

6/22/77

SUBJ: INSPECTION AND FUNCTIONAL CHECK OF EMERGENCY EXITS

1. **PURPOSE.** This order provides all field inspectors with information needed to ensure an adequate level of safety is provided by emergency exits.

2. **DISTRIBUTION.** This order is distributed to Flight Standards Offices in Washington headquarters, the regions, and the Aeronautical Center to the branch level; to General Aviation, Flight Standards, and Engineering and Manufacturing District Offices; and to all International and International Aviation Field Offices.

3. **BACKGROUND.** There have been several recent inquiries as to whether or not emergency exits must be inspected and functionally checked during 100-hour and annual inspections. The questions were generated by a manufacturer's service bulletin which indicated such inspections were not required, and by manufacturers' inspection forms which do not include the exits as items to be inspected.

a. Some persons have taken the position that since emergency exits are not specifically mentioned in FAR 43, Appendix D, inspection is not required. This concept, if applied generally, would exempt many items commonly inspected and functionally checked, such as passenger doors, baggage doors, fuselage structural members, flooring, etc.

b. FAR Section 43.15(c) reads: "(1) Each person performing an annual or 100-hour inspection shall use a checklist while performing the inspection." It further provides: "The checklist may be of the person's own design, one provided by the manufacturer of the equipment being inspected or one obtained from another source? Provision is made for the use of a checklist provided by the manufacturer but with the following limitations: "This checklist must include the scope and detail of the items contained in Appendix D to this" Thus, if the manufacturer provides an inspection checklist which does not meet the requirements of Subpart D of FAR 43, it cannot be used in the conduct of 100-hour or annual inspections unless items are added to it to make it meet the scope and detail of Appendix D of FAR 43.

c. FAR 43, Appendix D, item (b) states: "Each person performing an annual or 100-hour inspection shall inspect (where applicable) the following components of the fuselage and hull group"

"(2) Systems and components for improper installation, apparent defects, and unsatisfactory operation."

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Emergency exits are fuselage components and the latches, levers, rods, etc., used to open or restrain the hatches are components **comprising** systems which must be functionally checked and inspected. The parenthetical inset, in the regulation, is required since not all aircraft have the same components; **e.g.**, gas bags, floats, hulls, etc.

d. **Emergency exits** are an integral part of the aircraft safety design and it is imperative that their proper function be ensured by detailed inspection and functional checks during **100-hour**, annual inspections, and during the conduct of other approved or accepted inspection programs.

4. **ACTION.**

a. During regular surveillance activities, inspectors should place emphasis on compliance with FAR 43, Appendix D, item (b)(2), which requires that emergency exits be inspected and functionally checked as part of **100-hour** and annual inspections.

b. Aircraft inspection programs approved under the provisions of Part 135, Section 135.60, and Part 91, Section 91.217, and those utilized under the provisions of Part 91, Section 91.171, should be reviewed to ensure they provide for the inspection and functional check of emergency exits.



J. A. FERRARESE
Deputy Director
Flight Standards Service