

February 29, 2024

Jason Miller recently brought to my attention that AC 91-67A is now available. We have been waiting for the FAA to provide this guidance since the previous version was canceled in 2017. During that time, we have been operating in somewhat of a gray area when it comes to flying with inoperative equipment. This AC makes it clear as to what the FAA expects pilots to do and not do.

I've included a few snippets in the attached graphic and underlined the parts I think GA pilots need to pay attention to. Please read the entire AC at:

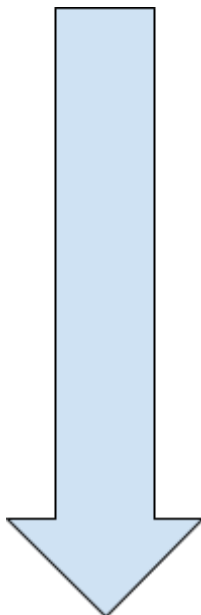
https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_91-67A.pdf

Even though ACs "do not have the force and effect of law," it is important that we teach pilots the practicality of following all FAA guidance. Like many things in aviation, no one is going to care about the details of what was or was not done until there is an accident or incident that includes a thorough investigation. Then the lawyers get involved and EVERYONE cares about the details. If a pilot chooses to not follow FAA guidance that is clearly spelled out in an AC, they are going to have a difficult time explaining their way out of that situation.

Please help share this important information.

Jim Pitman
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Select sections from AC 91-67A

Please read the entire document for complete information.

4.2 Removal, Deactivation, and Placarding. When an operator elects to operate without an MEL, any inoperative instrument or equipment items must either be repaired, removed, deactivated, or inspected, and then placarded. Repair, removal, deactivation, or inspection must be performed by a person authorized to perform aircraft maintenance in accordance with § 43.3.

4.2.1 Removal. Removal of any item requires an appropriately authorized person under § 43.7 to:

- Properly record the removal of the item in maintenance records in accordance with § 43.9;
 - Properly adjust the aircraft's W&B information and equipment list, if required;
 - Placard the cockpit controls or indicators, as appropriate;
 - Complete and submit an FAA Form 337, Major Repair and Alteration (Airframe, Powerplant, Propeller, or Appliance), as appropriate; and
 - Approve the aircraft for return to service, as appropriate.
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4.2.2 Deactivation. When an item is "deactivated" or "secured," or both, the specified item must be put into an acceptable condition for safe flight. Deactivation may involve more than simply turning off a system switch, which does not remove power from the system. Deactivation may involve pulling and securing the circuit breaker and/or removing the equipment. Deactivation of an inoperative system is not preventive maintenance as described in part 43 appendix A. Regardless of the method of deactivation, a person authorized to approve the aircraft for return to service under § 43.7 must make the maintenance record entry required by § 43.9. No person may operate the aircraft without the entry required by § 43.9.

- Only appropriately qualified maintenance personnel may conduct procedures requiring specialized knowledge or skill, or requiring the use of tools or test equipment. The satisfactory accomplishment of all maintenance procedures, regardless of who performs them, is the responsibility of the operator.
 - An appropriately authorized person must accomplish the deactivation.
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4.3 Continued Operation with Inoperative Items. The operator of the aircraft must ensure any inoperative instrument or item of equipment, permitted to be inoperative by § 91.213(d)(2), is repaired, replaced, removed, or inspected at the next required inspection, and when listed discrepancies include inoperative instruments or equipment, shall ensure that a placard has been installed, as required by § 43.11.