerances to be used for the functional test and final inspection. See §§ 21.137(e) and 43.3(j)). The PAH may refer to the same functional test and final inspection data used for manufacturing.

h. The PAH must describe procedures for the development and use of work instructions or shop travelers. This documentation must identify the various operations or steps, as well as inspections accomplished. The PAH must identify what articles are replaced, the results of the functional test or final inspection, and the name of the person(s) performing each operation and inspection (traceability using assigned stamps or employee numbers is acceptable). See §§ 43.2, 43.3, and 43.11.

i. The PAH must identify the records required for approval for RTS and how to complete them in compliance with § 43.9(a). The certificate type and number and the name and signature of the person approving the product(s) or article(s) for RTS must be documented. In the case of PAHs rebuilding their own products and articles, the certificate number is the assigned FAA project number under part 21, subparts F, G, K, or O.

j. There are no regulatory requirements for a PAH to maintain separate facilities for production or rebuilding and alteration operations. It is acceptable to perform manufacturing or rebuilding and alteration processes using the same equipment and personnel, provided that the processes remain independent of one another. Product(s) or article(s) should be traceable to materials and work completed or inspection status during production or rebuilding and alteration processing.

k. Product(s) or article(s) that are returned to a manufacturer for repairs or service that are outside the scope of this order must comply with the provisions of 14 CFR part 145 (repair stations).

9. Instructions for Completing FAA Form 8130-3 under §§ 43.3(j) and 43.7(d). General guidelines for completing FAA Form 8130-3, such as electronic signature, formatting, retention, errors, and lost forms are found in FAA Order 8130.21.

a. Block 1. Approving Civil Aviation Authority/Country. FAA/United States. (Preprinted.)

b. Block 2. Authorized Release Certificate, FAA Form 8130-3, *Airworthiness Approval Tag*. (Preprinted.)

- c. Block 3. FAA Form Tracking Number. Enter the unique number established by the PAH numbering system.
- d. Block 4. Organization Name and Address. Enter the full name and physical address of the organization or facility and certificate management (CM) project number.
- e. Block 5. Work Order/Contract/Invoice Number. Enter the customer's reference, e.g., work order, contract, invoice, or equivalent information, and state the number of pages attached to the form, including dates. If none are applicable, enter "N/A."
- Note:** If a separate list is used to transmit the information required in blocks 6-11, it must include the tracking number in block 3 and easily cross-reference the information required by blocks 6-11.
- f. Block 6. Item. Enter the item number for each aircraft engine, propeller, or article. If entering multiple items, whether they share the same part number or not, number each item in sequence. If a separate list is used, enter "List Attached."
- g. Block 7. Description. Enter the name or description of each item listed in block 6. If a separate list is used, enter "List Attached."
- h. Block 8. Part Number. Enter the part number of each item. If the item is an aircraft engine or propeller, the model designation may be entered. If the item is a subassembly that does not have a part number of its own, enter the next higher assembly number followed by the word "subassembly." If a separate list is used, enter "List Attached."
- i. Block 9. Quantity. Enter the quantity of each item. If a separate list is used, enter "List Attached."
- j. Block 10. Serial Number. If part 45 requires a serial number to identify the item, enter it here. Any other serial number not required by regulation may also be entered. If there is no serial number, enter "N/A." If a separate list is used, enter "List Attached."
- k. Block 11. Status/Work. Enter "See Block 12." If a separate list is used, enter "List Attached."
- l. Block 12. Remarks. Enter one of the following statements in Block 12: "Rebuilt to original PAH's specifications," "Altered to original PAH's specifications," or "Inspected to original PAH's specifications."
- m. Blocks 13a through 13e. These blocks are reserved for issuance of the form under part 21. Shade, darken, or otherwise mark this area to prevent inadvertent or unauthorized use.
- n. Block 14a. Approval for Return to Service. Mark the box "14 CFR 43.9 Return to Service."

- o. Block 14b. Authorized Signature. This block must be signed by an authorized person.
- p. Block 14c. Approval/Certificate No. Enter the CM project number.
- q. Block 14d. Name (Typed or Printed). Enter the name of the person signing block 14b.

r. Block 14e. Date (dd/mmm/yyyy). The date to be entered in block 14e for approval for RTS will be the date on which the original work was completed (refer to § 43.9). The date must be in the following format: two-digit day, first three letters of the month, and four-digit year. This does not need to be the same as the printing or shipping date, which may occur later.

10. Instructions for Exporting Rebuilt Engines to the European Union (EU). The European Union Aviation Safety Agency (EASA) classifies “rebuilt engines” as a manufacturing certification output, not a maintenance release by the FAA. The technical implementation procedures (TIP) between the FAA and EASA place the same EASA import requirements on rebuilt engines that are on new aircraft engines. Follow these instructions when completing FAA Form 8130-3 for this purpose:

- a. Refer to section 9 of this order for instructions on how to complete blocks 1 through 11.
- b. Enter “Rebuilt to original PAH’s specifications” in block 12.
- c. Mark block 13a “Approved design data and are in a condition for safe operation” once the aircraft engine is rebuilt to the manufacturer’s approved design specifications. Block 13b is signed by an authorized person at the PAH. Block 13c consists of the CM project number. Enter the typed or printed name of the authorized person signing block 13b in block 13d. Enter the date the form was signed in block 13e, using the format dd/mmm/yyyy (two-digit day, first three letters of the month, and four-digit year).
- d. Shade, darken, or otherwise mark blocks 14a through 14e to prevent inadvertent or unauthorized use.

DANIEL J. ELGAS
Digitally signed by
DANIEL J. ELGAS
Date: 2025.09.25
11:55:09 -04'00'

Daniel J. Elgas
Aviation Safety
Director, Policy and Standards Division, Aircraft Certification Service

Appendix A. Administrative Information

1. Distribution. This order is distributed to the Aircraft Certification Service and Flight Standards Service.

2. Authority to Change This Order. Policy and Standards Division (AIR-600) is responsible for issuing, revising, or canceling the material in this order.

3. Definitions. See appendix B for a list of definitions.

4. Related Publications. The following documents are related to the guidance in this order:

a. Title 14, Code of Federal Regulations (14 CFR). You can download the full text of the 14 CFR regulations referenced in this order from the Federal Register at [eCFR](#).

b. FAA Advisory Circular and Orders. The following FAA documents are available at [FAA Regulations & Policies](#) and on the [Dynamic Regulatory System \(DRS\)](#).

- AC 43-9, *Maintenance Records*.
- Order 0000.1, *FAA Standard Subject Classification System*.
- Order 1350.14, *Records Management*.
- Order 2150.3, *FAA Compliance and Enforcement Program*.
- Order 8130.21J, *Completion of FAA Form 8130-3 under Part 21*.
- Order 8300.16, *Major Repair and Alteration Data Approval*.

c. Other Documents.

- Changes to Production Certificates and Approvals Amendments, 80 Federal Register 59021 (Oct 1, 2015 at 59022); codified in 14 CFR 21.137 (see [FAA-2013-0933](#)).

- FAA Memorandum AIR010-2019-DM-01, *Deviation to Orders, List of Orders Affect by Cancelled FAA Order 1350.15 Records, Organization, Transfer, and Destruction Standards*; available at [AVS Policy](#).

- FAA AIR-002-035, *Aircraft Certification Service (AIR) Compliance and Enforcement Process*; available at [DRS](#).

5. Forms. You can download the following forms at [FAA Forms](#).

- FAA Form 1320-19, *Directive Feedback Information*.
- FAA Form 8130-3,

6. Suggestions for Improvement. Your suggestions are welcome. FAA Form 1320-19, *Directive Feedback Information*, is located in appendix C of this order for your convenience. Please forward all comments on deficiencies, clarifications, or improvements regarding the contents of this order to the AIR Directives Management Officer (DMO) at 9-AVS-AIR-Directives-Management-Officer@faa.gov.

7. Records Management. Refer to Order 0000.1, FAA Standard Subject Classification System; FAA Order 1350.14, Records Management; or your office Records Management Officer (RMO)/Directives Management Officer (DMO) for guidance regarding retention or disposition of records.

Appendix B. Definitions

1. Definitions. For the purpose of this order, the following definitions apply. You can download the full text of the 14 CFR regulations referenced in this order from the Federal Register at [eCFR](#).

- **Approved.** See [§ 1.1](#).
- **Article.** See [§ 21.1\(b\)\(2\)](#).
- **Authorized Person.** The PAH-authorized person who signs and issues FAA Form 8130-3 under § 43.7(d).
- **Export.** When an article, aircraft engine, or propeller is transferred from one Civil Aviation Authority (CAA) to another CAA (see [subpart L](#) to part 21).
- **Major alteration.** See [§ 1.1](#).
- **Minor alteration.** See [§ 1.1](#).
- **Product.** See [§ 21.1\(b\)\(6\)](#).
- **Production Approval Number.** Means the project number (e.g., PQ1234NM), assigned by the Certification Management Section.
- **Rebuild.** A used product or article that has been completely disassembled, inspected, repaired as necessary, reassembled, tested, and approved in the same manner and to the same tolerances and limits as a new item with either new or used parts. However, all parts used must conform to the production drawing tolerances and limits for new parts or be of approved oversized or undersized dimensions for a new item.
- **Signature.** Any form of identification used to acknowledge completion of an act and authenticate a record entry. A signature must be traceable to the individual making the entry, and it must be handwritten or be part of an electronic signature system or other form acceptable to the FAA.

2. Reserve.

Appendix C. Directive Feedback Information

Please submit any written comments or recommendations for improving this directive or suggest new items or subjects to be added to it. Also, if you find an error, please tell us about it.

Subject: FAA Order 8120.18A

To: Directive Management Officer @ 9-AVS-AIR-Directives-Management-Officer@faa.gov

(Please mark all appropriate line items)

An error (procedural or typographical) has been noted in paragraph _____ on page _____.

Recommend paragraph _____ on page _____ be changed as follows:
(attached separate sheet if necessary)

In a future change to this order, please include coverage on the following subject:
(briefly describe what you want added):

Other comments:

I would like to discuss the above. Please contact me.

Submitted by: _____ Date: _____

Telephone Number: _____ Routing Symbol: _____