

12/15/2017

## Aviation Group Client Update

Shelley A. Ewalt, Partner | [sewalt@mklawny.com](mailto:sewalt@mklawny.com) | +1 703 399 6078

### FAA ISSUES AC ON OPERATIONAL USE OF RADIO FREQUENCY IDENTIFICATION DEVICES ONBOARD AIRCRAFT

On October 17, 2017, the FAA issued [AC 119-2](#) – *Operational Use of Radio Frequency Identification Systems Onboard Aircraft*.

**Purpose.** This AC provides aircraft operators with guidance on the use of RFID devices and systems in operational and maintenance environments as an alternative means of performing specific maintenance and inspection tasks in accordance with Title 14 of the Code of Federal Regulations (14 CFR) parts 43, 91, 121, 125, 129, and 135. This AC also limits its scope to aircraft RFID applications, where RFID tags are installed directly on aircraft, parts, and components to verify identification, serviceability status, or presence.

**Application.** This AC applies to: operating certificate holders under parts 91, 121, 125, 129, and 135; persons or entities holding certificates under 14 CFR parts 65, 145, and 147; persons performing maintenance under part 43; and operators using RFID technology to perform or report completion or accomplishment of inspections.

**Scope.** This AC addresses Title 47 of the Code of Federal Regulations (47 CFR) part 15, §15.245 compliant passive, battery - assisted passive, and active RFID devices and systems only installed within aircraft and on aircraft components.

**Considerations.** The FAA recommends that operation of RFIDs should include considerations about human factors, training, schedules for tracking RFID systems installations and deployment, update of maintenance procedures affected by adoption of RFID systems, system failure and shutdown procedures, maintenance of system hardware, among others.

If you have any questions or would like further information, please contact Shelley Ewalt.

\* \* \* \* \*

McBreen & Kopko's Aviation Group represents air carriers, fixed base operators (FBOs), airport managers, aviation service providers, and business aircraft owners and operators on a wide range of aviation issues including regulatory matters, commercial transactions, aircraft finance matters, and bankruptcy and creditors' rights.