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Subject: Alternative Methods of Compliance

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This advisory circular (AC) presents guidance for persons seeking approval of an alternative method of compliance (AMOC) to an airworthiness directive (AD). This AC also provides answers to common questions regarding AMOCs.

If you have any suggestions for improvements or changes, you may use the template provided at the end of this AC.

A handwritten signature in blue ink, reading "Richard E. Jennings".

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CHAPTER 1. GENERAL INFORMATION

1.1 Purpose.

1.1.1 This advisory circular (AC) provides the following information:

1.1.1.1 Guidance for persons seeking approval of an alternative method of compliance (AMOC) to an airworthiness directive (AD).

1.1.1.2 Answers to common questions, such as when an AMOC is necessary, changes that may require an AMOC, and how to document AMOC approval after completion.

1.1.2 This guidance is derived from Federal Aviation Administration (FAA) and industry experience with AMOCs. Although it is not mandatory, implementation of any or all aspects of this AC will enhance the AMOC process, facilitate continued compliance with an AD, and reduce the potential for delays caused by incomplete AMOC proposals.

1.2 Audience.

This AC is for anyone who wishes to propose an AMOC to the FAA. The AC is also for owners/operators who choose to comply with an AMOC.

1.3 Effective Date.

The effective date for this AC is XX/XX/XX.

1.4 Background.

In August 2002, the FAA added amendment 39-9474 to Title 14 of the Code of Federal Regulations (14 CFR) part 39. The amendment incorporated several standard provisions previously included in individual ADs. One standard provision specified that an AD applies to a product even if the product had been modified, altered, or repaired in the area addressed by the AD. Another standard provision identified procedures for asking the FAA to approve AMOCs to an AD.

1.5 Definitions.

For the purposes of this AC, the following definitions are used:

1.5.1 Airworthiness Directive.

A final rule of the following types of rulemaking documents issued by the FAA pursuant to part 39, including supersedures and corrections to those documents:

- Final rule after notice of proposed rulemaking (NPRM) or supplemental NRPM (SNPRM);

- Final rule, request for comments (commonly referred to as an Immediately Adopted Rule (IAR), No-Notice Final Rule (NFR), or Federal Register Version of an Emergency AD (FRV)); or
- Emergency AD.

1.5.2 Alternative Method of Compliance.

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

1.5.3 Change in Compliance Time.

As authorized by § 39.19, anyone may propose a change to the compliance time stated in the AD if the proposal provides an acceptable level of safety.

Note: This AC 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 compliance time.

1.5.4 Global AMOC.

A global AMOC is sometimes referred to 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.

1.5.5 Product.

An aircraft, aircraft engine, propeller, or appliance.

1.5.6 Responsible Office.

The office within the FAA’s Aircraft Certification Service (AIR) that is responsible for approving AMOCs for a particular AD. Each AD identifies the responsible office.

1.5.7 Service Bulletin (SB).

Document used to convey service information (such as modifications or inspections) to owners/operators of products.

1.6 Discussion.

1.6.1 The FAA issues an AD when an unsafe condition is found to exist in a product and is likely to exist or develop in other products of the same type design.

1.6.2 The actions specified in an AD are intended to detect, prevent, resolve, or eliminate the unsafe condition. Those actions can either be written directly into the rule portion (“body”) of the AD, or into another document, such as an SB, that can be referenced in

the AD body and incorporated by reference in the AD. Compliance with the portions of an SB that are incorporated by reference in an AD is mandatory.

- 1.6.3 An AMOC is required if an owner/operator cannot comply or wants to propose a different way to comply with the actions specified in an AD. Chapter 2 of this AC provides some questions and answers about when an AMOC is necessary.
- 1.6.4 The reasons an AMOC may be necessary or desirable include, but are not limited to, the following:
 - 1.6.4.1 To accomplish AD actions in a way that better suits an owner/operator's business processes;
 - 1.6.4.2 Because an owner/operator devises another way of addressing the unsafe condition;
 - 1.6.4.3 Because an owner/operator wishes to adjust the compliance time stated in an AD;
 - 1.6.4.4 Because existing modifications, alterations, or repairs to a product make compliance with AD procedures difficult or impossible;
 - 1.6.4.5 To use later revisions of service documents specified in an AD;
 - 1.6.4.6 Because a superseding AD invalidates previous AMOCs to the original AD; or
 - 1.6.4.7 To address errors in the service document.
 - 1.6.4.8 To address errors in the AD.

Note: For an error in an AD, an AMOC can be an expeditious way to alert the public of the error and the correction. However, the AD will be superseded to eliminate the error in the regulation and ensure the broadest availability of the correction.

CHAPTER 2. WHEN AN AMOC IS NECESSARY

2.1 **General.**

This chapter provides information useful for determining when an AMOC may or may not be required. It is not intended to be all inclusive. For circumstances or situations not covered in this chapter, contact your local principal inspector (PI), your local Flight Standards District Office (FSDO), your local Certificate Holding District Office (CHDO), or the responsible office listed in the AD.

2.2 **AD-Mandated Instructions.**

Each AD contains instructions on the actions necessary to resolve an unsafe condition. Sometimes those instructions are included in the AD itself; at other times, the instructions are contained in a design approval holder's (DAH) service information, which is incorporated by reference in the AD. If you desire to deviate from the mandated instructions as written, you must propose an AMOC to the FAA.

2.3 **Frequently Asked Questions From AMOC Requesters.**

2.3.1 Service Documents in ADs.

2.3.1.1 **Question:** I converted the AD and the referenced instructions in the referenced service document to an in-house fleet campaign notice, an engineering change order, or individual work cards. Do I need an AMOC?

Answer: No, as long as you transfer the AD language to your own in-house instructions and those instructions precisely represent all of the AD requirements and compliance times.

2.3.1.2 **Question:** I complied with the referenced instructions in the service document revision referenced in the AD before the AD was issued. Do I need an AMOC?

Answer: Maybe. If the AD specifically allows previously accomplished work, you do not need an AMOC. If the AD is silent on previously accomplished work or it is unclear whether the work done before the AD was issued is acceptable, an AMOC is required.

2.3.1.3 **Question:** Do I need an AMOC if I accomplish the instructions in a later version of the DAH service document than what was mandated in the AD?

Answer: Yes, any deviations to the technical requirements of the specific document that are required to be accomplished by the AD will need an AMOC. Therefore, if the DAH did not obtain a global AMOC approval for the later version of the service document, you must apply for

an AMOC. Contact the DAH or FAA responsible office to determine whether the DAH obtained a global AMOC for the service document revision.

2.3.1.4 **Question:** The instructions in the mandated service document incorporated by reference in the AD call for a specific fastener on my aircraft. May I substitute another fastener?

Answer: No. You cannot use a different fastener (or any part, material, or process) from what is specifically mandated in an AD without obtaining an AMOC, unless the procedures in the AD (or service information that was incorporated by reference) permit substitution. If you substitute another fastener without an AMOC, you violate § 39.7 each time you operate the aircraft.

2.3.1.5 **Question:** The AD requires me to perform actions in a service document by a certain date. The service document recommends a date that is later than required by the AD. I want to perform the actions at the later date, pursuant to the service document. Do I need an AMOC?

Answer: Yes. Pursuant to § 39.27, AD requirements override any other language in service documents. You would have to propose an AMOC and substantiate that a change in compliance time similar to that referenced in the service document provides an acceptable level of safety. The service document alone is inadequate substantiation.

2.3.1.6 **Question:** The AD requires that I accomplish specific instructions in an SB. Those instructions require actions from a manual, and the manual requires actions from a standard practice manual. My operating procedure differs from the standard practice manual. Do I need an AMOC to continue using my operating procedure?

Answer: Yes. You must accomplish the specific instructions in the SB specified in the AD, including any second- or third-tier documents required to complete the actions. However, if the specific instructions in the SB use flexible language (refer to AC 20-176) to refer to the second- or third-tier documents, then an AMOC may not be required.

2.3.2 Changes in the Area Addressed by ADs.

2.3.2.1 **Question:** I previously repaired my aircraft structure in the area now addressed by the AD. The repair affects my ability to perform the AD. Must I obtain an AMOC for the AD?

Answer: Yes. Pursuant to § 39.17, if a change to a product affects your ability to accomplish the actions required by the AD in any way, you must request FAA approval of an AMOC. Unless you can show the change eliminated the unsafe condition, your proposal should include the specific actions you propose to address the unsafe condition.

2.3.2.2 **Question:** During the last AD inspection, I found a crack the AD warned about. I obtained an approved repair from the aircraft DAH, which differs from the repair mandated by the AD. Do I need an AMOC for the repair?

Answer: Yes. You must comply with the specific requirements of the AD. Therefore, you or the DAH must apply for and obtain an AMOC if any action differs from the specific requirements of the AD.

2.3.2.3 **Question:** The AD requires that I visually inspect for cracks. However, the previous owner/operator installed a repair doubler that prevents me from inspecting. I am attempting to accomplish the AD inspection. Do I need an AMOC?

Answer: Yes. Whenever you cannot comply with the specific requirements of an AD, you must seek an AMOC. In this case, you must either devise a new method to inspect the area identified in the AD, or show that the repair reinforces the area and redistributes the loads, so an inspection is no longer required. In either case, you must request and obtain an AMOC to ensure compliance with the AD.

2.3.2.4 **Question:** The AD requires that I perform an eddy current inspection of a structural area. There is a repair doubler behind the area that interferes with the eddy current readings, making them uncertain. Do I need an AMOC for this AD?

Answer: Yes. You need an AMOC any time a repair, modification, or alteration interferes with the ability to obtain proper results from a required inspection. This is true when the results of the required inspection are questionable, even though you can physically perform the inspection.

2.3.2.5 **Question:** A structural modification required by an AD was accomplished on my aircraft. I have to do a repair in the region previously modified by this AD for a specific reason (such as corrosion, accidental damage, or cracks). Do I need to apply for an AMOC to install this repair?

Answer: Yes. Any change or modification to the configuration mandated by an AD requires an AMOC.

2.3.3 Removing and Replacing Appliances.

2.3.3.1 **Question:** The applicability section of an AD lists an appliance I previously removed from my aircraft. Is an AMOC required for the aircraft?

Answer: No. You do not need an AMOC when the AD applicability statement applies to an appliance and you no longer have the appliance installed.

2.3.3.2 **Question:** The applicability section of an AD lists an appliance installed on my aircraft. I cannot accomplish the actions in the AD because I previously modified, deactivated, or partially removed the appliance. Do I need an AMOC?

Answer: Yes. Whenever you cannot comply with the specific requirements of an AD, you must seek an AMOC. Pursuant to § 39.15, the AD still applies to the appliance even though it was modified, altered, or repaired, including deactivation or partial removal.

2.3.3.3 **Question:** The AD says I must install a specific version of software. I did that. Now I have received a later version of the same software from the DAH. Do I need an AMOC to install this later version?

Answer: Yes. You will need an AMOC to install any version other than the version specifically referenced in the AD.

2.3.3.4 **Question:** An AD applies to a technical standard order (TSO)-approved article. The DAH has received an AMOC for changes to the article. Do I need an additional AMOC to install the modified article into my aircraft?

Answer: No. You do not need an additional AMOC to install the article into the aircraft. The installation, however, may require additional approval. The AMOC approval letter will identify this as a limitation.

2.3.4 Superseding ADs.

2.3.4.1 **Question:** An AD supersedes another AD applicable to my aircraft. I had received an AMOC for a different inspection procedure from what the original AD called out. Is my AMOC still valid?

Answer: It depends on the superseding AD.

- If the superseding AD includes a provision that AMOCs to the original AD inspection are approved as an AMOC to the superseding AD inspection, your AMOC is still valid for the superseding AD inspection.
- If the superseding AD does not include such a provision, your AMOC is not valid for the superseding AD inspection and you must propose a new AMOC if you cannot comply with the superseding AD compliance actions.

Note: If you have any question concerning compliance with the superseding AD, contact the responsible office.

2.3.4.2 **Question:** An AD that applies to my aircraft was superseded, adding a mandatory terminating action. It includes a provision that AMOCs to the inspection methods, approved in accordance with the original AD, are approved as AMOCs to the inspection methods in the superseding AD.

Can I perform the AMOC inspection instead of accomplishing the terminating action?

Answer: No. Even if an AMOC is still valid, it is only valid for the specific paragraphs of the AD as listed in the AMOC response, not for the superseding AD as a whole. An AMOC inspection may be an acceptable alternative to the mandated inspection (if the superseding AD allows it), but not for the mandated terminating action (which is likely to be in a different paragraph of the AD). The mandatory terminating action must still be done within the compliance time specified in the superseding AD.

2.3.5 Parts Approved via Parts Manufacturer Approval (PMA).

Question: The AD calls for installing a specific part number as the corrective action. There is a PMA-approved replacement for the part listed in the AD. Do I need an AMOC to install the PMA part?

Answer: Yes. Unless the PMA part number is listed in the AD as an acceptable alternative, you need an AMOC to install any part number other than the one listed in the AD.

2.3.6 AD Compliance Before Delivery.

2.3.6.1 **Question:** The DAH (or production approval holder [PAH]) delivered my aircraft with AD status records (indicating compliance with all applicable ADs). Do I still need to get AMOCs for these ADs?

Answer: No. AMOCs are not necessary if the AD status records show that the aircraft complies with all of the applicable ADs. Note that there might be recurring or terminating AD actions that are not yet due. To continue operating the aircraft, you are responsible for complying with these actions before they become due.

2.3.6.2 **Question:** I just received my aircraft, but cannot get an AD status record from the DAH (or PAH). AD XXXX-XX-XX applies to the aircraft. Do I need to take action?

Answer: Yes. Before flying the aircraft, you must either comply with the AD as written, or obtain and implement your own AMOC.

2.3.7 Typographical Errors.

Question: Do I need an AMOC if the service instructions referenced by the AD have an obvious typographical error? For example, it states to use lint-free clothes (when it should have identified lint-free cloths)?

Answer: Yes. In cases of typographical errors in either the AD or service instructions, you must apply for an AMOC. The FAA will approve these types of requests as global AMOCs because a typographical error affects all parties subject to the AD.

2.3.8 Required for Compliance.

Question: Do I need an AMOC if I can accomplish the intent of the compliance action in the service instructions? For example, the service instructions state to use a 20-gallon bucket, but I only have a 50-gallon bucket to rinse the part.

Answer: Maybe. Starting June 2011, some DAHs are adopting the “required for compliance” (RC) notation whereby the critical steps of an SB are identified with a notation of “RC”.

If the SB incorporates this notation, and—

- If the task is identified as RC, you must request an AMOC to deviate from this task; or
- If the task is not identified as RC, you may deviate from the specific task using accepted methods in accordance with an operator’s maintenance or inspection program without an 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.

If the SB does *not* incorporate the RC notation, and the task is in the mandated portion of the SB, you must request an AMOC to deviate from the requirements in the service instructions.

CHAPTER 3. THE AMOC PROPOSAL

3.1 General.

This chapter provides the requirements and the process for submitting an AMOC proposal. It includes the minimum requirements for what an AMOC proposal must contain, and to whom and where to submit the proposal.

3.2 Requirements for an AMOC Proposal.

Anyone may propose an AMOC according to § 39.19. An AMOC proposal is not considered complete until the required information is received. The proposal must include the following:

- 3.2.1 The requester's name and complete mailing address.
- 3.2.2 The affected products, model designations, serial numbers (if applicable), flight hours or cycles (if applicable), and State of Registry (if known).
- 3.2.3 The AD number and specific AD paragraphs to which the proposal applies.
- 3.2.4 A complete and detailed description of the AMOC proposal, including the following (where applicable):
 - 3.2.4.1 Article name.
 - 3.2.4.2 Article numbers.
 - 3.2.4.3 Article serial numbers.
Note: The term "article" is defined in 14 CFR 21.1(b)(2), Amendment 21-92.
 - 3.2.4.4 Descriptions of damage (such as fatigue cracks or corrosion).
 - 3.2.4.5 Existing or affected modifications, alterations, or repairs.
 - 3.2.4.6 Alternative inspection methods, including repeat intervals.
 - 3.2.4.7 Change in compliance times.
 - 3.2.4.8 Technical descriptions of alternative processes or procedures.
 - 3.2.4.9 Pictures and drawings.
 - 3.2.4.10 Other details necessary to define the acceptable level of safety that the AMOC will achieve.

- 3.2.5 Substantiating data showing that the proposed AMOC resolves the unsafe condition with an acceptable level of safety. Two examples are—
 - 3.2.5.1 Data demonstrating that a different inspection method will produce acceptable results.
 - 3.2.5.2 Analysis showing that a previously modified, altered, or repaired structure in the area addressed by the AD redirects the load paths to eliminate the potential for cracking (the unsafe condition) identified in the AD.
- 3.2.6 If the requester wants to change their airplane/rotorcraft flight manual, the affected sections of the manual and the proposed changes.
- 3.2.7 If the requester wants to use later revisions of service documents specified in an AD, copies of those service documents and how the revised service documents provide an acceptable level of safety.
- 3.2.8 If the requester wishes to allow the AMOC response to be shared with the DAH, a statement to that effect. Refer to paragraph 4.8 of this AC.
- 3.2.9 If the proposal is for an AMOC to an appliance AD, such as for an approved TSO article, a statement regarding the installation approval of the modified article (that is, whether the modified TSO article has been approved for installation or whether additional approval is required of the installer). Refer to paragraph 4.9 of this AC.

3.3 **Who Approves an AMOC?**

The manager of the FAA office identified in the AD has the authority to approve AMOCs to the AD. The following are some cases in which other persons may approve an AMOC:

- 3.3.1 The Aircraft Certification Office (ACO) has authorized a designee. Some ACOs authorize certain company designated engineering representatives (DER) or type certification Organization Designation Authorization (ODA) holder unit members to review and approve AMOC proposals. For information on what the ODA holder or 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*.
- 3.3.2 A different FAA office manager is responsible. Sometimes the responsibility for the type design 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 type design. Therefore, 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 currently responsible certificate managing office for approval/denial of the AMOC.

3.4 **Where to Submit.**

Send your AMOC proposal to—

- 3.4.1 Your local PI. If you are an owner or operator, or otherwise have an airworthiness PI for either maintenance or avionics, you must submit your proposal through your PI. Your PI is the person in the FAA most familiar with your operations and can add insight into your request that may be helpful to the ACO when reviewing your proposal. In addition, you may send your proposal to the manager identified in paragraph 3.4.2 below; however, this does not relieve you of your obligation to send your proposal to your PI.
- 3.4.2 The manager of the FAA office identified in the AD. If you do not have a PI (for example, if you are a DAH), you must submit your proposal directly to the office responsible for approving AMOCs. Send your proposal to the attention of the person identified in the Related Information section of the AD. Alternatively, if the FAA has notified the public (typically via letter to industry organizations) of the transfer of either the type certificate or of continued operational safety responsibilities, your proposal should be sent to the newly identified office to avoid unnecessary delays.
- 3.4.3 An authorized designee of the FAA. The AD will identify if AMOC approval authority is delegated. For older ADs that do not include an AMOC delegation section, contact the office identified in the AD to see if AMOC approval has been delegated.
- 3.4.4 The manager of the Military Certification Office (MCO), ACE-MCO-100M, if your proposal concerns a military commercial derivative aircraft (MCDA). Refer to paragraph 4.6 of this AC for more information.

3.5 **AMOC Submittal Methods.**

The FAA office or authorized designee identified in the AD may receive AMOC proposals via the following methods: letter, email, fax, or telephone call. Please note that the FAA or authorized designee may request that any AMOC proposal made via telephone be followed up by one of the other methods mentioned above. In any case, you must provide the information identified in paragraph 3.2 of this AC.

3.6 **The AMOC Response.**

All complete AMOC proposals will receive one of the following responses:

- 3.6.1 AMOC responses will either be in email or letter format, at the discretion of the FAA.
- 3.6.2 An authorized designee will provide a signed FAA Form 8110-3 or 8100-9 as appropriate.
- 3.6.3 Any proposal that does not provide an acceptable level of safety will be denied.

- 3.6.4 If the FAA or authorized designee determines that the proposal provides an acceptable level of safety, it will issue an approval response. You may not use an AMOC until you have actually received a copy of the AMOC response. A verbal response from the FAA or authorized designee is not acceptable.

CHAPTER 4. OTHER AMOC CONSIDERATIONS.

4.1 General.

This chapter provides guidance on the following topics:

- Global AMOCs,
- Returning aircraft to service,
- Revoking an AMOC,
- Foreign registered aircraft,
- MCDA,
- 24/7 AMOC support,
- Sharing AMOCs with DAHs,
- AMOCs for appliances including TSO-approved articles, and
- Previously approved AMOCs.

4.2 Global AMOCs (AMOCs of General Applicability).

A global AMOC applies to the product and is transferable with the product to other owners/operators. Anyone, including someone other than an owner/operator, may propose a global AMOC.

4.2.1 The following are some examples of global AMOC proposals:

- 4.2.1.1 An operator proposes a global AMOC for the entire range of aircraft cited in the applicability section of an AD, which includes, and may be used by, other operators.
- 4.2.1.2 A company proposes a global AMOC to repair multiple aircraft for more than one operator, even though the company is not the DAH for those aircraft.
- 4.2.1.3 A type club proposes a global AMOC that may be used by multiple owners of a particular aircraft model.
- 4.2.1.4 An individual proposes an AMOC for his or her aircraft that other owners of that same aircraft model may use because the AMOC of general applicability.
- 4.2.1.5 The DAH for all aircraft affected by an AD develops a revision to the SB mandated by the AD and proposes a global AMOC to allow all owners/operators of the aircraft to use the new revision. If the AMOC proposal is approved, the DAH may then notify the affected

owners/operators by adding a statement in the SB revision describing which engineering aspects of the SB are an AMOC to the AD.

4.2.2 Is an AMOC Applicable to an Operator’s Fleet of Aircraft the same as a Global AMOC?

An AMOC applicable to an operator’s fleet of aircraft is not a global AMOC, but rather an individual AMOC that applies to multiple aircraft operated by a *single* operator.

4.2.3 Frequently Asked Questions.

4.2.3.1 **Question:** Who can apply for a global AMOC?

Answer: Anyone may apply for a global AMOC.

4.2.3.2 **Question:** The DAH of my aircraft received a global AMOC for the engineering aspects of its service document. Do I need to propose another AMOC if I use the same service document?

Answer: No. If you use the service document as an AMOC, you are responsible for notifying your PI (or lacking a PI, the manager of the FSDO/Certificate Holding District Office [(CHDO)]) before using it.

4.3 Returning Aircraft to Service.

4.3.1 You are responsible for notifying your PI (or lacking a PI, the manager of the FSDO/CHDO) before you use an AMOC. You may have additional requirements for maintenance recordkeeping for methods of compliance to an AD (for example 14 CFR 43.9, 14 CFR 91.417(a)(2)(v), 14 CFR 121.380(a)(2)(vi), or 14 CFR 135.439(a)(2)(v)).

4.3.2 You may approve your aircraft for return to service after accomplishing an AMOC only if you record the AMOC in your aircraft maintenance records as your method of compliance with the AD. Annotate the maintenance records with an applicable statement as follows:

4.3.2.1 “AMOC approval from the [XXX] ACO (or Directorate) approval authority, dated [MM-DD-YYYY],” or

4.3.2.2 “AMOC approval, FAA Form 8110-3, Statement of Compliance with the Federal Aviation Regulations, dated [MM-DD-YYYY] from [company DER name and employer],” or

4.3.2.3 “AMOC approval, FAA Form 8100-9, Statement of Compliance with Airworthiness Standards, dated [MM-DD-YYYY] from [ODA holder’s name],” or

4.3.2.4 “Global AMOC approval from the [XXX] ACO (or Directorate) approval authority to [global AMOC requester’s name], dated [MM-DD-YYYY],”
or

4.3.2.5 “Global AMOC approval from the [XXX] ACO (or Directorate) approval authority to [global AMOC requester’s name], pursuant to paragraph [XXX] of FAA-approved Service Bulletin [XXX], revision [XXX], dated [MM-DD-YYYY].”

4.3.3 **Question:** Do I need an AMOC if I deviate from the AD before the required compliance time?

Answer: Maybe. Before the AD compliance time, changes/modifications to a product may be accomplished via acceptable methods (such as an operator’s approved maintenance program). However, if AD compliance will be noted upon completion of this maintenance, even if it is before the required compliance time, and you have deviated from the steps required by the AD, you need an AMOC. If you do not note compliance with the AD at this time, no AMOC is necessary. Compliance with the AD, and a corresponding AMOC, will be required by the compliance time noted in the AD.

4.4 Revoking an AMOC.

If the FAA determines that a previously approved AMOC no longer provides an acceptable level of safety, the AMOC will be revoked.

4.4.1 The AMOC holder will receive a certified letter from the FAA with details regarding the revocation and any timeframes associated with it.

4.4.2 If an AMOC is revoked and a new AMOC is not approved in its place, the compliance actions stated in the AD must be met.

4.4.3 The FAA will not revoke a global AMOC because it may not be possible to determine who received or used it. If a global AMOC is found to no longer provide an acceptable level of safety, a new AD will be issued to revoke the AMOC.

4.5 Foreign Registered Aircraft.

Anyone may apply for an AMOC for a foreign (non-U.S.) registered aircraft. The FAA issues AMOCs on foreign registered aircraft because it can minimize urgent proposals in the future should the aircraft join the U.S. registry.

4.5.1 The FAA only approves AMOCs to FAA ADs.

4.5.2 The FAA cannot approve AMOCs to another civil aviation authority’s AD.

4.5.3 Submit the required information in paragraph 3.2 of this AC to the appropriate person identified in paragraph 3.4.2 or 3.4.3 of this AC.

4.6 Military Commercial Derivative Aircraft.

The responsible military airworthiness authority may request an AMOC to meet the provisions of an AD differently than the civil sector.

4.6.1 Submit the information in paragraph 3.2 of this AC to the MCO.

4.6.2 The FAA cannot approve AMOCs to any mandatory airworthiness action issued by the military.

4.6.3 If the AMOC is approved, a copy of it must be kept in the aircraft maintenance records. This will facilitate an AD compliance determination if the aircraft owner/operator later requests civil registration.

4.7 24/7 AMOC Support.

4.7.1 In September 2010, the FAA implemented a process to support an urgent need for AMOC issuance after normal business hours to avoid significant air transportation disruptions or substantial impact to an operator. Although a 24/7 AMOC support process is available, it is not intended to be used to accommodate air carriers or owners/operators that have failed to adequately plan for AD compliance (refer to FAA Order 8110.103, *Alternative Methods of Compliance (AMOC)*).

4.7.2 Use of the 24/7 process is at the discretion of the FAA office responsible for approving AMOCs to the AD. Requests to use the process must come from the Aircraft Evaluation Group after identification of the need for urgent AMOC support by the PI/FSDO/CHDO/IFO.

4.8 Sharing AMOCs with Design Approval Holders.

Some DAHs keep a database of global AMOCs that is available to their operators. The database allows operators to search previously approved global AMOCs that may apply to their aircraft. To assist DAHs in identifying AMOCs that might be candidates for a global AMOC, requesters may provide consent in the AMOC proposal letter to permit 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 allowing the FAA to provide the AMOC approval response to the DAH for consideration for a global AMOC.

Example: Operator XYZ grants the FAA approving office permission to share the AMOC approval response with the DAH for their consideration in proposing a global AMOC.

4.9 AMOCs for Appliances Including TSO-Approved Articles.

The FAA has the authority to issue ADs that apply to appliances, including articles approved via TSO 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.

- 4.9.1 Any person, including the TSOA holder, may propose 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*.
- 4.9.2 The design change holder must indicate whether the requested AMOC proposal includes installation approval for the modified TSO article or whether additional approval is required.
- 4.9.3 The installer of a TSO article modified with an approved AMOC does not require a separate AMOC for the installation of that article.

4.10 AMOCs for Rotable or Unserialized Parts.

When proposing an AMOC that affects a rotatable or unserialized part, be sure to carefully check the applicability statement required by paragraph 3.2.2 of this AC. Because the installation of these types of parts may be eligible for multiple serialized products in an operator's fleet, it may be appropriate to list more than one serial numbered product on the AMOC proposal. Doing so may avoid having to obtain an identical AMOC if that part is installed on a different serial number product.

4.11 Previously Approved AMOCs.

The following are some frequently asked questions regarding previously approved AMOCs:

- 4.11.1 **Question:** I have a previously approved AMOC for a different repair method that applies to my aircraft. I was not the original AMOC proposer, but it is transferable. Do I need to obtain ACO, directorate, or company DER approval before using it on my aircraft?

Answer: No. However, if the AMOC has not yet been accomplished, you are responsible for notifying your PI (or lacking a PI, the manager of the FSDO/CHDO) before you use it.

- 4.11.2 **Question:** Can the new owner/operator of my aircraft use my AMOC?

Answer: Only if the AMOC approval identified it as transferable and you make it available to them.

- 4.11.3 **Question:** Can other owners/operators use my AMOC?

Answer: Only if their aircraft are identified in your AMOC approval response. The AMOC can only be used for the specific aircraft, AD, and paragraph(s) cited in the AMOC approval document. The owner/operator must determine that the AMOC applies to their product (that is, to the model and serial number), whether they can meet any restrictions identified, and that they can accomplish the specific instructions

in the AMOC. They are also responsible for notifying their PI (or lacking a PI, the manager of the FSDO/CHDO) before using the AMOC.

4.11.4 **Question:** Is there a fee for using AMOCs?

Answer: The FAA does not charge fees to use AMOCs. However, some AMOC holders may charge fees for allowing others to use their AMOC procedures.

4.11.5 **Question:** Where can I find information about previously approved AMOCs?

Answer: Pursuant to § 39.21, the office listed in the AD can provide information about AMOCs it has previously 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 paragraph(s) to which the AMOC applies. The office cannot provide specifics on the technical nature of the AMOC, nor can it provide you with a copy of an AMOC approval letter. If you seek a copy of an AMOC approval letter, you must request it from the AMOC holder.

APPENDIX A. LIST OF ACRONYMS

14 CFR	Title 14 of the Code of Federal Regulations
AC	Advisory circular
ACO	Aircraft Certification Office
AD	Airworthiness directive
AIR	Aircraft Certification Service
AMOC	Alternative method of compliance
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
MCDA	Military Commercial Derivative Aircraft
MCO	Military Certification Office
ODA	Organization Designation Authorization
PAH	Production approval holder
PMA	Parts manufacturer approval
PI	Principal inspector
RC	Required for compliance
SB	Service bulletin
TSO	Technical standard order
TSOA	Technical standard order authorization

APPENDIX B. RELATED FAA PUBLICATIONS**B.1 Where to Find Publications.**

Publications referenced throughout this document refer to the latest revision level. You can get copies from the FAA website at <http://www.faa.gov> and our Regulatory and Guidance Library (RGL) at <http://rgl.faa.gov>.

B.2 FAA ACs.

- AC 39-9, *Airworthiness Directives Management Process*.

B.3 FAA Orders.

- 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 8110.103, *Alternative Methods of Compliance (AMOC)*.
- FAA Order 8150.1, *Technical Standard Order Program*.

B.4 FAA Manuals.

- FAA-IR-M-8040.1, *Airworthiness Directives Manual*.

APPENDIX C. ADVISORY CIRCULAR FEEDBACK INFORMATION

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by (1) complete the form online at <https://ksn2.faa.gov/avs/dfs/Pages/Home.aspx> or (2) emailing this form to 9-AWA-AVS-AIR-DMO@faa.gov

Subject: AC 39-10

Date: [Click here to enter text.](#)

Please check all appropriate line items:

An error (procedural or typographical) has been noted in paragraph [Click here to enter text.](#) on page [Click here to enter text.](#)

Recommend paragraph [Click here to enter text.](#) on page [Click here to enter text.](#) be changed as follows:

[Click here to enter text.](#)

In a future change to this AC, please cover the following subject:
(Briefly describe what you want added.)

[Click here to enter text.](#)

Other comments:

[Click here to enter text.](#)

I would like to discuss the above. Please contact me.

Submitted by: _____

Date: _____