



PIA Technical Bulletin TB-252 v1.1
Parachute Industry Association Publications

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Mid-Cycle Reserve/Emergency Parachute
Maintenance Guidelines

Background: This document is based on portions of the December 10, 2008 FAQ (revised February 3, 2009), developed by PIA in conjunction with USPA in regards to questions from parachute riggers concerning the transition from the 120 to 180-day repack cycle. The FAQ was reviewed by AFS-300, FAA HQ - Washington, and found to be consistent with the current regulations.

Portions of the FAQ no longer have any relevance once the “transition period” from December 19, 2008 to February 17, 2009 has passed. As such, the transition items are not addressed in this Technical Bulletin.

This document also includes language from the FAA/PIA/USPA joint AC 105-2D re-write project.

It should be noted that the subjects addressed here are not a consequence of the 180-day repack rule change. Rather, they have again come to light as a result of questions and concerns from riggers.

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Question 1: Is it legal for a rigger to pack a parachute if the AAD will need required servicing, require battery replacement, reach end of life, etc. prior to the next required reserve repack date?

Yes. According to FAA N 8900.60 (dated 12/12/08, National Policy, SUBJ: 180-Day Parachute Repack), “The amended rule makes no changes regarding the Automatic Device (AAD). If the battery replacement due date is before the repack due date, the battery pack still has to be replaced on schedule.” 14 CFR 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 (“person”) with their customers. Riggers should record any next AAD service date(s) on the packing data card, so that the “person” can easily make this determination. NOTE: Riggers are not required to pack a reserve when an AAD will not be airworthy the entire repack cycle.



Question 2: Is it legal for a rigger to open and re-close a reserve mid-repack cycle to perform maintenance such as: shortening the closing loop, replacing or removing an AAD, replacing an AAD battery, etc.?

Yes. The reserve container may be opened, re-closed, and resealed to permit scheduled or unscheduled maintenance or repairs (for example, AAD service or closing loop replacement) within the 180-day or 60-day period as applicable. The rigger who reseals the container is responsible for the airworthiness of the parachute system at the time it is returned to service. Important: mid-cycle maintenance does not alter the next repack due date; notations on the packing data card must clearly indicate this to avoid confusion by parachute users. NOTE: A rigger may elect to re-close, sign, and reseal only a reserve that they originally packed.

NOTICE: Before opening and re-closing a container packed by another rigger, careful consideration should be given to any and all legal ramifications.