



U.S. Department
of Transportation
**Federal Aviation
Administration**

800 Independence Ave., SW.
Washington, DC 20591

FEB 24 2004

Mr. Craig Brown
Senior Technical Specialist
AOPA
421 Aviation Way
Frederick, MD 21701

Dear Mr. Brown:

Thank you for your e-mail requesting clarification of Federal Aviation Administration (FAA) policy on manufacturer's maintenance recommendations.

The requirement to follow manufacturer's recommendations for replacement of parts is found in the regulations, primarily in 14 CFR § 91.403(c). The section contains the following language:

“No person may operate an aircraft for which a manufacturer's maintenance manual or instructions for continued airworthiness has been issued that contains an airworthiness limitations section unless the mandatory replacement times, inspection intervals, and related procedures specified in that section or alternative inspection intervals and related procedures set forth in an operations specification approved by the Administrator under part 121 or 135 of this chapter or in accordance with an inspection program approved under §91.409(e) have been complied with.”

For emphasis, I've underlined the important language in this rule. Only those items that are listed in the approved airworthiness limitations section of the maintenance manual *must* be complied with. For most General Aviation (GA) aircraft these are the items with mandatory retirement times or life limits. For instance, the turbine blades in most turbine engines must be replaced after they have reached their life limit. In this case, these limitations are commonly found in the approved section of the maintenance manual.

There are two other places where limitations are often imposed on an aircraft; the Type Certificate Data Sheet (TCDS), or an Airworthiness Directive (AD). If a limitation is listed in the TCDS or if an AD is issued against an aircraft, engine, propeller, or accessory, and contains a limitation, that limitation is mandatory. Limits contained in other sections of the maintenance manual that are not FAA approved are not mandatory. An example of these would be the Time Between Overhaul (TBO) for a piston engine. The manufacturer has a recommended interval, but if these intervals are not contained

in the approved section of the manual, they are not mandatory. The same holds true for manufacturer's service bulletins. Unless the FAA includes these documents in an AD, they are optional.

I hope this information is helpful. If you have further questions please feel free to contact me at 202-267-3546.

Sincerely,

A handwritten signature in cursive script that reads "David E. Cann". The signature is written in black ink and extends across the width of the page.

David E. Cann
Manager, Aircraft Maintenance
Division