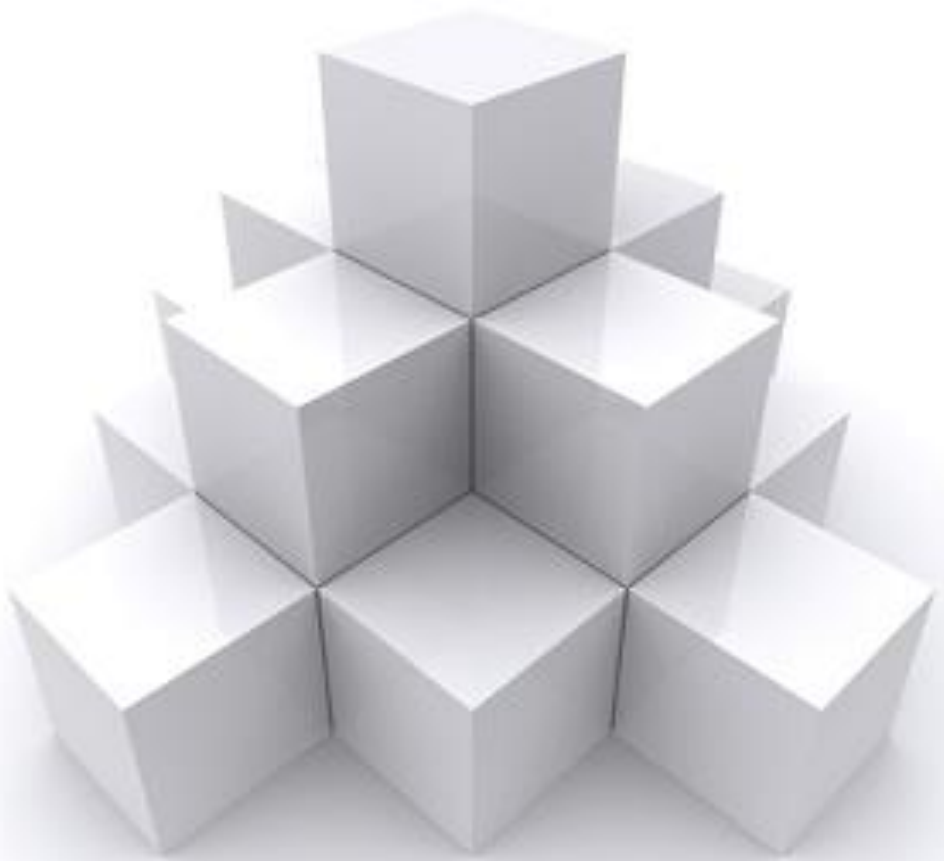
AIR PRINCIPLES

Aircraft Certification Service (AIR)



Preface

First established in 1989, the Aircraft Certification Service (AIR), has continuously evolved over the years to keep pace with an innovative, dynamic aviation environment. Although much has changed since its inception, AIR remains steadfast in its commitment to the basic, fundamental principles originally set forth by its first Director, Craig Beard, in his "Aircraft Certification Statement of Philosophy."

Craig introduced his philosophy by reflecting on the history of aircraft certification:

> *Aircraft certification by the Federal Government was initiated in the 1920's when aviation was struggling. In fact, it appeared aircraft would not be widely accepted as a viable means of transportation. The aviation industry was not making economic headway; if anything, air transportation was shaping up as an economic disaster. Industry officials blamed these economic problems on the atrocious safety record which, in turn, was attributed to the absence of a central authority which regulated flying activity. Complaints about badly-engineered, badly-built, and badly-repaired aircraft were widespread. The aviation industry lobbied Congress to pass Federal regulations for aeronautics, claiming such regulations were absolutely indispensable to the effective development of air commerce in the United States. Due to this high level of public concern about aviation safety and the economic well-being of the aviation industry, the Air Commerce Act of 1926 was enacted. This Act was the seed from which the present-day Federal Aviation Administration and the program of Aircraft Certification grew.*

These words are as relevant today as they were in the 1980s. The aviation system continues to change rapidly. International networks and complex business arrangements require different approaches. Technological advances coupled with projected growth in demand and diversity demand agility and adaptability. Finally, the public, industry, and government entities continue to increase their expectations of us to do things faster and without error. Meeting the challenges of a complex, dynamic aviation environment requires AIR to continuously improve - to increase efficiency and effectiveness while remaining true to the principles on which we were formed.

1. We are public servants dedicated to furthering the interests of the American people.

The fledgling aviation industry of the early 20th century is now a major component of the U.S. economy. In 2014, economic activity attributed to civil aviation-related goods and services totaled $1.6 trillion, contributed over 5 percent to U.S. Gross Domestic Product, and supported over 10 million jobs. Civil aircraft manufacturing contributes significantly to the U.S. economy as the largest net export, with a trade balance of almost $60 billion. This success could not have occurred without continuous improvements in the aviation safety record. We, as public servants, play a significant role in this vitality by establishing standards that reflect the public's expectation of safety. Craig explained:

> *Government standards applicable to the design, production, and original airworthiness of aircraft, engines, propellers, and associated parts will be standards that define a high level of safety. These standards establish the minimum acceptable level of safety for the aircraft certificated by the FAA. When working within this principle, it is recognized that the "minimum acceptable level of safety" will vary depending upon product type and utilization. These differences result from fundamental societal values and beliefs. …Government is presented with an obligation to provide reasonable, yet high, standards of safety while balancing the concepts of public responsibility and individual rights.*

Society's demand for and expectation of safety depend upon product type and utilization[1] and can change over time. While too little safety oversight is a clear threat to safety, too much rigor can prove to be an equal threat by discouraging safety enhancements from entering the market. AIR balances the needs of our applicants, aircraft owners and operators with the public's demand for safety assurance. By constantly maintaining this balance, the safety of aviation can grow as we allow for the proper introduction of innovation and oversight of the system.

> *Also embodied in the principle of "minimum standards" is the recognition that economy and efficiency of air transportation are critical considerations. Pursuit of absolute safety would, in all likelihood, impose intolerable economic public expenditures and unjustifiable economic penalties on the aviation industry. Thus, in carrying out the responsibility to promote aviation safety, the agency will judge each proposed safety improvement in light of the price to be paid for it*[2].

As public servants, our primary purpose is translating public interest into standards and promoting safety to build public confidence so industry can achieve its full economic potential[3].

[1] The Safety Continuum – A Doctrine for Application, dated September 2014.
[2] This responsibility is driven by the Administrative Procedure Act, Public Law 79–404, 60 Stat. 237, the U.S. federal statute that governs the way in which administrative agencies of the federal government of the United States may propose and establish regulations.
[3] The Federal Aviation Act of 1958, repealed and recodified in 1994, and the Code of Federal Regulations provide a framework of law and requirements Aircraft Certification.

2. We collaborate within and outside of AIR to effectively manage safety.

> *The process of certification has many facets, involves diverse technical and administrative specialties, is widely dispersed geographically, and involves voluminous regulatory, policy, and procedural guidance material. All of these factors can… hamper effective interaction, common understanding and an attainment of common goals.*
>
> *In the FAA, we work with industry and each other cooperatively. We believe that the existing safety record has been achieved through a cooperative effort… and significant progress in safety can only be realized through a continuation of this highly cooperative attitude.*

In other words, the American public is best served through well-balanced collaboration and cooperation. Strong relationships with stakeholders promote the evolution of a common understanding of the interests of those we serve and facilitates sound decision-making as a diversity of viewpoints are considered.

AIR must work to fulfill Congressional direction by maintaining a responsive relationship with industry characterized by early involvement, transparency and respect for one another's responsibilities. Craig highlighted the importance of these relationships in our inception:

> *An interesting point to note (in) the early activity is the cooperative spirit that existed between industry and Government in developing a safe and economically healthy aviation industry in the United States. The Air Commerce Act itself was a product of that cooperation. In the years since, those attitudes have not changed. While industry and Government have some disagreements over some specific issues, the overall concept of regulation through cooperation is one that is still strongly supported by both the industry and the public at large. Safety through Aircraft Certification results from that cooperative spirit.*
>
> *Technology continues to advance and the agency must be proactive in developing the regulatory material necessary to allow that advancement in a timely manner. When <u>current</u> regulations/policy/guidance are in place, the public process has been accommodated; industry knows what is expected; and FAA can more nearly attain standardization in compliance. Likewise, up-to-date regulatory material leads to greater cooperation between FAA and industry and reduces, in large measure, duplication of effort.*

AIR collaborates to excel domestically as well as influence aviation safety internationally. Congress emphasized[4] that, "global leadership in aerospace is a national imperative," and directed the FAA Administrator and the Secretary of State to facilitate the reciprocal airworthiness certification of aviation products. To accomplish this, AIR must maintain a high level of confidence in the integrity of our bilateral airworthiness safety agreements and collaborate closely with other foreign civil aviation authorities (FCAA) to continuously improve confidence in one another's decision making on airworthiness matters.

As the velocity of change and international interdependencies increase, AIR continues to foster common understanding and cultivate responsive, proactive relationships with all stakeholders.

[4] Vision 100 – Century of Aviation Reauthorization Act; Pub. L. 108-176.

3. Industry has a responsibility to comply with regulations; FAA has a discretionary role in the regulatory oversight of industry.

Industry and the FAA each have discretely defined roles. Applying and respecting these roles is fundamental to understanding how the FAA exercises discretion in overseeing industry's compliance to the regulations.

- Applicants' responsibility is to comply with all applicable regulations using means acceptable to the FAA.
- FAA's responsibility is to prescribe standards, deliver clarifying policy and project-specific assistance as necessary, and provide guidance on acceptable means of compliance in a timely manner.

The applicant for a type certificate, including an amended or supplemental type certificate, must—(a) Show compliance with all applicable requirements and must provide the FAA the means by which such compliance has been shown; and (b) Provide a statement certifying that the applicant has complied with the applicable requirements[5]. In accordance with 14 Code of Federal Regulations (CFR) Part 21.21, an applicant is entitled to a certificate if the product complies with all applicable requirements.

In determining compliance, the FAA applies its discretionary oversight authority using risk-based decision making tools and sound judgment while performing work within the bounds of the statutes, regulations and directives.

The FAA may:

- Make a finding of compliance directly based on the evidence (showing) provided by an applicant or approval holder;
- Delegate the finding to a qualified designee or delegated organization;
- Accept the applicant's or approval holder's showing without making any discrete finding (i.e., applicant showing only); or,
- Accept the statement made by a bilateral partner authority that the product complies with either the 14 CFR or the regulations of the partner authority.

The U.S. Supreme Court has consistently affirmed the right of U.S. government agencies to apply discretion in regulatory oversight[6] through the "discretionary function" exception of the Federal Tort Claims Act. Speaking for the Court, Chief Justice Warren E. Burger said, "The FAA has a statutory duty to promote safety in air transportation, not to insure it."

[5] 14 Code of Federal Regulations (CFR) 21.20

[6] In the case of United States v. Varig Airlines, the Supreme Court affirmed "the duty to ensure that an aircraft conforms to FAA safety regulations lies with the manufacturer and operator, while the FAA retains responsibility for policing compliance. Thus, the manufacturer is required to develop the plans and specifications and perform the inspections and tests necessary to establish that an aircraft design comports with the regulations; the FAA then reviews the data by conducting a "spot check" of the manufacturer's work.

4. Our designees, including delegated organizations, are an extension of the FAA.

> *The small FAA certification workforce cannot possibly accomplish all aspects of the elaborate processes associated with design, production, and original airworthiness certification. Thus, reliance on a system of delegation is imperative if fulfillment of the FAA responsibilities… is to be realized.*
>
> *Designees are an asset to the FAA and they should be treated with the same respect, trust, and confidence afforded the FAA employee. The benefits which have accrued to the FAA, the general public, and industry from the designee system are immeasurable and the excellent safety record… is the best testimony to its success.*

Designees will continue to play a vital role in accomplishing our mission. Therefore, we have a responsibility to maintain a high level of credibility in the designee program and remain diligent in the appointment and oversight of designees. We must prudently authorize only functions that the designee is capable and qualified to perform; provide designees with continuous feedback on their performance through supervision and audits; offer real-time training and guidance on new regulations and policy; and appropriately terminate or limit a designee's authority when warranted.

Conclusion

No single entity can claim credit for the great safety record we enjoy. The basic principles set forth by the first Director of Aircraft Certification have stood the test of time and remain the cornerstone for our success in the dynamic aviation environment. We have a responsibility to remain true to these principles by collaborating with all stakeholders to fulfill our safety mission.

To build on our shared success and maintain our reputation for continuous improvement, we must monitor and evaluate performance and implement improvements. Where we find we are inefficient, we must be more resourceful. Where we are ineffective in accomplishing our safety goals, we must enhance our methods. And where we are successful, we must remain alert to changes across the system – so that what happens now prepares us for tomorrow.

APPENDIX A: Aircraft Certification Statement of Philosophy, circa 1985

PREFACE:

Aircraft Certification in the Federal Aviation Administration (FAA) is a threefold commitment of safety in aviation, promotion of air commerce, and service to industry and the general public.

Aircraft Certification by the Federal Government was initiated in the 1920's when aviation was struggling. In fact, it appeared aircraft would not be widely accepted as a viable means of transportation. The aviation industry was not making economic headway; if anything, air transportation was shaping up as an economic disaster. Industry officials blamed these economic problems on the atrocious safety record which, in turn, was attributed to the absence of a central authority which regulated flying activity. Complaints about badly-engineered, badly-built, and badly-repaired aircraft were widespread. The aviation industry lobbied Congress to pass Federal regulations for aeronautics, claiming such regulations were absolutely indispensable to the effective development of air commerce in the United States. Due to this high level of public concern about aviation safety and the economic well-being of the aviation industry, the Air Commerce Act of 1926 was enacted. This Act was the seed from which the present-day Federal Aviation Administration and the program of Aircraft Certification grew.

An interesting point to note the early activity is the cooperative spirit that existed between industry and Government in developing a safe and economically healthy aviation industry in the United States. The Air Commerce Act itself was a product of that cooperation. In the years since, those attitudes have not changed. While industry and Government have some disagreements over some specific issues, the overall concept of regulation through cooperation is one that is still strongly supported by both the Industry and the public at large. Safety through Aircraft Certification results from that cooperative spirit.

No single entity can claim credit for the great safety record this country enjoys. The United States is preeminent in aviation because the industry and the FAA share the common goal of aviation safety and work together toward achievement of that goal. By achieving a high level of safety, aviation-commerce is promoted and the economic well-being of the industry is enhanced. It was so in the 1920's and it is equally so today.

PHILOSOPHY:

When considering the historical events that define the reason for and purpose of Aircraft Certification, certain philosophical principles emerge:

1. Regulatory standards established by Government will be minimum standards.

The Federal Aviation Act of 1958, as amended, and the Code of Federal Regulations provide a framework of law and requirements for the process of Aircraft Certification. This framework clearly establishes the principle that Government standards applicable to the design, production, and original airworthiness of aircraft, engines, propellers, and associated parts will be standards that define a high level of safety. These standards establish the minimum acceptable level of safety for the aircraft certificated by the FAA. When working within this principle, it is recognized that the "minimum acceptable level of safety" will vary depending upon product type and utilization. Thus, the various parts

of the Federal Aviation Regulations (FAR) differ. These differences result from fundamental societal values and beliefs. On the one hand society embraces the idea that people holding out their service to the public will be held to a higher standard of care than those who do not, while on the other hand society places high value on the concept of individual rights and a voluntary exposure to risk. Therefore, Government is presented with an obligation to provide reasonable, yet high, standards of safety while balancing the concepts of public responsibility and individual rights.

Also embodied in the principle of "minimum standards" is the recognition that economy and efficiency of air transportation are critical considerations. Pursuit of absolute safety would, in all likelihood, impose intolerable economic public expenditures and unjustifiable economic penalties on the aviation industry. Thus, in carrying out the responsibility to promote aviation safety, the agency will Judge each proposed safety improvement in light of the price to be paid for it.

The concept of "minimum acceptable level of safety" doesn't end with the development of regulations. On the contrary, it includes application of the standards and permeates the entire Aircraft Certification process even though the day-to-day compliance activity is not subjected to public scrutiny. The agency should not consciously seek to change the established standards or otherwise regulate through advisory material, policy, letters, procedural guidance, or individual whim. Should this happen it would diminish credibility, create confusion, contribute to a lack of standardization, and violate the public trust. Rather, every employee has the ethical responsibility to promote aviation safety through conscientious (albeit discretionary) application of the properly established regulatory standards (both technical and procedural) and associated guidance material.

In applying the principle of "minimum acceptable level of safety" to the development of standards and determination of compliance, each employee must maintain a constant awareness of his or her public service role, and must yield special interests and opinions to the higher and broader "public interest." Safety standards have been established through the public process, and it is imperative that they be applied in keeping with the public will. Toward that end, it is incumbent upon every involved employee to acquire intimate knowledge of the technology, regulations, policy, and procedural information, and to apply that knowledge so that standardization in compliance is realized throughout the aviation industry and the FAA. Therein lies the test of a responsible public employee.

2. Promotion of aviation safety through Aircraft Certification is a public service role.

The Federal Aviation Administration is mandated to promote both aviation safety and air commerce by the Federal Aviation Act of 1958, as amended, and the Department of Transportation.

It is important to note that the work "promote" is not synonymous with "assure" or "insure." That is, FAA is not expected to "insure" or "assure" safety in aviation. As previously noted, aviation safety is a joint responsibility of the industry and the FAA, and no single entity, by itself, can provide the assurance of safety. The idea that FAA is to "promote" aviation safety was reinforced by the United States Supreme Court in 1984 (USA v. Varig, et al & USA v. United Scottish Insurance Co., et al) when, speaking for the Court, Chief Justice Warren E. Burger said, "The FAA has a statutory duty, to promote safety in air transportation, not to insure it." Further, this decision clearly established that the FAA certification process is a "discretionary" function. That is, the 400 or so FAA engineers, flight test pilots, and inspectors obviously cannot evaluate every detail associated with the elaborate process of aircraft design, production, and original airworthiness and, therefore, must use discretion in determining exactly

what will or will not be evaluated. In no way is this intended to imply that certification bases (i.e., regulatory requirements) are discretionary nor does it intend that FAA personnel will apply individual discretion regarding regulatory interpretation. Rather, it simply provides for a "spot-check" approach to certification.

The Aircraft Certification responsibilities associated with promotion of aviation safety can be broadly categorized into three areas;

a. Certificate Integrity/Continued Airworthiness - This entails monitoring and formally auditing the safety performance of certificated or approved civil aeronautical products, production quality control systems and authorized representatives of the Administrator.

It also involves taking corrective action as necessary to assure the continued integrity of issued certificates, approvals, or authorizations. This process includes, but is not necessarily limited to, the Aviation Safety Analysis System, accident/incident investigation, enforcement program, and service difficulty system. Assuring certificate integrity provides a high level of safety of the in-service products.

b. Development of Regulations/Policy/Guldance - The following definitions apply insofar as Aircraft Certification is concerned:

(1) Policy is that body of information which includes regulatory preamble material, all documented past acceptable means of compliance that has not been superseded, and current documented acceptable practices. Policy is generic and must stand the test of time; i.e., precedents should remain valid or be formally abandoned. Policy is issued by the FAA Administrator or, as delegated, by the Director of an accountable directorate, or the Director of Airworthiness.
Such policy is generally issued in advisory circular (AC) format.

(2) Procedural guidance is a subset of policy. It does not have any applicability beyond the specific project in question until formally published in an advisory circular. It is generally issued in letter form by the accountable Aircraft Certification Division, Aircraft Engineering Division, or Aircraft Manufacturing Division.

Technology continues to advance and the agency must be proactive in developing the regulatory material necessary to allow that advancement in a timely manner. When current regulations/policy/guidance are in place, the public process has been accommodated; industry knows what is expected; and FAA can more nearly attain standardization in compliance. Likewise, up-to-date regulatory material leads to greater cooperation between FAA and Industry and reduces, in large measure, duplication of effort.

Thus, the mission of aviation safety, promotion of air commerce, and service to the public demand that FAA regulatory activity can be accomplished promptly and properly.

c. Certification - Certification activity constitutes the major part of the Aircraft Certification work load. Aircraft Certification is critical to the economic well-being of the industry, progress in aviation and related fields, continued preeminence of the United States in

> aviation matters, and fulfilling Government's responsibility for public safety. Therefore, it is a function which must be accomplished timely, efficiently, effectively, and professionally, and it must be accomplished by the Federal Government.

There is a noteworthy characteristic of Aircraft Certification which relates to the phrase "service to the public." To some this refers only to the "general public" and excludes the aviation industry. Flowever, according to legislative mandate, the FAA serves two publics. One, of course, is the general public and involves the broad responsibilities of promoting aviation safety and air commerce. This public service role needs no elaboration. The other public served by FAA is the aviation industry. Certainly, promotion of safety and promotion of air commerce are the heart of this FAA service, but beyond that is the responsibility to have a responsive direct relationship with those seeking to satisfy the Government requirements. The FAA and industry should never be viewed as adversaries. Generally, both parties are seeking the same goal; i.e., safe aviation products that comply with the regulations, and they should, therefore, work together cooperatively.

Should FAA adopt an attitude that service to the aviation industry is not a primary responsibility, promotion of aviation safety and air commerce would suffer through a loss of efficiency, economy, and productivity. Therefore, it is incumbent upon the FAA to serve industry by providing guidance, utilizing delegation to the maximum extent practicable, minimizing duplication, reducing the regulatory and procedural burden where possible without derogating safety, and otherwise conducting business in an efficient, economical, and professional manner.

In this regard, it is appropriate to mention the program of delegation provided for by the Federal Aviation Act and its predecessor, the Civil Aeronautics Act of 1938. The Act recognizes the wisdom of having a corps, of responsible, ethical, and technically competent private people who are willing and able to serve as representatives of the FAA Administrator. Likewise, a National Research Council study in 1980 noted that the designee workforce is essential to the business of Aircraft Certification. As noted elsewhere in this paper, the small FAA certification work force cannot possibly accomplish all aspects of the elaborate processes associated with design, production, and original airworthiness certification.

Thus, reliance on a system of delegation is imperative if fulfillment of the FAA responsibilities of promotion and service is to be realized. Designees are an asset to the FAA and they should be treated with the same respect, trust, and confidence afforded the FAA employee.

Critics of delegation are sometimes concerned with the "appearance" of a conflict of interest insofar as designees are concerned. Early on, this was no doubt a reasonable concern, but on the basis of experience gained since inception of the Civil Aeronautics Act (1938) such concern should no longer be given credence. The benefits which have accrued to the FAA, the general public, and industry from the designee system are immeasurable and the excellent safety record compiled over the last 60 years is the best testimony to its success. The FAA has a responsibility to maintain a high level of credibility in the designee program by assuring that only capable, qualified people are selected as representatives of the Administrator, quality supervision and audit are provided (including prompt cancellation of an appointment when warranted), and findings of compliance by properly delegated private persons are recognized as FAA findings of compliance. With proper management of the designees, the FAA work force capability increases substantially, with the concomitant benefit of increased safety, enhanced promotion of aviation commerce, and improved service to the public.

3. Promotion of aviation safety and promotion of air commerce are compatible goals.

These two goals taken separately are reasonably clear, but together they can cause confusion on the part of many people. Some argue that promoting aviation safety and promoting air commerce are mutually exclusive goals that cannot be pursued simultaneously without creating tremendous conflict.

In fact, that is not the case. Everything FAA does in the interest of aviation safety, when it is done in a reasonable way, promotes air commerce by increasing public confidence and acceptance of air transportation. Promotion of safety and promotion of air commerce are so tightly intertwined that they should not and cannot effectively be separated.

The Congress, the Department of Transportation, and the Federal Aviation Administration recognize this direct symbiotic relationship and the delicate balance between promotion of safety and promotion of air commerce. A balanced approach to safety automatically enhances air commerce, whereas seeking absolute safety would likely stifle air commerce through increased costs and regulatory burdens. Conversely, emphasizing the promotion of air commerce to the exclusion of safety considerations would be disastrous. Thus, it is incumbent upon the FAA to maintain this delicate balance by conducting an Aircraft Certification process that is characterized by credibility, integrity, quality, and consistency. In that regard, the agency strives to maintain a process of certification which is open, honest, forthright, sound in concept, not subject to change without benefit of the public process, accomplished in a competent and professional manner, and uniformly applied throughout the FAA. With such a process, every time a new or modified aircraft is properly certificated, produced in accordance with approved data, and placed in service with a certificate of airworthiness, air commerce and safety are being promoted. The manufacturers, operators, and general public benefit, technology advances, and progress toward an improved society is achieved. In fact, world leadership in aviation could not have been realized without a constant FAA focus on this delicate dual mission.

4. Aircraft Certification in the FAA demands unity of purpose.

Experience has clearly shown that the exacting and sometimes complex process of certification does, in fact, significantly contribute to enhanced safety and service which, in turn, promotes air commerce. The process is sound in theory and is limited in our unity of purpose, commitment, and ability to communicate, coordinate, and cooperate. The process of certification has many facets, involves diverse technical and administrative specialties, is widely dispersed geographically, and involves voluminous regulatory, policy, and procedural guidance material. All of these factors can, if not properly managed on an individual basis, hamper effective interaction, common understanding, and attainment of common goals. The directorate organization was established in the spirit of unity and with the intent of obtaining a greater level of certification effectiveness, national standardization, accountability, and team action in the work force.

a. Standardization:

Standardization in compliance enhances safety, enables more efficient industry planning and development, contributes to economic stability, minimizes confusion, reduces conflict, and results in improved performance and morale.

Standardization does not mean everyone is to design alike and that all projects will be substantiated by identical data. There must always be the latitude to provide for innovative designs and to exercise sound engineering judgment regarding technical adequacy. When judgment is applied, differences in design will occur, and appropriately so. In a letter of August 6, 1984, the FAA Administrator wrote in part:

> "Let me start by saying that I do not want to emphasize mindless adherence to rules or that we standardize at the expense of innovative thought. Standardization is a mind-set. It is making an act or procedure the same, such that each person in the organization knows what he or she is to do and how to do it, and each person outside that organization views his or her treatment or interface with the organization as being the same regardless of where the interface occurs."
>
> "When I refer to the need for standardization in the FAA, I am thinking in terms of standardization of procedures such that our public sees us as one - consistent and understanding."

With this guidance in mind, standardization in the Aircraft Certification programs can be defined as:

The process which affords all applicants the equal opportunity to comply with the letter and intent of the regulatory requirements by utilizing existing FAA policies and procedures or by proposing unique methods of compliance with provide an equivalent level of safety.

The Regional Director of each accountable directorate and the Director of Airworthiness have final authority and responsibility and are ultimately accountable for the assigned certification programs. In that regard, the accountable Director is responsible for providing the regulations, guidance, and technical direction necessary for standardization in compliance, and the certification workforce has the responsibility to apply the regulations and guidance in a uniform manner. There is no place in the certification environment for casual non uniform guidance, private regulatory interpretations, personal application of certification standards, "turf" protection, or parochialism. There is an essential place, however, for individual initiative in communication/coordination/ cooperation.

b. Non-Adversarial:

In the FAA, we work with industry and each other cooperatively. We do not approach certification from an adversary point-of-view. We believe that the existing safety record has been achieved through a cooperative effort between manufacturers, operators, and the FAA, and significant progress in safety can only be realized through a continuation of this highly cooperative attitude.

c. Reducing the regulatory and administrative burden:

Within the FAA, we continually give thought to ways of reducing the regulatory and administrative burden without derogating safety. In this regard, if industry desires, we can become involved in the early phases of product design, planning, and development to share our opinions regarding compliance issues. Industry must recognize, however, that FAA does not dictate design and FAA opinions are not provided with that intent. Likewise, FAA will not participate in developmental company flight tests or provide certification test equipment to the industry.

d. Duplication of effort:

We intend to minimize duplication of effort. The directorate organization looks like an ideal arrangement to enable two FAA offices to evaluate all aspects of a certification program. That is not the intent, and it should not happen.

CONCLUSION:

To be meaningful, this statement of philosophy must be accompanied by intellectual cooperation and true recognition that "we" collectively are dependent upon each other for success and satisfaction. Every person in the organization has an important contribution to make to the whole. Such contribution should not be blindly obstructed by process, procedures, interpersonal relationships or organization. We are the best in the world at what we do, and we will continue to strive to be better. We, as FAA employees, owe that commitment and promise to the general public, the industry public, the FAA organization, and each other. We can rightfully be proud of our achievements and have every reason to look to the future with optimism.

REFERENCES:

1. Policy Statement of the FAA dated May 6, 1965.
2. Paper on "Historical Background to Parts 27 and 29 of the Federal Aviation Regulations" (Undated and author unknown).
3. Supreme Court decision No.'s 82-1349 and 82-1350, dated June 19, 1984.
4. Paper on Ethics and the Public Service, Stephen K. Bailey.
5. Order 8000.51.
6. August 6, 1984, letter from Administrator Engen.
7. National Research Council Study, June 1980.
8. Aircraft Certification Evaluation Report, February 20, 1985.