

NOTICE

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.632

National Policy

Effective Date:
6/17/22

Cancellation Date:
6/17/23

SUBJ: Issuance of Revised Notice Superseding N 8900.608, Relocation of Guidance on Required Inspection Items (RII) in FAA Order 8900.1, Volume 20, Chapter 6, Section 1

1. Purpose of This Notice. On January 6, 2022, Notice N 8900.608, Relocation of Guidance on Required Inspection Items (RII) in FAA Order 8900.1, was published to provide information regarding the revision and relocation of guidance and policy in Federal Aviation Administration (FAA) Order 8900.1. The notice also directed principal inspectors (PI) to conduct an evaluation of operators' existing RII procedures using the new guidance, and the correction of deficiencies within 6 months. This new notice supersedes N 8900.608 to remove the 6-month timeframe for PI evaluation and completing corrective actions, and to solicit feedback for concerns related to the information contained in Order 8900.1, Volume 20, Chapter 6, Section 1, Evaluating Required Inspection Item (RII) Procedures.

2. Audience. The primary audience for this notice is the Flight Standards (FS) Safety Assurance offices' aviation safety inspectors (ASI) with certificate management and oversight responsibility of air carriers and operators who currently have, or will pursue authority to use a Continuous Airworthiness Maintenance Program (CAMP). The secondary audience includes the Safety Standards and Foundational Business offices.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>. Operators and the public can find this notice on the FAA's website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. Background.

a. In 2018, specialists from the Commercial Aviation Group (AFS-330) in the Aircraft Maintenance Division (AFS-300) conducted an extensive review of a sampling of existing CAMPs that revealed significant risks within RII programs. Those reviews found many CAMP operator manuals did not describe RII methods of compliance as prescribed by rule, but rather provided generalized policy that lacked well-defined procedures and controls. AFS-300 concluded this was due to subjective guidance, poor inspector training, and the exclusive use of Safety Assurance System (SAS) Element Design Data Collection Tools (ED DCT) that did not address all RII requirements.

b. AFS-300 took steps to address this systemic risk by revising the guidance and initiating revisions to the associated ED DCT questions to align with the new guidance. AFS-300 is also producing an advisory circular (AC) on RII to provide the public with the policy and expanded guidance regarding RII regulatory requirements.

c. Following the publication of N 8900.608 and the RII guidance, a number of concerns and questions have been raised among some Safety Assurance offices and PIs with responsibility for oversight of air carriers certificated under Title 14 of the Code of Federal Regulations (14 CFR) part 121 or 135 with aircraft maintained under a CAMP. This notice provides information on the steps AFS-300 is taking to address these concerns.

5. Discussion.

a. **Policy Clarification.** Content related to RII previously found in Order 8900.1, Volume 3, Chapter 43, Section 2, Evaluating the Required Inspection Program, was revised and relocated to Order 8900.1, Volume 20, Chapter 6, Section 1. The guidance published in Volume 20, Chapter 6, Section 1 on RII does not present new FAA policy. Rather, it gives clear and detailed information for ASIs to use when evaluating and assessing RII procedures in an operator's manual. However, shortly after the issuance of N 8900.608 and Volume 20, Chapter 6, Section 1, AFS-330 began to receive significant feedback regarding the actions required by N 8900.608, as well as content contained in several paragraphs of Volume 20, Chapter 6, Section 1. These concerns include:

(1) N 8900.608, Paragraph 6, Action, which directed Principal Maintenance Inspectors (PMI) and Principal Avionics Inspectors (PAI) to review existing programs and collaborate with assigned CAMP operators that require a revision to their existing RII procedures, to ensure those revisions are completed within 6 months from the effective date of the notice. This timeframe created an undue burden on the certificate management offices (CMO), as well as the certificate holders (CH) themselves. In response to these concerns, AFS-300 canceled N 8900.608 and the 6-month timeframe has been eliminated.

(2) Secondly, concerns were raised regarding Order 8900.1, Volume 20, Chapter 6, Section 1, Subparagraph 20-6-1-9C, Defining the Level of Administrative Control. This subparagraph addresses the management positions held by the Director of Maintenance (DOM) or equivalent, and the Chief Inspector or equivalent (when applicable). The guidance states the position described in 14 CFR part 91, § 91.1427(b)(8); part 121, § 121.369(b)(8); and part 135, § 135.427(b)(8), having authority to countermand the decision of an RII inspector at that level of administrative control that has overall responsibility for the management of both the required inspection functions and the other maintenance functions, is the position meeting the requirements of § 91.1413(a)(1) or 14 CFR part 119, § 119.65 or § 119.69, as applicable. While the title used for that position may be determined by the CH, the person assigned to the position must hold the requisite experience and qualifications associated with that position and be identified in the CH's Operations Specification (OpSpec)/Management Specification (MSpec) A006, Management Personnel. Further, the guidance states the position of Chief Inspector or equivalent, and/or other inspection personnel within the CAMP operator's inspection unit, fall organizationally under the control and authority of the DOM or equivalent position. Based on the feedback regarding this information, AFS-300 is evaluating Volume 20,

Chapter 6, Section 1 to provide greater clarity of the content covering these organizational lines of authority.

(3) Finally, AFS-300 has received comments and concerns over Order 8900.1, Volume 20, Chapter 6, Section 1, paragraph 20-6-1-13 and Figures 20-6-1C and D that provide examples of a means (but not the only means) to designate, perform, and document required inspections when using task cards. The guidance does not include other examples of acceptable means to designate, perform, or document RII designations and procedures. This has led to the misconception by some ASIs that task cards are required. Therefore, AFS-300 is evaluating Volume 20, Chapter 6, Section 1 content covering program acceptability relative to rule requirements.

b. Continuous Improvement. The revision to Order 8900.1, Volume 20, Chapter 6, Section 1 provides RII qualitative criteria intended to guide ASIs through the process of evaluating acceptable RII methods and procedures that ensure compliance with the RII regulations. The Safety Assurance System (SAS) requires ASIs to answer DCT questions that, if used alone, only provide a quantitative assessment. The intent of the Volume 20 effort is to provide ASIs with better guidance that enables them to provide qualitative assessments when answering SAS Element Design Assessment (EDA) questions.

c. Feedback. AFS-300 welcomes feedback at any time concerning the guidance we produce. Such feedback ensures the goal of continuous improvement and to that end, this new notice includes a comment form as an appendix as a means to provide feedback specifically for Order 8900.1, Volume 20, Chapter 6, Section 1. AFS-300 requests any ASI or Safety Assurance office desiring to submit comments, do so on or before 14 calendar-days from the effective date of this notice. Comments will only be accepted from FAA personnel. AFS-300 is committed to revisiting the content in Volume 20, Chapter 6, Section 1 based on feedback received via the comment forms.

6. Action. For the purposes of this notice and to address the concerns described above, we encourage FAA PMIs, PAIs, and ASIs to thoroughly review the guidance in Order 8900.1, Volume 20, Chapter 6, Section 1. When providing feedback, please complete the attached comment form by identifying the information and the nature of the concern. Please be as detailed as possible and substantiate all comments. Submit feedback directly to the persons indicated on the form.

7. Future Revision. AFS-300 is committed to evaluating and addressing all comments received. We anticipate a future revision to Order 8900.1, Volume 20, Chapter 6, Section 1 will be necessary. This subsequent revision will be published together with another notice to apprise Safety Assurance offices and ASIs of any changes made, and will likely establish a surveillance activity to address the systemic risk identified above in paragraph 4.

Note: AFS-300 will consolidate all comments received and their disposition, and retain according to Office File Plan requirements.


8. Documentation. Other than providing optional feedback via the completed comment form, there are no documentation requirements at this time.

9. Disposition. We do not intend to incorporate the information in this notice into FAA Order 8900.1. Please direct questions or comments concerning information in this notice not related to Order 8900.1, Volume 20, Chapter 6, Section 1 content to AFS-300 at 202-267-1675.

A handwritten signature in black ink, appearing to read "R. Carty". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert C. Carty
Deputy Executive Director, Flight Standards Service

Appendix A. Comment Form

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|  | <h1>AVS</h1> <h2>Quality Management System</h2> | | QPM # AFS-002-103-F4 | Revision 4 |
| | Title: AFS Directive and AC Comment Form (Coordination) | | Date: 3/3/2016 | Page 1 of 2 |
| OPR/Branch/Routing Symbol AFS-300/AFS-330 | Project SME Name, Phone Number, and Email Greg Young, 206-231-3737, greg.young@faa.gov; Ken Mahan, 405-666-1038, ken.mahan@faa.gov | | Document Number/Title 8900.1 V20 C6 S1, Evaluating Required Inspection Item (RII) Procedures (1/6/22) | |
| Reviewing Organization: V20 C6 S1 <i>(Note: On new content review entire document. On Changes limit review scope to change bar area only)</i> | | | Coordination Deadline Date: 14 calendar days from Notice N8900.632 effective date. | |

| Reviewer Name / Routing Symbol / Phone Number | Reviewer Page & Para or Vol., Chap., & Sec. | Reviewer - Comment and Rationale <small>Note: If reviewer suggests a non-concur, state "Suggests Non-concur" in block below providing specific rationale stated in Order 1320.1 Table B-1, Coordination Responses. Comments will not be considered non-concur unless the Division Manager, Deputy Division Manager or their actor checks the Non-Concur box on the coordination clearance record then signs/dates form or uses PIV card to digitally sign.</small> | Reviewer Recommended Change <small>Note: If reviewer recommends nonconcur a proposed solution is required from reviewing organization. The OPR will address the comments received by either accepting, rejecting or partially accepting them.</small> | OPR Accept (A) Partially Accept (PA) Or Reject (R) | OPR Disposition/Rationale |
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