

SUMMARY SHEET
Airworthiness Directive Implementation Aviation Rulemaking Committee

Primary Report and Recommendation	FAA and OEMs develop procedures for addressing crisis situations related to widespread AD compliance issues: (T2, R10) Communication & 24/7 Process
Secondary Report and Recommendation	None
Assigned Members	Rick Hardmeyer (American Airlines; Subgroup Focal), Al Boring (Alaska Airlines), Greg DiLiberio (FAA), Bill Heliker (FAA), Paul Sesny (Boeing Corporation), Herman Bijl (Bombardier Aerospace)
Links to Other Working Groups	Not applicable
Date to Sent to ARC	12/07/2010
Date of ARC Approval	2/16/2011

WORKING GROUP REVIEW OF ISSUE/PROBLEM

- Issue is related to the interaction between and among air carrier, OEM/DAH, AEG and ACO at different levels. Communication needs to occur at the first sign that there may be a non-compliance that affects multiple aircraft and should take place within the different entities with the right escalation level.
- The FAA has developed an internal 24/7 process that can be invoked by Flight Standards personnel including when after hours ACO support is needed. The AR-ANM -029-W2 published December 2009 does now include a path for air carrier or Certificate Holding District Office (CHDO) contact of the ACO.
- All major OEM/DAHs provide 24/7 technical support to their air carriers including points of contact. This support should include a crises escalation process that facilitates the involvement of the air carrier, the PI (either PMI or PAI) and the ACO.

REGULATIONS AND GUIDANCE IDENTIFIED FOR REVIEW

1. FAA working instruction AIR-ANM-029-W2; 24/7 support
2. Order 8040 (Airworthiness Directives)
3. IR-M-8040.1 (Airworthiness Directive Manual)
4. Order 8110.37 (DER Handbook)
5. Order 8110.103 (AMOC)
6. Order 8100.15 (ODA)
7. Order 8900.1 (Airworthiness Inspectors Handbook)
8. DER Seminars
9. AC 39-7c (AD)
10. 14 CFR 21.99 (Required Design Changes)
11. 14 CFR 21.137 (m)

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

- FAA working instruction AIR-ANM-029-W2, establishes 24/7 process for ACO internal support to CHDO and CHDOs have been briefed on process.
- All OEM/DAHs have a technical helpdesk to ensure 24/7 support to air carriers to prevent grounding due to potential AD non-compliance. Air carriers have existing means to initiate contact with both the Regulatory Authority (CHDO) and the OEM/DAH's Technical Helpdesk. Air Carriers should establish and use contact points with the OEMs/DAHs before the issue becomes a crises.
- The air carrier and FAA Regional Office, as a best practice, should jointly develop an issue resolution process. For compliance issues, this process may include communication first with the OEM/DAH and then as necessary with the AEG and ACO through the PI. The practice also should include an escalation contingency plan. Include in process a risk management/safety assessment for resolution purposes for the aircraft and possibly fleet wide issues.

ALTERNATIVES CONSIDERED

None

IMPLEMENTATION PLAN

- In new AD Compliance AC 39-XX (AD Management AC being developed by AFS-300 through the AD ARC WGs) include language recommending air carriers develop a conflict resolution process with their FAA Regional Office. Include in process a risk management/safety assessment for resolution purposes for the aircraft and possibly fleet wide issues. This process should ensure that the air carrier and specifically the PI mutually understand that the purpose of the FAA internal 24/7 process is for the PI to communicate with the AEG and ACO on significant compliance issues.
- In new FAA AD Policy Memo, include language recommending OEM/DAHs put a process in place or document existing process to ensure 24/7 support to air carriers to prevent grounding due to potential AD non-compliance.
- In new AD Compliance AC XX-XX, include language recommending that Air Transport Association (ATA)-member airlines invoke the provisions of the ATA Spec 111 Airworthiness Concern Coordination Process for a significant compliance issue that may be widespread and newsworthy. Other associations (RAA, ARSA, et al) should establish a similar process. The AC should include language regarding ATA and other air carriers associations' coordination with Regulatory Authorities and OEM/DAHs. Air Carriers should establish and use contact points with the OEMs/DAHs before the issue becomes a crises.

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ASSUMPTIONS/CONSTRAINTS

OEM/DAH harmonization; ‘Foreign’ OEM/DAHs are challenged in direct discussion with FAA ACO/CHDO. Will need to involve regulatory authority of the state of design.

ISSUES FOR WORKING GROUP CONSIDERATION

None

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.

The ARC may want to follow-up in three month, six month and twelve months to determine if the recommendations have been implemented and are still in place and working effectively.

FINDING No. 10

The Team found that although air carriers had access to the ACO, the ACO found it more efficient to collectively address the volume of air carrier issues through the OEM. The ACO often was occupied and not available to individual air carriers. As a result, the OEM was the best positioned to develop an overall picture of developments. In effect, the OEM operated a “war room,” orchestrating conference calls for air carriers, CMOs, and ACOs.

RECOMMENDATION No. 10

Responsive communication and industry collaboration are essential in crisis situations involving widespread AD compliance issues affecting air carriers. The ACO and OEM should develop contingency procedures and disseminate them internally in advance of future events. This will ensure that points of contacts are established for air carrier use in expediting resolution of fleet wide issues. The ATA may facilitate this process provided that air carriers immediately advise the ATA of a significant compliance issue that may be widespread and newsworthy.

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APPENDIXES

None