



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

# Advisory Circular

---

**Subject:** Aging Aircraft Inspections and  
Record Reviews

**Date:** 1/15/09

**AC No:** 120-84

**Initiated by:** AFS-300

**Change:** 1

**1. PURPOSE.** This change revises this advisory circular (AC) to update references to Title 14 of the Code of Federal Regulations (14 CFR) and Federal Aviation Administration (FAA) Order 8900.1, Flight Standards Information Management System.

**2. PRINCIPLE CHANGES.** This change updates references to 14 CFR and FAA Order 8900.1 in AC 120-84. It also updates information on requesting extensions, found on page 3, paragraph 5d.

## PAGE CONTROL CHART

<b>Remove Pages</b>	<b>Dated</b>	<b>Insert Pages</b>	<b>Dated</b>
2 and 3	10/22/04	2 and 3	1/15/09
6 through 10	10/22/04	6 through 10	1/15/09

ORIGINAL SIGNED by  
/s/ Chester D. Dalbey for

John M. Allen  
Director, Flight Standards Service

---



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

# Advisory Circular

**Subject:** Aging Aircraft Inspections and Record Reviews

**Date:** 10/22/04

**AC No:** 120-84

**Initiated by:** AFS-300

**Change:**

- 1. PURPOSE OF THIS ADVISORY CIRCULAR (AC).** This advisory circular (AC) provides information pertaining to aging airplane inspections and records reviews accomplished to satisfy the requirements of the Aging Airplane Safety Final Rule. This information represents an acceptable way, but not the only way, for an aging airplane inspection and records review to be conducted. However, if you use the means described in this AC, you must follow it in all important aspects. 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, and the document is intended only to provide information to the public regarding existing requirements under the law or agency policies.
- 2. AUDIENCE.** This AC is for air carriers operating airplanes under Title 14 of the Code of Federal Regulations (14 CFR) part 121, foreign air carriers or persons operating U.S.-registered, multiengine airplanes under 14 CFR part 129, and persons operating multiengine airplanes with nine or fewer seats in scheduled operations under 14 CFR part 135.
- 3. WHERE YOU CAN FIND THIS AC.** You can find this AC on the Federal Aviation Administration's (FAA) website at [https://www.faa.gov/regulations\\_policies/advisory\\_circulars](https://www.faa.gov/regulations_policies/advisory_circulars) and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>.
- 4. EFFECTIVE DATE.** December 8, 2003.
- 5. BACKGROUND.**

- a. The Aging Aircraft Safety Act of 1991 (the Act).**

(1) To address aging aircraft concerns, Congress enacted Title IV of Public Law (PL) 102-143, the Aging Aircraft Safety Act of 1991 (the Act). This act was subsequently codified as Title 49 of the United States Code (49 U.S.C.) § 44717. The Act instructs the Administrator to prescribe regulations that ensure the continuing airworthiness of aging aircraft. The Act requires the Administrator to conduct inspections and review the maintenance and other records of each aircraft an air carrier uses to provide air transportation. The Act also requires the Administrator to establish procedures for performing such inspections. These inspections and records reviews enable the Administrator to decide whether an aging aircraft is in a safe condition and maintained properly for operation in air transportation.

(2) In addition to imposing obligations on the Administrator, the Act requires air carriers to demonstrate as part of these inspections that the maintenance of the aircraft's structure, skin, and other age-sensitive parts and components has been adequate and timely enough to ensure the

highest degree of safety. The Act also requires air carriers to make their aircraft and aircraft records available for inspection and review.

**b. The Aging Airplane Safety Final Rule.**

(1) On December 6, 2002, the Federal Aviation Administration (FAA) published the Aging Airplane Safety Interim Final Rule in the Federal Register (67 FR 72726). On February 2, 2005, the FAA published the Aging Airplane Safety Final Rule in the Federal Register (70 FR 5518). The final rule specifies mandatory aging airplane inspections for certain airplanes according to their years in service, as well as requiring damage-tolerance (DT)-based inspections and procedures to be included in the maintenance programs of certain airplanes. The Aging Airplane Safety Rule also prohibits operation of these airplanes after specified deadlines unless the maintenance programs under which the airplanes are maintained include DT-based inspections and procedures. The FAA implemented this requirement to assess the DT of older airplane structures and to ensure the continuing airworthiness of aging airplanes operated in air transportation.

(2) The Aging Airplane Safety Rule permits certain appropriately authorized representatives of the Administrator to conduct required aging airplane inspections and review records. Aviation safety inspectors (ASI), Designated Airworthiness Representatives (DAR), or Organization Designation Authority (ODA) may carry out these required inspections and records reviews.

**6. AGING AIRPLANE INSPECTIONS AND RECORDS REVIEWS.**

a. **Aging Airplane Safety Rule Requirements.** The Aging Airplane Safety Rule requires that, after their 14th year in service (the calendar-time elapsed since the FAA issued an airplane its first U.S. or first foreign airworthiness certificate), certain airplanes must undergo inspections and records reviews by the Administrator. This action ensures the maintenance of the airplanes' age-sensitive parts and components has been adequate and timely. These airplanes include all those operated under part 121, all U.S.-registered, multiengine airplanes operated under part 129, and all multiengine airplanes used in scheduled operations under part 135. To ensure the maintenance is adequate and timely, the FAA will conduct structural spot inspections and review applicable airplane records. To satisfy the intent of the rule, the FAA will sample the tasks and records for each airplane, and perform continued surveillance of an air carrier's maintenance program.

b. **Airplanes and Operations Affected.** To determine which airplanes must undergo inspections and records reviews which the Aging Airplane Safety Rule requires, an affected operator should see Figure 1, Decision Logic—Applicability of Inspections and Records Review. If an air carrier operates an airplane under part 121, then part 121, § 121.1105 applies. Multiengine airplanes operated under part 129 and smaller multiengine airplanes operated under part 135 may also be subject to the Aging Airplane Safety Rule. If the airplanes are U.S.-registered and operate under part 129, then part 129, § 129.105 applies. Multiengine airplanes with nine or fewer seats in scheduled operations under part 135 must comply with part 135, § 135.422. Airplanes not used to conduct operations under these parts of 14 CFR are not subject to aging airplane inspections and records reviews. The Aging Airplane Safety Rule

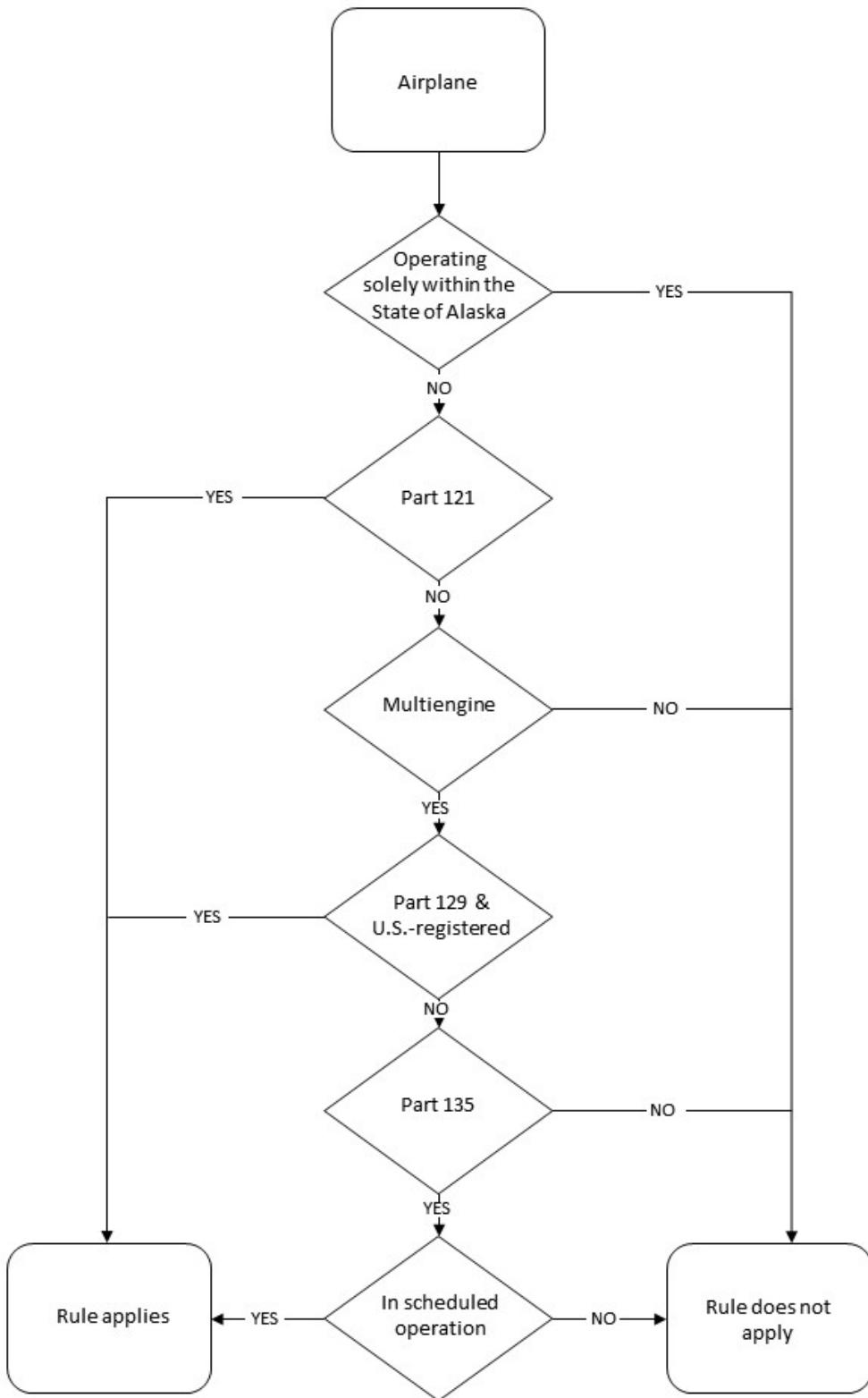
also does not apply to an airplane operated between any point within the state of Alaska and any other point within the state of Alaska.

**c. Due Date for Inspections and Records Reviews.** After the operator determines which of its airplanes the Aging Airplane Safety Rule affects, they should see Figure 2, Decision Logic—Initial Inspections and Records Review Due Date, to determine when each airplane's initial inspection and records review is due. Although the aging airplane inspection and records review is only required after an affected airplane's 14th year in service, the Aging Airplane Safety Rule requires airplanes past their 24th year in service as of December 8, 2003, to be inspected no later than December 5, 2007. This ensures ASIs inspect the oldest airplanes first and distribute the FAA's workload for initial inspections. For an airplane that has passed its 14th year in service, but not its 24th year in service as of December 8, 2003, an ASI must inspect the airplane no later than December 4, 2008. An airplane that has not passed its 14th year in service must have its first aging airplane inspection and records review within 5 years after the start of its 15th year in service. In all cases, subsequent inspections and records reviews are required at no more than 7-year intervals after the initial inspection and records review. The Aging Airplane Safety Rule prohibits persons from operating an affected airplane under parts 121, 129, and 135, unless the airplane has undergone the required inspection and records review. However, an operator could still operate an airplane under 14 CFR part 91 or part 125.

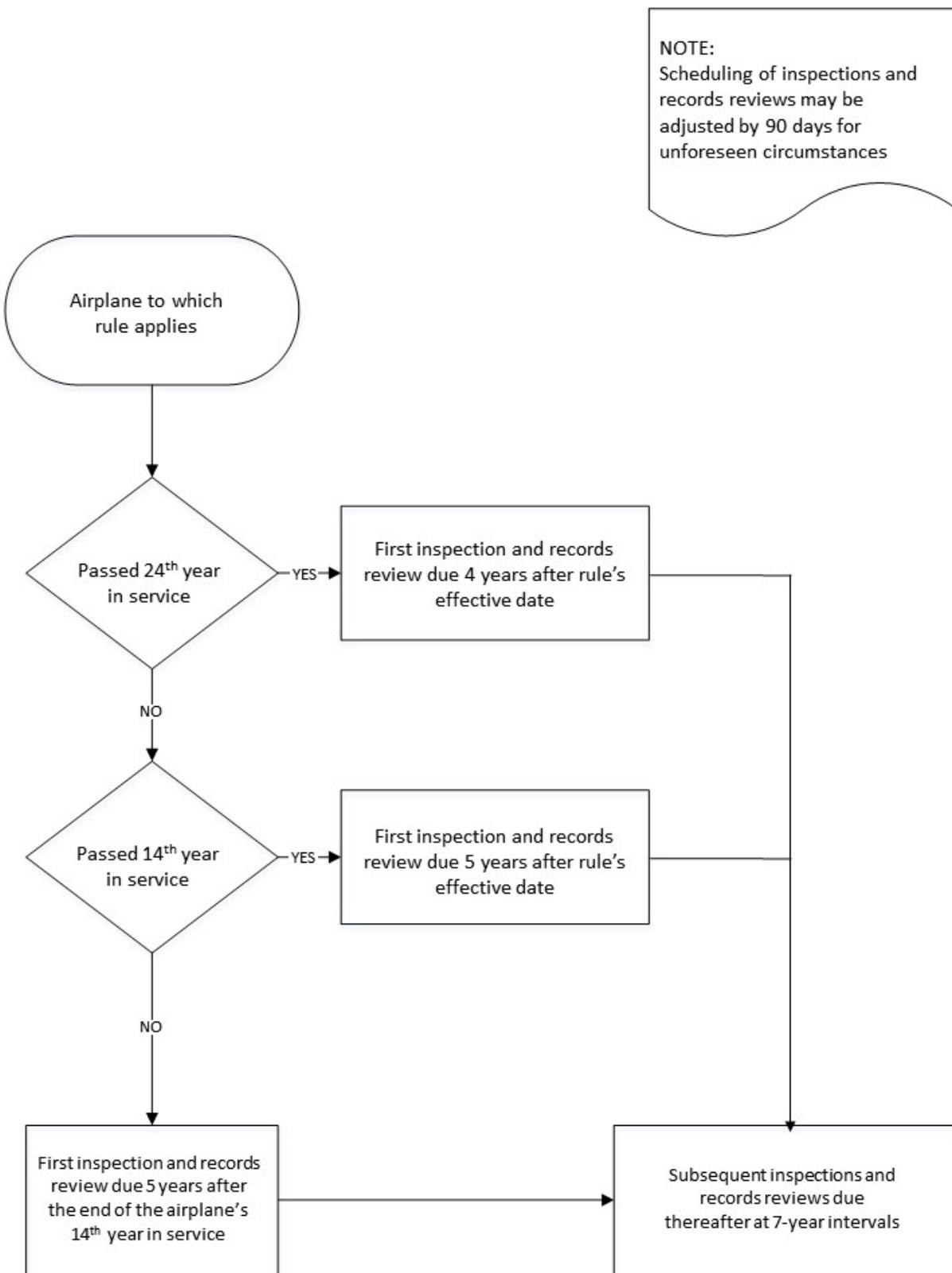
**d. Extensions.** As specified in the Aging Airplane Safety Rule, the Administrator may approve an extension of up to 90 days on the repeat interval of an aging airplane inspection and records review to accommodate an unforeseen scheduling conflict. The ability of the operator to request and the FAA to subsequently approve an extension does not apply to the threshold dates for the initial inspections as stated in the applicable rule. The operator should submit a request for extension to its Principal Maintenance Inspector (PMI), along with justification for the extension. An air carrier may submit its request through email, fax, or other means acceptable to its PMI.

**NOTE: Even though a DAR or ODA may conduct the inspection and records review, only an air carrier's certificate management office (CMO) may grant an extension to the repeat intervals. We intend that an air carrier must not operate an airplane after it has reached its threshold date until it has completed the inspection and review of records.**

**FIGURE 1. DECISION LOGIC—APPLICABILITY OF INSPECTIONS AND RECORDS REVIEW**



**FIGURE 2. DECISION LOGIC—INITIAL INSPECTIONS AND RECORDS REVIEW DUE DATE**



## 7. CONDUCT OF AGING AIRPLANE INSPECTIONS AND RECORDS REVIEWS.

**a. General Information About Inspections and Records Reviews.** An airplane's inspection and records review should be carried out during an airplane's heavy maintenance check. A heavy maintenance check is a "C" check or segment thereof, a "D" check or segment thereof, or other scheduled maintenance visit where structural inspections are accomplished. Air carriers should schedule their inspections and records reviews early and provide their PMI with advance-planning schedules for their airplanes' heavy maintenance checks. PMIs should work closely with their air carrier to address any issues that may delay an airplane's inspection and records review or prevent the airplane from returning to service as scheduled. The CMO may also get help from responsible ASIs to assist in performing these inspections and reviews. The inspections and records reviews may be conducted by an ASI, DAR, or ODA. In addition, an airplane's inspection and records review may take place in different locations and be accomplished by different inspectors/designees.

**b. FAA Notification.** Each air carrier must provide the FAA with notification at least 60 days before each airplane will be available for its inspection and records review. The notification should be provided to the PMI in a form agreed to by the PMI and air carrier. An air carrier may make a single notification to cover several airplanes. The notice should identify each airplane by make, model, serial number, and registration number. It should also provide each airplane's scheduled inspection date and location. Because most records reviews will be carried out separately from the aircraft inspections, the air carrier should also provide the FAA with the location of each airplane's records that are required to be reviewed, as specified in §§ 121.1105(d), 129.105(c), and 135.422(d).

### c. Airplane Inspections.

(1) For each inspection, the FAA will coordinate with the air carrier as to the scope and extent of its planned inspection. To meet the intent of the Act, the FAA will conduct structural spot inspections, as specified in FAA Order 8900.1, Flight Standards Information Management System. The FAA will select structural inspections, corrosion prevention and control program (CPCP) tasks, and/or major repairs/modifications on parts of the airplane for review that will be accessible during the heavy maintenance check. The FAA will also sample job task cards to ensure their completeness. These cards should indicate the task, method of compliance, and required tooling and signoffs. The air carrier should provide the ASI, DAR, or ODA conducting the inspection with the supporting documentation for these tasks before the planned inspection. The FAA will attempt to avoid disrupting the air carrier's scheduled operations. However, the FAA may require additional access to the airplane based on its records review and findings during the airplane inspection.

(2) For the Administrator to ensure air carriers demonstrate that the maintenance of the aircraft's structure, skin, and other age-sensitive parts and components has been adequate and timely enough to ensure the highest degree of safety, the FAA will focus each inspection and records review on existing aging airplane requirements. These requirements consist of aging airplane structural modifications, corrosion prevention and control programs, supplemental structural inspections programs (including airworthiness limitations (AL) inspections), and structural repair requirements.

(3) During the inspection, the ASI, DAR, or ODA may also observe the accomplishment of maintenance tasks to ensure:

(a) Work instructions provide sufficient detail to accomplish the scope of required maintenance tasks,

(b) Required tooling and materials are available and used, and

(c) Properly trained and qualified personnel perform the work.

d. **Airplane Records Review.**

(1) The records review usually will be accomplished separately from the airplane inspection. The ASI, DAR, or ODA will review/sample the records identified in this section using Order 8900.1, Volume 6, Chapter 11, Section 14, Conducting Records Reviews and Aircraft Inspections Mandated by the Aging Airplane Rules for Parts 121, 129, and 135, to evaluate the air carrier's records, as applicable.

(2) As required in §§ 121.1105(d), 129.105(c), and 135.422(d), the air carrier must make the following records available to the FAA for the aging airplane records review:

(a) Total years in service of the airplane;

(b) Total time in service of the airframe;

(c) Total flight cycles of the airframe (not required under § 135.422(d));

(d) Date of the last inspection and records review required by the Aging Airplane Safety Rule;

(e) Current status of life-limited parts of the airframe;

(f) Time since the last overhaul of all structural components required to be overhauled on a specific time basis;

(g) Current inspection status of the airplane, including the time since the last inspection required by the inspection program under which the airplane is maintained;

(h) Current status of applicable Airworthiness Directives (AD), including the date and methods of compliance (and, if the AD involves recurring action, the time and date when this action is required);

(i) A list of major structural alterations; and

(j) A report of major structural repairs and the current inspection status for those repairs.

(3) The air carrier may provide actual hard copies, electronic versions of the records, or summaries of compliance.

(4) In addition, the ASI, DAR, or ODA may need to verify current airframe status information. Therefore, the air carrier should coordinate with the FAA so that the ASI, DAR, or ODA may review the appropriate records, if necessary.

(5) If the inspection and records review are conducted at separate locations and/or different times, the air carrier must make available to the FAA a summary of any additional records made at the time of the aircraft inspection, such as ADs accomplished and major repairs accomplished. Normally, the records review should be accomplished prior to the aircraft inspection.

e. **Aging Airplane Supplemental Inspections.** The Aging Airplane Safety Rule prohibits certain airplanes from operating unless DT-based inspections and procedures are included in the maintenance or inspection program for each airplane in accordance with a specified schedule. The rule also requires the operator to assess the adverse effects of any repairs or alterations on Fatigue Critical Structure (FCS). Although the Aging Airplane Safety Rule specifies dates by which the FAA requires air carriers to develop and incorporate DT-based inspections and procedures into their approved maintenance program, the program may not require inspections to be completed until a later date. That date depends on the DT assessment of the airplane's structure.

f. **Reporting.** Upon completion of the inspection or records review for a specific airframe, the ASI, DAR, or ODA who accomplished the inspection or records review will notify the air carrier's PMI of any discrepancies found during the inspection/records review. A report will also be submitted to the CMO that includes the airplane's registration number, total years in service, total flight hours, and date of last inspection and records review required by the Aging Airplane Safety Rule, as well as a statement that the inspection or review, as applicable, is complete for that airplane (see Appendix 1, Sample Reporting Form). The ASI, DAR, or ODA also may give the report to the air carrier to forward to its PMI. The PMI then notifies the air carrier using email, fax, or another accepted form of notification that the inspection or records review is complete. Because the inspection and records review may have been completed on different dates, the date the PMI notifies the air carrier that both the inspection and records review are complete is the date used to determine the due date of the next required inspection and records review.

**8. DESIGNATED AIRWORTHINESS REPRESENTATIVES.** As specified in 14 CFR part 183, the Administrator may designate individuals to act on behalf of the Administrator to conduct functions by FAA personnel. The Aging Airplane Safety Rule revised part 183, § 183.33(a) to expand the authority of DARs by authorizing them to conduct inspections and records reviews on behalf of the Administrator. An air carrier may have its aging airplane inspections and records reviews performed by a DAR, ODA, or an FAA inspector.

**9. REQUESTS FOR INFORMATION.** Requests for information about this AC should be directed to the Aircraft Maintenance Division, Commercial Aviation Group (AFS-330), Federal Aviation Administration Headquarters, 800 Independence Avenue SW., Washington, DC 20591, 202-267-1675.

**10. AC FEEDBACK FORM.** For your convenience, the AC Feedback Form is the last page of this AC. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this AC on the Feedback Form.

**APPENDIX 1. SAMPLE REPORTING FORM****RESULT OF AGING AIRPLANE SAFETY INSPECTION (IN ACCORDANCE WITH  
14 CFR § 121.1105, 129.105, OR 135.422)**

U.S. Department  
of Transportation  
Federal Aviation  
Administration

**RESULT OF AGING AIRPLANE SAFETY INSPECTION**

(in accordance with 14 CFR § 121.1105, 129.105, or 135.422)

INSTRUCTIONS: Print or type all entries.

1. Airplane	Make	Model
	Serial No.	Registration Mark
2. Air Carrier	Name	Address
	Certificate No.	
3. Completion of records review and airplane inspection		
A. The airplane inspection and records review have been completed in accordance with the following regulations:		
<input type="checkbox"/> § 121.1105 <input type="checkbox"/> § 129.105 <input type="checkbox"/> § 135.422		
B. Have discrepancies been identified during this inspection?		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
Name		
Signature of Authorized Individual		Date

Sample Reporting Form

**APPENDIX 2. RELATED PUBLICATIONS (CURRENT EDITIONS)**

1. FAA Order 8100.8, Designee Management Handbook.
2. FAA Order 8900.1, Flight Standards Information Management System, Volume 6, Chapter 1, Section 14, Conducting Records Reviews and Aircraft Inspections Mandated by the Aging Airplane Rules for Parts 121, 129 and 135.

## **Advisory Circular Feedback Form**

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by contacting the Flight Standards Directives Management Officer at 9-AWA-AFB-120-Directives@faa.gov.

Subject: AC 120-84 CHG 1, Aging Aircraft Inspections and Record Reviews

Date: \_\_\_\_\_

*Please check all appropriate line items:*

An error (procedural or typographical) has been noted in paragraph \_\_\_\_\_  
on page \_\_\_\_\_.

Recommend paragraph \_\_\_\_\_ on page \_\_\_\_\_ be changed as follows:

---

---

In a future change to this AC, please cover the following subject:  
*(Briefly describe what you want added.)*

---

---

Other comments:

---

---

I would like to discuss the above. Please contact me.

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_