



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

SUBJ: Q&As AVS-60 Organization Designation Authorization (ODA) Office related to May 2024 Webinar.

- 1. Currently, a certain company's ODA manual states ODA Administrators utilize function codes 8040/8050 when they sign the cover pages of Airplane Flight Manuals and Airworthiness Limitations of the Instructions for Continued Airworthiness. The Unit Members (UMs) also utilize the same function code in their review and approval. Recently the company engaged in conversation with its Organization Management Team (OMT) Lead on whether ODA Administrators are required to have function codes. In reviewing FAA Order 8100.15B, it is not clear that the ODA Administrators utilize function codes 8040/8050. Do ODA Administrators need function codes?**

ODA Administrators are not required to have functions code assigned to them in the UM listing, unless they also act as a UM. However, there are a number of function codes that are inherently reserved for the ODA Administrator. Those function codes include:

- 11020 - ISSUE STCS and/or AMENDMENTS
- 13031/13032 - ISSUE and REVISE PMA SUPPLEMENTS
- 8180/11180/13180 - PERFORM REVIEW AND ACCEPTANCE OF INSTRUCTIONS FOR CONTINUED AIRWORTHINESS (ICA) – which includes approval of AWLs

For function codes 8040 and 8050 related to operational or repair information and airworthiness limitations, respectively, the ODA Administrator is signing only after the data has been approved by appropriately qualified UMs.

- 2. Has there been discussion about creating ODA function codes to support Airworthiness Certification of Unmanned aircraft and Optionally Piloted aircraft?**

There have been no formal discussions on adding functions codes for airworthiness certification of unmanned aircraft and optionally piloted aircraft.

- 3. Direct Ship Authority (DSA) is a topic I would like to understand more about. A brief understanding of the uses of a DSA letter and what verbiage should be included when providing would be helpful.**

A DSA is a written authorization granted by a Production Approval Holder (PAH), with responsibility for the airworthiness of an article to a supplier to ship articles produced in accordance with the PAH's quality system, directly to end users without the parts being processed through the PAH's own facility. The verbiage that should be included in the written authorization will vary by PAH based on what is appropriate to its production and quality system. Refer to Advisory Circular (AC) 21-43 for additional information on DSA.

4. **To the best of my knowledge there is no guidance in FAA Order 8100.15B that addresses electronic record keeping for ODA records. Recent changes in process for submitting records to Aircraft Certification Office (ACO)/OMT now requires submission of records in electronic format via the FAA SharePoint site.**

I propose that the Order or some other form of FAA policy should allow for the ODA's to also adopt electronic record keeping for records required by Order 8100.15(). I also propose that precedence for this exists under 14 Code of Federal Regulations (CFR) part 145 where the FAA issues Operations Specification A025 to Repair Stations. Guidance for acceptable means of compliance is available in FAA AC 120.78A. AC 120.78A specifically excludes supplemental type certificate (STC) ODAs.

FAA Order 8100.15B describes records requirements for ODA holders in Chapter 3, paragraph 3-17. The Order specifies that FAA's National Policy Order 1350.14, Records Management, be followed for consistency with the FAA records control system. Each line of business (LOB)/service office (SO) has responsibilities for records management in accordance with this Order including establishment of either paper or electronic filing systems. The only requirement in FAA Order 8100.15B for paper records is in Chapter 11 for a paper copy of any signed STC. This requirement has been removed from the draft of FAA Order 8100.15C.

5. **Will the forthcoming FAA Order 8100.15C carry specific requirements to be implemented via a Partnership for Safety Plan (PSP)?**

ODA holders specific to certification are encouraged to utilize PSPs and follow the guidance in the FAA and Industry Guide to Product Certification.

6. **Does AVS-60 envision hosting informational sessions with ODAs during the public comment period for forthcoming FAA Order 8100.15C?**

Yes. Two separate activities will occur:

- For existing ODA types, the Revision C Existing ODA Project Team will provide an FAQ document and change summary material to help explain the significant changes and to garner more focused feedback.
- Multiple outreach sessions are planned with ODA Administrators and OMT Leads. This effort will focus on ODA Administrator questions received by the Project Team and will provide general highlights of Revision C. Additionally, the Airmen Certification (AC) ODA Project Team plans have external webinars for industry during the public comment period. The webinar will provide an

overview of the new AC ODA type included in the forthcoming FAA Order 8100.15C. The AC ODA Project Team is also planning to meet with industry groups.

7. Is there any other FAA regulatory material (orders, policy, etc.) which will be revised and released along with forthcoming FAA Order 8100.15C?

AVS-60 is coordinating with Flight Standard Service (FS) to identify and revise policies affected by the new AC ODA type. The FS plan is to incorporate the necessary policy changes into a Notice that will be released at the time of Revision C release. FAA Order 8900.1 will be updated next year and volumes 1, 5, 13, and 19 have been identified. More changes may come as FS continues to work through the process of reviewing guidance for AC ODA type specific changes.

8. When are all the Designated Engineering Representative (DER) authority areas/delegations going to be defined in FAA Order 8000.95? There are policy memos out there that haven't been incorporated such as EWIS delegation definitions. Even when the Designee Management Site (DMS) was working correctly and we could access DER charts, we could not access DER EWIS charts (per the EAPAS memo), which are stored by the Managing Specialist as an attachment in the DMS. DERs could not access this either, as I understand it.

The contents of the EWIS memo were moved to FAA Order 8000.95C and the Electrical Systems Supplemental Information Sheet. The experience/knowledge and skill requirements for the four activity areas are listed in volume 9 of FAA Order 8000.95C, pages 9 through 14. The supplemental information sheet (SIS) contains the bulk of the memo information including the EWIS areas of delegated authority. The SIS along with the new authorization charts are available outside of DMS at the following website: [Designee Management System \(DMS\) - Designated Engineering Representative \(DER\) Resources and Job Aids | Federal Aviation Administration \(faa.gov\)](#)

9. When will the additional training scenarios for the Interference Review Team (IRT) be made available to the industry?

Additional scenarios are currently being developed. We anticipate additional scenarios to be provided by the next webinar.

10. AJ mentioned that the IRT will continue in the near term. Is it envisioned that, long term, the IRT will be disbanded?

The current plan is to sunset the IRT at some point in the future.

11. What is the timeframe (average? typical?) from initial report of interference until final review/determination by AVS-60 team? Is the timeframe realistic and does feedback get back to the ODA holder in real time?

Per FAA Notice N 8100.18, the ODA holder has 30 days to conduct an investigation. Once the investigation has concluded, the ODA holder has 15 days to provide their final report to the OMT. The OMT has 30 days to review and provide a proposed response to the IRT.

The IRT has 30 days to review and provide determination back to OMT. The OMT then has 15 days to provide the FAA's response to the ODA holder.

12. Will the 8100.15C risk-based decision making (RBDM) process extend those risk-based considerations to ODA holders for decision making on frequency of self-audits, i.e., for individual UMs, etc.?

Order 8100.15C does not permit an ODA holder to use risk-based decision making to determine frequency of internal audits. ODA holders are required to perform an internal audit every calendar year, which includes an assessment of each unit member. The ODA holder may choose to complete all required internal evaluations as a single event in time or complete evaluations as an ongoing activity.

13. Are open corrective actions counted against the ODA in the new reporting period? This may explain the gap in open vs closed.

The RBDM only considers open, non-implemented corrective actions when performing assessments for the next surveillance window. Closed or implemented corrective actions are not considered in generating surveillance minimum activities but may be considered by the OMT in targeting the activities or the decision to perform more than the minimum number of activities.

14. The timing of the ODA holder's audit can influence the number open at the end of the year. If the audit is late in the year, many of the actions may legitimately still be open.

The RBDM process and surveillance planning begins 90 days prior to the end of the surveillance window. The RBDM assessments will look at data obtained from 90 days prior to the current surveillance window up through 90 days prior to the end of the current surveillance window. Any corrective actions, from any source, that are open and not implemented will be accounted for in the RBDM assessments. For example, the current one year surveillance window ends on Sept. 30, 2025. The OMT will perform the RBDM assessments between July 1 and September 30, 2025. The assessment will consider all corrective actions that are open as of July 1, 2025. The assessments will also consider data obtained between July 1, 2024, and June 30, 2025.

15. Regarding ODA Score Card: when a project is first opened, a Project Notification Letter (PNL) is issued along with the initial PNR. The program may have multiple Project Specific Certification Plans (PSCPs), which require a revision of the PNL, then submission back to the OMT with a new PNR. The column that tracks the time for PNR is skewed.

The intent of the scorecard is to capture the final response from the FAA on a project PNL. This means that the FAA no longer needs to see the PSCP and the ODA holder and unit may proceed with the certification activities defined in the PSCP, and all FAA involvement has been defined in the PNL response. If, for whatever reason, the PSCP needs to be revised and re-submitted to the OMT, that would not constitute a new PNL as far as the scorecard is concerned, and so would not be included in the participation tab of the scorecard worksheet.

16. When does FAA Order 8100.8D actually sunset?

Order 8100.8D was cancelled with policy memorandum AVS60-FY24-PM03 on February 26, 2024.

17. How does this new non-compliance policy relate to ODA holder notifications and responsibility under 14 CFR part 183.63(b)(2)?

The new policy won't change any requirements for ODA. It provides a process for the Aircraft Certification Service (AIR) personnel to follow when a potential or known noncompliance is reported or found, including reports to the OMT or findings by the OMT. ODA holders continue to follow their procedures manuals and Order 8100.15.

18. What sort of actions were taken by the IRT related to the confirmed interference cases?

FAA follows the compliance and enforcement process. All confirmed cases result in corrective action for the ODA holder. Notice N 8100.17/8100.18, paragraph 5(a)(5) "ODA Holder Corrective Action Related to Interference" specifies the ODA holder's corrective action process items.

19. Parts 34 Emissions & 36 Noise are actually "owned" by the Environmental Protection Agency (EPA), which can make it difficult for all parties. Can you confirm that's the case with Part 38?

The Clean Air Act Amendments of 1970 (Clean Air Act) directs the U.S. EPA to adopt standards applicable to the emission of any air pollutant from any class of aircraft engines. The Clean Air Act also directs the Secretary of Transportation (and by delegation, the Administrator of the FAA) to implement the standards adopted by the EPA.

On January 11, 2021, the EPA published a final rule adopting new domestic airplane greenhouse gas (GHG) emissions standards in 40 CFR part 1030.

As required by the Clean Air Act, the FAA is implementing those EPA standards through this final rule by adopting new certification regulations in 14 CFR part 38 for fuel efficiency for certain covered airplanes. The applicability of these regulations and the regulatory emissions limits are the same as those adopted by Global web International Civil Aviation Organization (ICAO) in its airplane CO² emission standards.

The FAA's authority to issue rules on aviation safety is found in Title 49 of the United States Code (49 U.S.C.). Subtitle I, Section 106 describes the authority of the FAA Administrator.

The Clean Air Act, 42 U.S.C. 7572, authorizes the Secretary of Transportation to implement aviation emission standards adopted by the EPA to insure compliance with the same. Furthermore, 49 CFR section 1.83(c) delegates to the FAA Administrator the authority to carry

out the functions of this section of the Clean Air Act.

This rulemaking adopts regulations to insure compliance with the standards adopted by the EPA under the Clean Air Act in 40 CFR part 1030 to control the emissions of certain GHG emissions from airplanes. This rulemaking is issued under the authority described in 42 U.S.C. 7572 and 49 CFR section 1.83(c).

See the FAA's Final Rule on [Airplane Fuel Efficiency Certification](#), effective April 16, 2024, for more information.

20. Regarding delegation of Aircraft Flight Manual Supplement (AFMS) Operational Suitability, is there any action to allow delegation to ODAs?

The Policy and Standards Division (AIR-600) is actively working with Aircraft Evaluation Division (AFS-100) to discuss. We should be able to provide updates for a future webinar.

21. Would there be any opportunity for industry feedback prior to the release of policy "Processing known NNCs" in order to comprehensively address issues and ambiguities that we are seeing in daily practice?

Yes. The policy that we have drafted will be formally coordinated for public comment. The estimated timeframe for public comment is later this summer.

22. When adding a new DER to the ODA, there are issues crossing over the new Certificate of Authorization (COA) delegation to the old charts that ODAs currently must use.

Order 8100.15C policy has allowances for existing ODAs and chart use between Orders 8110.37 and 8000.95.

23. Adding on to the positive feedback of the role that the IRT performs. I'd like to recommend leverage IRT learnings to publish guidance/scenarios/decision making criteria to address the subjectivity. This would be shared with all OMT/ODAs to help drive consistency.

As mentioned in the webinar, in addition to reviewing cases and making interference determinations, the role of the IRT is to help the interference implementation team to identify any trends or opportunities to provide additional support via outreach, training scenarios, policy/guidance, etc.

24. Has the FAA noted that the increased scope of ODA Interference [i.e., inclusion of all ODAs instead of just (Type Certificate) TC and Production Certificate (PC) ODAs] has yielded a benefit?

Interference has been prohibited by 14 CFR section 183.57(c) since the creation of ODA. It has always applied to all ODA holders. Notice N 8100.17/18 provide procedures and structure for ODAs to follow to help ensure compliance with section 183.57(c).

25. Is there still a plan in place to replace 8100-9 with 8110-3 in DMS?

This is being reviewed as potential future update to policy.

26. Human Factors (HF) was discussed as a delegation being investigated. I know of at least one person with HF under ODA. Is that a trial that is being used to determine validity of the delegation?

AVS-60 & AIR-630 are teamed to review and advance as required.

27. Are we mandating the enhanced PSCP process?

The answer is no...We are not mandating the ePSCP process. We do have a notice of proposed rulemaking (NPRM) to mandate submittal of certification plans for TC / ATC / STC / ASTC projects when the application is submitted. The rule proposes specific requirements to be included in the certification plan but does not go to the level of detail that has been included in the ePSCP process.

28. Will 8100.15C include the new designee authority charts to align UM authority with current DER authority?

Yes, it is within the new Order 8100.15 Rev C policy.

29. Did I hear you say maintenance testing would be included in AC ODA?

Yes. Current 14 CFR part 145 and 147 certificate holders that meet the qualifications may apply for AC ODA. The authorized functions included in the draft policy are to conduct Airframe and/or Powerplant tests for mechanics.

30. Many FAA forms can only be accessed through the FAA employee site. Any plans to enable ODA administrators to have access? Hate having to bug my OMT Lead for new/revised forms.

Not at this time.