



# Federal Aviation Administration

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## Memorandum

Date: SEP 01 2017

To: John S. Duncan, Executive Director, Flight Standards Service, AFX-1 *JSD*

From: Leisha Bell, Chair, Regulatory Consistency Communication Board (RCCB)

Subject: RCCB Decision: PC-12 compliance with §135.163(f)

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### Action Required

Concur or non-concur with comment on the resolutions facilitated by the Regulatory Consistency Communication Board (RCCB).

This memo serves as documentation of the actions taken to address the issues described below. This memo is not a policy document. Refer to current guidance for decision-making support.

### Summary

On March 31, 2017, Mountain High Aviation submitted an issue to the RCCB. The question dealt with whether the PC-12 meets the requirements of §135.163(f), Equipment requirements: Aircraft carrying passengers under instrument flight rules (IFR), and concern that the FAA was not currently reviewing operator-specific procedures to demonstrate compliance with §135.163(f).

### Background

On August 6, 1997, the FAA published the final rule which expanded the provisions to conduct IFR passenger-carrying operations in single engine aircraft (SEIFR). This rule added additional requirements, and an aircraft certificated under part 23 does not automatically meet the §135.163(f) requirements for SEIFR. Although we have issued multiple notices with guidance on compliance with §135.163(f), there has been inconsistent implementation that has persisted into the present time regarding some models of the Pilatus PC-12 airplane across the country. This includes OpSpec A046 denials/removal/appeals and Consistency and Standardization Initiatives regarding the legacy Pilatus (serial numbers 101 through 888).

### Actions Taken

As a result of these inconsistencies, AFS-200 has worked diligently with the Kansas City Aircraft Evaluation Group (MKC-AEG), the Small Airplane Directorate (SAD) and industry

(notably the General Aircraft Manufacturers Association and the National Air Transportation Association) over the past year. As a result of this work, we have determined a methodology by which the legacy Pilatus airplanes will likely comply with the requirements for SEIFR through §135.163(f)(2). This work culminated with the publication of the following new/revised documents on August 4, 2017:

- Information for Operators (InFO) 17011
- Notice 8900.428
- FAA Order 8900.1 Volume 3, Chapter 18, Section 3
- FAA Order 8900.1 Volume 4, Chapter 16, Section 1

Additionally, we held an outreach session with field inspectors on August 9, 2017. The targeted audience was supervisors and Principal Inspectors (PI) with oversight of certificate holders operating or desiring to operate legacy Pilatus airplanes.

Finally, replies were sent to those operators that filed appeals to AFX-1 as a result of removal of OpSpec A046 apprising them of the new/updated guidance and requesting that they work with their PI to see if A046 can be re-issued.

Concur: John Banzetta

Non-Concur: \_\_\_\_\_

Date: 9/1/17

John S. Duncan  
Executive Director, Flight Standards Service