



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

Aircraft Certification Service Policy

**ORDER
8100.11D**

08/01/2016

SUBJ: Requirements for Finding Undue Burden and No Undue Burden Under
14 CFR Part 21

This order establishes requirements for determining the burden associated with certain Federal Aviation Administration (FAA) certification and oversight activities outside the United States. This order applies to all Aircraft Certification Service (AIR) personnel who work with production approvals.

A handwritten signature in blue ink, reading "Susan J. M. Cabler", is positioned above the typed name.

Susan J. M. Cabler
Acting Manager, Design, Manufacturing, &
Airworthiness Division
Aircraft Certification Service

Table of Contents

<i>Paragraph</i>	<i>Page</i>
1. Purpose of This Order	1
2. Audience	1
3. Where to Find This Order	1
4. Cancellation	1
5. Explanation of Policy Changes	1
6. Effective Date	1
7. Definition of an Undue Burden.....	1
8. Requirement for a Finding of Undue Burden	2
9. Factors That Affect the FAA’s Burden.....	2
10. Relevance of a Bilateral Agreement with the United States.....	4
11. Guidance for Production Certificate Extension Requests.....	5
12. Guidance for Use of Manufacturing Facilities Outside the United States.....	5
13. Coordination of PAH’s Project Plan.....	6
14. Optional Methods to Demonstrate No Undue Burden.....	8
15. Letter of TSO Design Approval	8
16. Issuing Export Airworthiness Approvals for Products and Articles Located Outside the United States.....	8
17. Use of Designees.....	8
Appendix A. Sample Letter Advising a PAH of a Finding of No Undue Burden.....	A-1
Appendix B. Sample Letter Advising a PAH of a Finding of an Undue Burden	B-1
Appendix C. Sample Letter Advising a PAH of a Finding of an Undue Burden After Review of Changes to Status of a Submitted Project Plan	C-1
Appendix D. Acronyms	D-1
Appendix E. Administrative Information	E-1
Appendix F. FAA Form 1320-19, Directive Feedback Information	F-1

1. Purpose of This Order. This order contains policy and instructions for FAA managing offices responsible for making findings of undue burden or no undue burden when an applicant requests to utilize a manufacturer outside the United States. The expected outcome of this guidance is that the FAA makes fair, consistent, and uniform decisions for those situations where Title 14 of the Code of Federal Regulations (14 CFR) part 21 identifies the need for an undue burden or no undue burden finding be made. For the purposes of this order, manufacturing facilities includes PC extensions, associate facilities, and suppliers located outside the United States.

2. Audience. This order applies to all AIR Directorates, Directorate managers, Manufacturing Inspection Offices (MIO), Manufacturing Inspection District Offices (MIDO), Manufacturing Inspection Satellite Offices (MISO), and the Certificate Management Offices (CMO) personnel.

3. Where to Find This Order. You can find this order on the Directives Management System (DMS) website https://employees.faa.gov/tools_resources/orders_notices/. This order is available to the public at http://www.faa.gov/regulations_policies/orders_notices/.

4. Cancellation. This order cancels FAA Order 8100.11C, *Decision Paper Requirements for Undue Burden and No Undue Burden Determinations Under 14 CFR Part 21 for Production and Export Airworthiness Approvals*, dated August 24, 2012. If you have already started working on an undue burden decision paper (UBDP) before the effective date of this order using the guidance in FAA Order 8100.11C, you can finish it using that revision or you may start over and use the policy in this revision.

5. Explanation of Policy Changes. This revision—

a. Removes the requirement for aviation safety inspectors (ASI) to complete an UBDP when an applicant or PAH proposes to manufacture outside the United States. The applicant or PAH is directed to use Advisory Circular (AC) 21-55, *Process to Support FAA Findings of Undue Burden or No Undue Burden for PAHs Requesting to Use a Manufacturing Facility Located Outside of the United States*, for guidance when submitting a project plan for the proposed international activity.

b. Provides the managing office with guidance for validating the PAH's project plan when proposing to use a manufacturing facility outside the United States.

c. Changes references to the International Policy Office (AIR-40) to the International Division (AIR-400).

6. Effective Date. This order is effective October 1, 2016.

7. Definition of an Undue Burden. An undue burden is a determination made by the FAA that a proposed activity outside the United States, requiring FAA support, will exceed available FAA resources. Resources may include personnel or time commitments. If the FAA determines that a proposal will cause an undue burden, the proposal is rejected.

8. Requirement for a Finding of Undue Burden. Sections 21.122(a), 21.139(a), 21.309(a), and 21.609(a) of 14 CFR state that the FAA does not issue production approvals if the manufacturing facilities are located outside the United States unless the FAA finds the location of the manufacturer's facilities places no undue burden on the FAA in administering the applicable requirements of Title 49 U.S.C. Also, 14 CFR 21.325(c) states that the FAA may issue an export

airworthiness approval for a product or article located outside the United States if it finds no undue burden in administering the applicable requirements.

9. Factors That Affect the FAA's Burden. Because of the FAA's constantly changing resources, it is difficult to categorize those burdens on the FAA that are undue and those that are not. Further, all overseas certification activity varies because of differences in the type of activity, bilateral agreements, scope of the project, and conditions in the country/jurisdiction where the facility is located, among other variables. It is up to the PAH's managing office, in coordination with their MIO, directorate manager, and the International Division (AIR-400), when applicable, to make the undue burden finding. Using this approach, each directorate can make a balanced determination depending on its available resources.

a. Any of the following conditions may create an undue burden:

(1) Shortages of FAA funds. Sometimes, the FAA needs to transfer resources from international to domestic projects because of an increase in domestic program levels, which then can create an undue burden to oversee new or existing international programs.

(2) Low managing office staffing levels or other human resource restrictions.

(3) Civil unrest in the applicable country, or other activity that can compromise safety to FAA personnel or hinder their access to PAH facilities.

(4) The applicable country/jurisdiction's civil aviation authority (CAA) is overburdened or otherwise unable to undertake PAH certification activity on behalf of the FAA. The CAA may lack the appropriate maturity level to provide effective oversight on behalf of the FAA.

(5) Significant manufacturing/production safety concerns develop, such as failed quality processes or failed parts, which can force the FAA to expand its oversight.

(6) The PAH proposes to manufacture a complex article or use a critical process or material. The severity and likelihood of a failure of the article drives the FAA's determination about the extent of its oversight. Some manufacturing processes could be critical depending on the application (for example, criticality of the part or assembly subject to the process). Some examples of critical processes include—

(a) Heat treating of critical parts,

(b) Machining or welding of alloys or exotic materials, or

(c) Processes supporting new technology, such as composites.

(7) The applicant's proposed activity is located in a country/jurisdiction that does not hold a bilateral agreement with the United States.

(8) The applicant requests that the FAA appoint designees to perform authorized functions at a manufacturing facility outside the United States, requiring the managing office to

travel to provide oversight of those designees or Organization Designation Authorization (ODA) unit members.

Note: The PAH is required to notify the FAA of any change affecting inspection, conformity, or airworthiness of its product or article. Changes to an approval holder's manufacturing programs involving non-U.S. facilities may cause the FAA to reevaluate the initial undue burden or no undue burden decision.

b. The following factors, either singularly or in combination, might mitigate the FAA's finding of an undue burden, even in situations where the FAA would normally find an undue burden:

(1) Performance of the PAH. If the PAH has a record of minimal noncompliance findings during past FAA audits, that record may be taken into consideration. The PAH's length of time as an approval holder and relationship with the FAA can also be considered when estimating the FAA's projected level of oversight at the facility outside the United States.

(2) Availability of company source inspectors. Some PAHs may use employees such as source inspectors to determine process compliance. All authorized "third party" audit activity should be documented in the PAH's approved quality system.

(3) MIO experience with a CAA. The MIO may request technical assistance from the CAA for oversight tasks if the MIO has positive experience working with that CAA.

(4) Perform oversight at multiple facilities during one trip. If the MIO and/or MIDO plans to travel to any given country for oversight of another PAH's extension or supplier, it may increase efficiency to perform oversight for several PAH facilities located in that country during the same trip.

(5) Low criticality of the article produced. The FAA's burden is tied to the oversight required, and one of the contributing factors that dictate oversight is whether the product or article being manufactured is located on the FAA's Category Parts List (CPL) or designated as critical by the PAH.

(6) Minimal complexity of the manufacturing process. Some facilities use a static and uniform process for manufacturing a certain product/article. Infrequent or nonexistent change to the supplier process (or the lack of any special manufacturing processes) may reduce FAA oversight responsibilities. By contrast, however, use of subtier suppliers may add to process complexity.

(7) Use of unscheduled audits. The MIO may choose to modify its annual CM plan by performing unscheduled audits of the facility. An audit planned shortly after approval of the PAH's proposal, along with follow-up audits, may help to mitigate some concerns the MIO may have about the facility or the CAA.

(8) Oversight required for supplier facilities. FAA oversight of a supplier facility is minimal (especially one manufacturing articles that are inspectable upon receipt at the PAH facility), compared to the more extensive FAA oversight required at a PAH extension.

(9) Proposed supplier holds a CAA production approval for the part or article to be produced. The FAA may (if desired) accept in whole or part any oversight performed by the approving authority within their own system.

(10) In certain cases where the CAA may lack the appropriate maturity level to provide effective oversight on the FAA's behalf, the FAA may choose to perform CM oversight for a limited period of time to facilitate the CAA's developmental growth.

10. Relevance of a Bilateral Agreement With the United States.

a. Under the provisions found in the Bilateral Aviation Safety Agreement Implementation Procedures for Airworthiness (BASA IPA) and other similar agreements, the FAA can request the CAA to provide oversight and surveillance functions. The extent of this support is outlined in the bilateral agreement. In many cases, applicants for activity outside the United States have anticipated that the counterpart CAA holding a bilateral agreement will, through technical assistance, mitigate the FAA's burden. However, this support may not be available or advantageous under certain circumstances. It is critical to consider each case and country/jurisdiction individually when doing your analysis of the burden on the FAA. Preliminary discussions between the CAA and the FAA may be necessary to ensure if, and to what extent, the CAA will support the project. The managing office, in consultation with AIR-400, and the applicant should consider the following factors when assessing potential support from another CAA:

(1) Not all CAAs have enough resources to support new or expanded ventures by U.S. companies.

(2) Not all CAAs have the same level of understanding of FAA requirements or the capabilities for production/airworthiness requirements.

(3) Not all authorities have a bilateral agreement in effect (the FAA website contains a listing of the bilateral agreements at http://www.faa.gov/aircraft/air_cert/international).

(4) Some bilateral agreements are limited to certain activity, such as production under a technical standard order (TSO) authorization. The managing office must take those limitations into account when evaluating the FAA's burden. The FAA website shows the status of each bilateral agreement and the implementation procedures for airworthiness.

(5) Not all bilateral partners have a conformity provision in their agreements with the United States or are active in the same companies that U.S. PAHs use.

(6) To request assistance from a CAA, some bilateral agreements require that the supplier hold a production approval issued by that country/jurisdiction's CAA. In such cases, CAA's may still decline FAA's request for assistance if they are unable to support the project.

Note: Most of the FAA's bilateral agreements include provisions for technical assistance between authorities. Certain CAAs may charge a fee for oversight activities performed on behalf of the FAA at a PAH's facility

located in its country or jurisdiction. A PAH should be aware that any CAA oversight activity fees incurred are solely the responsibility of the PAH.

b. For each bilateral country/jurisdiction involved, the managing office must identify the nature of the certification or oversight support that the FAA would request from the CAA. Manufacturing activities completed in non-bilateral countries can pose challenges to the FAA's ability to conduct surveillance and investigations as well as administer compliance and enforcement. Unless a country/jurisdiction has a current bilateral agreement with the United States, the FAA cannot rely on the work of the CAA and the full burden for support remains with the FAA. The managing office must address how the cognizant AIR office will conduct certification or oversight activity when a bilateral agreement is not in place. This managing office will document the above required information in the comments section of the project plan. Unless significant mitigation of FAA burden is in place, PAH activity in any non-bilateral country/jurisdiction will constitute an undue burden on the FAA.

11. Guidance for Production Certificate Extension Requests. A production certificate (PC) extension is granted at the discretion of the FAA and is not an entitlement of a PC holder. The PC extension facility must be owned and operated by the same corporate management as the original PC holder that controls the design and quality of the products or articles, except for companies participating in joint production and/or co-production business agreements. Additionally, the PC extension is listed as a manufacturing facility on the PC. For information and guidance regarding PC extensions located outside the United States, refer to AC 21-24, *Extending a Production Certificate to a Facility Located in a Bilateral Airworthiness Agreement Country*, and FAA Order 8120.22, *Production Approval Procedures*.

12. Guidance for Use of Manufacturing Facilities Outside the United States.

a. FAA Order 8120.23, *Certificate Management of Production Approval Holders*, identifies minimum requirements for the number and frequencies of audits to be conducted at a PAH's manufacturing locations, including suppliers. Those audits are based on the results of an annual risk assessment of the PAH. The locations of all audits, including those at suppliers, are selected based on a prioritization of the risk of the manufacturing activities performed at each facility. One risk factor may include whether a quality escape or noncompliance from a supplier may have a significant impact on safety, if not properly controlled by the PAH or associate facility. Any manufacturing facility located outside of the United States, including suppliers, can be selected for an audit; therefore, the cost of traveling to the proposed manufacturing facility should be considered when determining undue burden.

b. Following the guidance in AC 21-55, the PAH will notify the FAA of its intent to use a manufacturing facility outside the United States. After initial review by the managing office, projects determined low-risk will not require a full project plan and can therefore be signed and approved by the MIDO manager or their delegate. The PAH should expect to submit a full project plan when proposing to use a high-risk manufacturing facility. Examples of a high-risk manufacturing facility may include, but are not limited to, the following situations:

Note: For the purpose of this order, the term "high-risk" refers to its impact on the inspection, conformity, or airworthiness of a product, article, or process.

(1) The manufacturing facility will provide a critical part or process, as described on the Category Parts List (CPL), or as determined by the PAH.

(2) The manufacture facility will produce high-risk parts in a non-bilateral country.

(3) The PAH has a history of supplier control issues.

(4) The project is unique or precedent setting.

c. The FAA will need to validate the information submitted by the PAH in the project plan. The PAH project plan template listed in AC 21-55 provides check blocks for the managing office to use to document that the review and validation of the information provided is complete. The managing office will, if applicable, do the following when validating the project plan:

(1) Review the PAH's history regarding supplier control.

(2) Review the PAH's method of accepting products or articles at the manufacturing facility:

(a) By designated supplier quality representatives (DSQR),

(b) By PAH personnel, including authorized personnel approved to issue authorized release documents, or

(c) Only by acceptance of a certificate of conformance.

(3) Determine if the manufacturing facility is manufacturing the same product or article for other PAHs.

(4) Review design data for any material concerns or special process concerns.

(5) Review of work order/traveler for manufacturing, sequencing, correct technical data in travelers, etc.

(6) Determine quantity of articles or products expected from the manufacturing facility.

13. Coordination of PAH's Project Plan. It is the ASI's responsibility to work with their office manager, MIO manager, and directorate manager to obtain their concurrence with the review and validation of the PAH project plan.

a. Projects involving manufacturing in any non-bilateral country, or for a project in a bilateral country in which the CAA is unable to support the project, will require AIR-400 coordination.

b. For AIR-400 coordination, the managing office or the directorate office transmits the project plan electronically to AIR-400 using the AIR-400 email address (9-AWA-AVS-AIR400-Coord (FAA)). In the subject line, clearly note the country name and that the project plan being transmitted is an undue burden PAH project plan. Once AIR-400 receives the PAH project plan, the originator should receive a decision within 30 calendar days. Any changes requested by

AIR-400 will be coordinated back through the originating managing office. When AIR-400 coordination is finished, an email message will be sent to the originator, noting the review and concurrence or nonconcurrence with explanation.

c. Some projects require a briefing for the Office of the Director, Aircraft Certification (AIR-1). The cognizant directorate manager or the manager's delegate must develop and deliver the briefing as early in the process as possible. After the managing office receives concurrence from its MIO manager, it is the managing office's responsibility to notify the directorate manager of any project that might require an AIR-1 briefing. Projects requiring a briefing for AIR-1 may include, but are not limited to—

(1) Fabrication and manufacturing projects for major assemblies outside the United States;

(2) New applicants for production outside the United States that have never been issued any FAA production approvals (regardless of whether a bilateral agreement exists in the applicable country/jurisdiction); or

(3) Any other projects outside the United States judged by the managing office and its MIO manager to be sufficiently unique, complex, or precedent-setting as to require an AIR-1 briefing.

d. Once a PAH's project plan is accepted and an undue burden or no undue burden finding is made, it will be signed by the ASI, the MIDO manager, and the MIO manager, as well as the directorate manager or their delegate. It is acceptable to use electronic or digital signatures in lieu of hand written signatures. The managing office must provide a copy of the completed project plan and related correspondence to AIR-400 by uploading the documents onto the Undue Burden Decision SharePoint site at

https://my.faa.gov/org/linebusiness/avs/offices/air/div_dir/air40.html. To gain access, follow the procedure stated on the website. For additional questions or comments regarding the website, contact the AIR-400 email inbox at 9-AWA-AVS-AIR400@faa.gov, with the subject line "Undue Burden Decision SharePoint." In addition to providing a copy of the completed project plan to AIR-400, the managing office must send a copy to the Design, Manufacturing, and Airworthiness Division (AIR-100) at 9-AWA-AVS-AIR100-Coord@faa.gov, with the subject line "Undue Burden Project Plan per FAA Order 8100.11D."

e. Notify the Applicant of the FAA's Finding. Once a project plan is signed and coordination (as applicable) is finished, the undue burden finding is complete. At this point, the managing office must notify the applicant or approval holder and all other applicable parties of the FAA's finding using templates provided in appendices A and B to this order. For most projects requiring a full project plan, all undue burden findings should be coordinated through the directorate level. The PAH should be notified no later than 60 calendar days from the date the managing office received the full project plan.

f. Retention of the PAH Project Plan. The PAH's initial project plan, or full project plan, if applicable, should be stored so that it is easily retrievable (either electronically in the Aircraft Certification Audit Information System (ACAIS) and/or on paper, according to your office's procedures).

g. Change of Status. An undue burden finding is made based on an estimate of certification responsibilities at that time. Changes in conditions within the country/jurisdiction or the PAH's activity may occur. In addition, the PAH is required to notify the FAA of any change affecting inspection, conformity, or airworthiness of its product or article. If the change is significant enough to affect the FAA's burden, an update to the PAH project plan is required. If this occurs, the FAA will be required to reassess the original no undue burden finding and determine whether a complete project plan is required to address the newly found issues. The managing office should review a PAH's project plan during the annual risk assessment to determine whether the PAH has introduced any major changes, to include prior issued undue burden decision papers.

14. Optional Methods to Demonstrate No Undue Burden. AC 21-55 describes the preferred method for a PAH to demonstrate that its request to use a manufacturing facility located outside of the United States would prove no undue burden to the FAA. However, the PAH may provide the necessary information by other means. Should that occur, the managing office will ensure the information provided by the PAH is commensurate with the information requested in AC 21-55's appendix A, PAH Project Initiation Plan. In addition, the managing office should inform the PAH that, should it provide the information to the FAA in a manner other than that described in AC 21-55, the decision-making process may be prolonged.

15. Letter of TSO Design Approval. Applicants for a letter of TSO design approval do not require an undue burden finding.

16. Issuing Export Airworthiness Approvals for Products and Articles Located Outside the United States. An original FAA Form 8130-3 may be issued to document airworthiness approval at PAH facilities, including PAH suppliers and associate facilities identified in the PAH's approved procedures. Pursuant to § 21.325(c), the form may also be issued by a designated person at PAH suppliers with direct shipment authorization or associate facilities outside the United States, if the FAA finds there is no undue burden associated with the form's issuance.

17. Use of Designees. In determining the FAA's burden, you must consider the FAA oversight of all airworthiness designees, including any independent designees and designees associated with the PAH (such as Designated Airworthiness Representatives (DAR), designated manufacturing inspection representatives (DMIR), or ODA unit members).

a. The managing office must ensure that the proposed country will allow designees into the country.

b. The PAH must provide a plan or procedure that defines how it will provide the designee or designated personnel the special importing requirements as listed in AC 21-2, *Complying with the Requirements of Importing Countries or Jurisdictions When Exporting U.S. Products, Articles, or Parts*. Additional guidance can be found at http://www.faa.gov/aircraft/air_cert/international/.

c. To mitigate burden for designee oversight, the PAH must agree to pay for its designees to travel back to the United States for required training and FAA oversight.

Appendix A. Sample Letter Advising a PAH of a Finding of No Undue Burden



U.S. Department
of Transportation
**Federal Aviation
Administration**

July 13, 2016

Molly Brown
c/o Tight Weave Manufacturing
1600 Lind Ave. SW
Fort Worth, TX 76137

Dear Ms. Brown:

The Federal Aviation Administration (FAA) has completed its undue burden evaluation of your proposal to (extend your production approval to xx country) (use a manufacturing facility in xx country) and/or (issue FAA Form 8130-3 at your xx facility in xx country). This evaluation was required under Title 14 of the Code of Federal Regulations, part 21 (Section 21.122(a), 21.139(a), 21.309(a), 21.609(a), or 21.325(a)).

We have found that your proposal does not constitute an undue burden on the FAA, and work on your proposal may continue without further consideration of the FAA's burden. However, please be advised that subsequent amendments to your activity outside the United States (or any changes in FAA resources) will prompt us to reconsider our finding of no undue burden at that time.

If you have any questions, you may call me at (xxx) xxx-xxxx.

Sincerely,

Julia Gotta

Julia Gotta
Seattle Manufacturing Inspection
District Office

cc: Fort Worth MIDO

Appendix B. Sample Letter Advising a PAH of a Finding of an Undue Burden



U.S. Department
of Transportation
**Federal Aviation
Administration**

July 13, 2016

Molly Brown
c/o Tight Weave Manufacturing
1600 Lind Ave. SW
Fort Worth, TX 76137

Dear Ms. Brown:

The Federal Aviation Administration (FAA) has completed its undue burden evaluation of your proposal to (extend your production approval to xx country)(use a manufacturing facility in xx country)(issue FAA Form 8130-3 at your xx facility in xx country). This evaluation is required under Title 14 of the Code of Federal Regulations, part 21(Section 21.122(a), 21.139(a), 21.309(a), 21.609(a), or 21.325(a)).

We have found that we do not have the resources to properly support your proposal; therefore, we find it constitutes an undue burden on the FAA. On that basis, we will not be able to approve the activity outside the United States as described in your proposal.

If you have any questions, you may call me at (xxx) xxx-xxxx.

Sincerely,

Julia Gotta

Julia Gotta
Seattle Manufacturing Inspection
District Office

cc: Fort Worth MIDO

**Appendix C. Sample Letter Advising a PAH of a Finding of an Undue Burden
After Review of Changes to Status of a Submitted Project Plan**



U.S. Department
of Transportation
**Federal Aviation
Administration**

July 13, 2016

Molly Brown
c/o Tight Weave Manufacturing
1600 Lind Ave. SW
Fort Worth, TX 76137

Dear Ms. Brown:

The Federal Aviation Administration (FAA) has completed its undue burden evaluation of changes to your proposal dated XX/XX/XXXX to (extend your production approval to xx country)(use a manufacturing facility in xx country)(issue FAA Form 8130-3 at your xx facility in xx country). This evaluation is required under Title 14 of the Code of Federal Regulations, part 21(Section 21.122(a), 21.139(a), 21.309(a), 21.609(a), or 21.325(a))

We have determined, based on these changes, that we no longer have the resources to properly support your proposal. We therefore find it constitutes an undue burden on the FAA and we will not be able to approve the activity outside the United States as described in your proposal. This action becomes effective 30 days from receipt of this letter.

If you have any questions, you may call me at (xxx) xxx-xxxx.

Sincerely,

Julia Gotta

Julia Gotta
Seattle Manufacturing Inspection
District Office

cc: Fort Worth MIDO

Appendix D. Acronyms

14 CFR	Title 14 of the Code of Federal Regulations
ACAIS	Aircraft Certification Audit Information System
AIR	FAA Aircraft Certification Service
AIR-1	Office of the Director, Aircraft Certification
AIR-100	Design, Manufacturing, & Airworthiness Division
AIR-400	International Division
ASI	Aviation Safety Inspector
BASA	Bilateral Aviation Safety Agreement
CAA	Civil Aviation Authority
CFR	Code of Federal Regulations
CPL	Category Parts List
DAR	Designated Airworthiness Representative
DMIR	Designated Manufacturing Inspection Representative
DMS	Directives Management System
DSQR	Designated Supplier Quality Representative
FAA	Federal Aviation Administration
IPA	Implementation Procedures for Airworthiness
MIDO	Manufacturing Inspection District Office
MIO	Manufacturing Inspection Office
MISO	Manufacturing Inspection Satellite Office
ODA	Organization Designation Authorization
PAH	Production Approval Holder
PC	Production Certificate
PI	Principal Inspector
PMA	Part Manufacturer Approval
TSO	Technical Standard Order
UBDP	Undue Burden Decision Paper

Appendix E. Administrative Information

1. Distribution. This order is distributed to all Aircraft Certification Service headquarters offices and directorates, all Aircraft Certification Offices, all Manufacturing Inspection Offices, all Manufacturing Inspection District and Satellite Offices, and to the Aircraft Certification and Airworthiness Branches at the Federal Aviation Administration Academy.

2. Background. The guidance in this order originated as AIR-100 policy memorandums issued to standard methodology for determining undue burden. We found those memorandums to be an inadequate medium for properly documenting our guidance, so this order was developed as a better means to develop the guidance on undue burden determinations.

3. Delegation of Authority. AIR-100 is responsible for issuing, revising, or cancelling the material in this order.

4. Deviations. Adherence to the procedures in this order is necessary for uniform administration of this directive material. Any deviations from this guidance material must be coordinated and approved by AIR-100. If a deviation becomes necessary, the FAA employee involved must ensure that the deviations are substantiated, documented, and concurred with by the appropriate supervisor. The deviation must be submitted to AIR-100 for review and approval. The limits of federal protection for FAA employees are defined by Title 28 of the United States Code § 2679.

5. Suggestions for Improvement. Please forward all comments on deficiencies, clarifications, or improvements regarding this order to: 9-AWA-AVS-AIR-DMO@faa.gov.

FAA Form 1320-19, Directive Feedback Information, is located as Appendix F to this order for your convenience. If you require an immediate interpretation, please contact AIR-100 at (202) 267-1575; however, you should also complete Form 1320-19 as a follow-up.

6. Records Management. Refer to FAA Order 0000.1, *Subject Classification System*; FAA Order 1350.14, *Records Management*; or your office Records Management Officer (RMO)/Directive Management Officer (DMO) for guidance regarding the retention or disposition of records.

Appendix F. FAA Form 1320-19, Directive Feedback Information

U.S. Department
of Transportation
**Federal Aviation
Administration**

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: FAA Order 8100.11D

To: 9-AWA-AVS-AIR-DMO@faa.gov

(Please check 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 directive, 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: _____

FTS Telephone Number: _____ Routing Symbol: _____

FAA Form 1320-19 (10-98)