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This certifies that Patrick Poteen holder of Mechanic Certificate No. 1809539 has been authorized to exercise the privileges of Federal Aviation Regulation 65.95. This authority expires March 31, 2002 unless sooner revoked by the Administrator of the Federal Aviation Administration or extended by endorsement on the reverse of this card.		
DATE ISSUED 3/26/01	SIGNATURE, FLT. STUS. INSPECTOR <i>Lee J. Western</i>	
FAA FORM 8310-5 (8-80) SUPERSEDES PREVIOUS EDITION		

of FAR 65.95 has in the date shown below.	
INSPECTOR	FAA OFFICE

IA HISTORY

by Bill O'Brien

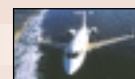
For all intents and purposes the Inspection Authorization (IA) is a walking, talking, two-legged, repair station who is responsible for ensuring that trust, responsibilities, and values of the maintenance profession are maintained at the highest levels of excellence. But have you ever wondered how the IA came to be. To accomplish this little insight into who we (the IA) are and where we came from we must go back in time, 63 years to be exact. The year is 1938, the CAA Act was passed, and the brand spanking new Civil Aeronautics Agency (CAA) was

opened for business on August 22. The new Federal agency was responsible for the certification of private and commercial aircraft.

That same year, before the CAA was even out of its bureaucratic diapers, the fledgling regulatory agency was already on the receiving end of complaints from the National Association of State Aviation Organizations (NASAO). It seems, with the up surge in pilot training under the Federally-sponsored Civilian Pilot Training Program, that all the CAA inspectors were being siphon off from performing general aviation functions to support this pre-war pilot training program. Since

a CAA inspector was responsible for inspecting and signing off all major repairs, owners of private and state-owned aircraft had to wait up to a year before an CAA inspector came out to check the repair to their aircraft and sign it off.

NASAO formally recommended to the CAA Administrator to appoint civilian designee mechanics to do the work. The CAA reluctantly agreed and made a policy decision, and Designated Airworthiness Maintenance Inspectors (DAMI) were born. It is important to note that mechanics were the second designees the CAA created. The first designees were physi-



cians who were allowed to conduct pilot flight physicals for a fee. Pilots did not join the designee ranks until 1941.

Despite the fact that a DAMI was now part of the CAA policy, very few DAMI certificates were issued during the war years because very little civilian flying was allowed. However, with the war's end the DAMI program finally took on official status on January 15, 1946, when the DAMI was formally institutionalized in the Civil Air Rules. This major transformation from policy to rule was not because of any change of heart on the CAA's reluctance to appoint designees in general, but was directly because of massive CAA budget and personnel cuts enacted by the Truman Administration after the war.

By June 30, 1948, there were 1,693 DAMI appointed. Each DAMI was appointed on a "need" basis by an individual CAA inspector. There was no test given, and in many cases the CAA inspector's decision was subjective, not objective, in nature and some mistakes were made.

On September 29, 1950, President Truman signed an amendment to the CAA Act that allowed DAMI to issue Airworthiness Certificates to GA aircraft every year. Now the DAMI could do everything that a CAA inspector could do, except process violations of the Civil Air Rules (CAR). The DAMI was now considered by the GA industry as a 1,200-pound aviation maintenance gorilla.

The CAA issued DAMI certificates that were totally different from the 2 1/4" by 3 1/4" buff-colored IA card that we stuff in our wallets today. The CAA DAMI certificate was big (11" by 15"), printed on high quality paper, and was mounted in its own glass and wood frame supplied by the government.

The CAA was an agency that knew how to impress. The first words on the certificate were written in fancy English script after the words: "The United States of America" were: "Reposing special trust and confidence in the integrity, diligence, and discretion of [insert name] and finding

that he has the necessary knowledge, skill, experience, and impartial judgment to merit special public responsibility. I [CAA inspector who signs the certificate] designated him as an Aviation Safety Representative and authorize him to act as a Designated Aircraft Maintenance Inspector."

I am sure those words were a lot more awe inspiring to a newly designated DAMI back then in 1950, instead of the 1972 parting comment: "Here's your IA card, kid. Don't screw up!" that I got from an FAA inspector at North Philadelphia General Aviation District Office when I passed the IA exam.

But even 1,200-pound gorillas have problems. Around the fall of 1953 the CAA's DAMI program started to run into trouble. It seems that under then existing law the CAA, which issued a DAMI certificate and allowed that designee to represent the United States Government and issue CAA airworthiness certificates, was not exempt from tort claims because of something the designee did while acting as a DAMI.

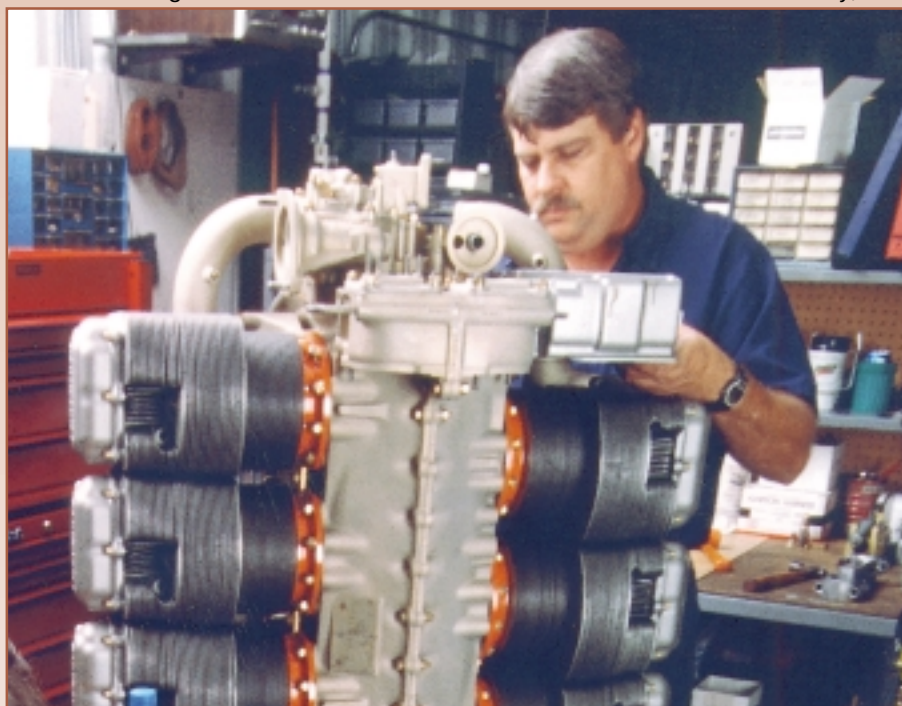
The triggering factor, which brought the CAA/DAMI/tort claims problem to a head, centers around a word of mouth story about a DAMI who on finding that a small GA air-

craft's fabric was bad, took a pen knife and in front of the owner cut the "N" number off the tail to prevent it from flying. The aircraft's owner went ballistic and sued both the DAMI and the CAA.

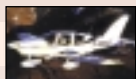
With personal property rights as the central issue, the outcome even then was predictable and the CAA paid for a recover job. To prevent other tort claims against the agency, the CAA on June 17, 1956, issued two big changes to the CAR. Section 24.43.1 of the CAR did away with the DAMI and created the Inspection Authorization and at the same time the rule did away with the "annual inspection" requirement. In addition all the DAMI's were grandfathered into the IA ranks. It's a sure bet that none of the DAMI's were not very happy about losing those extra 400 pounds of muscle and power.

I should explain here why the DAMI's were unhappy. Up until June 1956, if you owned a GA aircraft you had to get two inspections performed on it each year. The first inspection was a periodic inspection (similar to a 100-hour inspection) performed by an A&E mechanic and then a DAMI would be called in to perform an "Annual Inspection."

If the aircraft was airworthy, the



(Philips 66 Company photo)





DAMI would issue a new CAA Airworthiness Certificate which was good for one year. Under the new rule, the new periodic inspection (a combination of both the periodic and annual inspection) was now performed by an IA, and the airworthiness certificate duration was unlimited as long as the aircraft was maintained in accordance with the CAR.

On April 1, 1958, the FAA came into existence and over the next eight years the FAA performed the tedious process of re-codifying the Civil Air Rules into the Federal Aviation Regulations (FAR). In 1966 the term "periodic inspection" was dropped without fan fare from the FAR and the term "annual inspection" was reinstated.

However the likes of the DAMI was not altogether forgotten by a sentimental agency like the FAA. The DAMI is still found in FAR § 183.27, which allows DAMI to approve maintenance on civilian aircraft used by U.S. military flying clubs overseas. But that's enough about history lessons, let's pound

the regulatory books for a couple of minutes.

FOUR RULES

There are only four rules that govern the Inspection Authorization itself. FAR sections 65.91, 65.92, 65.93, and 65.95. The requirements of these rules are referred to in about a half a dozen places on the IA application form. These rules or their applicable paragraphs must be complied with at least twice in an IA career—once when the candidate makes the original application for an IA and again when the IA renews.

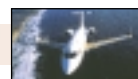
I am willing to bet nine out of 10 IA's, who have held their authorization for at least three years, no longer accurately remember what those four rules mean any more. I am so sure of that bet that I am even willing to go further and bet that most IA's have no idea what they are signing for every March when they fill out the yes/no questions on the FAA Form 8610-1 Mechanic's Application

for Inspection Authorization when they file for IA renewal.

However, in the IA's defense, I have noticed that most IA's pay very close attention filling out the yes/yes/no/no/yes blocks on the form and marked them in the proper sequence. They even take the time to sign their name legibly so the IA renewal application doesn't get kicked back.

As I write this I can remember a couple times when I was a little too casual filling out the IA renewal application and had to suffer the embarrassment of having the FAA call out my name in public at the IA meeting. My ears still get red when I relive having to assume a sinner's penitent stance in front of the FAA table and correct the offending block on the IA renewal form while my peers gleefully watched and commented on my discomfort.

So to avoid wearing your own personalized sack cloth with ashes in your near future let's look at the four IA rules in numerical order, so you will know what is behind the yes/no block



you are signing off.

Section 65.91: Inspection Authorization

This rule is important because it clearly states that if an applicant applying for the IA and meets all the requirements, then that applicant is entitled to the IA. In other words this rule does away with the original CAR "need" requirement that the CAA used to control the number of DAMI.

The same rule, § 65.91(c)(2), requires a new applicant or a individual who is renewing the IA to have three years as an A&P and for at least two years before applying the mechanic must have been actively engaged maintaining certificated aircraft. The term "actively engaged" is determined to be a mechanic working at least 35 hours a week as defined by the Department of Labor with allowances for absences because of sickness, vacation, and interruptions in employment caused by external factors such as business closures, strikes, etc.

Section 65.91 also requires a base of operations where an IA can be reached in person or by telephone. This does not necessary means the phone has to be located in the hangar where the IA works, but it shouldn't ring on the far side of the moon either.

The same rule also states that the IA must have "available" all equipment, current data, and facilities necessary to properly inspect the aircraft.

Section 65.92: Inspection Authorization: Duration.

The rules states that every IA authorization turns back into a pumpkin on March 31. In addition, the IA also ceases to be if any of the mechanic ratings or the authorization itself is surrendered, suspended, or revoked. The IA authorization also departs this plane of existence if the mechanic no longer has the data, facilities, or equipment to do the job.

In addition, any IA authorization that is suspended or revoked shall upon the FAA's request, be returned to the FAA. In summary this newer "even

numbered" rule just clarifies the initial section 65.91 requirements and makes it easier for the FAA to enforce.

Section 65.93: Inspection Authorization: Renewal

Most IA's know the five IA renewal requirements by heart.

1. You have to "perform" at least one annual inspection for each 90 days you have had the authority. Yes, you could have performed four annual inspections in February.

2. Performed at least two major repairs OR two major alterations for each 90 days you have had the authority. Yes, all eight major repairs or eight major alterations can be performed in February.

3. Perform or supervise a progressive inspection. For those of you who have forgotten what a progressive inspection is, think of a real formal, stretched out annual inspection, which is broken up into phases, controlled by its own inspection manual, and spread out over 12 calendar months.

4. Attend an eight-hour renewal meeting acceptable to the FAA. This is the most popular option with IA's, because it gives them a chance to interface with the FAA, their peers, and find out what is happening in the general aviation community.

5. This one is the least popular option, and for good reason this part of the rule says you can meet your IA renewal by taking an oral quiz administered by an FAA inspector.

Section 65.95: Inspection Authorization: Privileges and Limitations

This rule says an IA can do four things:

1. Perform annual inspections
2. Perform or supervise progressive inspections

3. Perform inspections of major repairs if the data was FAA approved.

4. Perform inspections of major alterations if the data was FAA approved.

The same rule requires the IA, if he/she changed his/her base of operation to notify the local FSDO in writing and tell them that a new 800-pound gorilla is in their back yard.

Well, there you have it, a bit of history and a regulatory overview of the IA requirements. In closing I would like to offer the local FSDO and the IA community a suggestion based on an idea that came out of this little writing effort of mine. The suggestion is offered only in hope of tying the past, the present, and the future of aviation maintenance community just a little bit closer together.

My suggestion is both simple and personal. I would like the local FAA office manager or his/her representative to consider saying these words to each brand new IA and at the close of each year's IA renewal meeting. Begin by addressing a brand new IA with the individual's name. For a group of IA's, address the assembly with the term IA.

"The Federal Aviation Administration, reposing special trust and confidence in your integrity, diligence, and discretion and finding that he or she has the necessary knowledge, skill, experience, and impartial judgement, to merit special public responsibility the FAA, now grants/renews your Inspection Authorization.

"The FAA now formally charges you with preserving the safety, values, and principles of our maintenance profession and urges you to continue the quest for aviation excellence."

Maybe, just maybe, if we say the above closing epilogue at enough IA meetings or to each brand new IA, enough times, out loud, and in public, the rest of the aviation industry would finally understand what the inspection authorization is all about.

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