

FAA/Applicant Relationship Management Guide



*This Guide Compliments the FAA & Industry Guide to Product Certification,
Third Edition, May 2017*

Prepared by AIA, AEA, GAMA, and the FAA Aircraft Certification Service and Flight Standards Service



Introduction

One of the principles of the FAA & Industry Guide to Product Certification (CPG) is to foster a strong relationship between an applicant for a design approval and the FAA. A strong underlying relationship facilitates the certification process in a number of ways. Roles and responsibilities are clearly understood and respected; transparent communication happens on a regular basis; both parties can respond to predictive needs of the other; and when issues arise, both parties approach resolving those issues with a common goal of achieving safe and compliant products.

As such, the CPG Implementation team has identified regular relationship level discussions between the FAA and an applicant as a best practice to build and foster a strong relationship. The frequency and audience may vary depending on the size and scope of certification work that an applicant performs. For example, a smaller PMA company might have regular discussions with a Program Manager from their ACO Branch and the Principal Inspector from their MIDO Section, while a larger STC company may have annual or semi-annual meetings that involved the ACO Branch and MIDO Section managers. The participants on the industry side will vary as well, but should be the appropriate equivalent to the FAA attendees. For smaller companies, this may include the owner or executives; for larger companies it may include the certification manager or other equivalent position. These meetings are most effective when all stakeholder groups from the FAA are represented including the ACO Branch, the MIDO section, and the Aircraft Evaluation Division. Independent of the audience, the intent of these meetings is to take a step back from project specific discussions and evaluate how the relationship between the FAA and the applicant is working and where both parties would like to see it move in the future.

The ODA Scorecard effort has been in place for TC and STC ODA holders for a number of years now. One of the most beneficial pieces of the ODA Scorecard effort every year is the conversation between the ODA holder and the FAA to review how things are going in the FAA/ODA Holder relationship, identify opportunities to capture those things that are working well in a documented process, and discuss areas for improvement in the relationship.

A similar framework does not exist for standard cert applicants and for PMA/TSO ODA holders. In addition, Branch Managers, Front Line Managers, and Program Managers across the FAA have varying levels of comfort entering into these types of conversations without a structure for the discussion, similar to that provided by the ODA Scorecard. For these reasons, the CPG Implementation Team has put together the following set of questions to help initiate and sustain relationship level conversations with standard cert applicants.

In some cases, applicants may be hesitant to raise issues or concerns about their relationship with the FAA. The FAA is a sole source provider for applicants seeking design approvals, meaning that they have no alternative to working with the FAA and some applicants may have concerns about reprisal should they raise challenges or issues they have with the level of support from the FAA. For this reason, it's critical to set the appropriate tone and approach for these conversations with the mutual goal of understanding the current status of the relationship and a commitment to improving those relationships.

These relationship level meetings do not need to be intricately planned, all day affairs (although with some major applicants, they may be exactly that). Rather, for many standard cert applicants, they could be 30 or 60 minute meetings held quarterly, semi-annually, or yearly depending on the volume and complexity of

certification work and the capability demonstrated by the applicant. Note that many ACO Branches have regular program management meetings with their applicants (weekly or biweekly). The intent of this toolkit is to encourage a more deliberate discussion about the status overall relationship between the FAA and the applicant/design approval holder so the relationship level discussion should be separate from any regular program management meetings.

It should also be noted that the goal of the CPG is to establish the appropriate level of compliance proficiency for an applicant to satisfy their business goals. While the FAA expects all applicants to have a baseline understanding of the certification process and that all Design Approval Holders understand and execute their responsibilities under Part 21, some smaller applicants who conduct a low volume of projects may not have a business case to significantly improve their certification capabilities and are content with a high level of FAA involvement in their projects and the resulting impact to schedule. Higher volume applicants on the other hand may (in fact, should) be looking to reduce FAA involvement through increased delegations or a systems approach to certification to allow more control of their schedule and resources on a certification project.

Note that these questions are not intended to be a formal script that needs to be followed. Rather, they are intended to initiate conversation between the FAA and an applicant. Some questions aren't appropriate for all applicants based on the size of the company or the type of work that they do. Once the conversation is initiated, other questions may arise that aren't on this list, which is appropriate given the expectations for these discussions.

Introduction

Project Level & Planning

- How many projects has the applicant completed over the last two years?
 - Do you see that volume increasing, decreasing or staying constant in the next year or two?
- What are the company's certification plans for the next year? 3 years?
 - Is the current level of support from the FAA sufficient to help you achieve those goals?

Certification Project Planning & Execution

- Do certification plans generally get accepted the first time through or are there revisions required prior to initial acceptance by the FAA?
 - If revisions are required, are there trends that can be addressed leading to higher quality submittals?
- Are compliance documents generally approved the first time through or do they require rework prior to FAA approval?
 - If revisions are required, are there trends that can be addressed to drive higher quality submittals?
- What does the company feel like its strengths are when it comes to certification? (Alternatively, what has worked well in the certification process over the last few years?)
 - Is there an opportunity to document those strengths into a process that can be recognized by the FAA?
- Where does the company see opportunity for improvement when it comes to certification? (Alternatively, what has caused issues or concerns in the certification process over the last few years?)
 - Is there a way to work together to address that opportunity?
- Is there general satisfaction with the level of FAA involvement in the projects? Would the company like to see increased delegation on their certification projects?
- What opportunities does the FAA see for the applicant to increase their proficiency when it comes to certification work?
- What is the company's commitment in resources/personnel to conducting and managing certification projects?
 - Does the company leverage outside resources such as a DER?

Continued Operational Safety

- How does the company support continued operational safety (Design Approval Holder responsibilities)?
 - Is there a feedback mechanism from operators to receive information about product performance in the field?
 - Does the company actively evaluate their procedures to identify issues and report them in a timely manner?
 - Are the issues resolved using a defined process to include root cause analysis and corrective action plans?
 - Are the issues closed in a reasonable timeframe?
 - Does the company meet their obligations for 21.99?
 - If sufficient volume of COS issues exist, is there regular discussion between the FAA and the company to review, prioritize and discuss open COS issues?

Relationship Level Questions

- Does the company have a PSP? If so, when was it last updated? If not, do they have a minor change agreement? If neither, would they be interested in pursuing one?
- If you need something from the FAA, do you always know who to go to?
- Are there any other sources of frustration (or opportunities for improvement) that come to mind?