

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.68

National Policy

Effective Date:
3/5/09

Cancellation Date:
3/5/10

SUBJ: Digital Signature Expiration in the Industry Operations Safety System

- 1. Purpose of This Notice.** This notice clarifies the interim process for signing operations specifications (OpSpecs), management specifications (MSpecs), letters of authorization (LOA), and other authorizing documents in the Industry Operations Safety System (IOPSS) pending the release of the Web-based automated Operations Safety System (WEBOPSS).
- 2. Audience.** The primary audience for this notice is aviation safety inspectors (ASI) with responsibility for signing OpSpecs or MSpecs in certificate management offices (CMO), certificate management units (CMU), and Flight Standards District Offices (FSDO) using the IOPSS through Citrix. The secondary audience includes the Flight Standards branches and divisions in the regions and in headquarters. This notice does *not* apply to users accessing the automated Operations Safety System (OPSS) certificate-holding district office (CHDO) application only through their local desktop (i.e., not accessing the IOPSS).
- 3. Where You Can Find This Notice.** Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Operators and the public can find this notice at <http://fsims.faa.gov>.
- 4. How This Notice Differs From Previous Processes and Procedures.** This notice explains the interim process for signing authorizing documents in the IOPSS.
- 5. Background.** In August of 2008, the contract providing digital signatures for the IOPSS expired, and it was decided that there was insufficient justification to renew the contract. Before the contract expired, messages were posted on the IOPSS message board asking all users to ensure that their digital signature was current, and that they maintained their password. Some factors that influenced this decision included:

 - a. Outdated Technology.** Technologies used in the IOPSS, and by the digital signature provider ARINC, were outdated and very costly to maintain.
 - b. Software Support.** The company providing the software used by ARINC to administer the digital signatures had long evolved away from the technology used in the IOPSS and, therefore, did not support it.

c. Code Redevelopment. Significant code redevelopment would have been required in the IOPSS to update the application to support a more modern digital signature solution. Given that development of the WEBOPSS to replace the legacy OPSS/IOPSS systems was ongoing, it was considered impractical to redesign the IOPSS or to continue to support the outdated digital signature technology.

6. Guidance.

a. Expired Federal Aviation Administration (FAA) Digital Signatures. If all of the FAA digital signatures for an operator have expired, then the office manager may allow another inspector with a valid digital signature to sign the draft authorizations for that operator, or request that the affected FAA and corresponding industry user profiles in the IOPSS be adjusted to disable the digital signature process. Once an inspector's digital signature is disabled, the inspector can then move documents to an active authorization without digitally signing them and return to signing paper copies of the authorizing documents, until the office has been transitioned to the WEBOPSS. Refer to FAA Order 8900.1, Volume 3, Chapter 18, Section 2, paragraphs 3-715 and 3-716 for guidance on printing and maintaining paper copies of the authorizing documents.

b. Expired Industry Digital Signatures. The FAA can continue to maintain the collaborative relationship with their industry counterparts in the certificate management process. Industry can continue to draft their authorizations in the IOPSS, but they will not be able to "sign" the documents digitally in the IOPSS. If only the industry digital signatures have expired, the FAA can still digitally sign and move the document to an active certificate holder authorization. It is then effective for use by the operator; however, a paper copy signed by the operator should be maintained by the FAA.

c. Activation Process without Digital Signatures. When a draft authorization is ready for inspector review, industry can call or e-mail the inspector to examine the changes in the IOPSS. If approved, the inspector should activate the document in the IOPSS. Then both parties should sign paper copies of the final authorizing document. Refer to FAA Order 8900.1, Volume 3, Chapter 18, Section 2, paragraphs 3-715 and 3-716 for guidance on printing and maintaining paper copies of the authorizing documents.

7. Action. If the FAA CHDO no longer has any inspectors with valid digital signatures in the IOPSS that it allows to digitally sign authorizations for a particular operator, then the office should contact 9-AWA-AFS-OPSSPROB@faa.gov and request that all user profiles in the IOPSS for that particular operator be adjusted to disable the digital signature process and return to signing paper copies of the authorizing documents. This should be completed for both FAA and industry users and will remain in place until the office has been transitioned to the WEBOPSS. Inspectors should then follow the guidance in paragraph 6 to activate and sign authorizations.

8. Disposition. We will not incorporate this information in FSIMS. This guidance is no longer applicable as soon as the office has been transitioned to the WEBOPSS or upon expiration of the notice. Direct questions concerning this notice to Aviation Safety (AVS) Support Central at 405-954-7272.

ORIGINAL SIGNED BY

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