



## Question of the Month

By Chris Lawler

### **Is my club required to do 100-hour inspections when conducting flight instruction in club aircraft?**

A flying club aircraft normally would not need to receive 100-hour inspections. FAR 91.409b requires a 100-hour inspection when a person receives instruction from a flight instructor who also provides the aircraft. The FAA guidance further clarifies that the 100-hour is required when a person is providing flight instruction for hire in the instructor's personal aircraft.

The example to begin with is an aircraft owner who wishes to receive instruction in an aircraft which he owns. The owner is using his own aircraft to receive flight instruction and would not need a 100-hour inspection, since the instructor is providing instruction services not the aircraft.

The aircraft owner scenario is similar to members using a club aircraft, and hiring an independent flight instructor. The club would not be required to have a mechanic perform a 100-hour inspection, since the same individual is not providing the aircraft and flight instruction. The club member is the de facto aircraft owner providing the aircraft, and the flight instructor is providing instruction not the aircraft. So FAR 91.409b would not be triggered.

Some clubs require a flight instructor to be a member prior to giving instruction in club aircraft. In this case, the FAA doesn't view this as an issue as long as three conditions are met:

There must be no contractual relationship between the member-instructor and the flying club for the provision of flight instruction.

The member-instructor is not recommended or given preference by the flying club.

The club members are free to choose instructors who are not club members.

If any one of these conditions is not met, then a 100-hour inspection would be required for the club aircraft.

The FARs are normally not the most restrictive guidance for club operations. It is possible that depending on club structure and activity, a 100-hour could be performed even when not required. If an aircraft is being utilized in a busy club environment; it may be cost-effective to perform more frequent inspections. This can allow a maintenance irregularity to be found early leading to less costly repairs.

If you have questions on maintenance inspections or any other club operations, The Pilot Information Center Staff are available to answer technical questions at 1-800-872-2672.

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