



DEPARTMENT OF TRANSPORTATION

Federal Aviation Administration

14 CFR Parts 43, 61, 65, 91, and 147

[Docket No.: FAA-2026-6671; Notice Nos. 26-08]

RIN 2120- AM04

Mechanic Certification: Inspection Rating and Recent Experience Requirements

AGENCY: Federal Aviation Administration (FAA), Department of Transportation (DOT).

ACTION: Notice of proposed rulemaking (NPRM).

SUMMARY: FAA proposes to amend the regulations for certificated mechanics by replacing the inspection authorization with an inspection rating on a mechanic's certificate, similar to the existing airframe and powerplant ratings. The inspection rating would carry the same privileges and limitations as the inspection authorization but would not require renewal or have an expiration date, consistent with the other mechanic ratings. As a result, FAA proposes to require certificated mechanics with inspection ratings to complete rolling recent experience activities, maintained independently, to exercise the privileges of their rating, rather than the current requirements of presenting evidence of renewal activities each March of every odd-numbered year. These proposed changes are intended to align mechanic privileges, which would streamline and simplify the process for maintaining inspection privileges, increase FAA efficiency by reducing on-demand work tasks, and save critical hours for safety-focused missions.

These proposed changes would be deregulatory since they would reduce the paperwork and resource burdens linked to complying with the existing regulations for both industry and FAA.

DATES: Send comments on or before [INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]

ADDRESSES: Send comments identified by docket number FAA-2026-6671 using any of the following methods:

- Federal eRulemaking Portal: Go to www.regulations.gov and follow the online instructions for sending your comments electronically.
- Mail: Send comments to Docket Operations; U.S. Department of Transportation (DOT), 1200 New Jersey Avenue, SE, West Building, 5th Floor (W58-213), Washington, DC 20590-0001.
- Hand Delivery or Courier: Take comments to Docket Operations in Room W58-213 of the West Building 5th Floor at 1200 New Jersey Avenue, SE, Washington, DC 20590 between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays.
- Fax: Fax comments to Docket Operations at (202) 493-2251.

Privacy: In accordance with 5 U.S.C. 553(c), DOT solicits comments from the public to inform its rulemaking process better. DOT posts these comments, without edit, including any personal information the commenter provides, to www.regulations.gov, as described in the system of records notice (DOT/ALL-14 FDMS), which can be reviewed at www.dot.gov/privacy.

Docket: Background documents or comments received may be read at www.regulations.gov at any time. Follow the online instructions for accessing the docket or go to the Docket Operations in Room W58-213 of the West Building 5th Floor at 1200 New Jersey Avenue, SE, Washington, DC 20590 between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays.

FOR FURTHER INFORMATION CONTACT: Colby Barron, AFS-320, Aircraft

Maintenance Division, Federal Aviation Administration, 800 Independence Avenue SW,
Washington, DC 20951; telephone (509) 398-1995; e-mail Colby.barron@faa.gov.

SUPPLEMENTARY INFORMATION:

List of Abbreviations and Acronyms Frequently Used in This Document

Airframe and Powerplant (A&P)

Advisory Circular (AC)

Airmen Certification Standards (ACS)

Aviation Safety Inspector (ASI)

Flight Standards District Office (FSDO)

Inspection Authorization (IA)

International Field Office (IFO)

Inspection Rating (IR)

National Airspace System (NAS)

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I. Executive Summary

A. Overview of Proposed Rule

This proposed rule would amend 14 CFR Part 65 by changing a mechanic inspection authorization (IA) into an inspection rating (IR). Currently, FAA certificated mechanics who hold airframe and powerplant (A&P) ratings and meet certain additional eligibility requirements may seek an IA, which provides additional privileges as set forth in § 65.95. The IA eligibility and renewal requirements would be largely retained and incorporated into the new IR requirements with some revision. Section IV.B of the preamble provides a table outlining the relocated provisions for ease of reference.

The privileges and limitations of the new IR would align with those of the current IA.

As explained in section III.B. of the preamble, this proposal intends to reduce both individual and administrative costs and harmonize the IA with the other ratings available on a mechanic certificate and would not make any substantive changes to a current IA's job duties or responsibilities.

FAA proposes to replace the IA with a new IR. Currently, an IA expires and requires renewal in March of each odd-numbered year, requiring IA holders to submit a renewal package to the responsible Flight Standards District Office (FSDO) or International Field Office (IFO) for review. The renewal package consists of a completed FAA Form 8610-1, Mechanic's Application for Inspection Authorization, documentary evidence to support that the applicant still meets the initial eligibility requirements of § 65.91(c)(1) through (4), and evidence to show that the applicant completed one of the activities listed in § 65.93(a)(1) through (5) for each of the years of the two-year inspection authorization period. An Aviation Safety Inspector (ASI) or Aviation Safety Technician (AST) reviews the package and if approved, will issue a renewal letter to the IA holder indicating the new expiration date. This renewal process creates an unnecessary repetitive administrative burden and cost to FAA and mechanics, as discussed in section III.B of the preamble. This proposal would eliminate the expiration date, as the IR would be treated like the A&P ratings, which do not expire.

Instead of the onerous renewal process, this rule proposes to convert the annual activity requirements to renew an IA (currently set forth in § 65.93 (a)(1) through (5)) into recent experience requirements. All five of the activity options to renew an IA would be retained as activity options to meet recent experience requirements; no new options would be added. Therefore, to exercise the privileges of the IR, FAA proposes to require a person to meet the recent experience activity within the previous 12 calendar months. Maintaining the same eligibility requirements from the IA to the IR and converting the IA

renewal requirements into IR recent experience requirements would ensure there is no increased risk to the National Airspace System (NAS).¹ In place of the renewal process and in light of the proposed conversion from renewal requirements to recent experience requirements, FAA proposes that inspection-rated mechanics keep records demonstrating recent experience for the previous 24 calendar months. To note, mechanics with IAs already maintain these records to present evidence at the time of IA renewal; under this proposal, they would no longer have to complete renewal paperwork every two years but still would be required to maintain their records independently for the previous 24 calendar months.

Currently, when a certificated mechanic with an IA does not meet the renewal requirements, there is no process to reinstate their IA privileges. Once an IA expires, a mechanic must reapply for a new IA, which includes resubmitting the application and supporting documentation and retaking the written examination. FAA proposes to add methods for certificated mechanics with an inspection rating to reestablish inspection privileges if they fail to meet the recent experience requirements within the previous 12 calendar months and can no longer exercise the privileges of the IR. Certificated mechanics with an IR could reestablish inspection privileges by either attending eight hours of acceptable training or successfully passing an oral test given by an ASI, provided they continue to meet eligibility requirements.

Finally, FAA proposes to convert the existing IA testing standards into formalized Airman Certification Standards (ACS) for the mechanic certificate IR, aligning with the training and testing framework for a mechanic certificate with an airframe rating, a powerplant rating, or both. FAA proposes to incorporate these standards by reference, as explained in section IV.A.4 of the preamble.

B. Summary of the Costs and Benefits

Mechanics who hold an IA (to be replaced with an IR) would realize a net savings of \$1.01 million over 10 years, discounted, and FAA would realize a net savings of \$4.44 million over 10 years, discounted. These savings would result from reduced paperwork costs for mechanics with an IA replaced by an IR who would no longer need to fill out renewal forms and reduced time to FAA that would no longer need to process the renewals. The net savings include a minimal one-time cost of approximately \$0.22 million, discounted. This one-time cost covers the cost to the mechanics to submit a simple online form requesting a replacement mechanic certificate with an IR and to FAA for processing and sending out the replacement mechanic certificate with an IR.

There are other revisions in the proposed rule that would not have an impact on the existing industry practices and would not result in any costs or benefits. Adjustments to knowledge requirements of this proposed rule would not impact the baseline as the written test is already required under the IA. These revisions reorganize the regulatory text to explain the tests required. In addition, the addition of IR specific privileges and limitations language would not affect the existing industry practices.

II. Authority for This Rulemaking

FAA's authority to issue rules on aviation safety is found in title 49 of the United States Code. Subtitle I, section 106 describes the authority of FAA Administrator. Subtitle VII, Aviation Programs, describes in more detail the scope of FAA's authority.

This rulemaking is issued under the authority described in subtitle VII, part A, subpart III, 44701(a)(2)(A) and (a)(5), General Requirements. Under that section, FAA is charged with prescribing regulations to promote safe flight of civil aircraft in air commerce by prescribing regulations and setting minimum standards in the interest of safety for inspecting, servicing, and overhauling aircraft, aircraft engines, propellers, and appliances, and for other practices, methods, and procedures necessary for safety in air commerce and national security. It is also issued under subtitle VII, part A, subpart III,

section 44703, Airmen Certificates, which requires the Administrator to prescribe regulations for the issuance of airman certificates when the Administrator finds, after investigation, that an individual is qualified for and physically able to perform the duties related to the position authorized by the certificate. This regulation is within the scope of that authority.

III. Background

Part 65, subpart D sets forth the requirements for a mechanic certificate and associated ratings (i.e., A&P). While not a rating under § 65.73, certificated mechanics may be eligible to receive an IA, which grants privileges beyond those associated with the mechanic certificate and its A&P ratings. A certificated mechanic with an airframe rating may approve for return to service an airframe, or any related part, after the mechanic has performed, supervised, or inspected its maintenance or alteration (excluding major repairs and major alterations) with the exception of § 65.85(b).²

In addition, an airframe rated mechanic may perform the 100-hour inspection on an airframe or any related part or appliance as required by part 91 and approve it for return to service. Similarly, a certificated mechanic with a powerplant rating may approve for return to service a powerplant, or propeller, or any related part after the mechanic has performed, supervised, or inspected its maintenance or alteration (excluding major repairs and major alterations) with the exception of § 65.87(b).³ Also, a powerplant rated mechanic may perform the 100-hour inspection on a powerplant or propeller, or any part thereof, as required by part 91 and approve it for return to service. A certificated mechanic with an airframe rating, powerplant rating, or both may exercise the privilege of their rating immediately after being issued a mechanic certificate under part 65 for the rating sought. However, an A&P mechanic must adhere to additional requirements to be eligible to apply for an IA.

The requirements for the IA are more rigorous than those of the ratings currently issued with a mechanic certificate because the privileges of the IA are associated with a higher risk to safety to the flying public. IA holders have the ultimate responsibility of ensuring that major repairs and major alterations have been performed properly and safely. Unlike mechanics with only A&P ratings, IA holders are able to approve aircraft or parts for return to service after major repairs and major alterations.⁴ While A&P rated mechanics are able to perform major repairs and major alterations, an IA holder is required to inspect their work to ensure it was performed to an acceptable level and approve the aircraft or part for return to service. In addition, IA holders may perform the aircraft annual inspection required by 14 CFR 91.409(a)(1), which mechanics with only A&P ratings may not perform. This annual inspection is a thorough examination of all aircraft systems and components to ensure the aircraft remains airworthy and meets all safety standards.

Currently, § 65.91(c) prescribes the IA applicant eligibility requirements. To be eligible for an IA, a certificated mechanic must currently have effective A&P ratings, in effect for at least three years, and have been actively engaged in exercising their certificate for at least the two-year period immediately preceding the application for authorization. In addition, an IA applicant must have a fixed base of operations where they can be located during a normal work week, with the equipment, facilities, and inspection data available to inspect airframes, powerplants, propellers, or any related appliance properly. If a mechanic meets the eligibility requirements described above, they must then pass a written test to obtain the IA.⁵

To exercise the privileges of the IA, the IA holder's mechanic certificate (and both A&P ratings) must be currently effective. In addition, an IA itself expires on March 31 of each odd-numbered year; therefore, IA holders must renew their IA, specifically, in March of each odd-numbered year.⁶ To renew an IA, an IA holder must

provide evidence of completion of one of the annual activities listed in § 65.93(a) for each year of the IA period. If an IA holder fails to renew their IA before the March 31 expiration date, there is no process to reinstate the expired IA; the IA holder must re-apply and meet the requirements of original issuance. Section IV.A.7. of this preamble further discusses the renewal methods, process, limitations, and resulting administrative burden to both industry and FAA that this rulemaking seeks to address.

FAA's process for issuing and renewing IAs in this manner has remained largely unchanged since the early 1960s. The preamble provides the relevant regulatory history of IAs in section III.A. and briefly discusses a related recent rulemaking that removed expiration dates from airman certificates, similar to this proposal, in section III.C.

A. History

The Civil Aeronautics Board originally codified the A&P ratings in § 24.43 of the Civil Air Regulations, which permitted a mechanic with both A&P ratings to have an IA.⁷ These regulations prescribed the eligibility and privileges for an IA, marking the formal beginning of the IA process. Over time, as the aviation industry and regulatory environment evolved, FAA issued further amendments and clarifications to the IA renewal process, including recodification to part 65 in 1962,⁸ but largely maintained the IA eligibility and renewal framework. For example, a 1977 final rule clarified in § 65.91(c)(1) that an applicant for an IA must hold a currently effective mechanic certificate with currently effective A&P ratings that have been continuously effective for no less than three-years.⁹

In addition, the 1977 final rule, in part, withdrew a proposed record keeping requirement that would have required IA holders to maintain current records of all inspections they performed.¹⁰ Proposed § 65.94 would have required IA holders to keep a record of every aircraft that they have inspected for a period of two years, including the registration number, name, and address of the registered owner, make and model of the

aircraft, the kind of inspection performed, the date, and if the aircraft was returned to service.¹¹ FAA acknowledged that most IA holders already maintain personal records of work completed to satisfy the annual renewal requirements. While the majority of the commenters favored the proposal, some contended that the proposed regulation would create an undue economic burden for IA holders and the records kept would not be beneficial.¹² Therefore, FAA decided to further evaluate the impact and withdrew the proposal.

FAA revisited the issuance and renewal of IAs in a 1985 final rule due to unintended effects upon an FAA enforcement short-term suspension, effectively rendering a person's IA revoked for three years upon short-term suspension of the underlying certificate, rating, or both for a minor offense.¹³ The 1985 final rule revised § 65.91(c)(1) to remove the continuous effectivity requirement with a requirement that the certificate and ratings each must be currently effective and have been in effect for a total of at least three years. FAA reasoned these revisions to § 65.91(c)(1) would provide a more equitable renewal process and a more flexible and fair enforcement program while maintaining satisfactory certification standards.

For almost three decades, IA regulations remained unchanged. However, in 2007 as an outgrowth of discussions between FAA and industry representatives, including the Professional Aviation Maintenance Association, FAA published a direct final rule amending the renewal period for IAs from March 31 of each year to March 31 of every odd-numbered year.¹⁴ Much like this proposal, the overall goal of the 2007 direct final rule was to reduce the administrative costs and burdens associated with the IA renewal process without affecting safety because changing the renewal duration from each year to every odd-numbered year did not change the requirement to complete annual currency activities listed in § 65.93(a)(1)-(5).

In 2010, FAA sought to clarify the term “actively engaged,” as used in § 65.91(c)(2), for the purposes of processing IA applications and renewals.¹⁵ FAA proposed to define “actively engaged” as exercising the privileges of A&P ratings on a mechanic certificate in the maintenance of civil aircraft. The 2010 notice sought to remedy confusion and inconsistent interpretation over the meaning of “actively engaged” among Aviation Safety Inspectors (ASIs) and aircraft maintenance personnel by providing a definition in FAA Order 8900.1. In addition, both the notice and the eventual adoption of policy responding to comments provided a number of examples and guidance, including consideration of the difference between full time, part time, and occasional engagement.¹⁶

B. Need for the Rulemaking Action

As stated in the aforementioned history, FAA has not engaged in a substantive regulatory review of IA holders in almost three decades. Since that time, FAA and industry have enjoyed advances in technology and processes, which FAA finds to be conducive in streamlining procedural regulations for IA holders at this time. This section of the preamble first discusses the identified need for the proposals to the IA and proposed conversion to an IR.

When an initial IA application is approved under § 65.91, FAA distributes an IA card (FAA Form 8310-5), which includes the mechanic’s name, certificate number, and the IA expiration date. As discussed further in this section, currently, an IA expires every March 31 of each odd-numbered year; this expiration and renewal process incurs substantial costs to both FAA and individual mechanics. IA holders must renew their IAs in March of each odd-numbered year either via the online Integrated Airman Certification and Rating Application (IACRA) or directly with a FSDO or an IFO. To renew an IA, an IA holder must fill out a Mechanic’s Application for Inspection Authorization, FAA Form 8610-1, and provide evidence of completion of one of the annual activities listed in

§ 65.93(a) for each year of the prior 2-year period that they continue to meet the initial eligibility requirements of § 65.91(c)(1) through (4). The FSDO or IFO personnel must review the application, verify the IA holder has completed the renewal activities, and issue a renewal letter with the new expiration date. Currently, no process exists for reinstatement of an expired IA. If an IA holder fails to renew their authorization prior to the expiration date, the IA is discontinued, and the IA holder must reapply for the IA and meet all the same requirements for original issuance.

In June 2022, FAA conducted research on innovative ways of accomplishing on-demand work to free up resources for more safety critical work. The research identified the IA renewal process as a task that could be eliminated to reduce unnecessary, repetitive on-demand work for both industry and FAA with no adverse impact on safety. On-demand work describes time-sensitive tasks an employee can expect to encounter, of which the quantity and scope cannot be prepared for in advance. Applications for IA renewals align with this definition. Upon receipt of a physical or digital IA renewal application, FAA personnel investigate and process the application in a timely manner. However, FAA personnel cannot anticipate the time needed to process an IA issuance or renewal application due to potential errors or the need for a more in-depth investigation. Though FAA currently conducts IA renewals in March of each odd-numbered year, FAA personnel cannot anticipate the workload because IA holders can submit renewal applications to any FSDO or IFO, regardless of their geographic location.

FAA estimates that approximately 21,500 renewal applications would be processed in every odd-numbered year at a total cost of approximately \$5.66 million over the next 10 years at a seven percent present value.¹⁷ In the 2023 renewal cycle, FAA processed 21,042 IA renewal applications.¹⁸ The IA renewal process is burdensome and costly to both FAA and mechanics, who must complete renewal paperwork every two years.

Therefore, FAA has determined that other procedural avenues exist to ensure IA holders' continuing proficiency and experience (as subsequently explained) while reducing the burden on government and industry resources. Upon further analysis of the IA regulations during the pendency of pre-rulemaking activity, FAA has also determined that replacing the IA with the IR would align the inspection privileges with those of the airframe rating, powerplant rating, or both, on a mechanic certificate, enabling streamlined regulations and expectations in part 65, subpart D - Mechanics.

These proposed changes would be deregulatory since they would reduce the economic and resource burdens linked to complying with the existing regulations for both industry and FAA.

C. Related Regulatory Actions

This rulemaking is not unprecedented as FAA has recently taken similar actions to remove administrative burdens and convert renewal requirements into a rolling recent experience requirement framework. On October 1, 2024, FAA published the *Removal of Expiration Date on a Flight Instructor Certificate: Additional Qualification Requirements to Train Initial Flight Instructor Applicants; and Other Provisions* final rule.¹⁹ This rule removed the expiration date on flight instructor certificates to align with other airman certificate ratings, converted renewal requirements to recent experience requirements, provided an additional recent experience activity option, and added a refresher course option to reinstate the privileges of a flight instructor certificate upon certain lapses in recent experience.

IV. Discussion of the Proposal

A. Inspection Authorization to Inspection Rating

1. Ratings and Display (§§ 65.73, 65.89, and 65.95)

i. Addition of Inspection Rating

Subpart D of part 65 contains the eligibility and certification requirements for persons seeking a mechanic certificate or rating. Specifically, § 65.71 sets forth the basic eligibility requirements for a person seeking a mechanic certificate with ratings as defined in § 65.73: an airframe rating, a powerplant rating, or both. To obtain each rating, a person must complete knowledge, experience, and skill requirements as set forth in §§ 65.75, 65.77, and 65.79, respectfully, and will then be authorized to carry out the privileges and limitations set forth in §§ 65.81 (general), 65.85 (airframe), and 65.87 (powerplant), respectfully. A certificate/rating holder must also meet those recent experience requirements set forth in § 65.83.

After a person receives a mechanic certificate with both A&P ratings, each of which is currently effective and has been in effect for a total of at least three years,²⁰ that person may pursue an IA. An IA allows a person to (1) inspect and approve for return to service any aircraft or related part or appliance (except any aircraft maintained in accordance with a continuous airworthiness program under part 121) after a major repair or major alteration to it in accordance with part 43, if the work was done in accordance with technical data approved by the Administrator, and (2) perform an annual, or perform or supervise a progressive inspection according to §§ 43.13 and 43.15.²¹

However, an IA is not a rating. While § 1.1 defines a rating as a part of a certificate that sets forth special conditions, privileges, and limitations, currently, under § 65.73, there are only two defined ratings issued with the mechanic certificate: airframe and powerplant. Conversely, the IA is not recognized as a rating (specifically called an “authorization”) and maintains separate requirements provided in §§ 65.91 through 65.95. However, FAA finds that the bestowed privileges and limitations, regulatory requirements, and general application of the IA lends itself to meeting the definition of a rating, with certain revisions to the relevant regulations. Therefore, FAA proposes to

replace the IA with an IR, first by adding “Inspection” to § 65.73(a) as one of the ratings issued with a mechanic certificate as new § 65.73(a)(3).

FAA proposes to apply current IA conditions, limitations, and privileges to the proposed IR, thereby maintaining an equivalent level of safety within the NAS while streamlining the privileges in part 65, subpart D as ratings rather than a mix of ratings and authorization. This would necessitate a reorganization of the relevant regulation sections to separate the requirements of the IR from the A&P rating requirements, discussed in the following sections of the preamble in detail.

If this proposed rule becomes effective, it would require a transition period for mechanics that have an IA to convert their IA into an IR. FAA emphasizes that holders of an IA before a final rulemaking action will not be placed at a disadvantage during the pendency of transition (compared to persons who can immediately apply for an IR after any final rule adoption) or subject to a rapid transition period unnecessarily. Rather, FAA proposes to add § 65.73(c) to allow certificated mechanics that have a valid IA when (and if) the proposed IR rule becomes effective to exercise the privileges of the IR with their issued-IA for up to 24 months from the effective date, provided that they comply with the limitations and recent experience requirements of proposed §§ 65.81(b) and 65.83(b).²² In other words, on the effective date of the rule, IA holders would be able to continue exercising inspection privileges without interruption and would not need to take immediate action to continue exercising inspection privileges so long as they (i) had a valid IA on the effective date; (ii) continue to hold a mechanic certificate with A&P ratings; (iii) have a fixed base of operations; and (iv) have the necessary equipment, facilities, and inspection data to inspect properly.²³ IA holders would also need to comply with the recent experience requirements of proposed § 65.83(b), but they would have a 6-month grace period from the final rule’s effective date to comply, as discussed in section IV.A.7.ii of the preamble. This new provision would only be necessary for 24 months

after the effective date of the final rule, as IA holders would be required to obtain a replacement certificate with the IR to continue exercising IR privileges, as discussed in the following paragraph. Therefore, FAA proposes amendatory language that would remove this provision after 24 months.

The IA holder would have a fixed time within which to replace their physical IA with a mechanic certificate with an IR with FAA. Therefore, FAA proposes to add § 65.73(d) to state that certificated mechanics that have a valid IA on the effective date of the final rule are entitled to a replacement mechanic certificate with the IR.²⁴ In addition, to exercise the privileges of the IR beyond 24 months from the effective date of the final rule, the mechanic would be required to request and obtain a replacement mechanic certificate with an IR. Replacement of the certificates would be at no charge to the mechanic. FAA Airman Registry currently maintains a system allowing a certificate holder to request a replacement mechanic certificate online; mechanics would use this same system to request a new mechanic certificate with an IR.²⁵

FAA would allow holders of an IA up to 24 months to exercise the privileges of an IR prior to obtaining the replacement mechanic certificate with an IR. The proposed 24-month period mirrors the current IA period between renewals. This would allow sufficient time for IA holders to complete the replacement process at their convenience; it would be at the IA holder's discretion as to when in the 24 months the person requests replacement. In addition, this would not be an additional burden from the IA renewal time period, as under the current regulations the IA holder would have to submit their renewal request within 24 months. In addition, spreading the replacement process out over 24 months would lessen the burden placed on FAA personnel who would be processing and issuing the replacement certificates. During this period, the mechanic would still have to meet the recent experience requirements of § 65.83(b) to exercise the IR privileges regardless of if they have obtained the replacement certificate, as discussed

in section IV.A.6 of the preamble. This would ensure there is no safety risk in allowing 24 months to obtain the replacement certificate

Proposed § 65.73(e) would direct the next steps if a person does not obtain a replacement mechanic certificate with an IR within 24 months of the effective date of the rule. After the 24-month time period, a person that does not obtain a replacement would be restricted from exercising the privileges of an IR. However, they would have the ability to regain these privileges without needing to go through a new application process. There would be no time limit to request a replacement certificate; a person with a valid IA on the effective date of the rule would be able to request a replacement mechanic certificate with an IR even after 24 months had passed. The difference between a new application process and the process set forth in proposed § 65.73(e) is that these re-applicants would not have to take the written test again. The written test is a computer-based fifty question multiple-choice test. The applicant is provided with a computer testing supplement to use during the test that contains excerpts from regulations, type certificate data sheets, airworthiness directives, advisory circulars, etc., that is used as a reference in answering the questions. The test is designed to ensure that the applicant possesses the baseline ability to locate, read, interpret, and apply data. FAA finds that a lapse in recency of experience would not affect this baseline ability and, therefore, it would be unnecessary for a mechanic who previously held an IA to take another written test when attempting to re-apply for their privileges (which would be via an IR).

To regain IR privileges, the person would be required to obtain the replacement certificate and comply with the limitations and recent experience requirements in proposed §§ 65.81(b) and 65.83(b). To comply with the limitations and recent experience requirements, the person must still hold a mechanic certificate with effective A&P ratings, have a fixed base of operations, have all of the necessary equipment, facilities, and data necessary to perform the work, have been actively engaged in maintaining

aircraft for the two year period leading up to exercising the privileges, and either complete an eight hour refresher training course or successfully complete an oral test from an FAA inspector. Because a person would have to meet the aforementioned limitations and recent experience requirements in order to exercise the privileges of the IR, FAA does not find it necessary to impose further prerequisites on a person's ability to request a certificate with the converted IR.

Therefore, FAA finds that there are sufficient safeguards to allow a person who has a valid IA at the time this rule becomes effective to obtain a replacement certificate with an IR and regain their IR privileges at any point in time without having to reapply fully. FAA invites public comment on this determination. Specifically, FAA seeks comments on whether FAA should establish additional requirements or limitations for a person to exchange an IA for a mechanic certificate with an IR and regain inspection privileges.

ii. Certificate Display

Currently, under § 65.89, each person who holds a mechanic certificate must keep it in the immediate area where they normally perform work and present it for inspection upon request of certain authorized individuals. Similarly, under current § 65.95(b), whenever an IA holder is exercising the privileges of the IA, they must keep it available for inspection and present it to certain authorized people. With this proposal to change an IA to an IR, the display requirement for the IR would be covered by § 65.89 and § 65.95(b) would no longer be necessary. Therefore, FAA proposes to eliminate § 65.95(b).

However, FAA recognizes that due to the 24-month period that IA holders have to replace their existing IA with a new mechanic certificate with an IR, there would be a period that the display requirement in § 65.89 would not require the IA holder to make the IA available for inspection and presentation if FAA completely eliminated § 65.95(b).

For that reason, FAA proposes to create two subparagraphs under § 65.89. The current requirements of § 65.89 would become § 65.89(a) and remain unchanged. The proposal would also create § 65.89(b), which would require those individuals that have not yet replaced their IA with a new mechanic certificate with an IR to, upon request, present documentary evidence to the same authorized individuals as in current § 65.95(b) to show that they are eligible to exercise the privileges of the IR. This new provision would only be necessary for 24 months after the effective date of the final rule, as all mechanics must then be required to obtain a replacement certificate with the IR to continue exercising IR privileges, as previously discussed. Therefore, FAA proposes amendatory language that would remove this provision after 24 months.

iii. Appeal Rights

Currently, the denial, suspension, or revocation of an IA is appealable to the National Transportation Safety Board (NTSB).²⁶ Denials, suspensions, or revocations of the ratings on a mechanic certificate are also appealable to the NTSB.²⁷ Therefore, the conversion of the IA to the IR would not change the appeal rights for a denial, revocation, or suspension of inspection privileges.

FAA acknowledges that a 2011 notice of policy in the Federal Register incorrectly stated that the issuance or renewal of an IA was not a certificate action, and therefore FAA did not have a formal appeal process.²⁸ Rather, it stated that an action on an IA application could be addressed through the Aviation Safety Consistency and Standardization Initiative. FAA finds this statement is incorrect; an action on an IA application is appealable to the NTSB.²⁹ FAA is issuing a *Federal Register* notice of policy correction to address this incorrect information along with this NPRM.³⁰ A copy of the notice of policy correction is available for review in the docket of this rulemaking.

2. Eligibility Requirements: General (§§ 65.71 and 65.91)

Section 65.71 sets forth the eligibility requirements for applicants seeking a mechanic certificate and associated ratings. To be eligible for a mechanic certificate, a person must be at least 18 years old, be able to read, write, speak, and understand the English language,³¹ have passed all prescribed tests within a period of 24 months, and comply with the sections of subpart D that apply to the rating sought. Section 65.71(b) requires mechanics who apply for additional ratings to meet the requirements in § 65.77 (Experience requirements), and within a period of 24 months, pass the tests prescribed by §§ 65.75 (Knowledge requirements) and 65.79 (Skill requirements) for the additional rating sought.

Similarly, § 65.91(c)(1) through (5) prescribe eligibility requirements for the IA. Currently, under § 65.91, an IA applicant completes an application (FAA Form 8610-1), which is reviewed by an ASI, to determine if all eligibility requirements have been met. As further explained in this section, four of these five eligibility requirements for an IA would be retained, revised, and integrated into revised § 65.71 as IR eligibility requirements in this rulemaking. The fifth, the written test requirement in current § 65.91(c)(5), would be integrated into current § 65.75, which already sets forth the knowledge requirements for a mechanic certificate and associated ratings. In changing the IA to an IR, FAA proposes to reorganize the requirements of § 65.71 to integrate IR eligibility requirements in with other ratings. As the IR has additional eligibility requirements beyond the A&P ratings, FAA generally proposes to reorganize the section so A&P requirements would be under paragraph (a) and IR requirements would be under paragraph (b).

The eligibility requirements as currently provided by § 65.71 apply to applicants for a mechanic certificate with an airframe or powerplant rating, or both.³² These requirements would be retained and redesignated under proposed § 65.71(a), with minor non-substantive revisions. FAA proposes to add an “Airframe or Powerplant

Rating” heading to paragraph (a) for clarity and add “airframe or powerplant” before any references to ratings in this paragraph. With the proposed addition of a paragraph (a) header, each current paragraph would be redesignated one paragraph level lower (e.g., current § 65.71(a)(1) would become § 65.71(a)(1)(i), § 65.71(a)(2) would become § 65.71(a)(2)(ii), etc.). Current §§ 65.71(a)(3) and 65.71(b) detail the amount of time that an applicant has to pass all of the required tests for a mechanic certificate with associated ratings, and for an additional rating, respectively. Section 65.71(a)(3) states that an applicant has 24 months, whereas § 65.71(b) states 24 calendar months. FAA has consistently drawn a distinction between months and calendar months.³³ Calendar months allow for a date in the future that corresponds to the last date of the month. For example, 24 calendar months from March 5, 2025, would be March 31, 2027. The practical application historically for the requirements in § 65.71 has been to use calendar months. Therefore, FAA proposes to specify “calendar” months in proposed § 65.71(a)(1)(iii) (which is currently § 65.71(a)(3)) for consistency with the language that is currently in § 65.71(b).

FAA proposes to place the IR eligibility requirements under paragraph (b), which would be revised to add an “Inspection Rating” heading. The IR eligibility requirements would largely consist of the current requirements for the IA. Specifically, the IA eligibility requirements currently in § 65.91(c)(1)-(4) would be relocated to § 65.71(b)(1)-(4), respectively, with minor revisions subsequently discussed.

Section 65.91(c)(1) currently states that, to be eligible for an IA, an applicant must hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating, each of which is currently effective and has been in effect for a total of at least three years. This would be relocated from current § 65.91(c)(1) to § 65.71(b)(1) with non-substantive revisions. This IA eligibility requirement would be retained, but the language would be modified to indicate that an IR applicant must hold a currently

effective mechanic certificate with an airframe rating and a powerplant rating that is currently effective in accordance with § 65.15(a) of this part, and has been in effect for a total of at least three years.³⁴ This modification is necessary to define what “currently effective” means. A mechanic certificate is currently effective if it has not been surrendered, suspended, or revoked, as provided in § 65.15(a).

Section 65.91(c)(2) currently requires that an IA applicant has been actively engaged³⁵ for at least the two-year period before the date of application in maintaining aircraft certificated and maintained in accordance with Chapter I of title 14.

This requirement would be relocated from § 65.91(c)(2) to § 65.71(b)(2). FAA proposes changing the requirement from two years to 24 calendar months to align with the way time periods are specified with the other mechanic certificate ratings. In addition, FAA proposes a non-substantive revision to improve readability.

Section 65.91(c)(3) currently requires IA applicants to have a fixed base of operations where they may be located in person or by telephone during a normal working week (to note, the regulation does not require that the location be the place the person will exercise the IA). This requirement would be relocated from § 65.91(c)(3) to § 65.71(b)(3).

Section 65.91(c)(4) currently requires an IA applicant to have available the equipment, facilities, and inspection data necessary to inspect airframes, powerplants, propellers, or any related part or appliance properly. This would be amended for grammatical accuracy and relocated from § 65.91(c)(4) to § 65.71(b)(4).

Currently, under § 65.91(c)(5), an IA applicant must pass a written test on the ability to inspect according to safety standards for returning aircraft to service after major repairs and major alterations and annual and progressive inspections performed under part 43. This IA eligibility requirement, which would be retained for future IR new applicants, conveys testing requirements. A&P rating written testing requirements are

located in § 65.75, Knowledge Requirements, rather than in § 65.71. As such, FAA proposes to integrate the IA written testing requirements from § 65.91(c)(5) as IR knowledge requirements under § 65.75(b), which would harmonize the rating eligibility framework under part 65, subpart D. Section IV.A.3 of this preamble further discusses proposed changes to § 65.75 and the IR written test. Passing the associated written test would remain an eligibility requirement for IR applicants under § 65.75(b). Therefore, FAA is proposing to add § 65.71(b)(5) to specify that IR applicants must comply with the sections of this subpart that apply to the rating sought (mirroring the standing requirement in § 65.71(a)(4) for airframe or powerplant ratings, proposed as new § 65.71(a)(1)(iv)).

To account for these relocations, the docket to this NPRM contains a proposed revision to the IA application (FAA Form 8610-1) consistent with these proposed changes. FAA notes that, currently, § 65.11 sets forth the requirements for application and issue of certificates and ratings. The current requirement for an IA application to be in a form in manner prescribed by the Administrator in § 65.91(a) would be rendered redundant, as the IR application requirement would be covered by § 65.11. Therefore, FAA proposes to remove § 65.91(a).

FAA's proposal would not carry forward the current § 65.91(b), which states that an applicant that meets all of the eligibility requirements for an IA is entitled to the IA. With the proposal to change the IA to an IR, this would be rendered redundant, as it would be covered by § 65.11(b), which states that an applicant who meets the requirements of part 65 is entitled to the appropriate certificate and rating.

3. Knowledge Requirements (§§ 65.75, 65.19, and 65.91)

As previously stated, § 65.75 contains knowledge requirements for applicants for a mechanic certificate and associated ratings: the required written test(s). Currently, after meeting the applicable experience requirements of § 65.77,³⁶ applicants for a mechanic

certificate or rating must pass a written test appropriate to the rating sought, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic General, Airframe, and Powerplant Airmen Certification Standards (ACS), which is incorporated by reference via § 65.23(a)(3). Section 65.19 provides generalized retesting provisions for all tests (i.e., written, oral, and practical) required of applicants for a certificate and rating and states that an applicant can apply for retesting 30 days after a failed test or meet the criteria outlined in § 65.19(b).

As discussed in the previous sections of this preamble, an applicant for an IA must have both an A&P rating, so an IA applicant must have previously passed the general, airframe, and powerplant written tests. Because an IA conveys additional privileges, § 65.91(c)(5) has required a separate written test in addition to the three base written tests that an IA applicant would have already passed. Pursuant to current § 65.91(c)(5), an IA applicant must pass a written test on their ability to inspect according to safety standards for approving aircraft for return to service after major repairs and major alterations and annual and progressive inspections performed under part 43 for this chapter. In changing the IA to an IR, FAA finds it necessary to maintain the separate written test for the privileges of an IR to validate inspection proficiency, as the aeronautical subject areas specific to inspection privileges are not adequately tested in the three base written tests (i.e., general, airframe, powerplant). Because § 65.75 already contains the written test requirements for the mechanic certificate, airframe rating, and powerplant rating, FAA proposes to reorganize the requirements of § 65.75 to integrate the written test requirements for an IR. First, the knowledge test standards as currently provided in § 65.75 would be retained for the A&P ratings and reorganized under § 65.75(a); current § 65.75(a) through (d) would be redesignated as § 65.75(a)(1) through (4), and the exception reference to paragraph (c) would be replaced with a reference to paragraph (a)(3). Paragraph (a) would add introductory text to include an “Airframe or

Powerplant Rating” heading to specify the provisions in proposed subparagraphs (a)(1) through (4) apply to a mechanic certificate with an airframe or powerplant rating, or both. The written test standards for the IR would be relocated, with the subsequently discussed revisions, from § 65.75(b)(2) to § 65.75(b), which would be revised to add an “Inspection Rating” heading and introductory text. FAA proposes several revisions to the current IA written test requirements, as replaced by proposed IR written test requirements.

First, FAA proposes to add a requirement that IR applicants receive an endorsement from a representative of the Administrator validating their compliance with proposed eligibility requirements in § 65.71(b)(1) through (4) before they can take the written test. Currently, only FAA ASIs are authorized to endorse IA applicants to take the written test. With the adoption of the proposed rule, this would not change for the IR endorsement. FAA Order 8900.1 contains guidance for ASIs responsible for evaluating IA applications on determining who is eligible for the IA written examination.³⁷ An ASI reviews the IA application (FAA Form 8610-1) for completeness and accuracy and interviews the applicant to the extent necessary to determine that the responses provided regarding the eligibility requirements in § 65.91(c) are valid. If the ASI finds the applicant meets the requirements of § 65.91, the ASI will endorse the application in Box 14, authorizing the applicant to test. After receiving the endorsement, the IA applicant must take FAA Form 8610-1 to an authorized testing center to take the IA written test. The endorsement on FAA Form 8610-1 states that it is only valid for 30 days. This is because the endorsement certifies that the applicant is actively engaged for the two years prior to the application; once 30 days pass, the ASI needs to reevaluate if this is still true. After 30 days, if the applicant has not taken the test, they must return to the FSDO or IFO to be reevaluated to ensure that they have remained actively engaged during that time. If they are still found to meet the eligibility requirements, a new FAA Form 8610-1 would be endorsed for them to test and it, too, would be valid for 30 days.

FAA's proposal in § 65.75(b)(1) to add the endorsement requirement to the IR written test requirements would reflect the form and manner IA holders currently use when applying for an IA. Therefore, FAA is not creating an additional burden for the IR written test requirement by explicitly adding this form and manner into the regulations from the IA process; an equivalent level of safety would be maintained from the current IA written test process.

In addition, FAA has developed a new Aviation Mechanic Inspection Rating Airman Certification Standard (Inspection Rating ACS) that would replace the current IA written test standards. FAA proposes to specify in § 65.75(b)(2) that applicants for an IR must pass a written test which includes the aeronautical knowledge subject areas contained in the Inspection Rating ACS. Section IV.A.4 of this preamble provides a detailed discussion of the Inspection Rating ACS and incorporation by reference.

Finally, the undesignated paragraph in current § 65.91 states that an applicant that fails the IA written test may not reapply for testing until at least 90 days after the date they failed that test. FAA proposes to retain the 90-day retesting restriction from the IA written test for the IR written test by relocating this paragraph from § 65.91 into the proposed § 65.75(b)(1). The proposed subparagraph would state that applicants can only receive an endorsement for the IR written test if they have not attempted the IR written test in the previous 90 days.

This 90-day retesting restriction for the current IA written test, and future IR written test, is and would remain different from the retesting provisions for the other mechanic certificate ratings. Under § 65.19(a), an applicant for a written, oral, or practical test for a certificate, rating, or additional rating under this part may apply for retesting 30 days after the date of the failed test. Under § 65.19(b), an applicant may retest after failure if before the 30 days have expired the applicant presents a signed statement from an airman holding the certificate and rating sought by the applicant

certifying that the airman has given the applicant additional instruction in each of the subjects failed and that the airman finds the applicant ready for retesting.

FAA finds it important to maintain the 90-day retesting restriction for IR, rather than adopting the same retesting requirements as the other ratings. This requirement has been present since the creation of the IA regulations in 1956.³⁸ FAA supports this longer retesting restriction as appropriate because of the higher level of risk associated with the privileges and responsibilities³⁹ of the current IA and proposed IR. The 90-day restriction ensures and encourages enough time to allow the applicant to get enough training as necessary to be prepared for the responsibilities that come with the IR. In addition, since the applicant would still be required to remain actively engaged during that time, it would allow them to bolster their experience and learning through practical application.

Therefore, FAA finds a conforming amendment necessary to implement the 90-day restriction in alignment with proposed § 65.75(b)(1); proposed § 65.19 would specify that an applicant for an IR may not apply for retesting until 90 days after the date of the failed written test. The current text of § 65.19 would be reorganized under paragraph (a) (i.e., current introductory text would be redesignated as § 65.19(a), current § 65.19(a) and (b) would be redesignated as § 65.19(a)(1) and (2)) with minor revisions in proposed paragraph (a) to note the new exception of paragraph (b), and paragraph (b) would be added to specify the 90-day standard for the IR.

4. Airmen Certification Standards and Incorporation by Reference (§ 65.23)

Currently, the knowledge areas for the aforementioned written test are contained in the Learning Statement Reference Guide for Airman Knowledge Testing.⁴⁰ This guide contains subject areas outlined in Learning Statement Codes that an applicant must demonstrate proficiency in to pass the written test for the IA. However, the Learning Statement Reference Guide is not a regulatory standard for the written test.

In addition to the IA written test, there is also an oral test associated with the IA. Under current § 65.93, there are two instances where an FAA inspector may give an oral test to an IA holder. Section 65.93(a)(5) allows for an IA holder to complete an oral test as one of the options for renewal activities. Section 65.93(c) applies to IA holders who do not complete the required activities in the first year of the IA period; if a person does not complete one of the activities set forth in § 65.93(a)(1) through (5) by March 31 of the first year of the two-year IA period, the person cannot exercise IA privileges after March 31 of that first year. However, the IA holder may pass the oral test during the second year and may resume exercising the privileges of the IA.

With the proposal to replace the IA with an IR, the oral test would be retained for both of these purposes, as is discussed at length in section IV.A.7 of this preamble. Under proposed § 65.83(b)(2)(v), a mechanic with an IR may complete an oral test to maintain recency. In addition, proposed § 65.83(b)(4)(ii) would allow a mechanic with an IR to reestablish recency of experience, if lapsed.

There are currently no regulatory testing standards for the oral test. FAA Order 8900.1 provides guidance to the FSDO or IFO conducting the test to develop test questions that are tailored to part 65 IA privileges and limitations the IA holder accomplishes routinely.⁴¹ FAA acknowledges that without regulatory testing standards, the tests created by the individual offices may vary and the testing standards are not legally enforceable. In addition, without testing standards, the IA or proposed IR applicants do not have a regulatory standard on which to base their preparation.

FAA has initiated a process to transition from the Learning Statement Reference Guide for the IR written test. In conjunction with this proposed rule, FAA has developed the Inspection Rating Airman Certification Standard (Inspection Rating ACS), which includes task-specific knowledge and risk management elements in the standards, resulting in a comprehensive presentation that integrates the knowledge standards to

validate an applicant's proficiency. Specifically, the Inspection Rating ACS, which is included in the docket to this rulemaking for comment, would not be creating new standards, but rather expanding on and formalizing the existing standards from the Learning Statement Reference Guide.

FAA proposes to incorporate the new Inspection Rating ACS by reference into the written test and oral test framework and seeks comment on the proposed draft of the Inspection Rating ACS. To note, the ACS testing framework is not novel to mechanics under part 65; in 2022, FAA published the Aviation Maintenance Technician Schools interim final rule,⁴² which incorporated the Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standard (Mechanic ACS) into 14 CFR Part 65. Further, this ACS and PTS testing framework is aligned throughout the airman training and certification regulations in title 14. In 2024, FAA adopted a final rule incorporating by reference: 30 pilot and flight instructor ACSs and Practical Test Standards (PTS) in part 61, one PTS for flight engineers in part 63, and two aircraft dispatcher and parachute rigger PTSs in part 65.⁴³

Incorporation by reference is a mechanism that allows Federal agencies to comply with the requirements of the Administrative Procedure Act (APA)⁴⁴ to publish rules in the *Federal Register* and the Code of Federal Regulations by referring to material published elsewhere.⁴⁵ Material that is incorporated by reference has the same legal status as if it were published in full in the *Federal Register*. Because 5 U.S.C. 552(a) requires the Director of the Federal Register to approve material to be incorporated by reference, incorporation by reference is governed by the Office of the Federal Register and is promulgated in its regulations: 1 CFR Part 51. Specifically, 1 CFR Part 51 provides certain requirements that a regulatory incorporation by reference must contain.

In accordance with 5 U.S.C. 552(a) and 1 CFR Part 51,⁴⁶ FAA would make the Inspection Rating ACS reasonably available to interested parties by providing free online

public access to view on FAA Airman Certifications Standards website at: www.faa.gov/training_testing/testing/acs. In addition, the Inspection Rating ACS would be available for download, free of charge, at the provided web address.

To incorporate the three part 65 ACSs and PTSs, FAA previously adopted a centralized incorporation by reference section as § 65.23 and amended the requirements in §§ 65.75 and 65.79, which require an applicant for a mechanic certificate or rating to pass a knowledge, oral and practical test, respectively.⁴⁷ The Inspection Rating ACS would align the testing framework for the new IR with the A&P ratings and the Mechanic ACS and ensure the testing standards are legally enforceable.

Therefore, FAA proposes revisions to §§ 65.23, 65.75, and 65.83. FAA proposes to amend § 65.23 to include the Inspection Rating ACS in new paragraph (a)(4). Centralizing the Mechanic ACS and the Inspection Rating ACS under this one section streamlines the regulatory text to avoid repetitive information in the regulations and utilizes the regulatory framework already in place. Subsequent part 65 sections that require compliance with these respective standards (i.e., §§ 65.75 and 65.83) would refer to § 65.23 for identification information and the incorporation by reference language required by 1 CFR Part 51. In addition, FAA proposes to revise § 65.75 to incorporate the Inspection Rating ACS in the written test requirements for the IR. The proposed revision would require applicants to pass the written test within 30 days of endorsement, as previously discussed, which would include the aeronautical knowledge subject areas contained in the Inspection Rating ACS. The database of questions for the IR written test would be derived from the subjects identified in the Inspection Rating ACS.

Similarly, FAA proposes to revise § 65.83 to incorporate the Inspection Rating ACS into the oral test recent activity requirement (proposed § 65.83(b)(2)(v)), as well as into the oral test option for a mechanic to reestablish their IR privileges if they have not

met recency of experience (proposed § 65.83(b)(4)(ii)). The oral test is discussed in more detail in section IV.A.7 of the preamble.

5. Experience Requirements and Skills Requirements (§§ 65.77 and 65.79)

Section 65.77 prescribes experience requirements for applicants for a mechanic certificate or added rating (i.e., practical experience) and § 65.79 prescribes skill requirements for applicants for a mechanic certificate or rating (i.e., oral test and practical test). The experience and skill requirements contained in these regulations are in addition to the basic eligibility requirements for a mechanic certificate and associated ratings contained in § 65.71. These requirements would continue to apply to A&P ratings, but the proposed IR would not have any additional skill or experience requirements that need to be integrated into § 65.71, as the proposed IR (and current IA) requires a mechanic to have both the A&P ratings for a minimum of three years and be actively engaged in maintaining aircraft certificated and maintained in accordance with 14 CFR for the two prior years.⁴⁸ This eligibility requirement would ensure that an applicant for an IR continues to have several years of experience to gain the knowledge to be qualified to exercise the IR privileges (identical to the current IA framework).

While the A&P ratings require an oral and practical test to demonstrate skill, there has never been an oral and practical test requirement for the IA. The oral and practical test requirement is important for mechanic applicants applying for an initial certificate and ratings to demonstrate that they possess the necessary proficiency and mechanical skills to perform the applicable maintenance on aircraft. The privileges of the current IA and proposed IR, which are performing annual and progressive inspections and inspecting major repairs and major alterations and approving them for return to service, are knowledge-based as opposed to skill-based. For example, when a major repair is accomplished on an airframe component of an aircraft, the mechanic that physically performs the work is exercising the privileges of the airframe rating on the mechanic

certificate. However, a mechanic with an IA must inspect the major repair after the work is completed to ensure that it was done satisfactorily and then issue the approval for return to service. The privileges of the IA (and proposed IR) are based on locating, reading, interpreting, and applying applicable standards to inspect major work performed or to perform annual or progressive inspections. For this reason, FAA finds that the written test requirement in proposed § 65.75(b)(2) is a sufficient proficiency validation and does not propose to add an oral and practical test requirement for the IR in this rulemaking.

Therefore, as the experience and skill requirements for the proposed IR will be covered in the eligibility requirements via proposed § 65.71, no additional experience or skill requirements need to be incorporated in §§ 65.77 and 65.79. Accordingly, FAA is proposing to amend the introductory text §§ 65.77 and 65.79 to specify that these requirements only apply to applicants for a mechanic certificate with airframe or powerplant rating, or both, or for an additional airframe or powerplant rating.

6. Privileges and limitations (§§ 65.81, 65.88, 65.92, and 65.95)

Section 65.81 prescribes the general privileges and limitations for certificated mechanics. These general privileges and limitations are applicable regardless of the specific rating(s) the mechanic has associated with the certificate. As applicable to the specific ratings, § 65.85 sets forth the privileges for the airframe rating, § 65.87 sets forth the privileges for the powerplant rating, and § 65.95 sets forth the IA privileges and limitations. Section 65.92 (Inspection Authorization: Duration) also contains IA limitations. FAA proposes to integrate the IA limitations as IR-specific limitations into current § 65.81 without substantive change. FAA proposes to create a new section for IR-specific privileges, § 65.88, where IA privileges would be revised and relocated.

This would align the IR privileges and limitations regulatory framework with the other ratings available on the mechanic certificate.

The current general privileges and limitations listed in § 65.81 would continue to apply to the mechanic certificate. First, the section title for § 65.81 would be updated from “General privileges and limitations” to “Privileges and limitations,” as the section would contain some IR-specific limitations. In addition, FAA proposes to add a “General Privileges and Limitations” heading in paragraph (a) (indicating revised paragraph (a) applies to the mechanic certificate in general) and relocate the current text of § 65.81(a) and (b) as paragraphs (a)(1) and (2). Minor revisions would be made to update the paragraph and subparagraph designations consistent with the reorganization.⁴⁹

Because current paragraph (b) would become new paragraph (a)(2), FAA proposes to add a new paragraph (b) under the heading “Inspection Rating Limitations” that would provide the limitations associated with the proposed IR. These limitations would be relocated from the current IA limitations in §§ 65.92 and 65.95, with revisions subsequently discussed.

Currently, § 65.92(a) states that an IA expires on March 31 of every odd-numbered year and an IA holder may only exercise privileges of the IA while holding a currently effective mechanic certificate with both a currently effective airframe rating and powerplant rating. As discussed in section I.A of the preamble, FAA proposes to remove the expiration date, so the duration limitation in § 65.92(a) would be removed. However, the proposed IR would still require a mechanic to have a currently effective airframe rating and powerplant rating (i.e., the second sentence of current § 65.92(a)), as these prerequisites remain essential to ensuring a base level of experience and skill before exercising inspection privileges. Therefore, this limitation would be relocated to § 65.81(b)(1). The language would be revised to state the A&P ratings must be effective in accordance with § 65.15(a) to define clearly what “currently effective” means. A mechanic certificate or rating is currently effective as long as it has not been surrendered, suspended, or revoked, as provided in § 65.15(a).

Currently, § 65.92(b) sets forth the circumstances under which an inspection authorization ceases to be effective. Section 65.92(b)(1) states that an IA ceases to be effective whenever the authorization is surrendered, suspended, or revoked. In replacing the IA with the IR, this limitation is now covered by § 65.15(a). Therefore, FAA proposes to remove § 65.92(b)(1). Section 65.92(b)(2) states that an IA ceases to be effective when the holder no longer has a fixed base of operation. Section 65.92(b)(3) states that an IA ceases to be effective when an IA holder no longer has the equipment, facilities, and inspection data required by § 65.91(c)(3) and (4).⁵⁰ These provisions would still apply to the proposed IR, as these are initial eligibility requirements set forth by § 65.91(c)(3) and (4) (proposed as § 65.71(b)(3) and (4)) integrated into a rolling eligibility requirement. Therefore, FAA proposes to relocate § 65.92(b)(2) and (3) as streamlined text in § 65.81(b)(2); this provision would require that a certificated mechanic with an IR may not exercise the privileges of the rating if they do not meet the requirements of § 65.71(b)(3) and (4), thereby citing the direct rolling eligibility requirement instead of restating the requirement in multiple subparagraphs. In sum, this limitation would require a mechanic to continue to have a fixed base of operations and have available the equipment, facilities, and inspection data necessary to perform inspections properly to continue exercising IR privileges.

Section 65.95(c) contains an additional IA limitation. If an IA holder changes their fixed base of operation, they may not exercise the privileges of the IA until they have notified the responsible flight standards office or international field office for the area in which the new base is located, in writing, of the change. This limitation would be retained for the IR. FAA proposes to remove § 65.95(c) and relocate it to § 65.81(b)(3) with minor editorial revisions.

Finally, § 65.95(a) sets forth the privileges of an IA, enumerating that the holder of an inspection authorization may: (1) inspect and approve for return to service any

aircraft or related part or appliance (except any aircraft maintained in accordance with a continuous airworthiness program under part 121) after a major repair or major alteration to it in accordance with part 43, if the work was done in accordance with technical data approved by the Administrator; and (2) perform an annual, or perform or supervise a progressive inspection according to §§ 43.13 and 43.15. These privileges would be retained with minor revision for the proposed IR. FAA proposes to relocate § 65.95(a) to proposed § 65.88. A new section with specific IR privileges would align with the other mechanic certificate rating privileges, which are each located in their own section (i.e., §§ 65.85 and 65.87).

Currently, § 65.95(a)(1) excludes inspection authorization privileges from applying to aircraft that are maintained in accordance with a continuous airworthiness program (CAMP) under part 121, which governs the operating requirements for domestic, flag, and supplemental operations. However, FAA finds it necessary to exclude certain aircraft in other parts, specifically those aircraft maintained in accordance with a CAMP under 14 CFR Part 91, 121, 129, or 135.⁵¹ Personnel performing maintenance and approvals for return to service on aircraft that are maintained under a CAMP that go beyond the scope of the privileges of the IA, as well as the proposed IR, must meet specific requirements. The current regulations in parts 91, 121, 129, and 135 include limitations on who can perform maintenance and approvals for return to service on aircraft maintained under a CAMP. Specifically, aircraft maintained under a CAMP may only be approved for return to service by maintenance personnel that are trained and authorized for that program and working under the direct supervision of the air operator, pursuant to §§ 91.1413, 121.368, 129.14(b)(3), and 135.426. This is not a new general limitation on the inspection privileges. Therefore, proposed § 65.88(a) (which is current § 65.91(a)(1)) would be revised to add parts 91, 129, and 135 into the privilege's

exception, which would align the IR privileges with the current inspection limitations for aircraft maintained under CAMP in each respective part.

Currently, § 65.95(a)(2) states that an IA holder may perform an annual, or perform or supervise a progressive inspection in accordance with §§ 43.13 and 43.15. In replacing the IA with an IR, a certificated mechanic with an IR would retain these privileges. Therefore, FAA proposes to relocate § 65.95(a)(2) to new § 65.88(b) with a minor editorial revision.

7. Recent Experience Requirements (§§ 65.83 and 65.93)

i. Recent Experience Activities

Section 65.83 sets forth recent experience requirements for certificated mechanics with an airframe rating, powerplant rating, or both. Currently, under § 65.83, to continue exercising the privileges of the certificate and rating, a mechanic must, within the previous 24 months, be found able to do the work by the Administrator or meet one of the four experience requirements provided in § 65.83(b) for at least six months.⁵² Conversely, an IA does not have recent experience requirements. Rather, § 65.93 requires IA holders to renew their certificate by continuing to meet the eligibility requirements and completing renewal activities each year of the two-year IA period.

In sum, this proposal would convert the current IA renewal requirements to IR recent experience requirements (mirroring recent experience requirements for the A&P ratings), which would eliminate the unnecessary administrative burden associated with the renewal process. Changing the IA to an IR would reduce administrative burdens without degrading safety because the current renewal requirements to validate ongoing proficiency would remain in effect, but as recent experience requirements, which FAA would require inspection rated mechanics to continue to meet to exercise their privileges. As further discussed, the proposal would require mechanics with an IR to keep records to demonstrate that they have met at least the previous 24 calendar months of recent

experience to retain IR privileges in lieu of submission of an FAA form evidencing activity completion every two years.

FAA recognizes that there may appear to be a decrease in the level of safety by eliminating the requirement for renewal every two years; however, FAA generally views this as a procedural revision rather than a substantive revision pertaining to ongoing proficiency and experience requirements. Currently, IA holder oversight is assigned to either a FSDO or IFO, depending on the geographic location of the IA holder's fixed base of operations. Within the FSDO or IFO, an ASI is assigned to each individual IA holder. It is the responsibility of the assigned ASI to provide oversight of the IA holder, which includes surveillance (spot inspections, site visits, etc.), monitoring, providing support, enforcement activities, etc. FAA does not intend to change the current system of oversight in place for IA holders with the proposal to replace the IA with the IR. Maintaining this system of oversight, along with the recordkeeping requirement, would not result in a decrease in the level of safety.

FAA considered two alternative actions to reduce the administrative burden related to the IA renewal process in the transition to an IR. The first alternative was to leave the general framework of renewal as it is (i.e., require a certificated mechanic with an IR to submit evidence of an activity per year during the month of March of each odd-numbered year). As this option ignores the administrative burdens and cost associated with the IR renewal for both FAA and individual mechanics, FAA declined to use this alternative. FAA is committed to decreasing administrative burden, as well as FAA and individual costs, when possible, where there is no adverse impact on safety.

The second alternative would have retained the renewal requirements, but allowed additional flexibility by permitting a certificated mechanic with an IR to renew their IR outside the month of March expiration date. This alternative would require FAA to determine a different renewal schedule. For example, instead of requiring IA renewals in

March of every odd-numbered year, IR renewals could be submitted every two years based on the quarter and a defining characteristic—for example, the mechanic’s last name (e.g., quarter 1 renewal period (Jan-Mar)—Last Names A-J would submit renewals, etc.). Though this alternative provides a remedy for the influx of renewals submitted in a single month, it does not address the administrative costs associated with processing renewal applications and issuing renewal letters every two years. It also does not address the individual mechanics’ costs of submitting the renewal paperwork every two years. Instead, the burden of these on-demand work tasks would simply be dispersed throughout the year. As this alternative would not result in a reduction of administrative burdens and costs, FAA declined to elect this alternative.

FAA’s general proposal to replace the IA with an IR would align all of the privileges available to an FAA-certificated mechanic as ratings under the mechanic certificate. Mechanic certificate ratings currently issued under part 65 do not have expiration dates or renewal requirements,⁵³ therefore, eliminating the expiration requirements and converting the renewal requirements to recency of experience requirements would provide consistency in how FAA administers mechanic privileges on a mechanic certificate.

FAA proposes to reorganize current § 65.83 to integrate the IA renewal requirements as new IR recent experience requirements. The current recent experience requirements would still apply to mechanics with A&P ratings and would be retained and reorganized under § 65.83(a) under the heading of “Airframe or Powerplant Rating” without any substantive changes. Minor edits would be made to update the paragraph and subparagraph designations consistent with the reorganization (e.g., proposed § 65.83(a)(iv)). The proposed IR recent experience requirements would be integrated under paragraph (b) under the heading of “Inspection Rating.”

Section 65.93(a) states that, to be eligible for an IA renewal for a two-year period, an applicant must show that they still meet the requirements of current § 65.91(c)(1)-(4). First, as previously discussed in section IV.A.2 of the preamble, this proposal would revise and relocate the eligibility provisions of § 65.91(c)(1)-(4) to § 65.71(b)(1)-(4). To reiterate, these initial eligibility provisions require a mechanic to: currently hold an effective mechanic certificate with A&P ratings, have been actively engaged in maintaining aircraft for the two years prior to the application, maintain a fixed base of operation, and have available the necessary equipment, facilities, and inspection data. While all four of these provisions would be retained as initial eligibility requirements in proposed § 65.71(b)(1)-(4), three have also been integrated into the IR limitations in § 65.81(b) as rolling requirements, as discussed in section IV.A.6 of the preamble: holding effective airframe and powerplant ratings, maintaining a fixed base of operations, and having necessary equipment, facilities, and inspection data. This means that under the proposal, a mechanic would continuously meet these requirements to exercise the privileges of the proposed IR, therefore, they do not need to be integrated into the recent experience requirements. However, the requirement for a mechanic with an IA to be actively engaged in maintaining aircraft for the two-year period prior to the application date would not be integrated into § 65.81 (which sets forth rating limitations) because it is more appropriately categorized as a recent experience requirement. Therefore, FAA proposes to integrate the requirement into § 65.83(b)(1). This provision ensures that a mechanic has had an active role in exercising the privileges of the A&P ratings in the two years prior to exercising IR privileges.

FAA proposes to modify the language to indicate that the person must be actively engaged for the 24-calendar month period prior to when they exercise their IR privileges, rather than two years prior to the application date (as is required by eligibility requirements in proposed § 65.71(b)(2)). This modification is necessary as a person

would only apply for the IR once, and they would not need to file a renewal application under this proposal. In addition, the proposal would change the language from two years to 24 calendar months to provide consistency to the time periods associated with the other mechanic ratings. Therefore, to maintain an equivalent level of safety, the actively engaged requirement would apply for a rolling period of two years prior to exercising the IR, rather than two years from the application date. For example, assuming this rule became effective in August 2026, if a certificated mechanic with an IR who meets all the other requirements wants to exercise their privilege in September 2026, they would have to have been actively engaged in maintaining aircraft since September 2024.

Section 65.93(a)(1)-(5) currently describes the renewal activity options that IA holders must complete at least one of annually to renew their IA. Currently, an IA holder must complete one of five activities annually: (1) at least one annual inspection for each 90 days that the applicant has held the current authority; (2) at least two major repairs or alterations for each 90 days the applicant has held the authority; (3) performed or supervised and approved at least one progressive inspection; (4) attended and successfully completed a refresher course of not less than eight hours of instruction; or (5) passed an oral test conducted by an FAA inspector. FAA proposes that these requirements would be largely retained and converted into recent experience requirements for the proposed IR as new § 65.83(b)(2)(i)-(v), with some revisions.

Because the proposed IR will not have a fixed period pursuant to an expiration, like the current IA, FAA proposes that these requirements be completed in the 12 calendar months prior to exercising the IR privileges to maintain the experience and validation of proficiency currently expected. FAA emphasizes this would not substantially increase the burden on a certificated mechanic with an IR as opposed to the current framework for an IA holder, as an IA holder must complete one activity in the

first year and one in the second year, the person just isn't required to submit evidence of such until the second year under the current framework.

For example, under this proposal, if a certificated mechanic with an IR who meets all the other requirements wants to exercise their privileges in June 2027, they must have completed one of the recent experience activities enumerated between June 2026 and June 2027.⁵⁴ The 12 calendar month period would be a rolling look-back period from the time a certificated mechanic with an IR exercises their privileges.

First, § 65.93(a)(1) and (2) would be relocated with revision to § 65.83(b)(2)(i) and (ii). Currently, two of the activity options to renew are one annual inspection or two major repairs or major alterations for each 90 days the applicant has held the IA. Under the current regulations, these can be done at any time throughout the year. For example, if a mechanic has an IA for a year, they can meet the renewal activity requirements for the year by doing four annual inspections within December of the year; one inspection does not have to be done every 90 consecutive days. Similarly, two major repairs or major alterations do not have to be done every 90 consecutive days; all eight could be done in the last month of the year. Since the IR would not expire or have a fixed period, the recent experience requirements of § 65.83(b)(i) and (ii) would be modified to require at least four annual inspections in the previous 12 calendar months or any combination of eight major repairs or major alterations in the previous 12 calendar months. This maintains the same number of inspections or major repairs and major alterations in a 12-calendar month period to exercise the proposed IR privileges as required to renew the IA.

FAA's proposal would modify § 65.83(b)(ii) to add "any combination of" eight major repairs or major alteration. This is necessary to clarify that a mechanic does not have to perform either eight major repairs or eight major alterations, but rather, may complete any combination to a total of eight. For example, three major repairs and five

major alterations would satisfy the recent experience requirement of § 65.83(b)(ii).

While the current requirements in § 65.93(a)(2) do not contain this language, FAA has issued a legal interpretation stating that a combination of major repairs and major alternations may be used.⁵⁵ Therefore, this proposal is not changing any requirements from the IA to the IR, but rather formalizing the current requirements, as clarified in legal interpretation, into regulation.

Next, § 65.93(a)(3) and (4) would be relocated to § 65.83(b)(2)(iii) and (iv).

These two sections would set forth the two activity options of progressive inspection and an 8-hour refresher course. The progressive inspection and refresher course activities are relocated without revision.

Finally, § 65.93(a)(5) would be relocated to § 65.83(b)(2)(v) with revision.

Currently, an IA holder can complete an oral test conducted by an FAA inspector to determine that the applicant's knowledge of applicable regulations and standards is current. As discussed in section IV.A.4 of the preamble, there is no current regulatory standard for the oral test; rather, FAA provides guidance to inspectors as to the conduct of the test. The requirements for the oral test would be modified to state that the oral test would include the aeronautical knowledge subject areas contained in the Inspection Rating ACS, which would be incorporated by reference in proposed § 65.23 to determine that the applicant's knowledge of applicable regulations and standards is current. The oral test in proposed § 65.83(2)(v), should a mechanic with IR choose that activity, would continue to be administered by the FSDO or IFO, but all questions for the oral test would be developed from the Inspection Rating ACS. This revision would ensure the oral test is standardized and those taking the test are aware of the specific subject areas enumerated in the ACS (i.e., what they are subject to demonstrating knowledge on).

Notably, the retesting provisions of § 65.19 do not apply to the oral test as they do to the written test as described in section IV.A.3. of the preamble. Section 65.19 is only

applicable to tests for a certificate or rating. The purpose of both the current IA oral test and the IR oral test in FAA's proposal is to determine that the applicant's knowledge of applicable regulations and standards is current after the person already holds the IA.

The oral test does not have specific retesting provisions because the intent is to provide the ASI giving the test flexibility in determining appropriate follow-up activities after a failed test. For example, if the test consists of 20 questions, the applicant would need to answer 14 of them correctly to meet the seventy percent minimum passing score. If they only answered 13 of them correctly, missing a passing score by one question, it might be appropriate for the ASI to offer a retest with a different set of questions. Alternatively, if the applicant only answered 5 of the questions correctly, the ASI might believe that indicates a significant lack of qualifications on the part of the IR holder and find it necessary to initiate a reexamination under 49 U.S.C. 44709 to determine whether the individual is competent or qualified to hold the rating.

ii. Exceptions to Recent Experience Requirements

Given the transition from expiration and renewal to recent experience requirements, FAA acknowledges two scenarios where a person would need an exception from the first year of recent experience requirements. First, if a person has just received their IR, the person would have just passed the written test to obtain the IR, demonstrating proficiency to exercise the IR privileges. In addition, by virtue of just receiving their IR, the person could not meet the recent experience requirements in the 12 calendar months prior to the original IR issuance, as the person did not have the privileges to perform annual inspections, major repairs or alterations, or perform or supervise and approve progressive inspections. Further, the requirement for a refresher course or oral test would be redundant in the first 12 calendar months, as a certificated mechanic with a newly issued IR would have recently passed the written test as required in proposed § 65.75(b). Therefore, proposed § 65.83(b)(3) would except a newly rated

person from meeting the recent experience requirements during the 12 calendar months following the original issuance of their IR. For example, if a person receives their IR in March 2026, they would not have to meet the experience requirements for the next 12 calendar months and they would be able to exercise the privileges of the IR through March 2027. However, beginning in April 2027, to continue exercising the privileges of the IR, they would need to have completed one of the recent experience activities during the previous 12 calendar months. The proposed language would also clarify that obtaining a replacement mechanic certificate with an inspection rating under proposed § 65.73(d) or (e) (which is required for a person holding a valid IA at the time of the effective date of this rule if they want to continue exercising inspection privileges) is not considered an original issuance of the IR, as the aforementioned considerations would not apply to a person who may already conduct inspection privileges.

Second, FAA acknowledges the unique timeline considerations characterized by the transition of an authorization with an expiration date to a rating with no expiration date and recent experience requirements. Without relief, the timing of the final rule may mean a person with a valid IA is compliant under the current rules, but they would not be compliant with the proposed regulations if they became final. For example, all IA holders renewed their IA in March 2025. To fulfill the current renewal activity requirements for the first year, suppose an IA holder completes a refresher course in June 2025. The IA holder then plans to complete their renewal activity in February 2027 for the second year of the IA period. If this final rule became effective in August 2026 and the mechanic wanted to exercise IR privileges in September 2026, they would look back one year to September 2025. In this example, if the only renewal activity the IA holder completed was the June 2025 refresher course, they would not be in compliance with the newly effective § 65.83(b)(2) and could not exercise the IR privileges. This results in a scenario where the mechanic with an IA could be compliant under the current rules, but they

would become non-compliant with the recent activity requirements on the date the new rules would be effective.

FAA acknowledges this outcome would be unfair to current IA holders who would be compliant under the current rules, but would become non-compliant on the effective date of a future final rule. Therefore, in proposed § 65.83(b)(7), FAA proposes a six-month grace period for a certificated mechanic with a valid IA on the effective date of the proposed rule to become compliant with the recent experience requirements for the IR. FAA intends for this six-month grace period to alleviate the immediate burden of complying with the new requirements when a mechanic has a valid IA on the effective date of the rule. During this six-month period, a mechanic who had a valid IA on the effective date of the rule could exercise the IR privileges without meeting the requirements of proposed § 65.83(b)(2).

FAA determined that the six-month grace period is an adequate amount of time for a mechanic to complete one of the required recent experience activities if they have not done so in the prior 12 calendar months. FAA acknowledges that each individual mechanic's circumstances are different, and for some it may take several months to satisfy the annual inspection or major repair and major alteration activities.

However, there are acceptable IA (which with this proposal would become IR) refresher trainings that are available year-round, many of which are available on demand, which can be completed to satisfy the recent activity requirement. Many of the refresher training courses are offered at no cost. FAA maintains a master list of courses that have been reviewed and accepted that can be found at:

www.faa.gov/gslac/ALC/lib_categoryview.aspx?categoryId=27. In addition, FAA.safety.gov offers online courses that can be taken for IA (with the adoption of FAA's proposal would become IR) refresher credit. Therefore, due to the availability of

refresher courses, six months provides sufficient time for a mechanic to find and schedule a refresher course to meet the recent experience requirements.

In addition, FAA finds that there would be no added risk in allowing the one-time grace period. Under the current regulations, it is possible for an IA holder to go beyond twelve months without an activity and remain current. For example, an IA holder could complete their required first year activity in June of 2025 and then not complete the required second year activity until March of 2027. In this example, the IA holder would be in compliance the entire time, however, there would have been twenty-one months between activities. Therefore, in most circumstances, a six-month grace period would not allow for a greater amount of time between required activities than currently allowed in the regulations. FAA emphasizes that, if finalized, the final rule will give due consideration to the timeline of the final rule and current expiration date requirements. In addition, FAA seeks comment on additional methods that would facilitate a seamless transition from IA to IR.

Importantly, § 65.83(b)(7) could be removed six months after the effective date of the rule (if adopted), as all mechanics with a valid IA would have to be compliant with the recent experience requirements at that time. Amendatory instructions would remove this provision six months after the effective date of the final rule, as well as remove the reference to paragraph (b)(7) from § 65.83(b)(2), as no longer be necessary.

iii. Reinstatement of Privileges After Recent Experience Lapse

Currently, if an IA expires and is not renewed, there is no way to reinstate privileges without going through the entire application process and written test again. FAA proposes to add a method by which certificated mechanics with an IR who have not completed their recent experience requirements in the prior 12 calendar months can reestablish privileges. This relieving provision would allow greater flexibility and lower cost to mechanics with an IR to reinstate privileges than the process of reapplying from

the beginning, as is currently required to regain IA privileges after IA expiration, while maintaining safety as subsequently discussed.

FAA proposes to add § 65.83(b)(4), which would allow a certificated mechanic with an IR that has not completed their recent experience requirements to reinstate their privileges by attending a refresher course (proposed § 65.83(b)(4)(i)) or passing an oral test from an FAA inspector (proposed § 65.83(b)(4)(ii)). In addition, proposed § 65.83(b)(5) would permit a mechanic with an IR who completes the requirements of proposed § 65.83(b)(4) deemed as having completed the recent experience requirements of proposed § 65.83(b)(2).

For example, assuming the provisions proposed are adopted, suppose a certificated mechanic with an IR wants to exercise their IR privileges in June 2027.⁵⁶ However, the person has not completed any of the recent experience requirements from § 65.83(b)(2) in the prior 12 calendar months. To reestablish privileges, the person could either take a refresher course or an oral test. Once the person completes the course or passes the oral test, and assuming the person meets all other applicable requirements, the person can exercise IR privileges and would be deemed to have met the recent experience requirements for the next 12 calendar months.

The refresher course and the oral test are both designed to ensure current mechanic knowledge of applicable regulations and standards. In addition, as previously stated, a mechanic with an IR would be required to meet all other applicable requirements to exercise the privileges of the IR. This means that even if the mechanic has not met the IR recent experience for a considerable amount of time, even after completing the refresher course or successfully completing the oral test, they would be required to hold an effective mechanic certificate with both A&P ratings, have a fixed base of operations, have the necessary equipment, facilities, and inspection data, and have been actively

engaged in maintaining aircraft for at least the two-year period before exercising the privileges of the IR.

For these reasons, FAA finds there would be no negative impact on safety and does not consider it necessary to establish a time limit for mechanics to reestablish recent experience requirements for the IR. FAA invites public comment on this determination. Specifically, FAA seeks comment on whether there are additional requirements or limitations that FAA should establish for a certificated mechanics to reestablish recent experience for the IR.

iv. Record Keeping Requirement

Currently, when an IA holder renews their IA, the person submits FAA Form 8610-1 and presents evidence that the person still meets the initial eligibility requirements of § 65.91(c)(1) through (4).⁵⁷ In addition, an applicant must show completion of one of the renewal activities.⁵⁸ This evidence is submitted with the renewal application and reviewed by FAA personnel before the IA is formally renewed. Therefore, under the current regulations, IA holders are functionally required to keep records to show that they have been actively engaged in the two-year period prior to the date of the application in maintaining certificated aircraft under § 61.91(c) and records to show that they have met the requirements for completing a renewal activity under § 61.93(a).

Because this proposal would eliminate the renewal process for an IA, applicants for an IR would only have to submit FAA Form 8610-1 on initial application. Certificated mechanics with an IR would not be required to submit any evidence indicating that they continue to meet the eligibility requirements or that they have completed the recent experience requirements. However, the proposed regulations would require mechanics with an IR to maintain eligibility requirements and complete the recent experience requirements. Therefore, to maintain an equivalent level of safety as the IA, FAA proposes to add a record keeping requirement to § 65.83(b)(6). FAA finds that,

despite the enumerated requirement, this would be a reduced burden on future individual mechanics with IR from the current IA renewal process.

This proposal would require a certificated mechanic with an IR to maintain records to demonstrate completion of the recent experience requirements as outlined in § 65.83(b)(1)-(4) for at least two years. These would be substantially similar records to those IA holders currently maintain and submit with FAA Form 8610-1 when renewing their IA. The proposed rule would change the requirement from an active submission of evidence every two years for verification to a mechanic keeping the records and verifying compliance with the recent experience requirements themselves, allowing flexibility for the mechanic with an IR. FAA estimates that burden imposed by this proposed recordkeeping requirement would be minimal, approximately five minutes per year. Some examples of acceptable recordkeeping would be: saving a copy of a certificate of training to a computer, making a copy of a maintenance record entry for a completed annual inspection, or making an entry into a mechanic's logbook indicating a completed FAA Form 337 for a major repair.

However, an equivalent level of safety would be maintained through surveillance and monitoring. ASIs are charged with surveillance and monitoring of IA holders as part of their annual work program. These general responsibilities would not change with the proposal to replace the IA with IR and renewal requirements to recent experience requirements. FAA recognizes that, by eliminating the renewal requirement, inspection rated mechanics would no longer be submitting their evidence of activity every two years on IA renewal. However, the proposed record keeping requirement would ensure that ASIs are able to verify that mechanics have met their recent experience requirements as the records would be subject to inspection given FAA's general inspection authority and the specific authority set forth in proposed § 65.83(b)(6). Section V.E. discusses the

applicability of the Paperwork Reduction Act and the burden associated with these requirements.

Of note, the proposed recordkeeping requirement is different from the recordkeeping requirement proposed in 1973 and discussed in section III.A of the preamble. The 1973 proposal would have required IA holders to keep a record of every aircraft that they had inspected for a period of two years, to include the registration number, name and address of the registered owner, make and model of the aircraft, the kind of inspection performed, the date, and if the aircraft was returned to service.⁵⁹ The recordkeeping requirement proposed in this rulemaking is significantly narrower. Certificated mechanics with an IR would only have to keep records for activities that demonstrate compliance with the proposed recent experience requirements. As previously discussed, IA holders already maintain these records and, overall, the burden for mechanics with an IR would be decreased because they would no longer need to fill out the application to renew every two years with evidence of those activities. Therefore, the concern regarding an undue economic burden, which prompted the removal of this proposed requirement from the 1977 final rule, is not applicable in this proposal.⁶⁰

v. Removed Requirements from § 65.93

Given the proposed revisions discussed in this section, FAA finds it necessary to propose removing § 65.93(b), (c), and (d). Section 65.93(b) provides an exception to required renewal activities when an IA is in effect for less than 90 days before the expiration date and provides the expectations when an IA is in effect for less than 90 days before March 31 of an even numbered year. These provisions are no longer necessary as the IR would not have an expiration date and the intent of relief for newly acquired IAs would be captured in proposed § 65.83(b)(3).

Section 65.93(c) sets forth the restrictions for an IA holder who does not complete one of the renewal activities in the first year of the IA period. As the proposed IR would

no longer have a fixed period, this paragraph would be removed. Proposed § 65.83(b)(4), which was previously discussed in this section of the preamble, would provide the restrictions and requirements to reinstate privileges for certificated mechanics that do not complete their recent activity requirements.

Finally, § 65.93(d) is currently in place to align with § 61.40 to allow relief for certain qualifying people to be eligible to renew an expired IA if they were deployed overseas and unable to renew during the month of March of the odd-numbered year. With the proposal to eliminate the expiration date and renewal requirement, this relief would no longer be necessary. In addition, proposed § 65.83(b)(4) would specifically allow for mechanics to reestablish IR privileges if they are unable to meet the recent experience requirements, rather than have to start over with an initial IR application as is currently required, so no additional relief is required for those deployed overseas. Section IV.C.2 of the preamble contains a discussion of § 61.40.

vi. Advisory Circular, FAA Form 8610-1, and FAA Form 8610-6

FAA publication FAA-G-8082-19, Inspection Authorization Information Guide⁶¹ currently provides general guidance for mechanics who hold an IA. It discusses the important role and responsibilities that IA holders have in air safety and the renewal requirements and process. With the proposal to replace the IA with the IR and eliminate the expiration and requirement for renewal, FAA has drafted a new AC to replace the IA information Guide. The most significant difference between the Information Guide and the AC, as drafted for this proposed rule, is the discussion of the recent experience and recordkeeping requirements that are introduced in this proposal. FAA seeks comment on the proposed draft of the AC, which is available in the docket for this rulemaking.

In addition, the proposal to eliminate the renewal requirement would necessitate revisions to FAA Form 8610-1, Mechanic's Application for Inspection Authorization (14 CFR Part 65). The form is currently used for initial application and application for

renewal. The revision would remove all blocks that are used for the renewal process, as well as change all references of “Inspection Authorization” to “Inspection Rating.”

As the proposed IR would no longer require renewal, this application would now only be required for initial application for an IR. FAA also seeks comment on this updated application, which is available in the docket for this rulemaking.

Also, this proposal would require revisions to FAA Form 8610-6, IA Refresher Course Acceptance Request. While the form would remain the same substantively, all references to “IA” and “Inspection Authorization” would be changed to “IR and “Inspection Rating,” respectively. In addition, the regulatory reference in Section E that currently references § 65.93(a)(4) would be changed to § 65.83(b)(iv). FAA also seeks comment on this updated application, which is available in the docket for this rulemaking.

Finally, throughout the pendency of this rulemaking, FAA would also perform a quality control check of related materials to the IA, to include legal interpretations. If adopted as proposed, FAA would handle these materials as appropriate, to include rescinding or revising any legal interpretations that are no longer valid, and FAA would address these changes in the final rule.

B. Proposed Changes to Affected Sections

The following table provides an overview of proposed changes to specific IA sections in part 65 (§§ 65.91, 65.92, 65.93, and 65.95): which removed paragraphs and subparagraphs would be covered by other sections, which would be integrated into other sections, and which would be removed entirely.

Table 1—Proposed Revision and Integration of Inspection Authorization Provisions for Inspection Rating

Current Citation (14 CFR)	Proposed Action (14 CFR)
§ 65.91(a)	Remove, covered by § 65.11(a).

§ 65.91(b)	Remove.
§ 65.91(c)(1)-(4)	Revise and integrate into § 65.71 as new §§ 65.71(b)(1)-(4).
§ 65.91(c)(5)	Revise and integrate into § 65.75 as new § 65.75(b).
§ 65.91 undesignated paragraph	Revise and integrate into § 65.19 as new § 65.19(b).
§ 65.92(a)	Partially remove, partially revise and integrate into § 65.81 as new § 65.81(b)(1).
§ 65.92(b)(1)	Remove, covered by § 65.15(a).
§ 65.92(b)(2)-(3)	Revise and integrate into § 65.81 as new § 65.81(b)(2).
§ 65.92(c)	Remove, covered by § 65.15(c).
§ 65.93(a)	Revise and integrate into § 65.81 as new §§ 65.81(b)(1)-(2) and 65.83(b)(1).
§ 65.93(a)(1)-(5)	Revise and integrate into § 65.83 as new §§ 65.83(b)(2)(i)-(v).
§ 65.93(b)	Remove.
§ 65.93(c)	Remove.
§ 65.93(d)	Remove.
§ 65.95(a)	Revise and add as new § 65.88.
§ 65.95(b)	Revise and integrate into § 65.89 as new § 65.89(b).
§ 65.95(c)	Revise and integrate into § 65.81 as new § 65.81(b)(3).

C. Miscellaneous and Conforming Amendments (§§ 43.7, 61.40, 65.11, 91.409, and 147.5)

1. Conforming Amendment to Part 43 (§ 43.7).

Part 43 prescribes certain rules governing maintenance, preventive maintenance, rebuilding, and alteration. Section 43.7 prescribes requirements for persons authorized to approve aircraft, airframes, aircraft engines, propellers, appliances, or component parts for return to service after maintenance, preventative maintenance, rebuilding, or alteration. Currently, under § 43.7(b), the holder of a mechanic certificate or an IA may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided under part 65. As this proposal would remove the IA, any reference to an IA would need to be removed in other sections.

A mechanic with the proposed IR would be able to approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service. As discussed

in section IV.A.6 of this preamble, the privileges of the IR are substantively unchanged from the IA. FAA would not need to replace “inspection authorization” with “inspection rating” in § 43.7(b), as the proposed IR would already be covered under the current language. The proposed IR is a rating on a mechanic certificate; therefore, a mechanic with an IR would be covered under “holder of a mechanic certificate” as currently authorized in § 43.7(b). Accordingly, certificated mechanics with the proposed IR would also be authorized under the language of § 43.7(b) despite removing “inspection authorization.” Therefore, FAA proposes to revise § 43.7(b) by removing “or an inspection authorization” to conform to the changes proposed in part 65.

2. Relief for U.S. Military and civilian personnel who are assigned outside the United States in support of U.S. Armed Forces operations. (§ 61.40)

Section 61.40 prescribes relief given to U.S. Military and civilian personnel assigned outside of the United States in support of U.S. Armed Forces operations, allowing these individuals additional time to renew a flight instructor certificate, establish recent flight instructor experience, take a practical test, or renew an IA. FAA proposes to revise § 61.40 by removing references to IA to conform to the changes proposed in part 65.

Section 61.40 codified Special Federal Aviation Regulations No. 100-2 to ensure military and civilian personnel deployed outside the United States have an adequate opportunity to renew an IA if they meet the criteria under § 61.40(b)(2)(i).⁶² With the proposed conversion of the IA to the IR, the IR would not expire, and a provision providing adequate opportunity to renew for deployed individuals would not be necessary. In addition, proposed § 65.83(b)(4) would allow all mechanics to reestablish IR privileges at any time if they are unable to meet the recent experience requirements.⁶³ This provision would equally provide deployed individuals with the same opportunity to reestablish privileges under proposed § 65.83(b)(4). Therefore, the relief provided by

§ 61.40 would not be necessary for the proposed IR. Accordingly, FAA proposes to remove the references to IA in § 61.40(a), 61.40(a)(6), 61.40(b)(2)(i), and 61.40(b)(3).

3. Application and issue (§ 65.11)

Section 65.11 prescribes the general application requirements for certificates under part 65. Currently, § 65.11(a) states that application for a certificate and appropriate class rating, or for an additional rating, under this part must be made on a form and in a manner prescribed by the Administrator. FAA proposes to remove the word “class” from paragraph (a) because none of the ratings that are issued on airmen certificates under part 65 are class ratings as defined in § 1.1.

Class, with respect to the certification, rating, privileges and limitations of airmen, means a classification of aircraft within a category having similar operating characteristics.⁶⁴ Class is also defined with respect to the certification of aircraft as meaning a broad grouping of aircraft having similar characteristics of propulsion, flight, or landing.⁶⁵ Certifications for air traffic control operators, aircraft dispatchers, mechanics, repairmen, and parachute riggers are not class ratings; none of the ratings limit airmen under part 65 to a specific class of aircraft within a category.

FAA acknowledges that “class” is currently used in § 65.107 with regard to repairmen for light-sport aircraft. However, the MOSAIC rulemaking proposed to replace references to “class” of aircraft in § 65.107 with “category”⁶⁶ of aircraft in proposed § 65.109.⁶⁷ Under § 65.107, the references to “class” are used in the context of classes of aircraft certification, not airmen certification. FAA has determined using the term “category” in the context of airman certification as defined in § 1.1, is more appropriate because § 65.107 specifically prescribes repairman certification, ratings, privileges, and limitations. Therefore, given that airmen certificates issued under part 65 do not have class ratings, FAA proposes to remove this term from § 65.11(a).

4. Inspections (§ 91.409)

Section 91.409 prescribes the requirements for inspections if operating under part 91; paragraph (d) describes the requirements of an aircraft owner or operator that wishes to utilize a progressive inspection program for their aircraft. Section 91.409(d)(1) states, in part, that the owner or operator must provide a certificated mechanic with an inspection authorization to supervise or conduct the progressive inspection.

FAA proposes to revise § 91.409(d)(1) to change the use of “inspection authorization” to “eligible to exercise the privileges of an inspection rating” to conform to the changes proposed in part 65 and to account for those persons who will hold inspection authorizations but will not have converted their authorization to a rating after a final rule is effective. As explained in section IV.A.6 of the preamble, the IR would have the same privileges as the IA, which would be relocated from § 65.95(a)(2) to § 65.88(b).

Therefore, this proposed change would simply update this section to require an owner or operator to provide a certificated mechanic holding an IR to use the progressive inspection program, consistent with the proposed conversion of the IA to an IR.

5. Application requirements. (§ 147.5)

Part 147 prescribes the requirements and the general operating rules for issuing aviation maintenance technician school certificates (AMTS). Section 147.5 prescribes application requirements for AMTS certificate applicants. Currently, § 147.5(b)(2) requires an AMTS applicant to include a description of the manner in which the school’s curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated ratings under subpart D of part 65. The proposed inspection rating is not a rating that is available to an AMTS, as the available ratings are enumerated in § 147.11 as airframe, powerplant, or airframe and powerplant.

Therefore, FAA proposes to revise § 147.5(b)(2) by specifying the associated ratings as airframe or powerplant ratings (or both). FAA acknowledges that part 147 was significantly revised pursuant to section 135 of the Aircraft Certification, Safety, and

Accountability Act in Pub. L. 116-260, the Consolidated Appropriations Act of 2021, including § 147.5. This proposed amendment is not a substantive change to the statutory requirements.

V. Regulatory Notices and Analyses

A. Regulatory Impact Analysis

Executive Order 12866 (E.O.) (“Regulatory Planning and Review”) and E.O. 13563 (“Improving Regulation and Regulatory Review”) require agencies to regulate in the “most cost-effective manner,” to make a “reasoned determination that the benefits of the intended regulation justify its costs,” and to develop regulations that “impose the least burden on society.” The Office of Management and Budget has determined that this proposed rule is not a significant regulatory action as defined in section (3)(f) of E.O. 12866.

This proposal would eliminate the requirement that mechanics holding an IA renew their IAs in March of every odd-numbered year. FAA would replace the current mechanic certificate and IA with a new mechanic certificate with an IR, which would not require renewal and would reduce administrative burden to both FAA and mechanics. The proposal would maintain safety by retaining the same initial qualifications and converting the renewal activity requirements to recent experience requirements.

There are a few other minor revisions in the proposed rule that would not have an impact on existing industry practices. The existing industry practices are the baseline for this analysis and thus the minor proposed changes would not result in any costs or benefits. Adjustments to knowledge requirements of this proposed rule would not impact current industry practices as the written test is already required under the IA. These revisions reorganize the regulatory text to explain the tests required. In addition, the addition of IR specific privileges and limitations language would not affect the

current practices. The following table summarizes the economic impact by provision change.

Table 2 – Regulatory Impact by Proposed Revision

Current Citation (14 CFR)	Proposed Action (14 CFR)	Economic Impact
§ 65.91(a)	Remove, covered by § 65.11(a).	No impact.
§ 65.91(b)	Remove.	No impact.
§ 65.91(c)(1)-(4)	Revise and integrate into § 65.71 as new § 65.71(b)(1)-(4).	No impact.
§ 65.91(c)(5)	Revise and integrate into § 65.75 as new § 65.75(b).	No impact.
§ 65.91 undesignated paragraph	Revise and integrate into § 65.19 as new § 65.19(b).	No impact.
§ 65.92(a)	Partially remove, partially revise and integrate into § 65.81 as new § 65.81(b)(1).	No impact.
§ 65.92(b)(1)	Remove, covered by § 65.15(a).	No impact.
§ 65.92(b)(2)-(3)	Revise and integrate into § 65.81 as new § 65.81(b)(2).	No impact.
§ 65.92(c)	Remove, covered by § 65.15(c).	No impact.
§ 65.93(a)	Revise and integrate into § 65.81 as new §§ 65.81(b)(1)-(2) and 65.83(b)(1).	The change results in cost savings of \$5.66 million at a 7% present value (pv).
§ 65.93(a)(1)-(5)	Revise and integrate into § 65.83 as new § 65.83(b)(2)(i)-(v).	No impact.
§ 65.93(b)	Remove.	No impact.
§ 65.93(c)	Remove.	No impact.
§ 65.93(d)	Remove.	No impact.
§ 65.95(a)	Revise and add as new § 65.88.	No impact.
§ 65.95(b)	Revise and integrate into § 65.89 as new § 65.89(b).	One-time replacement cost of \$218,954 at a 7% pv.
§ 65.95(c)	Revise and integrate into § 65.81 as new § 65.81(b)(3).	No impact.

The following table summarizes the net cost savings to 21,264 mechanics and to FAA from reducing the paperwork requirements associated with the current two-year renewal cycle.

Table 3 – 10 Year Net Savings (in \$Millions)

	3% Present Value	7% Present Value
Mechanics	\$1.22	\$1.01
FAA	\$5.31	\$4.44
Total*	\$6.53	\$5.44
*Totals may differ due to rounding.		

At a seven percent discount rate, mechanics who hold an IA would realize a net savings of \$1.01 million over 10 years and FAA would realize a net savings of \$4.44 million over 10 years. These savings result from reduced paperwork costs for IA holders, who would no longer need to fill out renewal forms, and reduced labor costs to FAA, which would no longer need to process the renewals. The net savings subtracts out a one-time cost of approximately \$0.22 million at a seven percent discount rate. This one-time cost includes the cost to the mechanics to submit a simple online form requesting a replacement mechanic certificate with an IR and to FAA for processing and sending out the replacement mechanic certificate with an IR.

Table 3 shows the savings from eliminating the two-year IA renewal requirement relative to the baseline. In other words, Table 3 contains the eliminated estimated discounted cost for renewals that would occur without the elimination of the renewal requirement.

Table 4 – 10 Year Savings from Eliminating IA Two Year Renewal Requirement

Year	Baseline IA Renewals Forecast	Mechanic Savings (3% PV)	Mechanic Savings (7% PV)	FAA Savings (3% PV)	FAA Savings (7% PV)
2027	21,264	\$291,362	\$280,470	\$1,207,325	\$1,162,192
2029	21,394	\$276,318	\$246,473	\$1,144,984	\$1,021,315
2031	21,524	\$262,040	\$216,588	\$1,085,822	\$897,482
2033	21,654	\$248,491	\$190,320	\$1,029,680	\$788,635
2035	21,784	\$235,635	\$167,232	\$976,404	\$692,964

Year	Baseline IA Renewals Forecast	Mechanic Savings (3% PV)	Mechanic Savings (7% PV)	FAA Savings (3% PV)	FAA Savings (7% PV)
Total	107,620	\$1,313,846	\$1,101,084	\$5,444,216	\$4,562,589

The analysis assumes that the final rule would be issued in December 2026.

Therefore, the cost savings from elimination of the renewal requirement would begin with the renewals that would have occurred in 2027 without the proposal. The baseline renewals forecast uses the renewals data over the 14 years presented in Table 4 to forecast in the average number of biannual renewals baseline renewals that would occur without the proposal.

Table 5 – Historical IA Renewals

Year	2009	2011	2013	2015	2017	2019	2021	2023
Renewals	20,094	20,003	20,522	21,076	21,160	20,800	20,662	21,042
Source: National Program Tracking and Reporting Subsystem (NPTRS) accessed 9-10-2024 through Safety Performance Analysis System (SPAS).								

To estimate the cost savings of eliminating the renewal requirement, FAA assumes that mechanics with an IA would save approximately 15 minutes due to this proposal. FAA assumes mechanics with an IA have a compensation rate of \$56.45 per hour,⁶⁸ including wages and benefits. Thus, FAA estimates the cost savings per renewal for IA holders of \$14.11 (\$56.45 multiplied by 0.25 hours). The total undiscounted cost savings for 2027 is then calculated by multiplying the cost savings per renewal for an IA holder (\$14.11) by the number of renewals in 2027 (21,264), or \$300,035. Table 4 shows this value discounted at three and seven percent.

FAA also assumes that a GS-13 step 5 FAA employee would spend 45 minutes processing an IA renewal application at a total compensation rate of \$77.98 per hour. Thus, FAA estimates FAA cost per renewal of \$58.48.⁶⁹ Similar to the total undiscounted cost savings for mechanics in 2027 calculation, the cost savings per renewal to FAA of

\$58.48 is multiplied by the number of renewals in 2027 (21,264) to arrive at \$1,243,518.

Table 4 also shows this value discounted at three and seven percent.

These cost savings are netted with one time cost of issuing a replacement mechanic certificate with IR. Table 6 shows the one-time cost of replacing the mechanic certificate with a mechanic certificate with an IR that would not require renewal under this proposal.

Table 6 – One-Time Cost of Issuing Replacement Mechanic Certificate with IR

Year	New IRs	Cost per IR	IR costs Undiscounted	IR costs (3% PV)	IR costs (7% PV)
2027	21,264	\$11.02	\$234,281	\$227,457	\$218,954

Though the proposal allows mechanics with IAs two years to request a replacement mechanic certificate, for simplicity, FAA assumes that all 21,264 replacement mechanic certificates with an IR would be requested in 2027. FAA estimates the cost of the physical mechanic certificate with an IR would be approximately \$2.20 per certificate.⁷⁰ FAA assumes it would take a mechanic approximately five minutes to learn about and request the replacement mechanic certificate with IR. The cost estimate uses the same mechanic hourly compensation rate discussed above. Further, FAA assumes it spends five minutes of document examiner time to review the application and issue the replacement mechanic certificate with IR. The cost for this labor time is \$4.69. FAA calculated its labor cost of \$4.13 per mechanic certificate with IR based on an hourly compensation rate of \$49.79 for a GS-10 step 5 in the 2025 locality pay tables for the rest of the U.S., including benefits equal to 36.25 percent of wages, multiplied by 0.08 hours.⁷¹ Therefore, the total cost per renewal is \$11.02.⁷² The undiscounted total cost for renewal, shown in Table 6, is arrived at by multiplying the cost per renewal, \$11.02, by the total renewals, 21,264, or \$234,281. The discounted cost totals are also shown in Table 6.

FAA finds that mechanics who hold an IA would realize a net cost savings of \$1.01 million over 10 years, discounted, and FAA would realize a net cost savings of \$4.44 million over 10 years, discounted. These savings result from reduced paperwork costs for mechanics with an IA replaced by an IR who would no longer need to fill out renewal forms and reduced labor costs to FAA that would no longer need to process the renewals. The net cost savings includes a minimal one-time cost of approximately \$0.22 million, discounted. This one-time cost covers the cost to the mechanics to submit a simple online form requesting a replacement mechanic certificate with an IR and to FAA for processing and sending out the replacement mechanic certificate with an IR.

B. Regulatory Flexibility Act

The Regulatory Flexibility Act (RFA) of 1980, (5 U.S.C. 601–612), as amended by the Small Business Regulatory Enforcement Fairness Act of 1996 (Pub. L. 104–121) and the Small Business Jobs Act of 2010 (Pub. L. 111–240), requires Federal agencies to consider the effects of the regulatory action on small business and other small entities and to minimize any significant economic impact. The term “small entities” comprises small businesses and not-for-profit organizations that are independently owned and operated and are not dominant in their fields, and governmental jurisdictions with populations of less than 50,000.

FAA expects that the proposed replacement of an IA that requires renewal every two years with an IR, which would not require renewal, would not have a “significant impact on a substantial number” of small entities. This proposal would save mechanics holding an IA time by eliminating the administrative process associated with the renewal requirement, which results in modest cost savings for each affected mechanic.

Therefore, FAA proposes to certify that the proposed rule would not have a significant economic impact on a substantial number of small entities. FAA welcomes comments on this cost assessment and proposed certification.

C. International Trade Impact Assessment

The Trade Agreements Act of 1979 (Pub. L. 96-39), as amended by the Uruguay Round Agreements Act (Pub. L. 103-465), prohibits Federal agencies from establishing standards or engaging in related activities that create unnecessary obstacles to the foreign commerce of the United States. Pursuant to these Acts, the establishment of standards is not considered an unnecessary obstacle to the foreign commerce of the United States, so long as the standard has a legitimate domestic objective, such as the protection of safety and does not operate in a manner that excludes imports that meet this objective.

The statute also requires consideration of international standards and, where appropriate, that they be the basis for U.S. standards.

FAA does not anticipate that this proposal would create an unnecessary obstacle to foreign commerce.

D. Unfunded Mandates Assessment

The Unfunded Mandates Reform Act of 1995 (2 U.S.C. 1531-1538) governs the issuance of Federal regulations that require unfunded mandates. An unfunded mandate is a regulation that requires a State, local, or Tribal government or the private sector to incur direct costs without the Federal government having first provided the funds to pay those costs. FAA determined that the proposed rule would not result in the expenditure of \$193,000,000 or more (\$100,000,000 adjusted for inflation using the most current Implicit Price Deflator for the Gross Domestic Product) by State, local, or Tribal governments, in the aggregate, or the private sector, in any one year.

E. Paperwork Reduction Act

The Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)) requires that FAA consider the impact of paperwork and other information collection burdens imposed on the public. According to the 1995 amendments to the Paperwork Reduction Act (5 CFR 1320.8(b)(2)(vi)), an agency may not collect or sponsor the collection of

information, nor may it impose an information collection requirement unless it displays a currently valid Office of Management and Budget (OMB) control number.

This action proposes a new one-time information collection under OMB Control Number 2120-0022 as an online form for IA holders to request a replacement mechanic certificate with an IR. This action also proposes to amend OMB Control Number 2120-0022 to reflect the elimination of the IA renewal requirement and the addition of a recent experience record-keeping requirement. After receipt of any comments, FAA will submit the proposed information collection amendments to OMB as required by the Paperwork Reduction Act of 1995 (44 U.S.C. 3507(d)).

Summary

The proposal would eliminate the requirement for mechanics with an IA to renew their IA in March of every odd-numbered year. Under current procedures, IA holders must be able to provide evidence with the renewal application that they continue to meet the initial eligibility requirements, as well as show fulfillment of the activity requirements.⁷³ The proposal would replace IAs with a mechanic certificate with an IR, converting the IA renewal requirement to recent experience requirements, thereby eliminating the renewal administrative process. To replace the IA with a mechanic certificate with an IR, the mechanic would fill out a one-time online form within two years of the effective date of the final rule. The mechanic would continue to maintain records of required recent experience for two years; however, they would no longer have to submit this evidence with a renewal application every two years.

As discussed in the preamble, the proposed changes would ensure safety while reducing paperwork burdens.

Respondents (including number of):

- 21,264 Mechanics with IAs would request replacement mechanic certificates with IRs.

- An average of 21,500 mechanics with IRs would need to maintain records for recent experience.

Frequency:

- Mechanic certificate with IR request would be one-time between the effective date of the final rule and 24 months after.
- Recent experience record keeping every year.

Annual Burden Estimates:

The annual burden estimate for the one-time mechanic certificate with IR request is listed in Table 6. It includes an estimated five minutes of mechanic time, five minutes of FAA document examiner time, and \$2.20 materials cost per mechanic certificate with IR. The wage data used for the calculations is presented with sources in Table 5.

Table 7 – One-time Annual Burden for Mechanic Certificate with IR

Year	Mechanic Cost Undiscounted	FAA Cost Undiscounted	Total Cost Undiscounted
2027	\$99,634	\$134,647	\$234,281

Table 3 presents the cost-savings from elimination of the IA renewal requirement.

Table 7 presents the burden estimate for the remaining recordkeeping requirement.

As detailed previously in section IV.A.7. of the preamble, the estimate assumes that mechanics with IR ratings would still spend five minutes annually on record-keeping.

The estimate uses the same hourly compensation rate for mechanics used in Table 3.

Table 8 – Continuing Recordkeeping Requirements

Average Number of Mechanics with IR	Time Burden per Mechanic (Hours)	Hourly Compensation Rate	Total Annual Burden
21,500	0.08	\$56.45	\$101,146

FAA is soliciting comments to—

(1) Evaluate whether the proposed information requirement is necessary for the proper performance of the functions of FAA, including whether the information would have practical utility;

(2) Evaluate the accuracy of FAA's estimate of the burden;

(3) Enhance the quality, utility, and clarity of the information to be collected; and

(4) Minimize the burden of collecting information on those who are to respond, including by using appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Individuals and organizations may send comments on the information collection requirement to the address listed in the **ADDRESSES** section at the beginning of this preamble by [INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]. Comments also should be submitted to the Office of Management and Budget, Office of Information and Regulatory Affairs, Attention: Desk Officer for FAA, New Executive Office Building, Room 10202, 725 17th Street, NW, Washington, DC 20053.

F. International Compatibility

In keeping with U.S. obligations under the Convention on International Civil Aviation, it is FAA policy to conform to International Civil Aviation Organization (ICAO) Standards and Recommended Practices to the maximum extent practicable. FAA has determined there are no ICAO Standards and Recommended Practices that correspond to these proposed regulations.

G. Environmental Analysis

The Department has analyzed the environmental impacts of this notice of proposed rulemaking pursuant to the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 et seq.). FAA has determined this proposal rule is categorically excluded pursuant to FAA Order 1050.1G. Categorical exclusions are categories of actions FAA

has determined normally do not significantly affect the quality of the human environment and therefore do not require either an environmental assessment (EA) or environmental impact statement (EIS).⁷⁴ In analyzing the applicability of a categorical exclusion, FAA must also consider whether extraordinary circumstances are present that would warrant the preparation of an EA or EIS.⁷⁵ This rulemaking, which would change a mechanic inspection authorization into an inspection rating, is categorically excluded pursuant to FAA Order 1050.1G, Appendix B, Paragraph B-2.6(f), which categorically excludes issuance of regulatory documents. FAA does not anticipate any environmental impacts, and there are no extraordinary circumstances present in connection with this rulemaking.

VI. E.O. Determinations

A. E.O. 13132, Federalism

FAA has analyzed this proposed rule under the principles and criteria of E.O. 13132, Federalism. FAA has determined this action would not have a substantial direct effect on the States, or the relationship between the Federal Government and the States, or on the distribution of power and responsibilities among the various levels of government, and, therefore, would not have federalism implications.

B. E.O. 13175, Consultation and Coordination With Indian Tribal Governments

Consistent with E.O. 13175, Consultation and Coordination with Indian Tribal Governments,⁷⁶ and FAA Order 1210.20, American Indian and Alaska Native Tribal Consultation Policy and Procedures,⁷⁷ FAA ensures Federally Recognized Tribes (Tribes) are given the opportunity to provide meaningful and timely input regarding proposed Federal actions that have the potential to affect uniquely or significantly their respective Tribes. At this point, FAA has not identified any unique or significant effects, environmental or otherwise, on Tribes resulting from this proposed rule.

C. E.O. 13211, Regulations That Significantly Affect Energy Supply, Distribution, or Use

FAA analyzed this proposed rule under E.O. 13211, Actions Concerning Regulations that Significantly Affect Energy Supply, Distribution, or Use (May 18, 2001). FAA has determined it would not be a “significant energy action” under the E.O. and would not be likely to have a significant adverse effect on the supply, distribution, or use of energy.

D. E.O. 13609, Promoting International Regulatory Cooperation

E.O. 13609, Promoting International Regulatory Cooperation, promotes international regulatory cooperation to (1) meet shared challenges involving health, safety, labor, security, environmental, and other issues and to reduce, eliminate, or (2) prevent unnecessary differences in regulatory requirements. FAA has analyzed this action under the policies and agency responsibilities of E.O. 13609 and has determined this action would have no effect on international regulatory cooperation.

E. E.O. 14192, Unleashing Prosperity Through Deregulation

This proposed rule, if finalized as proposed, is expected to be an E.O. 14192 deregulatory action.

VII. Additional Information

A. Comments Invited

FAA invites interested persons to participate in this rulemaking by submitting written comments, data, or views. FAA also invites comments relating to the economic, environmental, energy, or federalism impacts that might result from adopting the proposals in this document. The most helpful comments reference a specific portion of the proposal, explain the reason for any recommended change, and include supporting data. To ensure the docket does not contain duplicate comments, commenters should

submit only one time if comments are filed electronically, or commenters should send only one copy of written comments if comments are filed in writing.

FAA will file in the docket all comments it receives, as well as a report summarizing each substantive public contact with FAA personnel concerning this proposed rule. Before acting on this proposal, FAA will consider all comments it receives on or before the closing date for comments. FAA will consider comments filed after the comment period has closed if it is possible to do so without incurring expense or delay. FAA may change this proposal in light of the comments it receives.

B. Confidential Business Information

Confidential Business Information (CBI) is commercial or financial information that is both customarily and actually treated as private by its owner. Under the Freedom of Information Act (FOIA) (5 U.S.C. 552), CBI is exempt from public disclosure. If your comments responsive to this NPRM contain commercial or financial information that is customarily treated as private, that you actually treat as private, and is relevant or responsive to this NPRM, it is important you clearly designate the submitted comments as CBI. Please mark each page of your submission containing CBI as “PROPIN.” FAA will treat such marked submissions as confidential under the FOIA, and they will not be placed in the public docket of this NPRM. Submissions containing CBI should be sent to the person in the **FOR FURTHER INFORMATION CONTACT** section of this document. Any commentary FAA receives which is not specifically designated as CBI will be placed in the public docket for this rulemaking.

C. Electronic Access and Filing

A copy of this NPRM, all comments received, any final rule, and all background material may be viewed online at www.regulations.gov using the docket number listed above. Electronic retrieval help and guidelines are available on the website. It is available 24 hours each day, 365 days each year. An electronic copy of this document may also be

downloaded from the Office of the Federal Register's website at www.federalregister.gov and the Government Publishing Office's website at www.govinfo.gov. A copy may also be found at FAA's Regulations and Policies website at www.faa.gov/regulations_policies.

Copies may also be obtained by sending a request to the Federal Aviation Administration, Office of Rulemaking, ARM-1, 800 Independence Avenue SW, Washington, DC 20591, or by calling (202) 267-9677. Requesters must identify the docket or notice number of this rulemaking.

All documents FAA considered in developing this proposed rule, including economic analyses and technical reports, may be accessed in the electronic docket for this rulemaking.

D. Small Business Regulatory Enforcement Fairness Act

The Small Business Regulatory Enforcement Fairness Act of 1996 (Pub. L. 104 121, 110 Stat. 857, Mar. 29, 1996) requires FAA to comply with small entity requests for information or advice about compliance with statutes and regulations within its jurisdiction. A small entity with questions regarding this document may contact its local FAA official, or the person listed under the **FOR FURTHER INFORMATION CONTACT** heading at the beginning of the preamble. To find out more about SBREFA on the Internet, visit www.faa.gov/regulations_policies/rulemaking/sbre_act/.

¹ See section IV.A.7. for greater detail about FAA's risk evaluation in converting the renewal requirements into recent experience requirements.

² 14 CFR 65.85(a)

³ 14 CFR 65.87(a)

⁴ 14 CFR 1.1. A major repair is a repair that, (1) if improperly done, might appreciably affect weight, balance, structural strength, performance, powerplant operation, flight characteristics, or other qualities affecting airworthiness; or (2) that is not done according to accepted practices or cannot be done by elementary operations. A major alteration is an alteration not listed in the aircraft, aircraft engine, or propeller specifications that (1) might appreciably affect weight, balance, structural strength, performance, powerplant operation, flight characteristics, or other qualities affecting airworthiness; or (2) that is not done according to accepted practices or cannot be done by elementary operations.

⁵ Undesignated text in § 65.91 also restricts an applicant who fails such written test from applying for retesting until at least 90 days after the date of failure.

⁶ 14 CFR 65.92(a).

⁷ *Part 24-Mechanic and Repairman Certificates, Elimination of Annual Inspection of General Aircraft*, 21 FR 2586 (Apr. 20, 1956).

⁸ *Addition of Subchapter*, 27 FR 7954 (Aug. 6, 1962).

⁹ *Part 65 – Certification: Airmen Other Than Flight Crewmembers, Inspection Authorization*, 42 FR 46278 (Sep. 15, 1977).

¹⁰ *Id.* at 46279.

¹¹ *Inspection Authorization, Eligibility and Operational Requirements, NPRM*, 38 FR 3410 (Feb. 6, 1973).

¹² 42 FR at 46279.

¹³ *Issuance and Renewal of Inspection Authorization, final rule*, 50 FR 15700 (Apr. 19, 1985).

¹⁴ *Inspection Authorization 2-Year Renewal direct final rule; confirmation of effective date*, 72 FR 35151 (Jun. 27, 2007). See also, *Inspection Authorization 2-Year Renewal direct final rule, request for comments*, 72 FR 4400 (Jan. 30, 2007).

¹⁵ *Policy Clarifying Definition of “Actively Engaged” for Purposes of Inspector Authorization notice of proposed policy*, 75 FR 68249 (Nov. 5, 2010).

¹⁶ *Policy Clarifying Definition of “Actively Engaged” for Purposes of Inspector Authorization notice of policy; disposition of comments*, 76 FR 47058 (Aug. 4, 2011).

¹⁷ Table 2: 10 Year Net Savings in Millions of Dollars. See regulatory impact analysis discussion in section V.A of the preamble.

¹⁸ Source: FAA Airmen Certification Branch

¹⁹ *Removal of Expiration Date on a Flight Instructor Certificate: Additional Qualification Requirements to Train Initial Flight Instructor Applicants; and Other Provision, final rule*, 89 FR 80020 (Oct. 1, 2024)

²⁰ 14 CFR 65.91(c)(1).

²¹ 14 CFR 65.95(a).

²² Proposed § 65.81(b) would set forth IR limitations; proposed § 65.83(b) would set forth the IR recent experience requirements. These proposals are further discussed in section IV.A.6 and IV.A.7 of this preamble, respectively.

²³ 14 CFR 65.81(b).

²⁴ The reinstatement of privileges after recent experience lapse is further discussed in section IV.A.7.iii of this preamble.

²⁵ See www.amsrvs.registry.faa.gov/amsrvs

²⁶ 49 U.S.C. 44703, 44709. The Pilots Bill of Rights provided with the IA application, FAA Form 8610-1, states that the information submitted on this form will be used by the Administrator of FAA as part of the basis for issuing an airmen certificate, rating, or inspection authorization under 49 U.S.C. 44703(a).

²⁷ 49 U.S.C. 44703, 44709.

²⁸ 76 FR 47058.

²⁹ The NTSB has reviewed actions on IA applications in the past. See, e.g., *Whetsel*, 4 NTSB 1863 (1984), *Petition of Deville*, NTSB Order No. EA-5095 (2004). In addition, FAA Order 2150.3C, FAA Compliance and Enforcement Program, treats an action on an IA application as appealable to the NTSB.

³⁰ The primary purpose of the notice of policy was to provide notice that FAA clarified the definition of “actively engaged” for the purposes of application and renewal of an IA and update FAA Order 8900.1 to reflect the clarified definition. This clarified definition remains correct. Therefore, FAA is only correcting the portion of the notice as it applies to the discussion of actions on an IA application.

³¹ 14 CFR 65.71(a)(2). An applicant for a mechanic certificate that does not read, write, speak, or understand English, but is employed outside of the United States by a U.S. air carrier, have his certificate endorsed “Valid outside the United States.”

³² As previously stated, an applicant for an IA must hold a currently effective mechanic certificate with both an airframe rating and a powerplant rating, each of which is currently effective and has been in effect for a total of at least 3 years; therefore, applicants for an IA will have de facto met eligibility requirements in current § 65.71.

³³ See Legal Interpretation to Sean Conlin (Feb. 2000).

³⁴ The three years do not have to be consecutive; the 1985 rulemaking revised the regulation to remove the prior continuously effective requirement, discussed in section III.A of the preamble. For example, a suspension in the prior 3 years is not disqualifying for an IA so long as the applicant’s mechanic certificate and A&P ratings are currently effective and have been in effect for a cumulative total of three years.

³⁵ FAA Order 8900.1, volume 1, chapter 5, provides a definition of “actively engaged.” See 76 FR 47058. “Actively engaged” means having an active role in exercising the privileges of a mechanic certificate with A&P ratings in the maintenance of certificated aircraft. Applicants who inspect, overhaul, repair, preserve, or replace parts on aircraft, or who supervise (i.e., direct and inspect) those activities, are actively engaged. FAA will continue to use the same definition of “actively engaged” as outlined in this notice of policy and revised in FAA Order 8900.1. FAA recognizes the notice refers to an inspection authorization and the associated regulations, which this proposal would eliminate. However, the definition of “actively engaged” would apply without revision to the proposed inspection rating, and FAA Order 8900.1 would be updated for the updated terminology of “inspection rating.”

³⁶ 14 CFR 65.75(c) permits an applicant for a mechanic certificate or rating to take the mechanic general written test prior to meeting the applicable experience requirements of § 65.77, provided the applicant presents an authenticated document from a certificated aviation maintenance technician school that demonstrates satisfactory completion of the general portion of the school’s curriculum and specifies the completion date.

³⁷ FAA Order 8900.1, volume 5, chapter 5, section 7.

³⁸ 14 CFR 24.43-1 (1956).

³⁹ The privileges and responsibilities of the IA in comparison to the A&P ratings is discussed in the introduction to section III of the preamble.

⁴⁰ *Learning Statement Reference Guide for Airmen Knowledge Testing*, available at www.faa.gov/training_testing/testing/media/LearningStatementReferenceGuide.pdf

⁴¹ FAA Order 8900.1, volume 5, chapter 5, section 8, paragraph 5-1314C.

⁴² *Aviation Maintenance Technician Schools, interim final rule*, 87 FR 31391 (May 24, 2022).

⁴³ *Airman Certification Standards and Practical Test Standards for Airmen; Incorporation by Reference final rule*, 89 FR 22482 (Apr. 1, 2024).

⁴⁴ The APA includes requirements for publishing notices and providing opportunities for public comment of proposed and final rules in the *Federal Register*. See 5 U.S.C. 553(b).

⁴⁵ 5 U.S.C. 552(a), which states, “except to the extent that a person has actual or timely notice of the terms thereof, a person may not in any manner be required to resort to, or be adversely affected by, a matter required to be published in the *Federal Register* and not so published. For the purpose of this paragraph, matter reasonably available to the class of persons affected thereby is deemed published in the *Federal Register* when incorporated by reference therein with the approval of the Director of the Federal Register.”

⁴⁶ Section 552(a) requires that matter incorporated by reference be “reasonably available” as a condition of its eligibility. Further, 1 CFR 51.5(b)(2) requires that agencies seeking to incorporate material by reference discuss in the preamble of the final rule, the ways that the material it incorporates by reference are reasonably available to interested parties, and how interested parties can obtain the material.

⁴⁷ See 87 FR 31391 (adopting new § 65.23 with the Mechanic ACS and PTS) and 89 FR 22482 (adding the Aircraft Dispatcher PTS and Parachute Rigger PTS).

⁴⁸ See § 61.91.

⁴⁹ FAA acknowledges that the Modernization of Special Airworthiness Certification (MOSAIC) rulemaking also proposes amendments to § 65.81. *See MOSAIC*, NPRM, 88 FR 47650 (Jul. 24, 2023). If adopted, this final rule will reconcile any changes to this regulation consistent with those made with in the MOSAIC final rule.

⁵⁰ This proposal would relocate § 65.91(c)(3) and (4) to § 65.71(b)(3) and (4), discussed in section IV.A.2 of the preamble.

⁵¹ Part 91 governs the general operating and flight rules, part 129 governs the operations of foreign air carriers and foreign operators of U.S.-registered aircraft engaged in common carriage, and part 135 governs the operations and persons on board commuter and on demand operations.

⁵² These options are: served as a mechanic under his certificate and rating; technically supervised other mechanics; supervised, in an executive capacity, the maintenance or alteration of aircraft; or been engaged in a combination of any of those options.

⁵³ As previously stated, this is also consistent with other airman certificates, such as recent flight experience requirements for pilots in command (§ 61.57) and certificated flight instructors (§ 61.197).

⁵⁴ This hypothetical assumes that the certificated mechanic has had their IR for more than a year and the proposed rule became effective more than six months prior to June 2027.

⁵⁵ Legal Interpretation to Jerry Rhein (March 17, 1995).

⁵⁶ In this hypothetical, FAA assumes that the final rule has been in effect for more than a year.

⁵⁷ 14 CFR 65.93(a).

⁵⁸ *Id.*

⁵⁹ 38 FR 3410.

⁶⁰ *See* 42 FR 46278.

⁶¹ Inspection Authorization Information Guide, available at www.faa.gov/training_testing/testing/ia_info_guide.pdf.

⁶² 89 FR 80020

⁶³ See section IV.A.7 of the preamble for a detailed discussion.

⁶⁴ Section 1.1. Examples include: single engine; multiengine; land; water; gyroplane; helicopter; airship; and free balloon.

⁶⁵ *Id.* Examples include: airplane; rotorcraft; glider; balloon; landplane; and seaplane.

⁶⁶ Section 1.1 defines category, as used with respect to the certification, ratings, privileges, and limitations of airmen, as a broad classification of aircraft. Examples include: airplane; rotorcraft; glider; and lighter-than-air.

⁶⁷ 88 FR 47650, 47694.

⁶⁸ Source: U.S. Bureau of Labor Statistics, Occupational Employment and Wage Statistics, May 2024, 49-3011 Aircraft Mechanics and Service Technicians. Accessed 4-10-2025 at: www.bls.gov/oes/2024/may/oes493011.htm. To calculate hourly compensation, FAA used the BLS estimate that benefits are 29.5% of total compensation. Accessed 4-10-2025 at: www.bls.gov/news.release/archives/ecec_03142025.pdf.

⁶⁹ Based on GS-13 step 5 hourly wage of \$57.23 in the 2025 locality pay table for the rest of the U.S. To obtain the total hourly compensation rate the analysis multiplies the hourly wage by 1.3625 to reflect government benefits equal to 36.25% of wages. www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/RUS_h.aspx. Memorandum for the Heads of Executive Departments and Agencies, Office of Management and Budget, March 11, 2008. www.obamawhitehouse.archives.gov/sites/default/files/omb/assets/omb/memoranda/fy2008/m08-13.pdf.

⁷⁰ These cost estimates are based off data from FAA's Comprehensive Airmen Information System.

⁷¹ Based on GS-10 step 5 hourly wage of \$36.54 in the 2025 locality pay table for the rest of the U.S. To obtain the total hourly compensation rate the analysis multiplies the hourly wage by 1.3625 to reflect government benefits equal to 36.25% of wages. www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/25Tables/html/RUS_h.aspx.

wages/salary-tables/25Tables/html/RUS_h.aspx.

www.obamawhitehouse.archives.gov/sites/default/files/omb/assets/omb/memoranda/fy2008/m08-13.pdf
Memorandum for the Heads of Executive Departments and Agencies, Office of Management and Budget,
March 11, 2008.

⁷² \$2.20 + \$4.69 + \$4.13 = \$11.02

⁷³ Section 65.93(a).

⁷⁴ See DOT Order 5610.1D § 9.

⁷⁵ Id. § 9(b).

⁷⁶ 65 FR 67249 (Nov. 6, 2000).

⁷⁷ FAA Order No. 1210.20 (Jan.28, 2004), available at www.faa.gov/documentLibrary/media/1210.pdf.

List of Subjects

14 CFR Part 43

Aircraft, Aviation safety, Reporting and recordkeeping requirements.

14 CFR Part 61

Aircraft, Airmen, Alcohol abuse, Aviation safety, Drug abuse, Recreation and recreation areas, Reporting and recordkeeping requirements, Security measures, Teachers.

14 CFR Part 65

Air traffic controllers, Aircraft, Airmen, Airports, Alcohol abuse, Aviation safety, Drug abuse, Reporting and recordkeeping requirements, Security measures.

14 CFR Part 91

Afghanistan, Agriculture, Air carriers, Air taxis, Air traffic control, Aircraft, Airmen, Airports, Alaska, Aviation safety, Canada, Charter flights, Cuba, Drug traffic control, Ethiopia, Freight, Iran, Iraq, Libya, Mexico, Noise control, North Korea, Political candidates, Reporting and recordkeeping requirements, Security measures, Somalia, Syria, Transportation, Yemen, Yugoslavia.

14 CFR Part 147

Aircraft, Airmen, Educational facilities, Reporting and recordkeeping requirements, Schools.

The Proposed Amendment

For the reasons discussed in the preamble, the Federal Aviation Administration proposes to amend chapter I of title 14, Code of Federal Regulations as follows:

PART 43—MAINTENANCE, PREVENTIVE MAINTENANCE, REBUILDING, AND ALTERATION

1. The authority citation for part 43 continues to read as follows:

Authority: 42 U.S.C. 7572; 49 U.S.C. 106(f), , 40105, 40113, 44701-44702, 44704, 44707, 44709, 44711, 44713, 44715, 45303.

2. Amend § 43.7 by revising paragraph (b) to read as follows:

§ 43.7 Persons authorized to approve aircraft, airframes, aircraft engines, propellers, appliances, or component parts for return to service after maintenance, preventive maintenance, rebuilding, or alteration.

* * * * *

(b) The holder of a mechanic certificate may approve an aircraft, airframe, aircraft engine, propeller, appliance, or component part for return to service as provided in Part 65 of this chapter.

* * * * *

PART 61—CERTIFICATION: PILOTS, FLIGHT INSTRUCTORS, AND GROUND INSTRUCTORS

3. The authority citation for part 61 continues to read as follows:

Authority: 49 U.S.C. 106(f), 40113, 44701-44703, 44707, 44709-44711, 44729, 44903, 45102-45103, 45301-45302; Sec. 2307, Pub. L. 114-190, 130 Stat. 615 (49 U.S.C. 44703 note); sec. 318, Pub. L. 115-254, 132 Stat. 3186 (49 U.S.C. 44703 note); sec. 820, Pub. L. 118-63, 138 Stat. 1330 (49 U.S.C. 44939 note); secs. 815 and 828, Pub. L. 118-63, 138 Stat. 1328, 1336 (49 U.S.C. 44703 note).

4. Amend § 61.40 by revising paragraphs (a), (a)(6), (b)(2)(i), and (b)(3) to read as follows:

§ 61.40 Relief for U.S. Military and civilian personnel who are assigned outside the United States in support of U.S. Armed Forces operations.

(a) *Relief.* A person who satisfies the requirements of paragraph (b) of this section may use the following documents to demonstrate eligibility to renew a flight instructor certificate, establish recent flight instructor experience, or take a practical test, as appropriate:

* * * * *

(6) An expired written test report to show eligibility to take a practical test required under part 65 of this chapter.

(b) * * *

(2) * * *

(i) The person's flight instructor certificate issued before December 1, 2024, or airman written test report expired; or

(ii) * * *

(3) The person complies with § 61.197 of this chapter, as appropriate, or completes the appropriate practical test within 6 calendar months after returning to the United States.

* * * * *

PART 65—CERTIFICATION: AIRMEN OTHER THAN FLIGHT CREWMEMBERS

5. The authority citation of part 65 continues to read as follows:

Authority: 49 U.S.C. 106(f), 40113, 44701-44703, 44707, 44709-44711, 45102-45103, 45301-45302.

6. Revise § 65.11(a) to read as follows:

§ 65.11 Application and issue.

(a) Application for a certificate and appropriate rating, or for an additional rating, under this part must be made on a form and in a manner prescribed by the Administrator. Each person who applies for airmen certification services to be administered outside the United States or for any certificate or rating issued under this part must show evidence that the fee prescribed in appendix A of part 187 of this chapter has been paid.

* * * * *

7. Revise § 65.19 to read as follows:

§ 65.19 Retesting after failure.

(a) Except as specified in paragraph (b) of this section, an applicant for a written, oral, or practical test for a certificate and rating, or for an additional rating under this part, may apply for retesting—

(1) After 30 days after the date the applicant failed the test; or

(2) Before the 30 days have expired if the applicant presents a signed statement from an airman holding the certificate and rating sought by the applicant, certifying that the airman has given the applicant additional instruction in each of the subjects failed and that the airman considers the applicant ready for retesting.

(b) An applicant who fails the written test for an inspection rating prescribed by § 65.75(b) of this part may not apply for retesting until at least 90 days after the date of the failed test.

8. Amend § 65.23 by adding paragraph (a)(4) to read as follows.

§ 65.23 Incorporation by reference.

* * * * *

(a) * * *

(4) FAA-S-ACS-34, Aviation Mechanic Inspection Rating Certification Standards, (insert approval date), IBR approved for §§ 65.75 and 65.83.

* * * * *

9. Revise § 65.71 to read as follows:

§ 65.71 Eligibility requirements: General.

(a) Airframe or Powerplant Rating.

(1) To be eligible for a mechanic certificate with an airframe or powerplant rating, or both, a person must—

(i) Be at least 18 years of age;

(ii) Be able to read, write, speak, and understand the English language, or in the case of an applicant who does not meet this requirement and who is employed outside of the

United States by a U.S. air carrier, have his certificate endorsed “Valid only outside the United States;”

(iii) Have passed all of the prescribed tests within a period of 24 calendar months; and

(iv) Comply with the sections of this subpart that apply to the rating the applicant seeks.

(2) A certificated mechanic who applies for an additional airframe or powerplant rating must meet the requirements of § 65.77 and, within a period of 24 calendar months, pass the tests prescribed by §§ 65.75(a) and 65.79 for the additional rating sought, except as provided in § 65.75(a)(4).

(b) **Inspection Rating.** To be eligible for an inspection rating on a person’s mechanic certificate, a person must –

(1) Hold a mechanic certificate with both an airframe rating and a powerplant rating currently effective in accordance with § 65.15(a) of this part and has been in effect for a total of at least 3 years;

(2) Have been actively engaged, for at least the 24 calendar month period before the date of application, in maintaining aircraft certificated and maintained in accordance with this chapter;

(3) Have a fixed base of operations where he may be located in person or by telephone during a normal working week but it need not be the location where the privileges of the inspection rating will be exercised;

(4) Have available to him the equipment, facilities, and inspection data necessary to inspect airframes, powerplants, propellers, or any related part or appliance properly; and

(5) Comply with the sections of this subpart that apply to the rating the applicant seeks.

10. Amend § 65.73 by adding paragraphs (a)(3), (c), (d), and (e) to read as follow:

§ 65.73 Ratings.

(a) * * *

(3) Inspection.

(b) * * *

(c) A certificated mechanic with an inspection authorization that was valid on [EFFECTIVE DATE OF THE FINAL RULE] may exercise the privileges of an inspection rating in accordance with § 65.88 until [24 MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE] if they comply with the limitations and recent experience requirements prescribed in §§ 65.81(b) and 65.83(b).

(d) A certificated mechanic with an inspection authorization valid on [EFFECTIVE DATE OF THE FINAL RULE] is entitled to a replacement mechanic certificate with an inspection rating.

(e) A certificated mechanic with an inspection authorization that was valid on [EFFECTIVE DATE OF THE FINAL RULE] that has not obtained a replacement mechanic certificate as described in paragraph (d) of this section may not exercise the privileges of an inspection rating after [24 MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE]. After this date, a person may resume exercising the privileges of an inspection rating once they have obtained a mechanic certificate with an inspection rating and comply with the limitations and recent experience requirements prescribed in §§ 65.81(b) and 65.83(b).

11. Effective [24 MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE], amend § 65.73 further by:

a. removing paragraph (c); and

b. redesignating paragraphs (d) and (e) as paragraphs (c) and (d) to read as follows:

§ 65.73 Ratings.

* * * * *

(b) * * *

(c) A certificated mechanic with an inspection authorization valid on [EFFECTIVE DATE OF THE FINAL RULE] is entitled to a replacement mechanic certificate with an inspection rating.

(d) A certificated mechanic with an inspection authorization that was valid on [EFFECTIVE DATE OF THE FINAL RULE] that has not obtained a replacement mechanic certificate as described in paragraph (d) of this section may not exercise the privileges of an inspection rating after [24 MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE]. After this date, a person may resume exercising the privileges of an inspection rating once they have obtained a mechanic certificate with an inspection rating and comply with the limitations and recent experience requirements prescribed in §§ 65.81(b) and 65.83(b).

12. Revise § 65.75 to read as follows:

§ 65.75 Knowledge requirements.

(a) **Airframe or Powerplant Rating.** Applicants for a mechanic certificate with an airframe or powerplant rating, or both, or applicants for an additional airframe or powerplant rating:

(1) Must, except as specified in paragraph (a)(3) of this section, after meeting the applicable experience requirements of § 65.77, pass a written test, appropriate to the rating sought, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standards (incorporated by reference, see § 65.23), as appropriate to the rating sought.

(2) Must pass each section of the test before applying for the oral and practical tests prescribed by § 65.79. A report of the written test is sent to the applicant.

(3) May take the mechanic general written test prior to meeting the applicable experience requirements of § 65.77, provided the applicant presents an authenticated document from a certificated aviation maintenance technician school that demonstrates satisfactory

completion of the general portion of the school's curriculum and specifies the completion date.

(4) Are eligible to take a practical test for a mechanic certificate or rating under this part with an expired written test report in accordance with § 61.40 of this chapter.

(b) **Inspection Rating.** Applicants for an inspection rating must —

(1) Receive an endorsement from a representative of the Administrator that the applicant meets the requirements of § 65.71(b)(1) through (4) and has not attempted the inspection rating written test within the previous 90 days; and

(2) Within 30 days of receiving the endorsement set forth in paragraph (b)(1) of this section, pass a written test, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certifications Standards (incorporated by reference, see § 65.23).

13. Amend § 65.77 by revising the introductory text to read as follows:

§ 65.77 Experience requirements.

Each applicant for a mechanic certificate with an airframe or powerplant rating, or both, or an additional airframe or powerplant rating must present either—

* * * * *

14. Revise § 65.79 to read as follows:

§ 65.79 Skills requirements.

Each applicant for a mechanic certificate with an airframe or powerplant rating, or both, or an additional airframe or powerplant rating must pass an oral test and a practical test, as appropriate to the rating sought, by demonstrating satisfactory understanding of the knowledge, risk management, and skill elements for each subject contained in the Aviation Mechanic General, Airframe, and Powerplant Airmen Certification Standards (incorporated by reference, see § 65.23), as appropriate to the rating sought.

15. Revise § 65.81 to read as follows:

§ 65.81 Privileges and limitations.

(a) General Privileges and Limitations.

(1) A certificated mechanic may perform or supervise the maintenance, preventive maintenance or alteration of an aircraft or appliance, or a part thereof, for which he is rated (but excluding major repairs to, and major alterations of, propellers, and any repair to, or alteration of, instruments), and may perform additional duties in accordance with §§ 65.85, 65.87, and 65.88. However, he may not supervise the maintenance, preventive maintenance, or alteration of, or approve for return to service, any aircraft or appliance, or part thereof, for which he is rated unless he has satisfactorily performed the work concerned at an earlier date. If he has not so performed that work at an earlier date, he may demonstrate the ability to do it by performing it to the satisfaction of the Administrator or under the direct supervision of a certificated and appropriately rated mechanic, or a certificated repairman, who has had previous experience in the specific operation concerned.

(2) A certificated mechanic may not exercise the privileges of his certificate and rating(s) unless he understands the current instructions of the manufacturer, and the maintenance manuals, for the specific operation concerned.

(b) Inspection Rating Limitations.

(1) A certificated mechanic with an inspection rating may exercise the privileges of that rating only while he holds a mechanic certificate with both airframe and powerplant ratings that are effective in accordance with § 65.15(a).

(2) A certificated mechanic with an inspection rating may not exercise the privileges of the rating if that person does not meet the requirements of § 65.71(b)(3) and (4).

(3) If a certificated mechanic with an inspection rating changes his fixed base of operation required by § 65.71(b)(3), he must notify, in writing, the responsible Flight

Standards office or International Field Office for the area in which the new base is located before exercising the privileges of the inspection rating.

16. Revise § 65.83 to read as follows:

§ 65.83 Recent experience requirements.

(a) **Airframe or Powerplant Rating.** A certificated mechanic may not exercise the privileges of his certificate and rating unless, within the preceding 24 months—

(1) The Administrator has found that he is able to do that work; or

(2) He has, for at least 6 months—

(i) Served as a mechanic under his certificate and rating;

(ii) Technically supervised other mechanics;

(iii) Supervised, in an executive capacity, the maintenance or alteration of aircraft; or

(iv) Been engaged in any combination of paragraph (a)(2)(i), (ii), or (iii) of this section.

(b) Inspection Rating.

(1) A person may not exercise the privileges of the inspection rating unless they have been actively engaged in maintaining aircraft certified and maintained in accordance with this chapter for the 24 calendar month period prior to when they exercise their inspection rating privileges.

(2) Except as provided in (b)(3) and (7) of this section, no person may exercise the privileges of the inspection rating unless within the previous 12 calendar months one of the following activities has been completed:

(i) Performed at least four annual inspections;

(ii) Performed at least eight major repairs or major alterations, including any combination thereof;

(iii) Performed or supervised and approved at least one progressive inspection in accordance with standards prescribed by the Administrator;

(iv) Attended and successfully completed a refresher course, acceptable to the Administrator, of not less than 8 hours of instruction; or

(v) Passed an oral test by an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of applicable regulations and standards is current.

(3) A person does not have to meet the requirements of paragraph (b)(2) of this section to exercise the privileges of the inspection rating during the 12 calendar months following original issuance of the inspection rating. Replacement of a mechanic certificate for a mechanic certificate with an inspection rating under § 65.73(d) or (e) is not considered an original issuance of the inspection rating.

(4) A certificated mechanic with an inspection rating who does not meet the requirements set forth in paragraph (b)(2) of this section may not exercise the privileges of the rating, until they have:

(i) Attended and successfully completed a refresher course(s), acceptable to the Administrator, of not less than 8 hours of instruction; or

(ii) Passed an oral test from an FAA inspector, which includes the aeronautical knowledge subject areas contained in the Aviation Mechanic Inspection Rating Airman Certification Standards (incorporated by reference, see § 65.23), to determine that the applicant's knowledge of the applicable regulations and standards is current.

(5) A certificated mechanic with inspection rating who completes the requirements of paragraph (b)(4) of this section is deemed to have completed the requirements of paragraph (b)(2) of this section.

(6) A certificated mechanic with inspection rating must maintain records to demonstrate completion of the recent experience requirements in paragraphs (b)(1) through (b)(4) of

this section, as applicable, and present them to a representative of the Administrator upon request. The records must be retained for at least 2 years.

(7) If a person holds a valid inspection authorization on [EFFECTIVE DATE OF THE FINAL RULE], the person is not required to meet the requirements of paragraph (b)(2) until [SIX MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE].

17. Effective [SIX MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE],
amend § 65.83 further by:

a. removing “and (7)” from paragraph (b)(2); and

b. removing paragraph (b)(7) to read as follows:

§ 65.83 Recent experience requirements

* * * * *

(b) * * *

(2) Except as provided in (b)(3) of this section, no person may exercise the privileges of the inspection rating unless within the previous 12 calendar months one of the following activities has been completed:

* * * * *

18. Add § 65.88 to read as follows:

§ 65.88 Inspection rating; additional privileges.

A certificated mechanic with an inspection rating may—

(a) Inspect and approve for return to service any aircraft or related part or appliance

(except any aircraft maintained in accordance with a continuous airworthiness maintenance program under parts 91, 121, 129, or 135 of this chapter) after a major repair or major alteration to it in accordance with part 43 of this chapter, if the work was done in accordance with technical data approved by the Administrator; and

(b) Perform an annual inspection, or perform or supervise a progressive inspection according to §§ 43.13 and 43.15 of this chapter.

19. Amend § 65.89 by redesignating the introductory text as paragraph (a) and adding paragraph (b) to read as follows:

§ 65.89 Display of certificate.

(a) Each person who holds a mechanic certificate shall keep it within the immediate area where he normally exercises the privileges of the certificate and shall present it for inspection upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer.

(b) Each person exercising the privileges of a mechanic certificate with an inspection rating that has not yet obtained a replacement mechanic certificate with inspection rating per § 65.73(d) must, upon request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer, present documentary evidence of an inspection authorization that was valid on [EFFECTIVE DATE OF THE FINAL RULE].

20. Effective [24 MONTHS AFTER EFFECTIVE DATE OF THE FINAL RULE], amend § 65.89 further by:

- a. removing paragraph (b); and
- b. redesignating paragraph (a) as an independent paragraph under § 65.89 to read as follows:

§ 65.89 Display of certificate.

Each person who holds a mechanic certificate shall keep it within the immediate area where that person normally exercises the privileges of the certificate and shall present it for inspection upon the request of the Administrator or an authorized representative of the National Transportation Safety Board, or of any Federal, State, or local law enforcement officer.

21. Remove and reserve § 65.91.

§ 65.91 [Removed and Reserved]

22. Remove and reserve § 65.92.

§ 65.92 [Removed and Reserved]

23. Remove and reserve § 65.93.

§ 65.93 [Removed and Reserved]

24. Remove and reserve § 65.95.

§ 65.95 [Removed and Reserved]

PART 91—GENERAL OPERATING AND FLIGHT RULES

25. The authority citation for part 91 continues to read as follows:

Authority: 49 U.S.C. 106(f), 40101, 40103, 40105, 40113, 40120, 44101, 44111, 44701, 44704, 44709, 44711, 44712, 44715, 44716, 44717, 44722, 46306, 46315, 46316, 46504, 46506-46507, 47122, 47508, 47528-47531, 47534; Pub. L. 114-190, 130 Stat. 615 (49 U.S.C. 44703 note); Sec. 828 of Pub. L. 118-63, 138 Stat. 1330 (49 U.S.C. 44703 note); articles 12 and 29 of the Convention on International Civil Aviation (61 Stat. 1180), (126 Stat. 11).

26. Amend § 91.409 by revising paragraph (d)(1) to read as follows:

* * * * *

(d) * * *

(1) A certificated mechanic eligible to exercise the privileges of an inspection rating, a certificated airframe repair station, or the manufacturer of the aircraft to supervise or conduct the progressive inspection;

* * * * *

PART 147—AVIATION MAINTENANCE TECHNICAIN SCHOOLS

27. The authority citation for part 147 is revised to read as follows:

Authority: 49 U.S.C. 106(f), 40113, 44701-44702, 44707-44709; Sec. 135, Pub. L. 116-260, 134 Stat. 1182.

28. Amend § 147.5 by revising paragraph (b)(2) to read as follows:

* * * * *

(b) * * *

(1) * * *

(2) A description of the manner in which the school's curriculum will ensure the student has the knowledge and skills necessary for attaining a mechanic certificate and associated airframe or powerplant rating, or both, under subpart D of part 65 of this chapter;

* * * * *

Issued under authority provided by 49 U.S.C. 106(f), 44701(a), and 44703 in
Washington, DC.

Hugh J. Thomas,
Executive Director, Flight Standards Service

[FR Doc. 2026-13282 Filed: 6/30/2026 8:45 am; Publication Date: 7/1/2026]