

Adding your Aircraft to a 14CFR 135 Operating Certificate

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Adding your aircraft to an existing 14CFR 135 operating certificate doesn't need to be difficult. The most important thing is to know and understand the regulations, the guidance regarding this issue, and to have a good relationship with your local Flight Standards District Office (FSDO).

Along the lines of the last point, review the "fine print" of this document. Every FAA inspector has his or her own opinions and interpretations of the regulations and the 8900.10 guidance. The following is the author's interpretation of these items, which may or may not agree with your Principal Operations Inspector (POI) or Principal Maintenance Inspector (PMI). So, that is all the more reason to know these regulations and guidance yourself, and do your due diligence before making the request of your PMI to add an aircraft to your Operations Specifications (Ops Specs). In addition, while this document should be used as "guidance" from an experienced operator to assist you in your efforts to get FAA approval for your aircraft to be operated under FAR 135, it may not be all inclusive. Again, do your own research and communicate any questions with your POI or PMI.

Now let's split this process into two parts; Operations and Maintenance.

The first step in this process should be to ensure that you have all the items you need to complete this project. You will need access to the aircraft, and all of its maintenance records. Second, I recommend that you download the FAA's worksheet for this process. This is a document on the FAA website entitled "Notice of Intent to Add an Aircraft". The link for this document is:

https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_135-44.pdf

This document is structured to walk you through the process to ensure you cover all the possible items that affect compliance with the additional items required to operate this aircraft under part 135 regulations. However, it is also a wonderful tool to guide inspectors through the process of adding the aircraft to your Ops Specs since it is formatted along the same lines as the Ops Specs (i.e. Sections A, B, C, D, and E). This will also help those of you who have access to the FAA's Industry Operations Specifications Subsystem (IOPSS) and maintain your Ops Specs yourself.

From the Operations standpoint the first thing to do is check your Training Program. If you already operate a similar make and model of aircraft then you should already have this item covered. If not, then you will need to draft and submit a training program for this make and model of aircraft to your POI. Until such time as your training program is

approved, you cannot train the pilots for the aircraft. Your POI has the authority to grant one time approvals (within certain guidelines) if you are pushed for time, but the choice of most POI's will be to approve a compliant training program before any training is accomplished. Keep this in mind when you are planning when this aircraft will be ready to generate revenue. If you plan to train your pilots at a 14CFR 142 simulator training facility, this process may take longer than you think due to the inspector wanting to review and approve the center's program, as well as approving their instructors, check airmen, as well as your audit of the center. (See Notice 8000.294 for additional guidance on the issue of working with a FAR 142 center.)

The aircraft will need to conform with the regulations. Inspect the aircraft for the following items:

- Check that the Airworthiness Certificate and Registration are correct and reflect the correct registration number for the aircraft. You also need a Radio License if you are planning to operate the aircraft internationally.
- If you will be leasing the aircraft, prepare and execute a lease agreement. Some FAA inspectors will want to see a copy, and some may not. Regardless you are required to have a lease agreement in place that clearly shows that the certificate holder has "Operational Control" during all times that the certificate holder operates the aircraft under its Ops Specs.
- Review the Aircraft Flight Manual (AFM) or Pilot's Operating Handbook (POH). Those manuals should be appropriate for that specific make and model, and be up to date with the latest revision from the manufacturer. Contact the Technical Publications department for the aircraft manufacturer for information on the latest revision and/or part numbers for these manuals.
- Check all the supplements in the AFM or POH to ensure that they are appropriate for the equipment installed on the aircraft, and that all supplements are included. A review of all 337 forms will assist in helping to ensure that all the required supplements are included. (More on 337 forms later in the Maintenance section of this document)
- Check to see if any other manuals are required to be onboard the aircraft such as Operator's Guides for a GPS or FMS installed after manufacture. This information also should be noted on the 337 from installation.
- Check all placards to ensure that they are appropriate for the aircraft. This information can be found in the POH in smaller aircraft (single engine pistons for example) or in Chapter 11 of the aircraft's Maintenance Manual. Pay close attention to the serial number and/or configuration of the aircraft as this will affect which placards are applicable.
- Check the AFM or POH for the most recent Weight and Balance record. FAR 135.185 requires that all multi-engine aircraft be weighed every 36 months. Pay close attention to whether this document is an actual reweigh and not simply a weight and balance revision. The aircraft is required to have been placed on scales (that are within calibration) and weighed every 36 months.

- The AFM or POH must have a complete Equipment List. At a minimum you must have the original equipment list and all weight and balance revisions. Some maintenance operations will not amend the equipment list when removing or installing equipment and rely on the weight/balance revision to serve as a revision to the equipment list. However, after you take the original list, and remove the items that are no longer installed, add in the equipment that was installed, it must match the equipment currently installed on the aircraft. It's normally best to type up a new list that accurately reflects the equipment installed on the aircraft. This will eliminate any confusion by your PMI as to what equipment is installed at the time of the inspection.
- You will need to ensure that your method of maintenance compliance is onboard. Most operators use some sort of "Maintenance Status Sheet" onboard, which is a document for the Pilot in Command (PIC) to know that the aircraft is airworthy, and when the next inspection(s) are due. This information should be up to date and accurate.
- Passenger Briefing cards should be onboard, one for every passenger seat. Be extra careful of using the cards printed by the manufacturers. Few of these meet the requirements of FAR 135. Check the cards against AC 121-24C, Appendix 3. If they do not comply with this AC then either modify the cards or order custom cards. There are several companies that specialize in producing personalized Passenger Briefing Cards.
- Verify that all the Emergency Equipment required to be onboard is installed and in its proper place. Turbojets must have FAR 135 approved life vests (Type II), one for every seat. If the life vest is not labeled as Type II, check the part number with the manufacturer to see if that vest is compliant with the requirements of part 135 regulations. Also verify that Fire Extinguishers are installed, are within service limits (30 day inspections, weight checks, and hydro tests) and are labeled in some manner to show that they have been checked as required.
- Check seat belts for the proper labeling. All belts that have been tested and certified will have a tag that states they are compliant and FAA approved.
- If your General Operations Manual (GOM) or Minimum Equipment List (MEL) requires that the aircraft have headsets or handheld microphones, make sure those are installed.
- Obtain an OST 6410 from your insurance underwriter, and then complete an FAA 4507 showing this registration number as part of your fleet. This form should be mailed to the FAA prior to placing the aircraft into revenue service. The FAA should stamp this form and return it to you. Keep it on file.

The Maintenance subjects are normally the more complicated, especially on older aircraft that have more history that will have to be reviewed. The following are the items that should be researched to ensure compliance:

- Evaluate the previous maintenance on the aircraft to determine the current status and how you will continue the maintenance going forward. Are you going to maintain the aircraft in accordance with the manufacturer's program,

or develop your own Approved Aircraft Inspection Program (AAIP)? Be prepared to show and explain your answer.

- You will need to show the FAA the current maintenance status, as well as how you will track the maintenance going forward, i.e. A check is due.....B check is due.....etc.
- You will need a current Airworthiness Directive (AD) list for airframe, engines, and appliances, as well as a list of applicable “Mandatory Service Bulletins”.
- If the aircraft has more than ten (10) passenger seats you will need a Continuous Aircraft Maintenance Program (CAMP).
- You will need copies of the RVSM information such as the Service Bulletin (SB) or Supplemental Type Certificate (STC) to show proof of RVSM compliance, if applicable, along with the logbook entries showing the same, if you wish to have it added to your D092 section allowing RVSM operations.
- You will need access to the maintenance publications that dictate overhaul and life limited component (LLC) limits. These may be contained in the manufacturer’s manual(s) or through a service bulletin. Verify that all LLC’s are still within limits along with overhaul limits for engines, propellers, and governors.
- Review all 337’s and compare to the maintenance logbooks and flight manual supplements. If the logbooks make reference to a 337, then make sure you have a copy. If the 337 makes reference to a flight manual supplement, ensure there is a supplement installed in the AFM. It’s usually a good idea to request a copy of all 337 forms that are filed with the FAA in Oklahoma City. Compare this list to the 337’s that you have to ensure that you have copies of all 337s.
- Review all 337s for any “Instructions for Continued Airworthiness” (ICA). If an ICA applies to the aircraft, ensure that the aircraft is in compliance with the limits, and you will need to demonstrate the method in which you will ensure compliance going forward.
- If the 337 form required a “Field Approval” by the FAA, make sure that the form has been signed as required.
- Verify that all pressurized cylinders have been inspected and hydro-tested as required by the applicable maintenance document. Ensure that these dates are being tracked so that you can demonstrate a method of compliance going forward.
- If an Emergency Locating Transmitter (ELT) is required, ensure that it is the appropriate type for your intended operations, and that it is in compliance with FAR 91.207(d).
- Be certain that if your interior has been changed since the aircraft was manufactured that you have all the burn certification paperwork for all materials used in the interior change. For all FAR 23 certificated aircraft this should show a minimum of a “horizontal burn test”, and for FAR 25 certificated aircraft this should meet the “vertical burn” test. These

documents may only reference the regulation that it was certificated under, which should be fine.

- If life preservers are required to be installed on your aircraft, make sure you have access to the maintenance document that outlines how they will be maintained. Also ensure those guidelines are included in how you intend to maintain the aircraft going forward.
- If your aircraft is turbine powered, requires two pilots, and has more than 5 passenger seats, ensure that it has a properly installed Cockpit Voice Recorder (CVR).
- All turbine powered aircraft with more than 5 seats are required to have a Terrain Alert Warning System (TAWS). Aircraft with 9 seats or less are required to have at least a Class B system, more than 9 seats requires a Class A system.
- Traffic Collision Alert System (TCAS) is required for aircraft with more than 9 seats.
- Ensure that the aircraft has a data plate installed showing a minimum of the make, model, and serial number of the aircraft.
- Your name or certificate number must be located somewhere on the aircraft that is visible by customers and/or passengers. Although there is no guidance that the author is aware of as to exactly where this placard must be located, or how large it must be, the rule of thumb that seems to be understood by most FAA inspectors is that a customer standing at the wing tip must be able to see and read the name of the certificate holder or their certificate number. Check with your POI or PMI to see what they feel is appropriate.

Once you have done your due diligence to ensure that all of the above items are compliant with the applicable regulations, write a letter or email to your POI or PMI requesting that the aircraft be added to your Ops Specs. They may, or may not, require an inspection of the aircraft to review the research you have done to see if your efforts resulted in compliance with the regulations. If you have completed the Notice of Intent to Add Aircraft worksheet, send a copy along with your letter. This will certainly help to prove to your assigned inspectors that you have done your homework and that this aircraft is indeed compliant with the regulations. It will most likely result in a smoother and faster process.

Again, every FAA inspector may have a different interpretation of a regulation or guidance. If you feel that their requests are outside of the regulations or guidance, use the Customer Service Initiative to get an opinion from a supervisor, the region, or even Washington, DC. You must be in compliance with the regulations regardless of the opinions of your assigned inspectors. If you feel strongly that their request will not keep you in compliance then certainly use this system to get a written opinion from a higher source, and keep that written opinion for future reference. Remember, your current inspection team will change at some point, and if your new inspector feels that what you have done is not in compliance this written guidance will keep you from making changes unnecessarily.

This document is written according to regulations and guidance as of July 20, 2008, and with the experiences and knowledge from the 24 years of experience of the author. Be certain to know the current regulations and guidance and hopefully your experiences adding aircraft to your 14CFR 135 operating certificate will be positive ones.

Good luck and safe flying.

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