

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

Primary Report and Recommendation	Role of the PI (PMI or PAI) and the CHDO in the AMOC Process: (T2, R9, Issue 2)
Secondary Report and Recommendation	None
Assigned Members	Rick Hardmeyer (American Airlines; Subgroup Focal), Al Boring (Alaska Airlines), Greg DiLibero (FAA), Bill Heliker (FAA), Paul Sesny (Boeing Corporation), Herman Bijl (Bombardier Aerospace)
Links to Other Working Groups	None
Date to Sent to ARC	December 6, 2010
Date of ARC Approval	Feb. 16, 2011

WORKING GROUP REVIEW OF ISSUE/PROBLEM

The CRT Task 2, Recommendation 9 consists of two separate recommendations; 1) approving all AMOCs as global and posting these on a website so they are easily accessible to all air carriers and 2) clarify the role of the ACO and the PMI in AMOC approval and implementation.

This summary sheet only addresses the 2nd recommendation (T2 R9 I2). The work group discussions indicated that the lack of clarity of the PI’s role does not appear to be as pervasive as the recommendation indicates. However, the work group found there is an opportunity to improve awareness and guidance addressing PI’s role in the AMOC process.

Title 14 CFR section 39.19 defines alternative methods of compliance to Airworthiness Directives and how these are to be transmitted to the FAA. In general, it requires requestors to either submit it directly to the principle inspector (PI) for comment and transmittal to the appropriate Aircraft Certification Office (ACO) or the AMOC request can be transmitted to the PI and the ACO simultaneously.

- The Flight Standards Service has no published guidance material for use by its personnel regarding their role in the AMOC process that defines their role in the process. Order 8110.103A is primarily written for “Aircraft Certification Service Personnel responsible for AMOCs.”
- The intent of §39.19 is for the PI to be aware of the request so that appropriate information can be provided to the ACO that will approve the request. The PI is to be notified but not approve the request. The PI should provide comments to the ACO regarding the requestors’ fleet configuration, operational impact, environment or maintenance practices and the like that might be useful to the ACO in evaluating the request.
- Many air carriers request technical support from the OEM/DAHs. OEM/DAHs often obtain third party AMOCs from the ACOs on behalf of the air carriers. Sometimes these AMOCs are serial number specific and other times they are global (i.e., apply to the entire fleet). Air carriers must notify their PI (PMI or PAI) of these AMOCs prior to use but no further approval is required from the PI.
- Some air carriers complain that they are required to receive PI approval prior to implementing an AMOC.

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- Some air carrier’s general maintenance specifications may include language requiring PI approval. In this case, PI approval would be required; however having PI approval included in general maintenance manual is not a regulatory requirement.
- There is an industry wide perception that PIs are not standardized in their interpretation of the approval/notification requirements of §39.19 and their role in the AMOC process.

REGULATIONS AND GUIDANCE IDENTIFIED FOR REVIEW

1. 14 CFR 39.19
2. Order 8110.103 (AMOC)
3. AD Manual IR-M-8040.1B
4. Order 8900.1 (Airworthiness Inspectors Handbook)
5. DER Seminars
6. ATOS SAI, EPI 1.3.6

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

- Increase PI’s awareness and understanding of their role in the AMOC process through a series of regional briefings. These briefings were completed in June 2010 and included a slide to directly address this issue.
- Create language in FAA Order 8900.1 Flight Standards Information Management system (FSIMS) providing guidance on the PI’s role in the AMOC process. This change is intended to establish policy for future training and use by field inspectors.
- Reword ATOS SAI 1.3.6 (ref. Question 1.8) “FAA approval” to “FAA approval by the manger of the FAA office identified in the AD”

ALTERNATIVES CONSIDERED

- Considered revising Order 8110.103 to change the language in the AMOC letters to clarify who has approval authority. Team decided the problem was not pervasive enough to require this change. The briefings, notice, and change to the Airworthiness Inspectors Handbook is sufficient to address the problem in both the short and long term.
- Enhance FAA25704 training class “Foundations for Principal Inspectors” to further clarify the PI’s role in the AMOC process.
- Revising the language in §39.19. The team doesn’t believe this problem is pervasive enough to require a change in regulatory language. Better definition of the policy and guidance should be sufficient.
- Revise the AD Templates referenced by the AD manual. Add words to the AMOC paragraph in ADs to clarify the PI role in the AMOC process. This change would make clear to all users of ADs and should preclude any future misunderstandings. Team decided the problem was not pervasive enough to require this change.
- ATA/RAA make training available to air carriers to help them understand the AMOC process and the requirements of §39.19. The ARC may want to consider requesting ATA/RAA develop training for air carriers that encompass the outcome of all changes implemented as part of AD Implementation ARC.

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IMPLEMENTATION PLAN

- Regional Briefings were completed at various locations throughout the US in January through June of 2010.
- Write draft FAA policy for 8900.1, and ATOS SAI 1.3.6. Completed November 3, 2010.
- Work with each policy office to create final version of these documents through January 2011.

ASSUMPTIONS/CONSTRAINTS

Assume both air carriers and PI's refer to 8900.1 for policy related to AMOCs and approval process.

ISSUES FOR WORKING GROUP CONSIDERATION

The FAA Org/Proc WG has addressed that subject with the following items:

Order 8110.103 (some of the incorporations in the revised Order), clarifies simultaneous coordination of AMOCs.

New procedures for handling urgent "24/7" AMOC support requests.

eLMS training module is being developed that addresses the PI's role in the AMOC process.

Order 8900.1 - The FAA Org/Proc WG is in the process of drafting guidance that discusses the Role of the PI in the AMOC process

ISSUES FOR ARC CONSIDERATION

The ARC may want to consider requesting ATA/RAA develop training for air carriers that encompass the outcome of all changes implemented as part of AD Implementation ARC.

FINDING NO. 9

The Team noted that air carriers and CHDOs often are not aware of applicable global AMOCs that the FAA has approved. Some air carriers and CHDOs misinterpret the requirement that air carriers notify their CHDO before implementing a global AMOC as a requirement to gain the approval of the CHDO.

RECOMMENDATION NO. 9

The FAA and industry should develop a process to approve all AMOCs as global unless the requesting air carrier specifically states that it does not want the AMOC shared. The global AMOCs would be posted on OEM Web sites accessible to all air carriers in a way that protects the intellectual property rights of the OEMs and the air carriers where appropriate. The industry

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and the FAA also should ensure that CHDOs do not require air carriers to gain their approval to implement a global AMOC.

APPENDIXES

None