This Special Airworthiness Information Bulletin (SAIB) alerts owners, operators, and certificated repair and maintenance providers of the responsibilities of type and production certificate (TC/PC) holders, supplemental type certificate (STC) holders, and the parts manufacturer approval (PMA) holders to support the continued operational safety (COS) of their product or part design.

Background

Producers of aircraft, aircraft engines, propellers, and replacement parts comprise an elite segment of a global industry that has produced some of the safest aviation products in the world. The FAA recognizes that this is due to many factors including advanced design tools, testing and analysis techniques, materials, early fault detection capability, and the regulatory certification environment that the industry operates in.

In today’s competitive market, owners and operators are continuously searching for ways to reduce costs while maintaining safety. One way is to reduce maintenance expenses by finding alternative sources of replacement parts. This naturally created new markets for replacement parts.

Recently, some engine manufacturers responded to the FAA’s approval of PMA and STC for parts involving their type design engine models by telling customers that support of their products could be limited if such parts are installed, since they do not have data on these PMA and STC parts and the effect these parts may have on the overall system. Some TC/PC holders have included language in the FAA-approved airworthiness limitation section (ALS) of their engine instructions for continued airworthiness (ICA) stating that the ICA was developed only for use with their parts.

The FAA understands that the TC/PC holder has no knowledge or data about the PMA and STC parts installed in the product and, therefore, can only assess the airworthiness and systems effects of their parts installed in the product.

PMA and STC parts are thoroughly evaluated for compliance with respect to any changes they introduce and their effect on the original type design. The need for supplemental ICAs, new airworthiness limitations, and other conditions is established by the FAA to ensure the safe integration of the PMA and STC parts into the product.

Recommendations

The following information is provided to assist the aviation community with regard to the installation of FAA-approved replacement parts –

1) FAA-approved TC/PC holder, PMA, and STC parts are interchangeable within the certificated product since they are approved only after a full demonstration of compliance to the applicable requirements of Title 14 of the Code of Federal Regulations (14 CFR). A PMA or STC part, when FAA-approved for installation on a certificated product, is a valid replacement part to the TC/PC holder part according to 14 CFR;
2) Unless stated otherwise as a limitation to an STC, the FAA has determined and the applicant has shown that FAA-approved life limits established for the TC/PC holder parts remain unchanged for those TC/PC holder parts when PMA or STC parts are installed elsewhere within the product. For example, the life limit for a TC/PC holder disk is unchanged and remains in effect when PMA blades are installed in that disk;

3) The FAA approves the content of an ALS and ICA based upon its review of the substantiating data provided by an applicant. Applicants for PMA or STC parts are required to assess the ICA requirements. A PMA or STC applicant either shows and states that the product’s ICA are still valid with their part installed or provides a supplemental ICA for any differences; and

4) TC/PC holders, PMA holders, and STC holders are responsible for the COS support in accordance with the applicable standards for their parts and products which they have designed and produced.

Owners and operators are ultimately responsible for the safety and airworthiness of the product, which includes being responsible for the configuration control of the product. Owners and operators must ensure that any replacement part installed in the product is approved for that installation and further, they must also ensure that they follow any supplemental ICA that may have been developed for that part.

For Further Information Contact

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