

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

Primary Report and Recommendation	AD Compliance Review Team (Task 2), Finding 6, Recommendation No. 6, Bullets B2, B3 & B4
Secondary Report and Recommendation	None
Assigned Members	Craig Amadeo (DAL) Russell Reed (CQT) Ken Filippelli (FAA) Jeff Hodowanic (AirTran) Kawehi Lum (FAA) Nick Pearson (FAA)
Links to Other Working Groups	
Date Sent to ARC	12/7/2010
Date of ARC Approval	2/16/2011

WORKING GROUP REVIEW OF ISSUE/PROBLEM

Task 2, Recommendation 6, Bullet 2:

AD compliance planning throughout the industry can result in variations in AD compliance from carrier to carrier. The interpretation of compliance has become much stricter in recent years. This has necessitated the industry to develop best practices to help with consistent implementation of AD-related actions. For this reason, it is important to identify the following through air carrier manuals and FAA guidance material and policy. (1) the elements for effective Airworthiness Directive (AD) compliance planning and implementation, (2) the specific associated processes and tasks that comprise these elements, and (3) the individuals with authority and responsibility for the elements.

Task 2, Recommendation 6, Bullet 3:

Aviation Safety Inspectors (ASI) are often not familiar with operators' airworthiness directive (AD) compliance plans, which can raise questions and concerns as to how an operator is complying with a particular AD. Having ASIs participate in the carrier's AD planning process will give the ASI the opportunity to comment on any potential compliance issues, as well as provide them the opportunity to offer guidance and suggestions. ASI participation is not mandatory. As such, the draft documentation will advise that it is a best practice to invite the local FAA to the air carrier's compliance planning meeting.

Task 2, Recommendation 6, Bullet 4:

ASIs are not always familiar with what is involved in accomplishing AD tasks. ASI participation in the prototype process fosters a culture of open and honest communication with the goal of improving continued operational safety.

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

REGULATIONS AND GUIDANCE IDENTIFIED FOR REVIEW

- Element Performance Inspection (EPI) 1.3.6 (ATOS related)
- Safety Attribute Inspection (SAI) 1.3.6 (ATOS related)
- FAA Order 8900.1
- 14CFR39
- AC 43.13
- AC120-16E
- AC39-7C
- ATA Spec 111

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

This group proposes to draft documentation for incorporation into a new Advisory Circular that provides best practices for an AD compliance planning process, including prototyping of air carrier AD implementation documentation. It is important to communicate best practices for AD compliance planning. The recommendation suggests that the ATA should disseminate the information on AD compliance planning to the industry. The communication methods of the ATA disseminate information to ATA members. The Working Group sees that this information needs a much broader communication plan since not all carriers are ATA members. The new AC is seen as the best possible vehicle for this communication.

Recommended ASI participation in AD compliance planning and the prototype process will be included in the developed documentation. Aviation Safety Inspectors (ASI) are often not familiar with operators' airworthiness directive (AD) compliance plans. This can raise questions and concerns as to how an operator is complying with a particular AD. Having ASIs participate in the carrier's AD planning process will give them visibility of any potential AD compliance issues, the carrier's plan for accomplishment, as well as provide them the opportunity to provide guidance and offer suggestions.

In addition, ASIs are not always familiar with what is involved in accomplishing AD tasks. ASI participation in the prototype process fosters a culture of open and honest communication with the goal of improving continued operational safety. We will propose best practices for the new AC that will encourage air carriers to include the ASI/CMO during prototyping of the air carrier's compliance documentation on the first aircraft of their fleet.

We expect that air carriers will incorporate these suggested best practices into their AD compliance planning process.

This group also proposes to draft verbiage for incorporation into FAA order 8900.1 that provides guidance to the ASI as to their role in the air carrier AD planning meetings and prototypes. As there is currently no formal ASI participation in AD compliance planning or AD prototyping, no guidance exists as to the ASI's role in these events. This could lead to inconsistencies in what

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

ASIs require of operators. Providing guidance to the ASIs will ensure consistent involvement in the air carrier’s AD processes.

ALTERNATIVES CONSIDERED

The working group considered revising AC 120–16x or AC 39–7x, but the working group’s consensus is that an AD management process is not directly related to the topics of these AC: AC 120–16 is related to maintenance programs and AC 39–7 applies to all aircraft owners and operators, not just air carriers. In addition, AD management and compliance are very critical functions that have recently had industry-wide impact. The working group contends that a single location for AD management processes will allow for focused review and future process improvement. ATA Spec 111 currently stops at the point the Service Action, often a Service Bulletin, is released to the fleet. ATA Spec 111 is aimed at the OEM, the Lead Airline, and, to some extent, the FAA and the ATA. AD Compliance Planning, however, typically is performed at individual air carriers, does not include the ATA or the OEM and happens significantly after the release of the service action. For this reason, the working group recommends a new AC.

IMPLEMENTATION PLAN

The working group proposes to develop industry best practices for operators to follow in response to ADs. This implementation plan will include pre-planning, implementation, and AD verification programs. These best practices will also include ASI/CMO participation in AD compliance planning and on-aircraft prototyping. We expect this suggested wording will be incorporated into a new FAA Advisory Circular for AD Management.

The working group recognizes that upon issuance of the proposed AC, the FAA will revise the Element Performance Inspection (EPI) and Safety Attribute Inspection (SAI) Data Collection Tools to include reference to the new AC for industry best practices. Revision of the EPI and SAI Data Collection Tools will encourage the use of these practices and the AC and promote an industry standard method of processing ADs to comply with the applicable regulations.

The working group also proposes to develop language for FAA Order 8900.1 to identify the ASI’s role in the air carrier’s AD compliance planning process. The suggested wording will be intended for incorporation in a revision to Order 8900.1, or into a policy letter for ASIs.

Implementation milestones:

- (1) New FAA Advisory Circular outlining best practices
 - AIWG submits draft language for new AC 12/31/2010
 - AFS-300 publishes AC 4/30/2011

- (2) ATOS revision to reference the new AC
 - ATOS releases rapid revision to add references to EPI and SAI.....5/6/2011

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

- ATOS revises EPI and SAI.....6/30/2011
- (3) Revised FAA Order 8900.1
 AIWG submits draft language for revision to Order 8900.1 12/31/2010
 AFS-300 publishes revised Order 8900.14/30/2011
 AFS-300 completes training plan for ASIs on Order 8900.1 revision6/30/2011
- (4) Air Carrier confirmation of implementation of best practices
 AD ARC communicates need for industry to adopt best practices4/30/2011
 AD ARC gathers data on implementation by operators6/30/2011

ASSUMPTIONS/CONSTRAINTS

ASSUMPTIONS:

- It is assumed that the FAA may not always attend the AD Compliance Planning meetings or prototypes when invited.

CONSTRAINTS:

- The FAA may not want to participate in the AD Compliance Planning meetings.
- The FAA may not be available to participate in the AD Compliance Planning meetings.
- The Air Carrier may not want the FAA to participate in the AD Compliance Planning meetings.
- The prototypes may be accomplished in locations not accessible to the FAA.
- EPI 1.3.6 may need to be revised to add references to a new AC, if a new AC is developed.
- SAI 1.3.6 may need to be revised to add references to a new AC, if a new AC is developed.
- The FAA may need training on their role in AD Compliance Planning meetings and during the prototype process. Their role should not be a quality control function but rather to obviate the need for AMOCs and to reduce paperwork violations and infractions.

ISSUES FOR WORKING GROUP CONSIDERATION

None

ISSUES FOR ARC CONSIDERATION

None

FINDING No. 6

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

The Team found that it is important to identify the following through air carrier manuals and FAA guidance Material and policy. (1) The elements for effective AD compliance planning and implementation, (2) the specific associated processes and tasks that comprise these elements, and (3) the individuals with authority and responsibility for the elements.

RECOMMENDATION NO. 6

- ATA should review the primary elements for airline internal compliance planning discussed above and disseminate like information to the industry. (See discussion of the Lead Airline Process under section 2.2.2, AD Development.)
- The FAA and ATA jointly should develop a policy for CMO participation during the air carrier's AD compliance planning process. CMO participation during the process will educate the ASIs on the air carrier's AD compliance plan recommendations. However, the CMO should not perform a quality control function or require a signoff. Currently, FAA principal inspectors are invited to reliability board meetings at some air carriers but otherwise are not involved in developing EAs. The intent of advance CMO participation is to obviate the need for AMOCs and reduce paperwork violations and infractions.
- CMOs should participate in AD prototyping. However, this monitoring should not require a signoff from the CMO or be a required step to completing any work.