



PIA 180-day repack cycle FAQ - February 03, 2009

The new FAA rule on main and emergency repack intervals took effect December 19, 2008. PIA and USPA continue to work together with the FAA to formulate answers to common rigger and rigger's customer questions:

1 - Q: *Is there any change prior to December 19, 2008?*

A: No, up until that date, the emergency parachute (and main parachute if applicable) must have been packed within the previous 120 days.

2 - Q: *What happens on December 19, 2008?*

A: Beginning on that date, a parachute may be used if it has been packed within the previous 180 days.

3 - Q: *Even if the pack job had previously "expired"?*

A: Yes. Beginning December 19, count back 180 days. If it was packed during those 180 days, it is legal to use.

4 - Q: *What happens if the parachute has an AAD?*

A: For intentional jumping, FARs 105.43 and 105.45 hold the "person" (the jumper and the tandem instructor) responsible for ensuring that an AAD, if installed, has been "maintained in accordance with manufacturer instructions." A parachute user can only comply with that regulation if they know the maintenance schedule and service requirements of that AAD. It is necessary for the "person" to know applicable items such as any required battery replacement date, any required maintenance due date, and any end of service life date, if applicable. If this information is not readily available via the packing data card or via the AAD display, riggers should check their records and inform customers of the status before the parachute is used beyond its originally intended 120 days. If it is not possible to make a determination, then the only prudent thing is to inspect and repack the parachute before next use.

5 - Q: *What if the AAD requires servicing before the end of the 180 days?*

A: When a manufacturer-required AAD maintenance/service interval comes due, even if before the 180 days expires, the parachute should not be used until that maintenance/service is performed. That's why it is imperative that AAD service dates are recorded by the rigger, preferably on the packing data card, so that this info is readily available to the parachute user.



6 - Q: *Is it legal for a rigger to pack a parachute if the AAD will need required service (or reach end of life, etc.) prior to the next required reserve repack date?*

A: Yes. We have been informed by the FAA that "This rule (180-day repack) makes no changes with the AAD's. Say the battery comes due before the repack is due, it still has to be replaced on schedule." FARs 105.43 and 105.45 require that the "person" (skydiver or tandem instructor as appropriate) ensure that the AAD is maintained on schedule. Riggers should discuss the various options and the responsibilities of the user with their customers. Riggers should record next AAD service date(s) on the packing data card, so that the "person" can easily make this determination. If an individual rigger does not want to pack a reserve when an AAD will not be airworthy the entire repack cycle, that certainly is his option.

7 - Q: *Is it legal for a rigger to open and re-close a reserve mid-repack cycle to perform tasks such as: 1) shortening the closing loop, and 2) replacing the AAD?*

A: Yes. This opinion and practice is supported by numerous Master and Senior Riggers, who have been opening, performing service, closing, and re-sealing reserves for 30+ years. Important: this type of interim maintenance work does not alter the next repack due date; notations on the packing data card must clearly indicate this to avoid confusion by parachute users. As the rigger who reseals the container is responsible for the airworthiness of the parachute system at the time it is returned to service, a rigger may elect to reseal only a reserve that he originally packed.

Notice: This document has been reviewed by AFS-300, FAA HQ - Washington, and found to be consistent with the current regulations.