



CALIFORNIA PILOTS ASSOCIATION

Information Bulletin

CalPilots has been contacted regarding changed airport rules and regulations language specifying that an aircraft must be in “annual” in order to gain access to or lease facilities on an airport.

For sake of clarification, CalPilots is not here to interfere with the airport manager’s obligation to exercise authority over the operation of their airport. Rather, our goal is to avoid conflicts that interfere with that authority, ensure that those rules are fair and reasonable, and educate and assist pilots in complying with those rules.

Here is some guidance that should help all parties understand the issue better:

As we will discuss, aircraft “airworthiness” is a questionable criteria to use to determine eligibility for airport leases. We also recognize that hangar space is in short supply at many airports with lengthy wait lists.

An annual inspection does not guarantee that an aircraft is airworthy - all it does is state that an aircraft was determined airworthy at a point in time. There are items that are not covered by the annual that affect airworthiness - some are calendar related, some are flight time related. Also, given the current environment of the supply chain and parts shortages as well as service facility and technician availability, we are seeing aircraft grounded due to airworthiness items for periods that stretch months or longer.

There are also many aircraft that do not receive an annual inspection - experimental aircraft do not get an annual inspection, they receive a condition inspection. It should be noted that in-progress homebuilding is explicitly allowed. Turbine aircraft must be on an approved maintenance program that is based on calendar or time but they do not receive an annual inspection either.

Risk Management is an acknowledged area of authority of the airport sponsor, but it must not be done in a discriminatory manner. Aircraft hull coverage may not be available or even applicable for certain operators. Liability coverage is certainly a reasonable requirement, but again limits must be reasonable and attainable and non-movement coverage must be acceptable as an alternative.

In a parallel vein, we don’t want to go down the rabbit hole of using an airman certificate or medical as a requirement to get access to the airport. Basic Medical allows flight without a medical certificate and future MOSAIC-based aircraft will bring changes to airman certification - it would appear that those criteria will see an expanding number of aircraft available to them in the future. Light Sport aircraft further complicate the issue.

Then there is aeronautical activity that is allowed on the airport - FAR 103 Ultralights or Parasails - that requires neither an airworthiness inspection nor an airman certificate or medical. How would you determine the legitimacy of a parasail group that seeks to lease space at your airport - they are an aeronautical activity that is protected by regulation and must be accommodated.

We would urge restraint in drafting criteria for leasing - crafting proper verbiage will be difficult and, most importantly, must be defensible. Please reach out to us so that we may assist you and avoid misunderstandings.

Respectfully,

Douglas Rice
CalPilots Regional Vice-President