

# NOTICE

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

N 8900.36

National Policy

Effective Date:  
03/13/08

Cancellation Date:  
06/30/08

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**SUBJ:** Special Emphasis Validation of Airworthiness Directives Oversight

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**1. Purpose of This Notice.** This notice directs an audit of Title 14 Code of Federal Regulations (14 CFR) part 121 air carrier compliance with Airworthiness Directives (AD). The audit is necessary to validate our system for overseeing air carrier management of ADs.

**2. Audience.** The primary audience for this notice is Flight Standards District Office or certificate management office principal maintenance inspectors (PMI) and principal avionics inspectors (PAI) responsible for the approval/review and surveillance of air carrier AD management programs. The secondary audience includes Flight Standards branches and divisions in the regions and in headquarters.

**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. Background.** Current events involving one air carrier's noncompliance with ADs make it necessary to validate our system for overseeing air carrier management of this regulatory requirement.

**a.** In December 2007, all Federal Aviation Administration (FAA) Certificate Management Teams (CMTs) for 14 CFR part 121 air carriers completed their transition to the Air Transportation Oversight System (ATOS)—a systems-based approach to ensuring air carrier compliance with regulations. ATOS requires systematic, risk-based surveillance of all of the processes that an air carrier uses to comply with regulations and deliver its product. ATOS structures air carrier processes into 97 elements. Inspectors use detailed data collection tools to assess the design and performance of the processes represented by each element. Inspectors use Safety Attribute Inspections (SAIs) to collect data for design assessments and Element Performance Inspections (EPIs) for performance assessments. The SAI and EPI for element 1.3.6, Airworthiness Directive Management, provide specific references to regulations and FAA policy and guidance for an air carrier's management of compliance with ADs.

**b.** Element 1.3.6 is extremely complex. Multiple ADs affect every aircraft used in air transportation. Literally inspecting each of these aircraft for compliance with all ADs affecting it far exceeds FAA resources. Therefore, ATOS emphasizes the importance of an air carrier's responsibility to have a process that effectively manages the regulatory requirement to comply with ADs.

c. ATOS requires a performance assessment of element 1.3.6 every six months. Many recently transitioned CMT have not yet completed an assessment of element 1.3.6. For this reason, as well as the highly publicized noncompliance of one air carrier, this special emphasis audit is necessary to validate our system of oversight.

**5. Action.** PMIs and PAIs shall determine their assigned air carriers' compliance with ADs by auditing a sample of ADs applicable to their air carriers' fleets, in conjunction with a retargeted performance assessment of element 1.3.6. The audit consists of two phases. Phase 1 of the audit shall sample 10 ADs for each of the air carriers' fleets, including AD-2002-07-08 and AD-2004-18-06 for the Boeing 737 aircraft, if applicable. Phase 2 of the audit shall sample additional ADs to total 10 percent of the ADs applicable to the air carriers' fleets.

a. PMIs and PAIs shall complete Phase 1 of the audit by March 28, 2008 and Phase 2 as soon as possible but no later than June 30, 2008.

b. The audit shall:

(1) Validate the air carrier's work instructions (e.g., task cards, engineering authorizations, engineering orders, engineering change orders) to accomplish the AD by verifying that the instructions correctly describe the method of compliance contained within the AD and any referenced service information (e.g., service bulletins, service letters) or any related alternative methods of compliance; and

(2) Validate the proper performance of the AD by reviewing the complete work instructions "package" on at least one aircraft.

c. For Phases 1 and 2, PMIs and PAIs shall audit a different aircraft, to the extent practicable, for each AD. This review should also ensure that entries into the AD tracking system were performed correctly. Give emphasis to sampling those ADs which involve required inspections of fuselage, empennage, and wing areas for cracking or similar issues.

d. To initiate Phase 1 of the audit, complete the following steps:

(1) Use ATOS automation to create a Constructed Dynamic Observation Report(s) (ConDOR) for airworthiness element 1.3.6.

(2) In the Local/Regional/National use field enter N8900.36.

(3) In the Requested Completion Date field enter March 28, 2008.

(4) Select EPI question 1.2.

(5) Determine and document data collection requirements in accordance with the instructions above.

(6) Document the results of each AD sampled in the comment field associated with the yes/no response.

e. To initiate Phase 2 of the audit, complete the following steps of the ATOS version 1.2 business process:

(1) Step 2.4, adjust the due date of the next performance assessment of element 1.3.6 to June 30, 2008.

(2) Step 2.6, determine data collection requirements in accordance with the instructions above.

(3) Step 2.7, document data collection requirements in accordance with the instructions above. Include instructions for specific ADs to be sampled and deadlines to save EPI activities to “final” in ATOS automation to comply with Phase 1 and 2 completion dates.

(4) Step 5.1, use the comment field to document the results of each AD sampled.

(5) Step 7.4 or 7.5, complete the performance assessment of element 1.3.6. Include ConDOR data collected in Phase 1.

f. If the audit affirms the performance of element 1.3.6, take no further action.

g. If you cannot affirm performance, follow the ATOS business process to initiate required action, including scheduling a design assessment if systemic issues exists.

h. If the audit finds evidence of noncompliance with ADs, initiate immediate corrective action.

## 6. Tracking.

a. Document the results of this audit of the air carrier’s compliance with sampled ADs in the comment field of the EPI for element 1.3.6, Airworthiness Directive Management. Enter N8900.36 in the Local/Regional/National Use block of the activity screen.

b. If the air carrier did not comply with any of the sampled ADs, take immediate corrective action. Use the ATOS Risk Management Process (RMP), if appropriate.

**7. Disposition.** This is a special emphasis audit. Therefore, Flight Standards will not incorporate the information in this notice into FSIMS. Direct questions concerning this notice to the Certification and Surveillance Division, AFS-900, at (703) 661-0550.

Original signed by

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Director, Flight Standards Service