



Federal Aviation Administration

Memorandum

Date: OCT 15 2007

To: All Manufacturing Inspection Offices (MIO), Manufacturing Inspection District Offices (MIDO), Manufacturing Satellite Offices (MISO), Flight Standards District Offices (FSDO), and Flight Standards Regulatory Support Division, AFS-600

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Prepared by: Airworthiness Certification Branch, AIR-230

Subject: **INFORMATION:** Airworthiness Certification requirements for a light-sport aircraft (LSA), §21.191(i)(1).

This is in response to a recent increase in applicant complaints concerning Aviation Safety Inspectors/Designated Airworthiness Representatives imposed requirements on transitioning §21.191(i)(1), Operating light-sport aircraft. Specifically in question is the need for a FAA certificated mechanic or repairman to inspect a transitioning LSA and record the inspection in the aircraft's records prior to the airworthiness inspection for initial certification.

To clarify, there is *no* regulatory basis, policy or guidance material requiring an applicant of a §21.191(i)(1) LSA to obtain an inspection by FAA certificated mechanics or repairmen prior to initial airworthiness inspection and experimental certification. Therefore, there is *no* requirement for this type of prior inspection to be documented in the aircraft records.

Further, the owner/operator or "the applicant" for a transitioning §21.191(i)(1) LSA is the aircraft maintainer prior to the certificate issuance. The transitioning §21.191(i)(1) LSA are not required to have been designed or built to any accepted standard. It is therefore the applicant's responsibility to have maintained this existing aircraft in an airworthy condition as attested to on the FAA Form 8130-6, Application for U. S. Airworthiness Certificate, Section III., D.

Please utilize the guidance contained in Order 8130.2, Airworthiness Certification of Aircraft and Related Products. Specifically, please refer to Chapter 4, Special Airworthiness Certification, Section 8, Experimental Light-sport Aircraft Airworthiness Certifications.

If there are any questions, please contact the Airworthiness Certification Branch, AIR-230, at (202) 267-8361.