



**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION**

**ORDER**

**8110.103C**

National Policy

Effective date:  
MM/DD/YYYY

**SUBJ:** Alternative Methods of Compliance (AMOC)

---

This order provides guidance to Federal Aviation Administration (FAA) personnel and FAA designees who handle alternative methods of compliance (AMOC) proposals to airworthiness directives. This order explains how to determine if an AMOC is needed, the process to follow, and other AMOC considerations pursuant to Title 14 of the Code of Federal Regulations (14 CFR).

Daniel J. Elgas  
Director, Policy and Standards Division  
Aircraft Certification Service

## Chapter 1. General Information

**1-1. Purpose of This Order.** This order defines AMOC to an Airworthiness Directive (AD). This order shows how to—

- a. Identify who can approve or deny an AMOC proposal.
- b. Handle urgent requests for AMOC support.
- c. Differentiate between a transferable and non-transferable AMOC.
- d. Properly coordinate an AMOC approval or denial.
- e. Handle global AMOC proposals (also known as an AMOC of general applicability),  
and
- f. Handle AMOC proposals from other civil aviation authorities (CAA) and foreign owners/operators.

**1-2. Audience.** All FAA Aircraft Certification Service (AIR) personnel responsible for AMOCs. It is also written for Flight Standards Service (FS) inspectors, Aircraft Evaluation Division (AED) personnel, and certain designated engineering representatives (DER) and type certification Organization Designation Authorization (ODA) holders.

**1-3. Where to Find This Order.** You can find this order, and other FAA documents referenced in this order, on the FAA employee website, on the FAA public website, and in the FAA Dynamic Regulatory System (DRS).

**1-4. Explanation of Changes.** This order incorporates the following changes:

- a. Updates organizational references to reflect AIR's new organizational structure.
- b. Updates organizational references to reflect FS' new organizational structure.
- c. Replaces the list of specific CAAs in table 1 with newly created global AMOC email address.
- d. Incorporates deviations and clarifications issued against the previous revision of this order.
- e. Adds chapter 5, Administrative Information, and appendices H and G.

**1-5. Effective Date.** This order becomes effective on MM/DD/YYYY.

## **Chapter 2. What Is an AMOC?**

### **2-1. Defining an AMOC.**

**a.** An AD contains the required method for addressing an unsafe condition in an aircraft, aircraft engine, propeller, or appliance. An AMOC provides an acceptable level of safety for a different way, other than the one specified in the AD, to address the unsafe condition.

**b.** This order uses the general term “AMOC” to define an FAA-approved alternative method of compliance to the specific requirements of an AD or a change in the required time to accomplish the AD. The term “product” refers to an aircraft, aircraft engine, propeller, or appliance pursuant to 14 CFR 39.3.

**c.** In August 2002, the FAA added amendment 39-9474 to 14 CFR part 39. The amendment incorporated several provisions previously included in individual ADs. One such provision specified that the AD apply to the product even if it had been modified, altered, or repaired in the area addressed by the AD. Another such provision identified procedures for asking the FAA to approve AMOCs to the AD.

### **2-2. When and Why an AMOC Is Necessary or Desirable.**

**a.** An AMOC is required if an owner/operator cannot comply or finds a different way to comply with the actions specified in an AD.

**b.** The reasons an AMOC may be necessary or desirable include, but are not limited to, the following:

(1) To accomplish AD actions in a way that better suits an owner/operator’s business processes;

(2) Because an owner/operator devises a different or better way of addressing the unsafe condition;

(3) Because an owner/operator wishes to adjust the compliance time stated in an AD;

(4) Because existing modifications, alterations, or repairs to a product make compliance with AD actions difficult or impossible;

(5) To use later revisions of service documents specified in an AD;

(6) Because a superseding AD invalidates previous AMOCs to the original AD;

(7) To address errors in the service document; or

(8) To address errors in the AD.

**Note:** For an error in an AD, an AMOC can be an expeditious way to alert affected owners/operators of the error and the correction. However, if the error affects the substance of the AD or expands its scope, the AD must be superseded to eliminate the error and ensure the broadest availability of the correction.

## **2-3. Who Approves an AMOC?**

**a.** Each AD identifies the office responsible for approving AMOCs to the AD.

(1) For products where the United States is the State of Design (SoD), the responsible office will be the appropriate AIR-500 or AIR-700 branch (a Certification Branch, Continued Operational Safety Branch, or Operational Safety Branch).

(2) For products where the United States is not the SoD, the responsible office will be the appropriate certificate managing office in either AIR-500 or AIR-700.

(3) Sometimes the responsibility for the design approval of a product transfers from one FAA office to another FAA office, such as when a type certificate is transferred. When this happens, the responsibility for approving AMOCs for that product also transfers with the design approval.

(4) When the office identified in the AD receives an AMOC proposal for a product that has transferred, that office is responsible for forwarding the AMOC proposal to the certificate managing office currently responsible for approving or denying the AMOC.

(5) In the case of a large fleet of products, or when a high volume of AMOCs may be likely, the FAA may choose to send a letter to industry organizations notifying them of the transfer. This notification helps direct AMOC proposals directly to the responsible office, thereby eliminating delays resulting from one office having to transfer proposals to the correct office.

**b.** The FAA has authorized certain company DERs and ODA holders to review and approve AMOC proposals. Refer to paragraph 3-3 for more details.

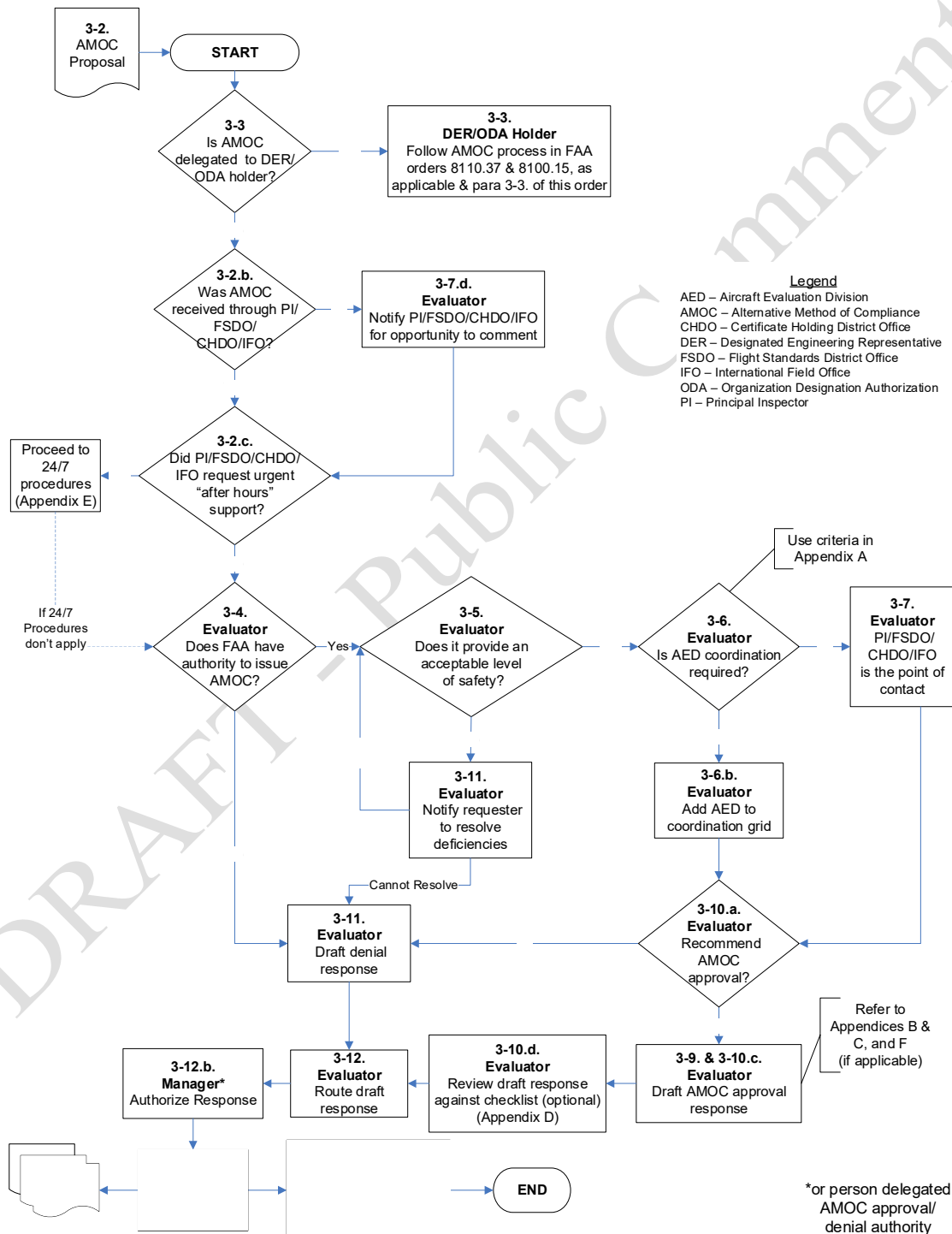
**c.** Principal inspectors (PI) may not approve an AMOC proposal, but they may comment on AMOC proposals they receive (such as pointing out the unique characteristics of the requester's fleet and operation, or indicating whether the operator can reliably accomplish the requirements of the AMOC proposal) before forwarding it to the manager of the FAA office identified in the AD.

**Note:** For the purposes of this order, a PI can be a principal maintenance inspector, principal avionics inspector, or principal operations inspector.

## Chapter 3. The AMOC Process

**3-1. AMOC Process Flowchart.** Figure 1 depicts the AMOC process in a high-level flowchart. The steps are explained in the following paragraphs.

**Figure 1. AMOC Process Flowchart**



**3-2. The AMOC Proposal.** Title 14 CFR 39.19 states in part that “anyone may propose to FAA an alternative method of compliance or a change in the compliance time, if the proposal provides an acceptable level of safety.”

**a.** Although a letter is preferred, AMOC proposals may be submitted by other means, such as email, fax, or telephone. AMOC proposals received by telephone must be documented.

**b.** AMOC proposals should be sent to the responsible office through the PI, unless the requester does not have a PI, as in the case of a DAH (Design Approval Holder). When the requester does not have a PI, the AMOC proposal is sent directly to the manager of the FAA office identified in the AD.

**c.** If a PI, Flight Standards District Office (FSDO), Certificate Holding District Office (CHDO), or International Field Office (IFO) identifies an urgent need for AMOC support outside of normal business hours, follow the process in appendix E to this order.

**Note:** A CHDO is the FSDO responsible for administering the certificate and is charged with the overall inspection of the certificate holder’s operations.

**d.** Refer to Advisory Circular (AC) 39-10, Alternative Methods of Compliance, for the requester’s responsibilities regarding AMOC proposals.

**3-3. Delegated AMOCs.**

**a.** The FAA authorizes certain company DERs or type certification ODA holders to review and approve AMOC proposals. For information on what the ODA holder and DER can do within this delegated authority, refer to FAA Order 8100.15, Organization Designation Authorization Procedures, and FAA Order 8110.37, Designated Engineering Representative (DER) Handbook.

(1) The AD will identify if AMOC approval authority is delegated. For ADs that do not include an AMOC delegation section, AMOC approval authority may be delegated following the guidance in FAA Orders 8110.15 and 8100.37, as appropriate, via a process established between the responsible office and the DAH. AMOC approval authority that has been delegated by the FAA and approved by the designee requires no further FAA approval. The responsible office can delegate AMOC approval authority only for ADs where the requester intends to restore a product to its type certification basis or other known, defined, and published standards. This includes the following:

(a) Certain AD-mandated structural modifications, alterations, or repairs, including those where no previous FAA approved action exists.

(b) Fully substantiated temporary structural repairs if the standards required by the AD are well defined.

(c) The approval of an alternative inspection method, threshold, or interval where a new repair or modification results in the inability to accomplish the existing AD-

mandated inspection or necessitates a change in the existing AD inspection threshold. The standard for these approvals is the appropriate damage tolerance regulation (for example, 14 CFR 25.571, amendment 25-45 or later).

(d) Non-structural minor deviations not associated with correcting the unsafe condition as documented and agreed to between the FAA and designee. The deviation must not have an adverse impact on the prescribed corrective action intended to address the identified unsafe condition. For example, if the location of a bracket is a part of, or the cause of, the unsafe condition described in the AD, it is not appropriate for an AMOC to allow a deviation from the bracket relocation requirement specified in the AD.

(e) In coordination with the responsible office, where the designee has documented the need for a pattern of identical approvals and it has been demonstrated that the AMOC is applicable to a defined set of products, the designee may be authorized to approve either a global AMOC or an individual AMOC applicable to multiple products (as in the case of rotatable or un-serialized parts), on a case-by-case basis, for any of the conditions identified in paragraphs 3-3a(1)(a) through 3-3a(1)(d) above.

(2) When reviewing an AMOC proposal, the DER or ODA unit member is not required to coordinate with the AED/PI/FSDO/CHDO/IFO. However, the designee must consider whether the AMOC proposal is transferable (refer to paragraph 3-10b for additional details).

(3) The responsible office must ensure DERs, and ODA holders follow restrictions applicable to foreign registered aircraft (refer to paragraph 4-5).

(4) The responsible office can remove delegated authority for approving AMOCs at any time and for any reason it deems appropriate. Refer to FAA Order 8000.95, Designee Management Policy, for more information on removing a DER's delegated authority. Refer to FAA Order 8100.15 for more information on removing an ODA holder's authority.

**b.** The FAA may delegate to an ODA holder the authority to approve global AMOCs for administrative (non-technical) corrections to a service bulletin referenced in an AD provided there is a procedure in place for such approvals. Refer to FAA Order 8100.15 for specifics regarding this procedure.

### **3-4. Assigning Evaluator and Checking FAA Authority.**

**a.** The responsible office assigns an evaluator to the AMOC proposal if the office has not delegated AMOC approval authority pursuant to paragraph 3-3 of this order. The evaluator can be an aviation safety engineer, flight test engineer, or pilot, as appropriate.

**b.** If the AMOC proposal is for an AD issued by another CAA, the FAA does not approve the proposal because approval is the responsibility of the CAA that issued the AD. The evaluator drafts a denial response pursuant to paragraph 3-11.

**c.** If an AMOC proposal is for an FAA AD for a foreign-registered aircraft, the FAA can approve the proposal, but the CAA of the State of Registry (SoR) is responsible for

authorizing use of the AMOC. Refer to paragraph 4-5 for more information on AMOC proposals for foreign-registered aircraft.

### **3-5. Level of Safety Determination.**

**a.** Evaluate the data submitted along with the information (such as risk analysis) used to support the decision to issue an AD and, using your best engineering judgment, determine if the AMOC proposal provides an acceptable level of safety. You may contact the requester to obtain missing or additional information. For import products, you may consult with the CAA of the SoD for information to help make the safety determination.

**b.** If the AMOC proposal provides an acceptable level of safety, continue with the AMOC process in paragraph 3-6.

**c.** If the AMOC proposal does not provide an acceptable level of safety, consider giving the requester an opportunity to address any deficiencies. If any deficiency still exists after giving the requester the opportunity to respond, you must deny the proposal pursuant to paragraph 3-11.

### **3-6. Is AED Coordination Required?**

**a.** AED provides technical knowledge for the operator's maintenance program, as well as insight into fleet issues. As the evaluator, you must determine if AED coordination is required by using the AED coordination criteria in appendix A to this order for both individual and global AMOCs.

**b.** If the AED coordination criteria in appendix A are met, the AED is your primary FS point of contact for the AMOC proposal. Discuss the AMOC proposal with the AED and continue the process starting with paragraph 3-8. Include AED on the AMOC response coordination grid when routing the response for coordination pursuant to paragraph 3-12.

### **3-7. Coordination with PI/FSDO/CHDO/IFO.**

**a.** If the AED is not the primary FS point of contact pursuant to paragraph 3-6, either the PI/FSDO/CHDO or the IFO is your primary FS point of contact. However, prior FS coordination is not required for a global AMOC proposal from a DAH.

**b.** If the AMOC proposal is for a U.S.-registered aircraft, the PI/FSDO/CHDO is your primary FS point of contact for the AMOC proposal, unless it is operated by a foreign operator (refer to 14 CFR part 129).

**c.** If the AMOC proposal is for a foreign-registered aircraft, or if the aircraft is U.S.-registered but operated by a foreign operator, the IFO is your primary FS point of contact; however, coordination with the IFO is not required.

**d.** If the AMOC proposal came directly to the responsible office with no PI/FSDO/CHDO comments, notify the appropriate PI/FSDO/CHDO to provide them an opportunity to comment on the proposal. PI/FSDO/CHDO insight is especially important for



proposals for changes in AD compliance times. If you are having difficulty obtaining a response from the PI/FSDO/CHDO or resolving issues, contact the manager of the appropriate office for assistance.

e. The evaluator must save any comments provided with the AMOC proposal, or a record of the request for PI/FSDO/CHDO comments and the resulting comments (including no comment, if applicable). These records can be in various formats such as a memorandum, printed email, or teleconference record.

**3-8. Coordination with Legal Counsel.** Legal review of an AMOC is not required. However, the evaluator can choose to request coordination from legal counsel if desired. When doing so, include legal counsel on the approval letter grid.

**3-9. Proper Methods of Responding to AMOC Proposals.**

a. The responsible office manager, or person delegated AMOC approval/denial authority, approves or denies all AMOC proposals via—

- (1) An email response, or
- (2) A letter response.

b. An email response must be transmitted from and contain the name and title of the official approving or denying the AMOC (refer to paragraphs 3-10e and 3-11b). The email must contain the minimum requirements of this order for an AMOC approval response (refer to paragraph 3-10c) or denial response (refer to paragraph 3-11). The AMOC approval email response must contain either of the following statements, as appropriate:

(3) For ADs where specific reference is made to an AMOC letter, use “This email is issued pursuant to the authority of the Manager of the [insert approving office] and is the AMOC approval letter referenced in paragraph (\*) of AD [\*\*\*\*-\*\*-\*\*].”

(4) For all other ADs, use “This email is issued pursuant to the authority of the Manager of the [insert approving office] as referenced in paragraph (\*) of AD [\*\*\*\*-\*\*-\*\*].”

c. Do not respond to AMOC proposals verbally. This applies even if you are certain a response will be provided. You may informally state that you are working on an AMOC proposal response, but you must clarify that the proposal is not approved or denied until the requester receives the authorized written or electronic response. Refrain from making a commitment for approval or denial of the proposal, because circumstances may change or delay that determination.

**3-10. How to Approve an AMOC.** If the FAA has delegated AMOC approval authority to a DER or ODA holder, follow the AMOC process as shown in FAA Order 8110.15 or FAA Order 8100.37, as applicable (refer to paragraph 3-3).

**a. Review of Comments.** When reviewing an AMOC proposal, review the comments, if any, received from the PI/FSDO/CHDO/IFO or AED and recommend whether to approve or deny the AMOC.

**b. Transferability Determination.** If you are considering recommending approval of the AMOC proposal, determine if the AMOC should be transferable. A transferable AMOC is an AMOC that will continue to apply to a product after it has been transferred to a new owner/operator. The holder of a transferable AMOC can make the AMOC approval document available to someone else who receives a product covered by that document. Changes of compliance time are typically not transferable. You must be careful when determining transferability, and not make an AMOC transferable if it depends on—

- (1) A particular maintenance program schedule, which may not transfer with the product;
- (2) Procedures, facilities, or processes unique to the requester;
- (3) Operational procedures, limitations, or training unique to the requester;
- (4) Recurring inspections or other maintenance actions unique to a requester's maintenance program; or
- (5) Any other factors unique to the requester.

**c. AMOC Approval Response.** If you recommend approval of the AMOC proposal, you must draft an AMOC approval response. Appendix B to this order contains guidance on how to write a specific and effective approval statement within the response and includes examples of problematic statements. The approval response must, at a minimum, meet the following requirements:

- (1) Clearly state the AD number and specific AD paragraph(s) to which the AMOC applies.
- (2) Specify the make and model designations or other limiting factors (such as serial numbers or part numbers) to which the AMOC applies.
- (3) Reference the substantiating data used to establish the acceptable level of safety that was the basis for approving the AMOC.
- (4) Identify any restrictions on the AMOC, such as applicability, special procedures, facilities, processes, or time limitations (or specify that there are no restrictions, if applicable).
- (5) If applicable, refer to the appropriate service documents by number, revision level, and date of revision (if available). It is acceptable to use "or later [FAA] approved revision" if the AMOC requester has a procedure in place with the responsible office to ensure

future revisions of the document will not change the specifics that led to the determination of an acceptable level of safety.

**Note:** If some of the required information in paragraphs 3-10c(1) through 3-10c(5) are contained in the AMOC proposal, you may refer to the information in the proposal and attach it to the AMOC response.

(6) State whether the AMOC is transferable. For an AMOC intended solely for a foreign registered aircraft, use one of the following as applicable:

“This FAA AMOC is transferable with the aircraft to an operator that operates the aircraft under U.S. registry.”

“This AMOC is not transferable with the aircraft to another owner/operator.”

(7) Include the following statements:

“Before using this AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local Flight Standards District Office/Certificate Holding District Office.”

“The preceding paragraph also applies to any applicable foreign registered aircraft upon transfer of the aircraft to the U.S. registry if compliance with the AMOC has not been accomplished.”

(8) Include the following statement:

“All provisions of AD [\*\*\*\*-\*\*-\*\*] that are not specifically referenced above remain fully applicable and must be complied with accordingly.”

(9) Include the following statement (this statement is not required for global AMOC approvals, because it may not be possible to determine who has received or is using a global AMOC):

“The [insert approving office] will revoke this AMOC if the [insert approving office] later determines that this AMOC does not provide an acceptable level of safety.”

(10) Include the following statement for an AMOC intended solely for a foreign registered aircraft or for a global AMOC that could apply to foreign registered aircraft:

“This AMOC only applies to the FAA AD listed above. The FAA does not have the authority to approve this as an AMOC to any AD issued by another CAA. Approval of an AMOC to another CAA’s AD must come from that CAA. A copy of this response will be forwarded to the CAA where [this/these] aircraft [is/are] registered for their consideration. [A copy of the response only needs to be sent to the CAA of the requester, in accordance with table 1.]” If the AD did not refer to critical task differentiation, or required for compliance (RC) notation, but the

revision of service information in the AMOC includes this notation, include the following statement:

“The steps labeled as RC, including substeps under an RC step and any figures identified in an RC step, must be done to comply with the AMOC. A different AMOC is required for any deviations to RC steps, including substeps and identified figures. Steps not labeled as RC may be deviated from using accepted methods in accordance with the operator’s maintenance or inspection program without obtaining approval of a different AMOC, provided the RC steps, including substeps and identified figures, can still be done as specified, and the airplane can be put back in an airworthy condition.”

**d. AMOC Approval Response Checklist Review (Optional).** Use the optional AMOC approval response checklist in appendix D to this order to help you comply with this order. If you determine that the draft approval response does not comply with any requirement in this order, correct it to bring it into compliance.

**e. AMOC Approval Authority.** The manager of the responsible office, or person delegated AMOC approval authority, is the approval authority for the AMOC. The manager is authorized to delegate duties and responsibilities for AMOC approval using an approval/denial authority delegation memorandum. The manager may delegate authority for AMOC approval to other managers or non-managers. These personnel do not have to be the acting manager as long as they have been delegated approval authority by the manager via an office AMOC approval/denial authority delegation memorandum. Any limitations associated with these delegations are defined in the memoranda issued by the manager.

**3-11. Denying an AMOC Proposal.** If you, the evaluator, are considering recommending denial of the AMOC proposal, notify the requester and the responsible PI/FSDO/CHDO/IFO or AED, as appropriate, and provide the requester an opportunity to address the deficiency. If the deficiency still exists after giving the requester sufficient time to respond, you must draft a denial response. The AMOC denial response must state the reasons the proposed AMOC is being denied (such as those listed in paragraphs 3-11a(1) through 3-11a(4)).

**a. AMOC Denial Criteria.** The responsible office must deny the AMOC proposal if the proposal—

- (1) Does not provide an acceptable level of safety.
- (2) Does not meet the AMOC proposal requirements pursuant to paragraph 3 2d.
- (3) Is for an AD issued by another CAA pursuant to paragraph 3-4b (the FAA refers the requester to the CAA of the country the aircraft is registered in).
- (4) Is not appropriate as an AMOC (for example, an AMOC proposal solely to reduce the applicability section of an AD, or a proposal that is already permitted by the service information instructions required by the AD).

**b. AMOC Denial Authority.** The manager of the responsible office, or person delegated AMOC denial authority, is the denial authority for the AMOC proposal. The manager is authorized to delegate duties and responsibilities for AMOC denial using an approval/denial authority delegation memorandum. The manager may delegate authority for AMOC denial to other managers or non-managers. These personnel do not have to be the acting manager as long as they have been delegated denial authority by the manager via an office AMOC approval/denial authority delegation memorandum. Any limitations associated with these delegations are defined in the memorandums issued by the manager.

### **3-12. How to Route the Response.**

**a. Response Package.** Once you have drafted the response using either an email or letter, you must route it for coordination along with the following documentation:

- (1) The original incoming AMOC proposal or documented telephone proposal (including the PI/FSDO/CHDO comments, if transmitted).
- (2) A coordination grid which includes signatures or initials of the following persons (you may collect scanned or faxed copies of coordination grids). A copy of coordination via email is an acceptable alternative.
  - (a) You, the evaluator;
  - (b) AED (or “AED - not required,” as applicable);
  - (c) Technical specialists at your discretion; and
  - (d) The manager of the responsible office, or person delegated AMOC approval/denial authority.
- (3) The completed AMOC approval response checklist, if used.
- (4) If recommending approval, any additional substantiating data used to establish the acceptable level of safety that was the basis for recommending approval of the AMOC (such as service information, emails, or calculations).

**b. Approval/Denial Authority Response.** If you are the manager of the responsible office, or person delegated AMOC approval/denial authority, consider the following before authorizing the AMOC response, and address any issues or concerns found:

- (1) Do you have the authority to approve or deny the proposal (refer to paragraphs 3-10e and 3-11b)?
- (2) If approving the AMOC, does the proposal provide an acceptable level of safety?

(3) If approving the AMOC, does the AMOC response avoid problematic language? (Refer to appendix C to this order for examples.)

(4) If approving the AMOC, does the AMOC response approval statement include the correct AD paragraphs?

(5) If approving the AMOC, does the AMOC approval response follow a clearly delineated requirement chain? (Refer to appendix B to this order for an example.)

(6) Should AED have been included on the coordination grid?

(7) Was the PI/FSDO/CHDO coordinated with, when required by paragraph 3 7b or paragraph 3-7c?

(8) Should other technical personnel or organizations review the AMOC decision?

(9) If denying the AMOC, does the AMOC response clearly state the reasons for denial?

**3-13. Compile Records and Storing in Office Files.** The responsible office's AMOC file consists of the following information (either in hard copy or electronic format). When filing AMOC information, use file code 8040.1. The responsible office should make the AMOC file a part of the project file for the AD to which the AMOC pertains, or at minimum include a cross-reference in the AD and AMOC files. Refer to paragraph 5-5, for more information on records management.

**a.** The original AMOC proposal in whatever forms it came (including the documented telephone proposal, if applicable).

**b.** Evidence that FS had an opportunity to comment. This can include comments forwarded with the initial proposal, a request for comment, record of no comment, and/or record of AED contact when required by paragraph 3-6b.

**c.** A copy of the AMOC response.

**d.** The original coordination grid and any scanned or faxed copies of coordination grids, including email coordination (refer to paragraph 3-12a(2)).

**e.** The completed AMOC approval response checklist (refer to appendix D to this order), if used.

**f.** If the AMOC was approved, any additional substantiating data used to establish the acceptable level of safety that was the basis for approving the AMOC (such as service information, emails, calculations, or records of discussion with technical specialists).

**3-14. Distribution of Responses.** The responsible office sends copies of the AMOC response as summarized in table 1.

**Table 1. AMOC Response Distribution for FAA ADs**

	Individual AMOC		Global AMOC  (U.S or Non-U.S. Registered Product)
	U.S. Registered Product	Non-U.S. Registered Product	
<b>AMOC Requester</b>	Original response	Original response	Original response
<b>PI/FSDO/CHDO</b>	Copy	N/A	N/A
<b>AED</b>	Copy if on response coordination grid	Copy if on response coordination grid	Copy if on response coordination grid
<b>CAA (for Non-U.S. Registered Products)*</b>	N/A	Copy to SoR	Copy SoR of requester, and <a href="mailto:9-AVS-Global-AMOC@faa.gov">9-AVS-Global-AMOC@faa.gov</a> **

\* When replying to direct AMOC proposals for non-U.S. registered products, always send a copy to the CAA overseeing the requester, and if different, the CAA of the SoR. Contact the FAA AIR International Office (AIR-40) if you are uncertain of the appropriate CAA contact.

\*\* In accordance with many of our bilateral agreements, the FAA is required to send copies of global AMOCs to certain CAAs. The FAA has created this email address so that offices only need to send a copy to this one address. AIR-630 will then forward it to a current list of applicable CAAs.

**Note:** For any delegated AMOC, in addition to the distribution shown in table 1, a copy of the AMOC response should also be sent to the responsible office and managing office, if different.

## Chapter 4. Other AMOC Considerations

**4-1. Amending an AMOC Response.** In some circumstances, you may need to amend an AMOC response (such as an omission, a typographical error, or submission of additional information that does not affect the acceptable level of safety). When amending an AMOC approval response, state the reasons it is being amended and that the original AMOC response is superseded. Ensure the amended AMOC approval response meets the criteria in paragraph 3-10c of this order. Only amend an AMOC response in cases where an acceptable level of safety still exists.

**4-2. Revoking an AMOC.** Although it should be rare, there may be times when a previously approved AMOC must be revoked because the AMOC does not provide an acceptable level of safety. A revocation letter will not be issued for global AMOCs because it may not be possible to determine who received or used the global AMOC. When a global AMOC does not provide an acceptable level of safety, it is necessary to supersede the AD to revoke the AMOC.

**a.** Because an unacceptable level of safety is contrary to the public interest and FAA requirements for airworthiness, the responsible office must revoke any previously approved AMOCs that no longer achieve an acceptable level of safety. To revoke such AMOC approvals, the responsible office must send a letter to the AMOC holder notifying them that the FAA proposes to revoke the AMOC and stating the reason for the proposed revocation. Any letters sent to the AMOC holder regarding revocation must be sent by certified mail (return receipt requested). For letters that must be sent internationally, as in the case of a foreign-registered aircraft, use a delivery service that provides guaranteed delivery confirmation. The office must send a copy of the (proposed) revocation letters to the AMOC holder's PI (or lacking a PI, the manager of the FSDO/CHDO/IFO).

(1) The proposed revocation letter must provide the AMOC holder with a minimum of 7 business days to respond to the proposal.

(a) During this notice period, the responsible office should work with the AMOC holder to identify a means to provide an acceptable level of safety, which may result in approval of a new AMOC.

(b) After the notice period, the responsible office decides whether a new AMOC is appropriate or whether the owner/operator must be required to comply with the AD as issued. The responsible office issues a letter revoking the AMOC and identifying the necessary actions for the owner/operator, such as complying with a different AMOC or complying with the AD as issued.

(2) If the AMOC is unsafe such that it creates an emergency situation, the FAA may forego or shorten the notice period, and the revocation may be made effective immediately or in fewer than seven days. An immediate revocation may effectively ground the affected aircraft. The reasons for the emergency action must be stated in the letter. The letter must include the following:



“This is to inform you of the FAA’s determination that the AMOC to AD [\*\*\*\* \*\*\_\*], approved on [MM-DD-YYYY], does not provide an acceptable level of safety. This determination is based on [insert justification for the revocation and the immediate safety concern]. Therefore, the FAA is revoking the AMOC.

This revocation is effective upon receipt of this letter. You must comply with the AD as issued (refer to 14 CFR 39.9). You may propose another AMOC if necessary. Otherwise, continued operation of the affected aircraft would violate 14 CFR 39.7.”

(3) If an acceptable level of safety can be ensured over the short term, the letter may delay the effectiveness of the revocation to avoid unnecessary disruption of operations. Once the revocation becomes effective, the owner/operator must be in compliance with either the AD as issued or a new AMOC. Otherwise, continued operation would be a violation of § 39.7.

**b.** The letter proposing to revoke an AMOC must include the following:

“This is to inform you of the FAA’s determination that the AMOC to AD [\*\*\*\*\* \*\*\_\*], approved on [MM-DD-YYYY], does not provide an acceptable level of safety. This determination is based on [insert justification for the revocation]. Therefore, the FAA is proposing to revoke the AMOC. In deciding whether to revoke this AMOC, the FAA will consider any information you provide us within 7 days of your receipt of this letter. This information may include data indicating that the FAA’s determination is erroneous or a request for a different AMOC. If the FAA decides to revoke this AMOC, you will be required to be in compliance with the AD unless the FAA approves a different AMOC. Otherwise, continued operation of the affected aircraft would violate 14 CFR 39.7.”

**c.** The responsible office must follow up with the final revocation letter, if appropriate, no later than 5 business days after the close of the notice period. The final revocation letter must address why any information submitted was inadequate.

#### **4-3. Global AMOCs (AMOCs of General Applicability).**

**a.** What is a global AMOC? As used in this order, a “global AMOC” is defined as an “AMOC of general applicability,” a term used in some bilateral agreements. A global AMOC applies to two or more operators; it can be used to obtain an AMOC for multiple serial numbers or makes and models specified in an AD. It can be a useful tool if the responsible office receives or expects to receive multiple requests for the same AMOC. A global AMOC applies to and is transferable with the product to other owners/operators. Anyone, including someone other than an owner/operator, may propose a global AMOC.

**b.** Is an AMOC applicable to a fleet of aircraft the same as a global AMOC? An AMOC applicable to a fleet of aircraft is not a “global AMOC,” but rather an individual AMOC that applies to multiple aircraft operated by a single operator.

**c.** Global AMOC approval responses:

(1) The minimum requirements for a global AMOC approval response are in paragraphs 3-10c(1) through 3-10c(8) of this order.

(2) Owners/operators using a global AMOC are still responsible for notifying their PI (or lacking a PI, the manager of the FSDO/CHDO) before using it.

**d.** Converting to a Global AMOC. If converting an individual AMOC into a global AMOC, consider coordinating the global AMOC with the original requester's PI/FSDO/CHDO/IFO pursuant to paragraph 3-7.

**e.** Proprietary Information in Global AMOCs. If converting an individual AMOC proposal into a global AMOC, be careful to not divulge proprietary information to unauthorized entities. When distributing a global AMOC approval response, use the distribution list in paragraph 3-14, table 1. Following this list ensures proprietary information is only sent to authorized parties/individuals. Consult with legal counsel for any questions concerning proprietary information.

**4-4. AMOC Proposals from Foreign Entities.** The FAA may receive proposals from foreign entities to approve AMOC proposals to FAA ADs for products that are not on the U.S. registry. Such proposals can come from a foreign owner/operator, a design or production approval holder, or another CAA for a foreign owner/operator. The FAA responds to such proposals because it can minimize urgent proposals for AMOCs in the future. Some aircraft change registration often, sometimes during maintenance. A foreign-registered aircraft today could be U.S.-registered tomorrow. The importing owner/operator must demonstrate FAA AD compliance before the FAA may determine the aircraft to be airworthy. The FAA's timely response to a foreign proposal for an AMOC, while the aircraft is on the foreign CAA's registry, can speed up future determinations.

**4-5. AMOC Proposals for Foreign Registered Aircraft.**

**a.** The FAA may approve or deny AMOC proposals (including global AMOCs) to FAA ADs for foreign registered aircraft.

**b.** The FAA may not approve AMOC proposals to another CAA's AD.

**c.** When responding to AMOC proposals for foreign registered aircraft, use the criteria specified in paragraph 3-10 or 3-11, as applicable.

(1) The FAA's AMOC approval responses for FAA ADs for foreign registered aircraft must clearly note that the FAA does not have authority to approve AMOCs to any AD issued by another CAA.

(2) If the response involves an AMOC to a "sensitive" AD (refer to FAA-IR-M 8040.1, Airworthiness Directives Manual, chapter 6, paragraph 6, for examples), coordinate with AIR-40.

**4-6. Military Commercial Derivative Aircraft (MCDA).** Because MCDA may be operated or maintained in a different environment than in the civil fleet, such as not being operated under U.S. civil registration, the military may want to meet the provisions of an AD differently than the way specified for the civil sector. The responsible military airworthiness authority may ask the FAA for an AMOC for the AD. The FAA reviews and approves proposed AMOCs for MCDA for reasons similar to proposals from foreign entities.

**a.** AMOC proposals for MCDA are sent to the Military Certification Branch (MCB). The MCB reviews the military request to determine if the FAA may evaluate it as an AMOC for the applicable AD. If the MCB determines the military request has merit, it will forward the request to the responsible office for technical evaluation and response.

**b.** The responsible office will evaluate the proposal and respond in accordance with chapter 3 of this order. The AMOC response will be directed to the requesting military authority with a copy to the MCB.

**c.** AMOC approval responses for FAA ADs for MCDA must clearly note that the FAA does not have authority to approve AMOCs to any mandatory actions issued by the military. Include the following statement:

“This AMOC only applies to the FAA AD listed above. The FAA does not have the authority to approve this as an AMOC to any mandatory action issued by the U.S. Armed Forces. Approval of alternatives to its mandatory corrective actions must come from the specific branch of service.”

**4-7. Sharing AMOCs with DAHs.** Some DAHs keep and make available to their owners/operators a database of global AMOCs. The database allows owners/operators to search previously approved global AMOCs that may apply to their aircraft. To assist DAHs in identifying AMOC proposals that might be candidates for a global AMOC, requesters may provide their consent in the AMOC proposal letter that permits the responsible office to share the AMOC approval response with the DAH. The responsible office will share with the DAH all AMOC approval responses for proposals that include such consent. The consent must include a statement such as the following, allowing the FAA to provide the AMOC approval response to the DAH for consideration for a global AMOC:

“Operator XYZ grants the FAA approving office permission to share the AMOC approval response with the design approval holder for its consideration in proposing a global AMOC.”

**4-8. Appliance AMOCs, Including Technical Standard Order (TSO)-Approved Articles.** Pursuant to § 39.3, the FAA has the authority to issue ADs that apply to appliances, including articles approved via technical standard order authorization (TSOA). As with any other AD, the responsible office has the authority to approve AMOCs for an appliance AD. However, there are certain considerations that must be made for this type of AMOC.

**a.** Any person, including the TSOA holder may propose, and the responsible office may approve, an AMOC for a design change to a TSO article. For more information regarding changes to TSOA articles, refer to FAA Order 8150.1, Technical Standard Order Program.

**b.** Because design changes to TSO articles do not include installation approval for those changes into a higher-level product such as an aircraft or aircraft engine, the responsible office must include the following statement, when applicable, as a restriction in accordance with paragraph 3-10c(4):

“The conditions and tests required for TSO approval of this article and approval of this AMOC are minimum performance standards. Those installing an article that uses this AMOC, either on or within a specific type or class of aircraft, must determine that the aircraft installation conditions are within the TSO standards, which include any accepted integrated non-TSO function performance specifications. TSO articles and any accepted integrated non-TSO functions must have separate approval for installation in an aircraft. The article may be installed only according to 14 CFR part 43 or the applicable airworthiness requirements.”

**c.** The installer of a TSO article modified with an approved AMOC does not require a separate AMOC for the installation of that article.

**d.** An AMOC issued against an appliance AD (one where the unsafe condition has been identified to be in the appliance) must address the unsafe condition in the appliance. An AMOC that does not address the unsafe condition in the appliance is not appropriate. For example, it would be inappropriate to approve an AMOC that allowed you to remove the appliance and replace it with a completely different appliance. In this case, the AMOC does not address the unsafe condition in the first appliance.

**e.** For an appliance AD, an AMOC should never be issued against the aircraft on which the unsafe appliance is installed; rather, the AMOC is written for the appliance itself.

#### **4-9. AMOCs Involving Certification Projects.**

**a.** Depending on the complexity of the AMOC proposal, a certification project such as a supplemental type certificate or parts manufacturer approval may be required to show compliance to the applicable airworthiness regulations. In these cases, it is important for the certification project office and the office responsible for evaluating the AMOC to coordinate early and often throughout the project. It is inefficient for the certification project office to approve the design if the office responsible for the AMOC will not accept the design change as an AMOC to the AD. Likewise, the responsible office cannot approve an AMOC until the design change is approved.

**b.** It is inappropriate to only list on the supplemental type certificate that it is an approved AMOC. An AMOC response must meet the requirements of paragraph 3-10c.

**4-10. Public Requests for Copies of AMOCs.** Pursuant to 14 CFR 39.21, the office identified in the AD can provide information about alternatives it has already approved. Information that can

be shared includes the name of the AMOC holder, the date the AMOC was approved, applicable make and model, and the AD number and paragraphs to which the AMOC applies. Do not provide specifics on the technical nature of the AMOC, and do not provide a copy of the AMOC approval letter to anyone not listed in table 1.

DRAFT - Public Comment

## Chapter 5. Administrative Information

**5-1. Distribution.** Distribute this order electronically to all branch levels of the Aircraft Certification Service, Flight Standards Service, and regional flight standards divisions; to all certification branches, all certificate management branches, AIR-40, and to the FAA Academy Regulatory Support Division.

**5-2. Authority to Change This Order.** Only the Administrator is authorized to approve changes to this order, which establishes policy, delegates authority, and assigns responsibility.

**5-3. Related Material.** See Appendix G for related regulations and publications pertinent to this order.

**5-4. List of Acronyms.** See Appendix H for a list of all acronyms and their meanings as used in this order.

**5-5. Suggestion for Improvements.** Please forward all comments on deficiencies, clarifications, or improvements regarding the contents of this order to the AIR Directives Management Officer at [9-AWA-AVS-AIR-DMO@faa.gov](mailto:9-AWA-AVS-AIR-DMO@faa.gov). Your suggestions are welcome. FAA Form 1320-19, Directive Feedback Information, is located in appendix H of this order for your convenience.

**5-6. Request for Information.** Refer to FAA Order 0000.1, FAA Standard Subject Classification System; FAA Order 1350.14, Records Management; or your office Records Management Officer/Directives Management Officer for guidance regarding retention or disposition of records.

**A-1. How to Use This Appendix.** This appendix provides a decision tool to determine if AED should be included on the coordination grid for the AMOC response. The grid copy of the AMOC response is the official record of AED coordination. The outcome of this decision tool is recorded by inclusion of AED on the grid or marking “AED - not required” on the grid. No other records of this decision are required. Notes regarding this decision may be included in the office files but are optional.

**A-2. Step 1: Review the Criteria in table 2 and Determine If Any Apply.**

**Table 2. AED Coordination Criteria**

#	AMOC-AED Coordination Criteria. Does the AMOC—
1	Involve a change to the airplane flight manual (AFM), rotorcraft flight manual (RFM), or AFM/RFM supplement, except in cases where the AFM/RFM change has been previously approved under existing certification/validation procedures?
2	Affect master minimum equipment list (MMEL) dispatch?
3	Involve flight crew training as part of the AMOC proposal (typically includes a change to the AFM)?
4	Involve a change to what and how information is displayed to the flight crew?
5	Involve any placard installed that affects operational use?
6	Affect Extended Operations (ETOPS)/Configuration, Maintenance, and Procedures?
7	Involve any change to a mandated maintenance requirement (such as Special Federal Aviation Regulation (SFAR) 88 program changes or Corrosion Protection Control Programs), or changes to a manufacturer's baseline maintenance/inspection requirements (typically found in the Maintenance Review Board Report or Electrical Wiring Interconnection System maintenance program)? This includes AMOCs that involve changes to the maintenance requirements, for example an AMOC that approves a revision to a Supplemental Structural Inspection Document (SSID) Significant Structural Item (SSI) or SSID SSI inspection program or inspection method. It does not include an AMOC that approves a repair on a PSE or an AMOC that approves an alternative inspection program on a PSE as the result of a repair on a single airplane or group of airplanes.
8	Introduce a new, novel, complex, or difficult inspection/maintenance procedure?
9	Involve a change to the Airworthiness Limitations Section (ALS) of the instructions for continued airworthiness (refer to 14 CFR 23.1529, 25.1529, 26.11, 27.1529, 29.1529, 31.82, 33.4, and 35.4), except in cases where the ALS change has been previously approved under existing certification/validation procedures? This includes AMOCs that involve changes to the ALS. It does not include an AMOC to an AD mandated ALS that approves a repair on a PSE or an AMOC that approves an alternative inspection program on a PSE as the result of a repair on a single airplane or group of airplanes.

**A-3. Step 2: Make a Decision (Select One).**

**Note:** If the evaluator is not sure about a criterion, either discuss it with AED or include AED on the grid.

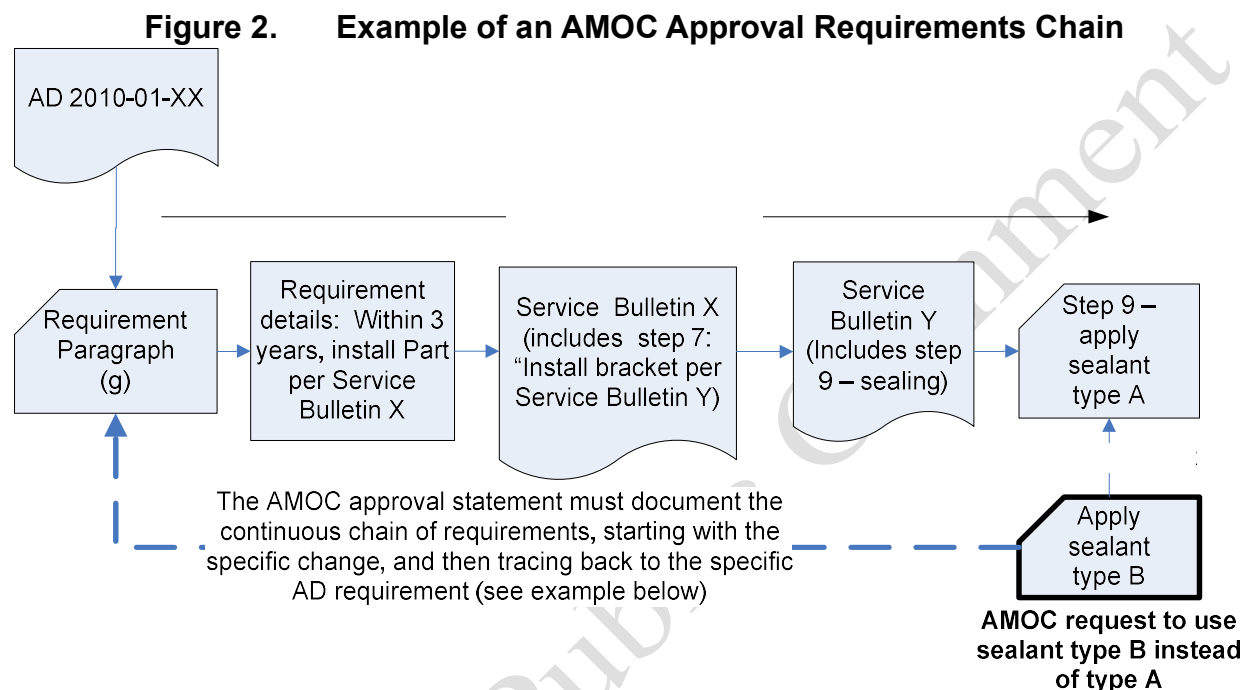
- a.** One or more criterion is YES: AED on grid is required.
- b.** All criteria are NO: AED on grid is not required.
- c.** All criteria are NO, but evaluator wants AED on grid: AED on grid is required.

**Note:** If AED coordination criteria are not met, you may still consider contacting them as technical specialists. AED's involvement may add value to the process and determination of AMOC acceptability.



## Appendix B. Guidance on Writing an AMOC Approval Statement

**B-1. AMOC Approval Requirements Chain.** Refer to figure 2 for an example of an AMOC approval requirements chain.



### B-2. AMOC Approval Statement.

**a.** The evaluator should write the specific AMOC approval statement to capture this chain of requirements. The example shown in figure 2 is for an AMOC proposal from a domestic operator where Service Bulletins X and Y were incorporated by reference into the AD:

“The Federal Aviation Administration (FAA) received your proposal dated June 6, 2010, proposing an alternative method of compliance (AMOC) to paragraph (g) of Airworthiness Directive 2010-01-XX.

The West Certification Branch approves your AMOC proposal to paragraph (g) of AD 2010-01-XX to replace Sealant type A with Sealant type B as required by step 9 of Service Bulletin Y, dated April 5, 2009, which is required by Step 7 of Service Bulletin X, dated April 5, 2009.

All provisions of AD 2010-01-XX that are not specifically referenced above remain fully applicable and must be complied with accordingly.”

**b.** If more than one AMOC is proposed, write an AMOC approval statement for each, or alternatively, write a separate AMOC response for each proposal.

## Appendix C. Examples of How NOT to Write AMOC Statements

### C-1. Examples of Problems. (This is what the FAA wants to avoid.)

#### C-2. Problematic Example 1.

Air \_\_\_\_\_ has proposed an extension of the repetitive inspection interval (Paragraph 'D') of the subject AD to 4,500 hours/18 months.

Due to Air \_\_\_\_\_'s past service experience, corrosion prevention program, and operating environment, the FAA finds this extension to be acceptable.

#### What's wrong with Example 1?

- The specific AD is not defined in the approval response.
- The interval of 4,500 hours/18 months is not definitive. Is it which occurs first or later?
- There is no approval. It was "found" to be "acceptable."

#### C-3. Problematic Example 2 (Global AMOC).

The subject service bulletin submitted with the reference letter has been reviewed in light of its relationship with Airworthiness Directive 85-13-01. The FAA concurs with the recommendation of DER \_\_\_\_\_ and considers the engineering aspects of the service bulletin to be approved.

#### What's wrong with Example 2?

- The FAA only "considers" the engineering aspects of the service bulletin to be approved. The FAA never actually approved the AMOC.
- It is unknown what "reviewed in light of its relationship" actually means (for example, it is unknown if the service bulletin impacted the compliance times or any of the required AD actions).
- Avoid statements that approve the engineering aspects of the service bulletin, but do not approve the engineering aspects of the service bulletin as an AMOC. DERs cannot approve the engineering aspects of service bulletins that are the subject of an AD or global AMOC.
- It is unknown whether the service bulletin was the document that provided an acceptable level of safety to the AD. Typically, the FAA approves both a report substantiating the acceptable level of safety to the AD and the engineering aspects of the service bulletin identifying how to accomplish the AMOC.

#### **C-4. Problematic Example 3.**

The FAA has found the proposal acceptable based on the result of the fault tree analysis conducted by manufacturer X on the unit. Therefore, the FAA permits extending the time interval to 3,000 flight hours for the repetitive functional tests of the CDU cone break unit required by paragraph (a)(2) of AD 2003-YY-ZZ.

##### What's wrong with Example 3?

Stating that the FAA permits something is not equivalent to approving it. This AMOC is not actually “approved” and thus has potential operational impact. Also, this “change in compliance time” should have stated it was changing the repetitive test from X,XXX hours to 3,000 hours.

#### **C-5. Problematic Example 4.**

The FAA has reviewed Service Bulletin 7X7-51-0018, Rev. 1 dated February 30, 2008, and approve it as an AMOC to AD 2009-23-51.

##### What's wrong with Example 4?

This approval permits the service bulletin as an alternative to all actions required by the AD. It does not state specific paragraphs of the AD to which the AMOC applies or what aspects of the service bulletin are approved. If there were other requirements in the AD, the operator may use this statement to justify not doing them.

#### **C-6. Problematic Example 5.**

The FAA has reviewed your proposal and believes that this AMOC is equivalent to the intent of paragraph (a) of AD 2006-21-05 and can be considered terminating action for the subject AD for U.S.-registered airplanes.

##### What's wrong with Example 5?

Stating that the FAA “believes” in an AMOC is not equivalent to approving it. Furthermore, the FAA’s responsibility in approving an AMOC is to determine that the AMOC provides an acceptable level of safety, not “equivalent to the intent” of the AD.

**Appendix D. AMOC Approval Response Checklist****Response Number:**

--

**Evaluator:**

--

3-10c	The approval response must, at a minimum, meet the following requirements:			
3-10c(1)	Clearly state the AD number and specific AD paragraphs to which the AMOC applies.		"Not Applicable" is not allowed. This is listed in the introduction/background section. It is also covered in the specific AMOC approval statement as covered by requirements below.	
3-10c(2)	Specify the make and model designations or other limiting factors (such as serial numbers or part numbers) to which the AMOC applies.		"Not Applicable" is not allowed; the AMOC's applicability must be clear and unambiguous.	

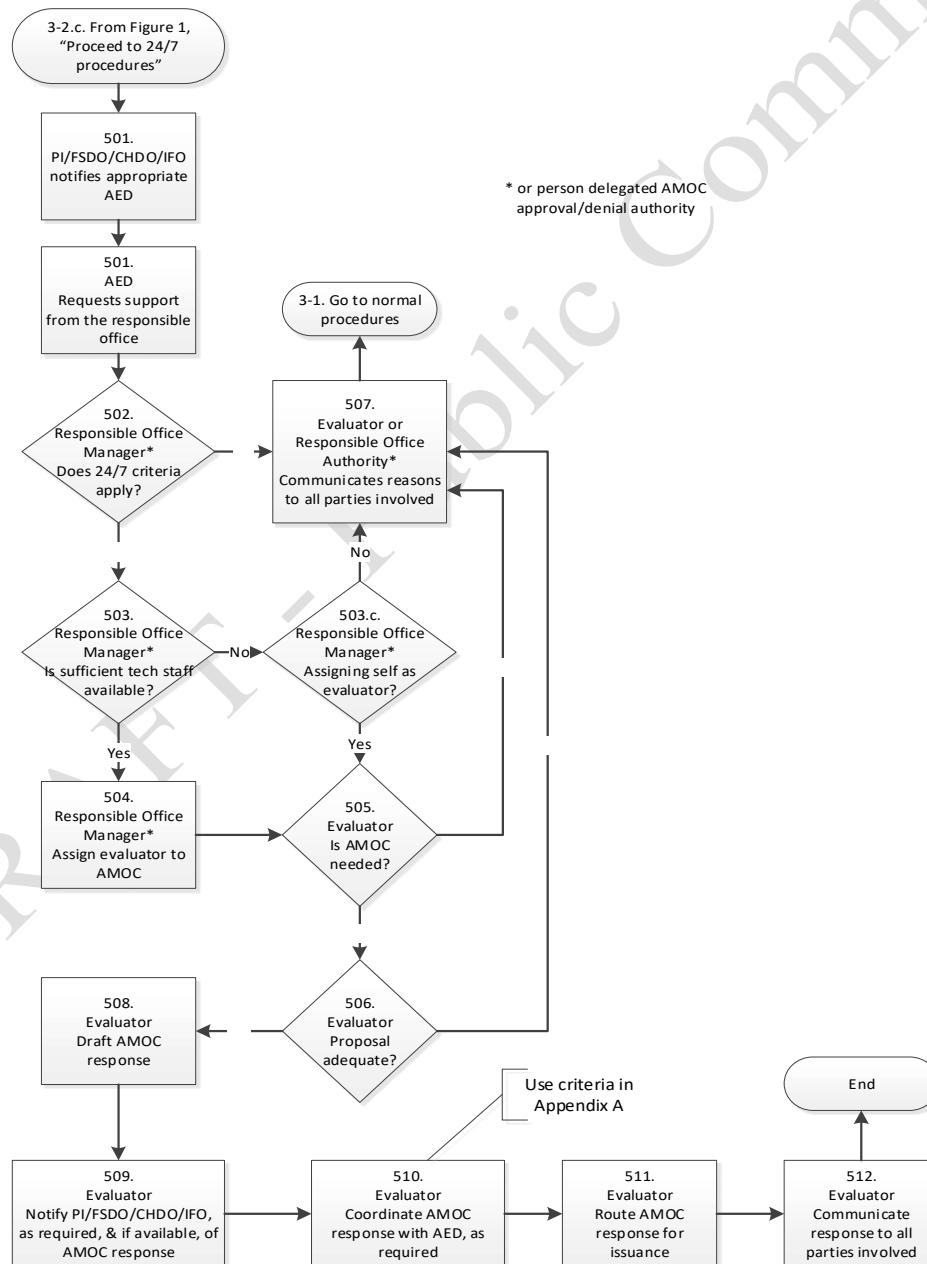
3-10c(3)	Reference the substantiating data used to establish the acceptable level of safety that was the basis for approving the AMOC.		"Not Applicable" is not allowed; the basis for the FAA's determination of an acceptable level of safety must be documented.	
3-10c(4)	Identify any restrictions on the AMOC, such as applicability, special procedures, facilities, processes, or time limitations (or specify that there are no restrictions, if applicable).		If there are no restrictions, mark "Not Applicable."	
3-10c(5)	If applicable, refer to the appropriate service documents by number, revision level, and date of revision (if available).		Applies if the proposal response included service documents.	
3-10c(6)	State whether the AMOC is transferable.		"Not Applicable" is not allowed.	
3-10c(7) through (10)	Include the statements in paragraphs 3-10c(7) through (10) as required.		"Not Applicable" is not allowed. The exact language in quotes from paragraphs 3-10c(7) through (10) must be used, as required. If not, mark "NO."	
3-10e	The manager of the responsible office (or person delegated AMOC approval authority) must authorize the approval response.		"Not Applicable" is not allowed. Verify that the person meets the requirements of the AMOC paragraph in the AD or meets the requirements of the office AMOC approval authority delegation memorandum.	
3-6, 3-7 App. A	FS coordination		Was the applicable FS office given the opportunity to comment? A "Not Applicable" response may be appropriate.	

Initials of person completing checklist:

Date Completed:

**Appendix E. 27/7 FS AMOC Urgent Request Support**

**E-1. Overview.** This appendix provides details on how AIR supports FS when there is an urgent need, after normal business hours, for an AMOC to an AD. FAA personnel should consistently advise operators that AMOC proposals are to be submitted pursuant to § 39.19. Figure 3 provides a process flowchart. The steps in the flowchart are explained in the following paragraphs.

**Figure 3. 24/7 AMOC Procedures**

**E-2. Is there a Need for Urgent Support?** If the PI/FSDO/CHDO/IFO identifies the need for urgent AMOC support after normal business hours, they must notify AED. If AED agrees, it requests 24/7 AMOC support from the manager of the responsible office or person delegated AMOC approval/denial authority.

**E-3. Does the 24/7 Criteria Apply?**

**a.** The responsible office manager or person delegated AMOC approval/denial authority determines if all of the following 24/7 conditions are met:

(1) AMOC support is needed after normal business hours and to support proposals identified by PI/FSDO/CHDO/IFOs, and

(2) AMOC support is needed to avoid significant air transportation disruptions or substantial impact to an operator.

**b.** This process is intended to provide urgent support to PI/FSDO/CHDO/IFOs and is exercised at the discretion of the responsible office manager or the person delegated AMOC approval/denial authority. It is not intended to be used to accommodate operators who have failed to plan adequately for AD compliance.

**c.** If the 24/7 criteria do not apply, proceed to paragraph E-8.

**d.** If the 24/7 criteria apply, proceed to paragraph E-4.

**E-4. Is Sufficient Technical Staff Available to Evaluate the AMOC?**

**a.** The responsible office manager, or person delegated AMOC approval/denial authority, determines if sufficient technical staff is available to provide AMOC support.

**b.** If sufficient technical staff is available, proceed to paragraph E-5.

**c.** If sufficient technical staff is not available, you may assign yourself as the evaluator and proceed to paragraph E.6. If technical staff is not available and you do not assign yourself as the evaluator, inform all parties involved that the action would need to wait pursuant to paragraph E-8.

**E-5. Assigning the AMOC.** The responsible office manager, or person delegated AMOC approval/denial authority, assigns an evaluator to the AMOC proposal. The evaluator can be an aviation safety engineer, flight test engineer or pilot, senior engineer or engineering manager, or responsible office manager or person delegated AMOC approval/denial authority.

**E-6. Is an AMOC Needed?** As the evaluator, you must determine if an AMOC is needed. If it is, proceed with the process. Refer to paragraph 2-2 of this order and AC 39-10 for guidance. If you determine an AMOC is not needed, inform all parties involved of your determination pursuant to paragraph E-13.

#### **E-7. Is the AMOC Proposal Adequate?**

**a.** Use the AMOC proposal requirements in AC 39-10 as a guide to determine if the proposal is adequate to make an evaluation. You may contact the requester, as necessary, to obtain missing information.

**b.** If you have enough information to determine that the AMOC does or does not provide an acceptable level of safety, draft an AMOC approval or denial pursuant to paragraph E-9. If the available data supports a limited period of operation, then to ensure an acceptable level of safety, consider making the AMOC time-limited (refer to paragraph 3-10c(4) of this order).

#### **E-8. Communicate Reasons to All Parties Involved.**

**a.** Send an email to all parties involved (including AED and the PI/FSDO/CHDO/IFO), notifying them of one of the following reasons that the action will need to wait:

(1) The 24/7 criteria do not apply, or

(2) The FAA cannot determine if the AMOC proposal does or does not provide an acceptable level of safety because of—

(a) Inadequate data, or

(b) Lack of available technical staff.

**b.** When sufficient data and/or technical staff are available, you may reconsider the AMOC proposal starting from the beginning of the AMOC process pursuant to paragraph 3-2 of this order.

**E-9. Draft AMOC Approval or Denial Response.** The responsible office manager or person delegated AMOC approval/denial authority approves or denies the AMOC proposal using the methods described in paragraph 3-10c or paragraph 3-11 of this order, as appropriate.

#### **E-10. Notify PI/FSDO/CHDO/IFO of AMOC.**

**a.** If the AMOC proposal is global and made by someone other than an owner/operator, there is no need for you to contact the PI/FSDO/CHDO/IFO.

**b.** For all other AMOC proposals, you must notify the appropriate PI/FSDO/CHDO/IFO of the AMOC response. If the PI/FSDO/CHDO/IFO is unavailable, proceed with issuing the AMOC response.

**E-11. Coordinate AMOC Response with AED as Required.** The evaluator must coordinate with AED, if needed. Use the criteria identified in appendix A to this order to determine if AED coordination is required.



**E-12. Route AMOC Response.**

**a.** Coordinate and route the AMOC response along with the incoming AMOC proposal (including the PI/FSDO/CHDO/IFO comments, if transmitted). You must file all correspondence and communication records in your office's file pursuant to paragraph 3-13 of this order.

**b.** Authority for delegation of the approval or denial of the AMOC is in accordance with the relevant authority delegation memorandum (refer to paragraphs 3-10e and 3-11b of this order). Refer to appendix D to this order for an optional checklist to support compliance with this order for AMOC approval responses.

**E-13. Communicate Response.** Communicate the AMOC response to all parties involved, as appropriate. Distribute the AMOC response pursuant to paragraph 3-14 of this order.

**Appendix F. AMOC Response Template.**

Use the following template when responding to AMOC proposals. Fill in customized information in place of the italicized text or delete as appropriate. Follow the latest FAA branding and format guidance.



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

[*Date*]

[*Name and address*]

Reference: [*Insert letter number if applicable*]

Subject: Alternative Method of Compliance (AMOC) to Airworthiness Directive (AD) [*Insert AD Number*]

Dear [*Name*]:

The Federal Aviation Administration (FAA) has received your proposal dated [*Month, Day, Year*] proposing an AMOC to paragraph(s) [*Insert specific paragraph number(s) of the AD*] of AD [*Insert AD number*].

[*For approval of the AMOC, include the following:*]

The [*Insert approving office*] approves your AMOC proposal to paragraph(s) [*Insert specific paragraph number(s)*] of AD [*Insert AD number*] to [*Insert description of AMOC. Use appendix B to FAA Order 8110.103 as a guide. Include a reference to the substantiating data used to establish an acceptable level of safety.*]

The following limitations apply to this AMOC:

- [*Specify the make and model designation(s) or other limiting factors (like serial number(s) or part number(s)) to which the AMOC applies.*]
- [*Insert any additional limitations that are necessary.*]
- [*State whether the AMOC is transferable. For an AMOC intended solely for a foreign registered aircraft, use one of the following as applicable:*] This FAA AMOC is transferable with the aircraft to an operator who operates the aircraft under U.S. registry.

(OR)

- This AMOC is not transferable with the aircraft to another owner/operator.

- Before using this AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local Flight Standards District Office/Certificate Holding District Office.

The preceding paragraph also applies to any applicable foreign-registered aircraft upon transfer of the aircraft to the U.S. registry if compliance with the AMOC has not been accomplished. *[Delete this paragraph for an AMOC that only applies to U.S.-registered aircraft.]*

- All provisions of AD *[Insert AD number]* that are not specifically referenced above remain fully applicable and must be complied with accordingly.
- The *[Insert approving office]* will revoke this AMOC if the *[Insert approving office]* later determines that this AMOC does not provide an acceptable level of safety. *[Delete this paragraph for a global AMOC.]*
- This AMOC only applies to the FAA AD listed above. The FAA does not have the authority to approve this as an AMOC to any AD issued by another civil aviation authority (CAA). Approval of an AMOC to another CAA's AD must come from that CAA. A copy of this response will be forwarded to the CAA where *[this/these]* aircraft *[is/are]* registered for their consideration. *[Include this statement for an AMOC intended solely for a foreign-registered aircraft or for a global AMOC that could apply to foreign-registered aircraft, otherwise delete. A copy of the response is only sent to the CAA of the requester, in accordance with table 1-1.]*

*[For denial of the AMOC, include the following:]*

The FAA has reviewed your proposal and denies the proposal as an AMOC to FAA AD *[Insert AD number]* because *[state why the AMOC is being denied, refer to paragraph 3-11 of FAA Order 8110.103]*.

*[For all AMOCs]*

If you have any questions, or need additional information, please contact *[Insert name of AMOC evaluator]* at *[Insert telephone number]* or email *[Insert email address]*.

Sincerely,

*[Insert name of AMOC approval/denial authority],*  
*[Insert title of signer]*

cc: *[Refer to table 1 of FAA Order 8110.103 for distribution.]*

## Appendix G. Related Material.

**G-1. Title 14, Code of Federal Regulations (14 CFR).** The following 14 CFR regulations are related to this order. You can download the full text of these regulations from the [eCFR Code of Federal Regulations](#) website. You can order a paper copy from the U.S. Superintendent of Documents, U.S. Government Publishing Office, Washington, D.C. 20401; at Government Publishing Office, by calling telephone number (202) 512-1800; or by sending a fax to (202) 512-2250.

- Part 39 (amendment 39-9474), Airworthiness Directives.
- Section 39.3, Definition of Airworthiness Directives.
- Section 39.7, What is the Legal Effect of Failing to Comply With an Airworthiness Directive?
- Section 39.15, Does an Airworthiness Directive Apply if the Product has Been Changed?
- Section 39.19, May I Address the Unsafe Condition in a Way Other Than That Set Out in the Airworthiness Directive?
- Section 39.21, Where Can I Get Information About FAA-Approved Alternative Methods of Compliance?

**G-2. FAA Advisory Circulars (ACs).** The following ACs are related to the guidance in this order. You should refer to the latest AC version for guidance, which is available on the [Dynamic Regulatory System \(DRS\)](#) website.

- AC 20-114, Manufacturers' Service Documents.
- AC 39-7, Airworthiness Directives.
- AC 39-10, Alternative Methods of Compliance.
- AC 43-9, Maintenance Records.
- AC 120-16, Air Carrier Maintenance Programs.
- AC 120-77, Maintenance and Alteration Data.

**G-3. FAA Manual FAA-IR-M-8040.1, Airworthiness Directives Manual.** The latest version of FAA-IR-M-8040.1, is available on [FAA Regulations/Policies/Handbooks/Manuals](#) website.

**G-4. FAA Orders.** The following FAA orders are related to the guidance in this order. The latest version of each FAA order referenced in this document is available on [FAA Regulations/Policies/Order/Notices](#) website.

- FAA Order 0000.1, FAA Standard Subject Classification System.
- FAA Order 1350.14, Records Management.
- FAA Order 8000.95, Designee Management Policy.
- FAA Order 8040.1, Airworthiness Directives.
- FAA Order 8100.15, Organization Designation Authorization Procedures.

- FAA Order 8110.37, Designated Engineering Representative (DER) Handbook.
- FAA Order 8110.101, Type Certification Procedures for Military Commercial Derivative Aircraft.

- FAA Order 8150.1, Technical Standard Order Program.
- FAA Order 8900.1, Flight Standards Information Management System (FSIMS).

DRAFT - Public Comment

**Appendix H. List of Acronyms**

<b>Acronym</b>	<b>Definition</b>
14 CFR	Title 14 of the Code of Federal Regulations
AC	Advisory circular
AD	Airworthiness directive
AED	Aircraft Evaluation Division
AMOC	Alternative method of compliance
FS	Flight Standards Service
AIR	Aircraft Certification Service
CAA	Civil Aviation Authority
CHDO	Certificate holding district office
DAH	Design approval holder
DER	Designated engineering representative
FAA	Federal Aviation Administration
FSDO	Flight standards district office
IFO	International field office
MCB	Military Certification Branch
MCDA	Military Commercial Derivative Aircraft
ODA	Organization designation authorization
PI	Principal Inspector
SoD	State of Design
SoR	State of Registry
TSO	Technical standard order
TSOA	Technical standard order authorization

**Appendix I. Directive Feedback Information**

Please submit any written comments or recommendations for improving this directive or suggest new items or subjects to be added to it. Also, if you find an error, please tell us about it.

Subject: Order 8110.103C, Alternative Methods of Compliance (AMOC)

To: Directive Management Officer, [9-AWA-AVS-AIR-DMO@faa.gov](mailto:9-AWA-AVS-AIR-DMO@faa.gov)

*(Please mark all appropriate line items)*

- ☐ An error (procedural or typographical) has been noted in paragraph \_\_\_\_\_ on page \_\_\_\_\_.
- ☐ Recommend paragraph \_\_\_\_\_ on page \_\_\_\_\_ be changed as follows:  
*(attach separate sheet if necessary)*
- ☐ In a future change to this order, please include coverage on the following subject:  
*(briefly describe what you want added.)*
- ☐ Other comments:
- ☐ I would like to discuss the above. Please contact me.

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Routing Symbol: \_\_\_\_\_