

Cover Letter for “ICA Appendix Review & Analysis – Tiger Team 1 Matrix” of the Instructions for Continued Airworthiness (ICA) Aviation Rulemaking Committee (ARC) Final Report

This cover letter is provided in accordance with Section 508 of the Rehabilitation Act to describe the “ICA Appendix Review & Analysis – Tiger Team 1 Matrix.” The matrix, which appears in Appendix F of the ICA ARC Final Report, is provided here as a supplemental document in the form of an Excel spreadsheet for easier readability.

The ARC reiterates its caution (on page 9 of the ICA ARC report) that the content of the matrix has neither been carefully reviewed or approved by all members of full ARC, nor is it intended to convey any sort of ARC (or TCH or OOMRO subgroup) position nor FAA action with regard to ICA regulation. Rather, this early, preliminary deep dive into ICA regulations was used solely to determine where areas of misalignment were most prevalent and prioritize for further ARC review and discussion.

The matrix consists of an Excel spreadsheet containing two tabs – one tab for *Analysis* and the other for *Comparison*.

The *Analysis* tab contains 8 columns of information.

Column A is titled “Cite” and contains the regulatory cite from the relevant appendix from 14 CFR Chapter 1, Subchapter C (e.g., H25.1(a) General).

Column B is titled “Language” and contains the language from the cited regulatory text. Some of the text in Column B is color coded blue to emphasize key language focused on during this review.

Columns C through G are color coded as follows:

- Column C is green and titled “Undisputed ICA.”
- Column D is yellow and titled “Undisputed ICA, but needs and update/clarification.”
- Column E is light blue and titled “Doesn’t need to be ICA, but does need clarification.”
- Column F is orange and titled “Not always ICA, but agreement that it should be.”
- Column G is red and titled “Not always ICA. Disagreement on whether it should be.”

Column H is titled “Issues/Comments” and contains information about the content of the preceding columns C-G.

The *Comparison* tab is a regulatory cross-reference tool comparing the language in 14 CFR Part 25 to the corresponding language in parts 23, 27, 29, and 33.

Column A is titled “Part 25 Cite” and contains the regulatory cite for 14 CFR Part 25 (e.g. H25.1(a) General).

Column B is titled “Part 25” and contains the language from the cited regulatory text.

Column C is titled “Part 23” and contains the language from part 23 that corresponds to the part 25 regulatory text cited in Column B.

Column D is titled “Part 27” and contains the language from part 27 that corresponds to the part 25 regulatory text cited in Column B.

Column E is titled “Part 29” and contains the language from part 29 that corresponds to the part 25 regulatory text cited in Column B.

Column F is titled “Part 33” and contains the language from part 33 that corresponds to the part 25 regulatory text cited in Column B. Certain rows in Column F are color coded green to indicate that they correspond directly with part 25 airplane requirements. Other rows in Column F are color coded orange to indicate that they are unique to engine requirements and do not correspond directly with part 25 airplane requirements

Column G is titled “Part 33 Cite” and contains regulatory cite for 14 CFR Part 33 that corresponds to regulatory text cited in Column F.