

The detailed change submission for Secs 91.1047, 135.251, and 135.255 provide for the use of maintenance personnel not currently covered by a DOT Drug and Alcohol program to perform "emergency maintenance" on Frac aircraft. This is allowed provided "the airport must be one at which there are no available maintenance personnel subject to the drug and alcohol testing requirements of Appendices I and J of part 121."

What constitutes "available maintenance personnel"?

Is this defined as maintenance personnel currently on duty, on the airfield, and with the qualifications to perform the work required? If a mechanic that would meet those qualifications refuses to work on the aircraft, is the aircraft grounded until maintenance can be arranged?

This seems to open to interpretation by the FAA and could lead an operator down the wrong path.