

CHAPTER 101. CONDUCT A FEDERAL AVIATION REGULATIONS (FAR) PART 133 BASE INSPECTION

SECTION 1. BACKGROUND

1. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) ACTIVITY CODE: 1635

3. OBJECTIVE. The objective of this task is to determine whether an applicant meets the FAR Part 133 regulatory requirements for initial certification, or whether an applicant continues to be able to conduct operations in compliance with the FAR. Successful completion of this task results in either a satisfactory or an unsatisfactory indication findings in the Flight Standards District Office (FSDO) files.

5. GENERAL.

A. Authority. FAR 133.39 allows the Administrator to make the inspections and/or tests found necessary to ensure compliance with the regulations.

B. Flight Under Instrument Flight Rules (IFR). Upon inspection FAR Part 133 operators, with authorization to conduct flight under IFR must present records showing they have a pilot who is rated and current and a rotorcraft that is certificated and equipped for flight under IFR. If the operator cannot produce this documentation during a base inspection, then the operations specifications (OpSpecs) authorizing flight under IFR should be surrendered or rescinded. This is notwithstanding FAR 133.27(c). The operator may retain the operating certificate for up to 2 years after discontinuing operations, but the operator may not retain IFR OpSpecs without having a current IFR pilot and appropriately equipped rotorcraft.

C. Operator Recordkeeping. The Administrator requires the operator to maintain records for the purposes of inspections and determining compliance with the regulations.

(1) For each class of authorization, the operator must maintain current pilot records signed by the chief pilot. These records should include the following:

(a) the rotorcraft classes each pilot is authorized to fly;

(b) a record of each pilot's duty appointment, such as chief or assistant chief pilot, and the effective date of the appointment to each duty position.

(c) the dates each pilot was assigned to operate external-loads and the dates each pilot was removed from an assignment;

(d) a copy of the appropriate logbook endorsements, letters of competency, or verification of a pilot's passing a knowledge and skill test for the class of external-load that pilot is assigned to; and

(e) a record of each pilot's operational checks.

(2) For Class D, the operator shall maintain the following records, which are signed by the chief pilot, in addition to those listed above:

(a) all the pilots' training records signed by the chief pilot, reflecting the date(s) the pilot completed the initial or recurrent training; and

(b) a record for each pilot of Class D currency within the past 12 months that specifies class load, make and model rotorcraft, and date of operations.

(3) For flight under IFR, the operator shall maintain the following additional records for each pilot:

(a) a list of assignments stating the class of load and make and model of rotorcraft each pilot is authorized to operate; and

(b) an IFR currency records; a copy of logbook endorsement for FAR 61.57 instrument competency check; or a record of instrument currency (6 hours and 6 approaches) obtained within the past 6 months.

7. GUIDELINES FOR DIFFICULTIES FREQUENTLY ENCOUNTERED IN FAR PART 133 OPERATIONS.

A. Coordination. When an airworthiness inspector cannot attend the base inspection, the operations inspector should tailor the inspection to examine general airworthiness aspects.

(1) The inspector should be prepared to conduct a general examination of the equipment, including the

attaching means, the Personnel Lifting Devices (PLD), and the normal and emergency release devices.

(2) The inspector should observe actual operational checks performed by the pilots, such as the installation and removal of the attaching devices that are approved for pilots to install.

(3) The inspector should coordinate with the airworthiness unit to ensure followup inspection of any items outside of the inspector's expertise.

B. Levels of Deficiency and Appropriate Corrective Action. This paragraph offers examples of various deficiencies that might occur in an inspection and the appropriate action to take for each situation. The actions described are based on two assumptions. First, even though a discrepancy is found, the base inspection is completed. After inspection, all the deficiencies and recommended corrective actions would be summarized in a note to the file and/or in remarks to the PTRS Data Sheet. Secondly, an unsatisfactory report often calls for an enforcement action. Unsatisfactory reports are usually based on violations of certification or operating rules found during the inspection. The requirements for holding an external-load operating certificate are never less than those for initial certification. There are intermediate stages between satisfactory and unsatisfactory results that may result in a satisfactory inspection with corrective action.

(1) A SPOT CORRECTION is a discrepancy that is not a violation and is corrected during the inspection. It may require no further action. An example of a spot correction is: the inspector does not find a facsimile of the external-load operating certificate on board the rotorcraft. The corrective action is the inspector notifying the operator that the certificate is not in the rotorcraft. During the inspection, the operator makes a copy of the certificate and places it in the rotorcraft. No other corrective action is taken because no external-load operation was found to be conducted without the certificate. However, the inspector marks the PTRS Data Sheet with an "I" to indicate that information, and notes that no facsimile of the certificate was found upon inspection, and that a spot correction was made.

(2) FOLLOWUP ACTION is taken on deficiencies or lack of pilot knowledge that do not involve violations. An example of a correction that needs followup action is: At the time of inspection, a placard was missing from the rotorcraft and it was not readily available. However, there was no evidence that the aircraft was operated without it. As a corrective action, the inspector advises the operator verbally of the deficiency, then writes a letter to the operator outlining the discrepancy found during the inspection, makes

a copy of the letter for the FSDO file, and schedules a followup inspection. The inspector marks the PTRS Data Sheet with an "F" indicating followup.

(3) A FINDING OF UNSATISFACTORY involves a blatant violation. An example of an unsatisfactory inspection is: During an inspection, the inspector finds that a new chief pilot has been designated who has not completed the knowledge and skill test. The inspector contacts the previous chief pilot and obtains verbal and written statements as well as a copy of the previous chief pilot's last pay stub that proves the chief pilot ceased serving as chief pilot more than 30 days before the last external-load operation conducted by the operator. (See Volume 2, Chapter 182 of this Handbook, and Federal Aviation Administration (FAA) Order 2150.3, Compliance and Enforcement.)

C. Presence of Chief Pilot and Other Pilots at Inspection. It is desirable to be able to spotcheck the knowledge of the chief pilot and other pilots of the operation. Spot-check examination of pilots is necessary to verify continuing compliance because of the lack of annual proficiency checks in FAR Part 133 operations. The inspector, for example, should ask questions on the Rotorcraft-Load Combination Flight Manual (RLCFM), including weight and balance problems and, if applicable, questions on the OpSpecs for Class D and/or IFR operations. In addition, the inspector should ask the pilots to demonstrate the use of attaching means, the operation of normal and emergency release mechanisms, and the operation of the winch, as applicable. If, as a result of an inspection or test, the pilot or operator's competency is found questionable, the inspector takes action under Section 609 and/or enforcement action (see Volume 2, Chapters 26 and 182 of this Handbook).

D. Discrepancy Between FSDO Files and Home Base Files. If there is a discrepancy between the records kept in the FSDO file and those found during the base inspection, the inspector determines which records are current and/or approved and requires correction of the unapproved or outdated ones. For example, a new rotorcraft may have been used without having been added to the list of authorized rotorcraft. The list is no longer current, and the inspector may require an enforcement action to rectify the omission.

E. An Expired Lease Agreement. For purposes of renewal, the exclusive use agreement must be current.

9. INITIAL CERTIFICATION VS. LATER SURVEILLANCE. When this task is performed as the base inspection for original certification (during the demonstration and inspection phase of the certifi-

cation process), there are necessarily some items that cannot be inspected. For example, an applicant for an external-load operating certificate would not have certificate facsimiles or lists of authorized rotorcraft

for examination. For an original certification, the inspector marks the "N/A" column on the base inspection job aid (Figure 101-1) for items that cannot be evaluated.

SECTION 2. PROCEDURES

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. Prerequisites. This task requires knowledge of the regulatory requirements of FAR Part 133 and FAA policies and qualification as an Aviation Safety Inspector Operations with knowledge of external-load operations.

B. Coordination. This task requires coordination with the airworthiness unit.

3. REFERENCES, FORMS, AND JOB AIDS.

A. References.

- FAR Parts 1, 27, 29, 61, 91, and 133
- Advisory Circular 133-1, Rotorcraft External-Load Operations in Accordance with FAR Part 133
- PTRS Procedures Manual (PPM)
- FSDO files for this operator or applicant working file for initial certification

B. Forms.

- FAA Form 8710-4, Rotorcraft External-Load Operator Certificate Application (for renewal or amendment)

C. Job Aids.

- Base Inspection Job Aid (Figure 101-1)
- Sample letters and figures

5. PROCEDURES.

A. Pre-Inspection Activities.

- (1) Open PTRS file.
- (2) Review operator's records file at the FSDO for currency and applicability of the following:
 - (a) the Congested Area Plans (CAP);
 - (b) the Minimum Equipment Lists (MEL);
 - (c) the training program (Class D only);
 - (d) the RLCFM (except restricted category aircraft);

(e) the operating certificate;

(f) the list of authorized rotorcraft;

(g) the OpSpecs for Class D and IFR;

(h) the chief pilot's designation;

(i) the training records and evidence of knowledge and skill tests;

(j) any previous ramp inspections;

(k) any complaints;

(l) the operator's and the pilots' violation histories;

(m) the operator's and the pilots' accident/incident histories;

(n) the associated records of surveillance.

(3) Schedule the base inspection.

(a) Schedule an appointment with the operator at the home base.

(b) Advise the operator to have the chief pilot and at least one other pilot available during inspection, if possible.

(c) Arrange to have at least the exclusive-use rotorcraft available.

(d) Remind the operator that the rotorcraft logbooks and engineering data must be available at the inspection, if practicable.

B. Conduct the Base Inspection.

(1) Inspect the following records to determine compliance with the regulations.

(a) Ensure that the operating certificate is available for inspection and lists all current authorizations. A copy must be on board each rotorcraft during FAR Part 133 operations. The original operating certificate and all facsimiles must be identical to the copy in the FSDO files.

(b) Inspect the list of authorized rotorcraft to ensure that it reflects the rotorcraft currently available for use. A copy of this should also be on board each rotorcraft during FAR Part 133 operations. This list

and all copies of it must be identical to the most current version in the FSDO files.

(c) Examine the RLCFM of each rotorcraft for currency.

(d) Check to see that the operator has copies of the current regulations, AC's, and current approved rotorcraft flight manual (RFM) for each rotorcraft.

(e) For CAP's, see Volume 2, Chapter 102 of this Handbook.

(f) Check for proof of ownership of the rotorcraft, or check the exclusive lease agreement, or notes on the agreement for exclusivity of use.

(g) Check for the appropriateness of external-load classification.

(h) Determine each pilot's qualifications for the operation by examining the records of each pilot's logbook endorsement or knowledge and skill letter of competence.

(i) For Class D, check training program to see if there are any unapproved changes. Ensure that the program matches the one filed in the FSDO.

(j) For an IFR authorization, check that at least one pilot is current for IFR rotorcraft operations and that at least one rotorcraft is certificated and equipped for flight under IFR (Airworthiness Unit).

(k) Examine the OpSpecs to determine if it is available for inspection and current for Class D and IFR.

(l) Inspect the records of each pilot.

(i) For pilots with Class D authorization, check their records to ensure initial or recurrent training (as appropriate) has been received within the preceding 12 calendar months.

(ii) For all pilots, ensure they have conducted rotorcraft external-load operations of the same class and in a rotorcraft of the same type within the preceding 12 calendar months.

(2) Spot-check any available external-load pilots. Examine the pilots verbally for competence in the following critical areas.

(a) Determine the pilots' understanding of the operating limitations outlined in FAR 133.45.

(b) Determine the pilots' knowledge of the OpSpecs (Class D and/or IFR).

(c) Ask the pilots to compute a weight and balance problem.

(3) Inspect the rotorcraft. (Airworthiness Unit)

C. Observe an On Site Operation. If possible, observe an actual external-load operation. Do not request the operator to conduct one unless one is scheduled.

D. Satisfactory Examination Results.

(1) For an initial certification, indicate "satisfactory" on the base inspection job aid and the certification job aid. Proceed with the other demonstration and inspection phase inspections.

(2) For a renewal, complete the application, prepare and issue a new certificate, and make a copy of the certificate for the FSDO file. If there are any changes from the initial certification or previous renewal, make a copy of the most recent certificate and indicate the changes from that copy to the current one. Indicate "satisfactory" on the base inspection job aid.

(3) For followup items, advise the operator verbally of the deficiency and, if necessary, write a letter to the operator outlining the discrepancies found during the inspection (Figure 101-2). Schedule a followup inspection as appropriate.

E. Unsatisfactory Examination Results.

(1) Inform the operator that the inspection was unsatisfactory. Confirm the deficiencies encountered in writing (Figure 101-3)

(2) According to the severity of the problem, take one of the following actions:

(a) schedule a followup inspection in 30 days; or

(b) initiate an enforcement investigation (see Volume 2, Chapter 182 of this Handbook).

F. PTRS. Close PTRS file.

7. TASK OUTCOMES. Completion of this task results in one or more of the following.

A. A record indicating a satisfactory inspection.

B. A record indicating an unsatisfactory inspection.

C. A record on file indicating deficiencies found during inspection that were corrected on the spot.

D. A letter to the operator indicating any discrepancies found during inspection.

9. FUTURE ACTIVITIES.

A. Followup inspection with a change in frequency of the surveillance plan for unannounced inspection.

B. Re-examination of pilot by conducting knowledge and skill test, as necessary.

**FIGURE 101-1
FAR PART 133 BASE INSPECTION JOB AID**

FAR PART 133 BASE INSPECTION JOB AID _____ Initial Certification _____ Renewal _____ Amendment _____ Surveillance	NAME OF OPERATOR:				
	INSP. INITIAL	DATE	YES	NO	N/A
1. FSDO file reviewed					
2. Application properly completed for renewal/amendment					
3. Rotorcraft inspection					
a. Equipped with a fixed external cargo carrying device for Class A loads					
b. Equipped with a hook for Class B and C loads					
c. Equipped with a winch or other device					
d. FAR 133.49(a) placard in the cabin stating the class or classes for which approval has been given					
e. FAR 133.49(b) marking adjacent to the load carrying device stating maximum load as per the rotorcraft					
f. Inspection of all aircraft:					
(1) Installation and function of the load carrying or attaching devices					
(2) Optional equipment installations inspected					
4. Operator has a copy of AC 133-1					
5. Operator has pertinent FAR					
6. RLCFM's approved and current					
a. Ground crew briefing included					
b. All items required by FAR 133.47					
7. Operator holds Class D Authorization					
a. OpSpecs current and available for inspection					
b. Operator has use of an FAA-approved PLD					
c. Training records for each pilot participating in Class D operations					
d. Operator has use of operable ground and flightcrew communications equipment					
8. Operator has appropriate chief pilot and other pilot services					
a. All pilots passed knowledge test (FAR 133.23(b))					
b. All pilots passed skill test (FAR 133.23(c))					
c. All pilots have conducted FAR Part 133 Operations within previous 12 months					
9. Congested area operations conducted					
10. CAP approved					
11. Pilot understands FAR 133.45 limits					
a. Understands operating limitations in FAR 133.45					

**FIGURE 101-1—Continued
FAR PART 133 BASE INSPECTION JOB AID**

FAR PART 133 BASE INSPECTION JOB AID <input type="checkbox"/> Initial Certification <input type="checkbox"/> Renewal <input type="checkbox"/> Amendment <input type="checkbox"/> Surveillance	NAME OF OPERATOR:				
	INSP. INITIAL	DATE	YES	NO	N/A
b. Understands passenger carrying limitations during external-load operations					
c. Able to compute weight and balance					
d. Understands operating airspeed limit					
e. Understands limitations concerning restricted category rotorcraft					
f. Understands typical hand signals					
g. Understands content of OpSpecs					
12. Operator has IFR authorization					
a. At least one pilot IFR rated and current in rotorcraft					
b. At least rotorcraft certified and equipped for IFR flight					
c. IFR OpSpecs current and available for inspection					
13. External-Load Operator Certificates available for inspection/current					
14. Lists of authorized rotorcraft available for inspection/current					

REMARKS:

FIGURE 101-2
LETTER OUTLINING INSPECTION DISCREPANCIES

FAA Letterhead

[*date*]

[*operator's name and address*]

Dear [*name of responsible person*]:

During an inspection of your facilities and equipment conducted on [*date*], the following discrepancies were noted:

- *List specific discrepancies.*

- *List discrepancies that were corrected during the inspection.*

The above items should be corrected within 30 days of receipt of this letter. A followup inspection is scheduled for [*time and date*]. If you are unable to correct these discrepancies before the next inspection or have any questions, please contact this office.

Sincerely,

[*Principal Operations Inspector's (POI) or Certification Project Manager's (CPM) signature*]

FIGURE 101-3
LETTER INDICATING INSPECTION WAS UNSATISFACTORY

FAA Letterhead

[*date*]

[*operator's name and address*]

Dear [*name of responsible person*]:

The inspection of your facilities and equipment conducted on [*date*] was unsatisfactory.

The following items were determined to be not in compliance with the Federal Aviation Regulations.

- *List each specific item and the related FAR, for example:*

Pilot training records for [*pilot's name*] did not indicate satisfactory completion of the appropriate knowledge and skill tests (FAR 133.37).

This matter is now under investigation by the Federal Aviation Administration. We wish to offer you an opportunity to discuss the incident personally and submit a written statement. If you desire to do either, this should be accomplished within 10 days following receipt of this letter. Your statement should contain all pertinent facts and any extenuating or mitigating circumstances that you believe may have a bearing on the incident. If we do not hear from you within the specified time, our report will be processed without the benefit of your statement.

Sincerely,

[*POI's or CPM's signature*]

NOTE TO INSPECTORS: This letter may also be used as the Letter of Investigation to initiate enforcement action against a certificated operator.

