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# InFO

Information for Operators

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*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. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.*

**Subject:** Expansion of Existing Programs and FAA Policy – Flexibilities for Managing Scheduled Maintenance Requirements Due to the COVID-19 Public Health Emergency.

**Purpose:** This InFO notifies operators of temporary changes to Federal Aviation Administration (FAA) policy on the use of short-term escalations (STE) to manage scheduled maintenance requirements affected by the COVID-19 public health emergency. This InFO also provides information on increased flexibilities related to the use of STEs and how operators may request FAA authorization for the expanded use of STEs.

**Background:** The COVID-19 public health emergency has had a significant impact on the demand for passenger operations. Due to the severe reduction in operations, some operators have sought additional flexibility when tracking, planning, and executing scheduled maintenance requirements. For operators subject to a Continuous Airworthiness Maintenance Program (CAMP), the time limitations, maintenance intervals, and instructions and procedures to conduct inspections are an integral part of their maintenance and inspection program. This maintenance and inspection program is a fundamental component of the operator's CAMP. For operators subject to a non-CAMP inspection program approved by the Administrator, the inspections and intervals contained in that program are also fundamental to maintaining aircraft in an airworthy condition.

Due to unanticipated situations (e.g., contractor scheduling, conflicts in weather, parts availability, or other unscheduled maintenance), operators may wish to adjust the interval temporarily for an individual aircraft, system, or component. The use of STEs provides operators with the flexibility to manage these scheduled maintenance intervals, while continuing to ensure the airworthiness of their aircraft. The FAA currently provides STE authorization to eligible CAMP operators through issuance of an Operations Specification (OpSpec) or Management Specification (MSpec), as applicable,<sup>1</sup> which authorizes operators to use short-term escalation procedures to extend maintenance intervals temporarily for aircraft, powerplant, systems, or other selected items without approval by the principal inspector (PI).

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<sup>1</sup> The FAA issues OpSpecs to operators and certificate holders in accordance with 14 CFR part 119, and MSpecs to part 91, subpart K program managers.

Operators with a non-CAMP inspection program approved by the Administrator may also incorporate STE procedures within that program.<sup>2</sup>

The OpSpec/MSpec (or inspection program procedures, in the case of non-CAMP operators) includes limitations on an operator's use of its STE authorization. Operators who are authorized to exercise STEs may request PI approval to exceed certain limitations of their current STE program.

**Discussion:** Operators impacted by the effects of the COVID-19 public health emergency that currently hold STE authorization may request increased flexibility in their STE programs. The FAA has provided PIs additional guidance for the evaluation and approval of requests to exceed certain limitations, consistent with the information discussed below.

1. Applicability.

- a. Operators Eligible for STE Authorizations via OpSpec/MSpec: All operators subject to a Continuous Airworthiness Maintenance Program (CAMP) under 14 CFR § 91.1411, 14 CFR part 121, or 14 CFR § 135.411(a)(2) are eligible for STE authorizations via OpSpec/MSpec D076, *Short-Term Escalation Authorization*, or when incorporated as part of their reliability program authorized by OpSpec/MSpec D074, *Reliability Program Authorization: Entire Aircraft*. Existing authorizations for the use of STEs contain specific limitations that may be relieved during the COVID-19 public health emergency and while the effects of the public health emergency persist. This allows for additional flexibility when appropriate, and remains subject to all applicable risk mitigations.
- b. Operators Not Eligible for STE Authorizations via OpSpec/MSpec: Operators with inspection programs approved by the Administrator may still be eligible for specific relief from STE limitations. Advisory Circular (AC) 91-90, *Part 91 Approved Inspection Programs*, addresses STEs within aircraft inspection programs approved by the Administrator. If an operator's approved inspection program incorporates STE provisions, the FAA may also consider STE flexibility for this operator if requested.

2. Flexibilities. When requested and authorized by the FAA, eligible operators may:

- a. Request STEs up to 30 percent, not to exceed 1500 hours time in service. Maximum short-term escalation intervals may be a percentage of an existing time interval for a particular task or designated in hours of time in service, cycles, or some other identifiable increment. Except under certain conditions, the maximum time authorized for a short-term escalation has previously been 10 percent, not to exceed 500 hours time in service.
- b. The unprecedented effects of the COVID-19 public health emergency have resulted in conditions that may warrant an exception to the previous maximum time interval limit,

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<sup>2</sup> Covered operators must obtain operations/management specifications containing time limitations, or standards for determining time limitations, for overhauling, inspecting, and checking airframes, engines, propellers, rotors, appliances, and emergency equipment. See 14 CFR §§ 119.49(a)(8), (b)(8), and (c)(8) and 91.1015(a)(5). The STE authorization supplements an operator's CAMP, reliability program, or approved inspection program in the determination of appropriate time limitations for maintenance.

depending on each operator's circumstances. The FAA has determined that the maximum limits should be temporarily increased by a factor of 3 to manage scheduled maintenance requirements for the expected duration of the public health emergency. Accordingly, operators may now request STEs up to 30%, not to exceed 1500 hours time in service. The operator should perform sufficient analysis and provide adequate justification to the responsible Flight Standards office to substantiate each request. An STE that results in an escalation greater than 10 percent, not to exceed 1500 hours time in service, is subject to PI approval.

- c. Execute STEs after the item becomes due. Calendar items becoming due during storage or other non-operational status may be escalated *after* the item becomes due. The following procedures should be observed:
    - o The flexibility to execute an STE *after* the calendar item becomes due applies only when the item becomes due on aircraft that are in storage or in non-operational status.<sup>3</sup>
    - o The escalation interval is calculated from the date the calendar item became due.
    - o Operators continue to be responsible for monitoring maintenance schedule requirements of their aircraft, and should exhaust all means to meet scheduled maintenance intervals. This flexibility should be used as a last resort to address calendar items that have come due, and not as general relief from scheduled maintenance intervals.
    - o Operators seeking increased flexibility on calendar items that become due while the aircraft is in storage or non-operational status may request authorization to execute, without PI approval, STEs up to 10 percent, and request PI approval for STEs greater than 10 percent (up to 30%). The operator should perform sufficient analysis and provide adequate justification to the responsible Flight Standards office to substantiate each request.
    - o In accordance with airworthiness requirements, operators may not approve an aircraft for return to service *prior to* addressing all maintenance requirements either through performance of the maintenance action or execution of an STE.
  - d. Apply STEs on a large scale to numerous aircraft. OpSpec/MSpec D076, paragraph b.(2) states that STEs "...must not be used on a large scale (escalating numerous aircraft at once)...". Under the temporary change in policy, operators may request more flexibility concerning this limitation; however, STEs should not be used to the extent that they result in a fleet-wide interval extension.
3. Limitations. Except as authorized by the FAA in accordance with the policy changes referenced in this InFO, all other existing STE program limitations continue to apply, including those concerning storage programs. These flexibilities, if requested and authorized, are intended as a means for operators to maintain control of their operations, while providing as much flexibility as possible for managing scheduled maintenance requirements during this unprecedented period. In accordance with existing limitations and procedures contained in the STE program authorized in OpSpec/MSpec D076, operators must consider each aircraft individually and apply STEs against specified task(s) and interval(s) or packaged checks, and not on a fleet-wide basis. As with any STE, operators are expected to substantiate their requests.

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<sup>3</sup> For purposes of the temporary policy, non-operational refers to aircraft that are not in revenue service.

The temporary policy is intended to provide operators with a risk-based process to request and, if authorized, exercise the STE flexibility consistent with the limitations contained in their existing maintenance and inspection programs:

- *Only* on the specific aircraft that need it,
- *Only* for the duration needed for that specific aircraft, and
- *Only* when substantiated by technical data.

The policy described in this InFO will remain available until December 31, 2020, unless sooner revised, extended, or cancelled. The FAA will notify operators of any change in policy prior to December 31, 2020.

**Recommended Action:**

- a. Operators should contact their respective Flight Standards oversight office to obtain additional details and information.
- b. CAMP operators desiring to exercise the temporary STE flexibility should request an amendment to an OpSpec/MSpec according to 14 CFR §§ 119.51(c) or 91.1017(c), as applicable. In addition, they should ensure their maintenance manuals do not contain any provisions that would conflict with or otherwise prevent the use of these STE flexibilities.
- c. Operators incorporating STE provisions in their approved inspection programs should collaborate with the FAA office having oversight responsibilities to apply these allowances within their existing programs and procedures. All STE requests associated with the COVID-19 public health emergency should be identified as such.
- d. Operators should engage their FAA oversight office to the fullest extent possible. This includes providing a periodic status (e.g., weekly, or more frequently if necessary) of current STE and maintenance planning activities.
- e. Operators should provide as much advance notice as possible when PI approvals are needed.

**Contact:** Direct any questions or comments regarding this InFO to the Flight Standards Service, Aircraft Maintenance Division, by telephone at (202) 267-1675 or by email at 9-AWA-AFS-300-Maintenance@faa.gov.