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InFO

Information for Operators

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http://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info

An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements with relatively low urgency or impact on safety.

Subject: Title 14 of the Code of Federal Regulations (14 CFR) Part 121, § 121.703 “Service Difficulty Reports”

Purpose: The purpose of this InFO is to establish an understanding of the regulatory requirement for reporting the occurrence or detection of each failure, malfunction, or defect per § 121.703(a) in operational service and the reporting timeline requirements of § 121.703(d). Specifically, to explain the agency position regarding aircraft undergoing scheduled maintenance, preventive maintenance and alterations that will be out of service for more than 72 hours.

Background: Section 121.703(d) requires each certificate holder to submit reports that cover each 24-hour period beginning at 0900 local time of each day and ending at 0900 local time on the next day, to the Federal Aviation Administration (FAA) offices in Oklahoma City, Oklahoma. Each report of occurrences during a 24-hour period shall be submitted to the collection point within the next 96 hours. A report due on Saturday or Sunday may be submitted on the following Monday, and a report due on a holiday may be submitted on the next work day.

Discussion: The reporting deadlines mandated by § 121.703(d) are easy to determine for difficulties discovered when an aircraft is “in service”. However the reporting deadlines mandated by § 121.703 (d) do not take into account the circumstance where aircraft are undergoing scheduled maintenance visits and out of service for extended periods of time (greater than 72 hours).

This reporting schedule is understandable for aircraft operating in a line operation environment, where single component failures or damage are generally identified, diagnosed and corrected in a short time frame. The nature of a heavy maintenance inspection visit is much different, and the purpose of § 121.703 would be met by clarifying the reporting requirements of part § 121.703(d) as applicable within 96 hours after all of the inspections, evaluations and repairs associated with heavy maintenance have been accomplished.

When an aircraft undergoes maintenance, preventive maintenance or alteration, maintenance personnel perform inspections and document findings for corrective action. Inspection findings are preliminary, and must be assessed for appropriate action. Indeed, significant findings are evaluated by engineering and even the design approval holder before an appropriate action is developed. Items that constitute corrosion, fatigue, stress or other damage are meticulously evaluated, and appropriate corrective action is planned and accomplished. In some cases, the findings are reported to the FAA by the design or production approval holder, repair station or other entity.

When an aircraft is out-of-service for more than 72 hours due to scheduled maintenance, preventive maintenance or alteration activity then the reporting requirement will be within 96 hours after the work on the aircraft is approved for return to service.

This approach ensures service difficulties are reported appropriately on in-service and out-of-service aircraft. It ensures certificate holder's report complete and insightful findings, classifications of findings and corrective actions. This approach decreases supplemental reports and provides data for evaluation.

Recommended Action: It is recommended that Certificate Holder's understand the purpose of 14 CFR Part § 121.703 requirements and ensure reportable events discovered during maintenance, preventive maintenance and alteration on aircraft out of service more than 72 hours are provided within 96 hours of completing the aircraft log or airworthiness release.

Contact: Questions or comments regarding this InFO should be directed to Aircraft Maintenance Division, Air Carrier Maintenance Branch, AFS-330, at (202) 267-1675.