

SUMMARY SHEET
Airworthiness Directive Implementation Aviation Rulemaking Committee
AD Development Working Group

Primary Report and Recommendation	AD Compliance Review Team (Task 2), Recommendation 4, Bullet 1 (Part 1)
Secondary Report and Recommendation	None
Assigned Members	Holly Thorson (AIR) (POC) Tim Dowling (Boeing) (POC) Tammy Anderson (AIR) Elizabeth Bumann (AIR) Jim Orchard (AFS) Harry Hoffman (AFS) Eric Blancaneaux (Airbus) Marco Capaccio (EASA) Ross Stewart (ABX) Rafael Marques (Embraer) Oswaldo de Oliveira (ANAC) Craig Fabian (ARSA) Plamen Stoyanov (Alaska) Barry Baker (Pinnacle)
Links to Other Working Groups	Service Information WG
Date Sent to AD Development WG	13 July 2010
Date Sent to other WGs for Review	16 August 2010
Date Submitted to ARC	5 October 2010
Date Approved by ARC	9 February 2011

WORKING GROUP REVIEW OF ISSUE/PROBLEM

Recommendation 4, bullet 1, identifies two issues. Namely, resolve the issues in Finding No. 4 and ensure the AD development process is effective and efficient. This Summary Sheet only addresses resolving the issues in Finding No. 4, specifically bullet 3. The focus is on bullet 3 because the first two bullets under Finding No. 4 are addressed by resolving bullets 5 and 3, respectively, under Recommendation 4. A separate Summary Sheet will be used to document resolution of Recommendation 4, Bullets 3 and 5.

With respect to the issue in Finding No. 4, bullet 3, air carriers often accomplish actions in a service bulletin when the bulletin is initially released by the Design Approval Holder or upon issuance of the Notice of Proposed Rulemaking (NPRM). In doing so, air carriers risk non-compliance to the Final Rule AD if the mandated service bulletin revision level is not the same as the one accomplished. In such cases, an Alternative Method of Compliance (AMOC) must be approved to address differences between the various revision levels of the bulletin and additional work may be required to comply with the AD.

REGULATIONS AND GUIDANCE IDENTIFIED FOR REVIEW

- AD Manual, FAA-IR-M-8040.1C

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- Standardized AD worksheet
- Standardized AD templates

WORKING GROUP PROPOSAL TO ADDRESS THE RECOMMENDATION(S)/FINDING(S)

The proposal includes adding a standardized header to each AD template when the FAA determines that an earlier revision of the service information is acceptable to resolve the unsafe condition. The Aviation Safety Engineer (ASE) will identify on the AD worksheet whether credit can be given for earlier revisions of the service information, see Appendix A. The ASE may also identify, if applicable, any limitations, restrictions, or additions necessary for persons who may have complied with earlier service information. The technical writers will then add the header “Credit for Actions Accomplished in Accordance with Previous Service Information”, see Appendix B, if credit is acceptable.

ALTERNATIVES CONSIDERED

N/A

IMPLEMENTATION PLAN

The latest revision to the AD Manual, FAA-IR-M-8040.1C, Chapter 8, requires addressing credit for actions accomplished using an earlier revision of the service information in the AD templates, see Appendix C.

We consider this part of the recommendation (Finding 4, Bullet 3) closed with the issuance of AD Manual, FAA-IR-M-8040.1C, dated May 17, 2010, and implementation of the standardized AD worksheet and template in August 2010.

ASSUMPTIONS/CONSTRAINTS

None

FAA AND INDUSTRY TRAINING IDENTIFIED

N/A

ISSUES FOR WORKING GROUP CONSIDERATION

N/A

ISSUES FOR ARC CONSIDERATION

N/A

FINDING No. 4

The Team found systemic problems in the AD process as follows:

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- Multiple ADs affecting airworthiness in the same area of the airplane resulting in overlapping and confusing mandates for air carriers. This can lead to inadvertent noncompliance or reversal of previous AD actions.
- Occasionally, the OEM's service instructions are not available when the AD NPRM is issued. In addition, copies of service instructions are not included in the Government's electronic regulatory docket system. In either case, this prevents air carriers from having the full comment period to comment on the specifics of the service document.
- ADs generally have an aggressive installation timeline. Because of the urgent nature of AD tasks and the need for planning to minimize aircraft out-of-service time, air carriers frequently accomplish service instructions ahead of the AD issuance date. This creates an exposure to noncompliance when there are changes in the final AD that differ from the originally released service document.

RECOMMENDATION No. 4, BULLET 1

The Team recommends the following related to AD development:

- Charter a joint team made up of representatives from the FAA, OEM, and air carriers to resolve finding No. 4. The overarching goal is to ensure that the AD development process is effective and efficient and results in a compliant product for air carriers.

NOTE: As described above, this summary sheet only addresses one part of Finding 4, specifically bullet 3.

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APPENDIXES

Appendix A. Excerpt from AD worksheet regarding credit for actions accomplished using an earlier revision of the service information.

Are there any other service bulletins or prior revisions of the mandated service information that we will grant credit for if previously complied with? Attach a clean copy. *(List previously issued service information considered acceptable, including, if applicable, any limitations, restrictions, or additions necessary.)*

Appendix B. Excerpt from AD Manual, FAA-IR-M-8040.1C, Chapter 8, paragraph 9g(3) regarding credit for actions accomplished using an earlier revision of the service information.

(3) When appropriate, allow credit for actions accomplished using an earlier revision of the service information than identified in the AD action. For example:

Example 8-38: Credit for Actions Accomplished in Accordance with Previous Service Information

Actions accomplished before the effective date of this AD in accordance with the procedures specified in Boeing Alert Service Bulletin 717-38A0004, dated December 6, 2006, are considered acceptable for compliance with the corresponding actions specified in paragraph (f) of this AD.

Appendix C. Excerpt from AD template, Compliance paragraph, regarding credit for actions accomplished using an earlier revision of the service information.

[Delete if N/A] [Credit for Actions Accomplished in Accordance with Previous Service Information]

(**) [If there are alternate service bulletins or prior revisions of the mandated service information that were previously released and are considered acceptable for compliance to the AD actions, list here. Also, if applicable, list any limitations, restrictions, or additions necessary for persons who may have complied with earlier service information.]