U.S. Department
of Transportation

Federal Aviation
Administration

DIVISION OF
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Small Airplane Directorate
901 Locust, Room 301
Kansas City, MO 64106

APR 2 5 2001

Mr. Lance Nuckolls
Director - Regulatory & Certification Policy
Aircraft Owners & Pilots Association (AOPA)
Government & Technical Affairs Division
421 Aviation Way
Frederick, MD 21701

Dear Mr. Nuckolls:

This letter is in response to your request for the Small Airplane Directorate to provide a statement regarding mandatory service bulletins (SB's) issued by the manufacturer to the effect that all such SB's are to be considered "advisory only." In April of 1987, the Small Airplane Directorate responded to a similar request for guidance from the Federal Aviation Administration (FAA) Flight Standards Division.

In summary, the Small Airplane Directorate response with respect to type design stated:

- Small airplane design approval holders cannot unilaterally impose mandatory compliance with manufacturer's SB's. A statement that bulletin compliance is mandatory must be FAA-approved to be included in the Airworthiness Limitations Section of the Instructions for Continued Airworthiness (ICA). *FAA policy does not permit this approval to be delegated to organizations or individuals.*

- Compliance with SB's specifically referenced by number and date in the initial FAA-approved Airworthiness Limitations Section is mandatory because the Airworthiness Limitations Section of the ICA is part of the type design (reference § 21.31(c)).

- FAA policy does not permit a predetermination that compliance with some future document is mandatory. Thus, SB's issued after the Airworthiness Limitations section is FAA-approved cannot be made mandatory without FAA involvement.

- Because the Airworthiness Limitations section of the ICA is FAA-approved, additional limitations, or more restrictive changes to existing limitations, are made mandatory by airworthiness directive actions.

The above findings remain as our current policy. We hope that this response satisfies your request. If you have any further questions, please contact Bill Timberlake by telephone at 816-329-4112 or Scott Sedgwick at 816-329-4111.

Sincerely,

for Michael Gallagher
Manager, Small Airplane Directorate