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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:** Persons Authorized to Load and Unload Air Ambulance Litter/Stretcher Systems on Federal Aviation Administration (FAA) Certificated Aircraft.

**Purpose:** This InFO clarifies the intent and application of the provisions of Title 14 of the Code of Federal Regulation (14 CFR) Part 43 § 43.3(i) in regards to the removal and installation of litter/stretcher systems on aircraft.

**Background:** Recent questions have arisen about the use of non-FAA certificated persons to perform the loading, unloading, and reconfiguration of the litter/stretcher systems, to include the installation of isolettes, on FAA certificated aircraft used as air ambulances. Various FAA and industry representatives have previously classified these actions as cabin conversions/ reconfigurations, which would require a certificated mechanic or a pilot authorized under § 43.3(i).

**Discussion:** Cabin conversion/reconfiguration tasks are considered to be aircraft alterations and would require a mechanic certificated under 14 CFR part 65 or a pilot of a qualifying aircraft operated under 14 CFR part 135 (pilots are limited to the removal and re-installation of specific items as stated in § 43.3(i)). The intent of 43.3(i) was to permit complete cabin conversions/reconfigurations, normally a maintenance item, by trained pilots.

The preamble to the 1996 Final Rule adopting § 43.3(i) makes clear the rule addressed cabin reconfigurations involved passenger-to-cargo or passenger-to-stretcher conversions. The 1996 amendment was prompted by numerous petitions for exemption (over 250 at the time of the rulemaking) from § 43.3(g). Historically, most of the early petitions involved operations in remote areas where mechanics were scarce or unavailable. Later most petitions involved requests from operators to allow their properly trained pilots to reconfigure cabin seats when flying missions of an emergency nature during times—at night and on weekends—when certificated mechanics were not normally available and time was of the essence. (61 FR 19498, May 1, 1996).

As indicated, the preamble to § 43.3(i) demonstrates the rule was intended to facilitate cabin conversions and/or reconfigurations. For purposes of this discussion, Advisory Circular (AC) No. 135-14B distinguishes between the types of re-configurations contemplated by § 43.3(i) and the types of activity that may be performed by a pilot or other personnel on the aircraft. For example, Chapter 5, Section 5-5(b), the AC states: “(1) Each installation should be evaluated at its time of approval to determine if a

mechanic is required to perform installation or if other personnel can be trained for its removal or replacement.” Clearly, each situation must be evaluated on its own merits to determine if it falls within the intent of § 43.3(i), or whether it is a simpler process as contemplated by the AC, i.e., whether “other

personnel can be trained for its removal or replacement.” These evaluations are normally accomplished by the operator using FAA guidance, best practices and industry norms.

Tasks associated with the loading and unloading of medical litter/stretchers systems (including isolettes) from an aircraft used for the purposes of an air ambulance is not considered to be cabin conversions/reconfigurations. For clarification, simply sliding litters/stretchers into or out of an aircraft (helicopter or airplane), where the litters/stretchers are secured by a quick connect latching mechanism, where no tools are required, is not an alteration of the aircraft. This is simply an operation of the litter system as designed. Similarly, the loading and securing of an isolette, either onto an existing litter mount or other appropriate area of the aircraft cabin, is not an aircraft reconfiguration (refer to AC 135-14B). These tasks may be performed by trained personnel other than persons certificated under 14 CFR parts 61 and 65. There may be operational issues to address, but these actions are part of operating the system as designed and are normally completed by the pilot as required (such as in the case of weight and balance calculations due to loading an isolette).

**Recommended Action:** The insertion and removal of isolettes, and litter/stretchers systems are not considered maintenance. Air ambulance operators should familiarize themselves with the information contained in this InFO and ensure that their operational procedures are adequate and personnel are appropriately trained for the operation and use of the installed litter systems.

**Contact:** Questions or comments regarding this InFO should be directed to the Aircraft Maintenance Division at (202) 267-1675, or via email at [9-AWA-AFS-300-Maintenance@faa.gov](mailto:9-AWA-AFS-300-Maintenance@faa.gov).