SUMMARY SHEET
Airworthiness Directive Implementation Aviation Rulemaking Committee

FAA Organization-Procedures Working Group

Compliance Planning Subgroup

Primary Report and Recommendation	Independent Review Team (IRT): Recommendation No. 2 Compliance Planning
Secondary Report and Recommendation	None
Assigned Members	Patricia Williams (AFS) (*POC*) Pete Spofford (AFS/ATOS) Sara Macleod (ARSA) Tim Holt (AFS) Doug Anderson (FAA/AGC) Ed Walton (UPS)
Links to Other Working Groups	T2, R6 (B2,B3,B4)
Date Sent to ARC	November 24, 2010
Date of ARC Approval	February 16, 2011

WORKING GROUP REVIEW OF ISSUE/PROBLEM

Summary of Primary Report and Recommendation

In collaboration with the Federal Aviation Administration (FAA) and the Airline Transportation Association (ATA), a policy needs to be established regarding Airworthiness Directive (AD) compliance. Also, identify the elements of an effective AD compliance process that may exist in air carrier manuals and FAA guidance.

Based on the IRT's Recommendation No. 2, the FAA Organization-Procedures Working Group (FAA WG) formed a subgroup following the IRT's recommendation to address AD compliance. After analyzing existing documents, it was determined that the elements of AD management were not concisely defined. Based on the subgroup's recommendation, the FAA WG determined to develop policy and guidance outlining the basic elements of an effective AD management process. An air carrier could then create its own AD management program based on these basic elements.

The six basic elements of an AD management process should consist of:

1. Planning: Review applicable documentation needed to implement an AD.

2. Support: Analyze and determine what logistical and personnel support is needed to implement an AD.

3. Provisioning: Assure that the materials specified in the AD and/or AMOC are available at the scheduled time for AD accomplishment.

FAA Organization-Procedures Working Group

Compliance Planning Subgroup

4. Implementing: Finalize and execute the actions involved in the Planning, Support, and Provisioning elements.

5. Recording: Record and archive documentation used in the AD management process.

6. Auditing: Provide a comprehensive method to continually verify and validate AD compliance.

After considering progress toward compliance, the FAA WG determined that this issue would be best resolved by working with the AD Implementation Working Group (ADIWG) to develop a new Advisory Circular (AC). This was done by collaborating with the ADIWG in September, November, and December of 2010 as they provided the elements of an AD process and expanded on an air carrier's specific process, which were incorporated in the appendices of the AC. This collaboration ensured the links to both ADIWG and FAA WG recommendations were addressed. The ADIWG

Implementing our proposals will establish the policy, guidance, and procedures to use in the AD management process. In addition, the placement of the proposed AD management AC on the Federal Register will globally disseminate the FAA's policy on effective AD management.

REGULATIONS AND GUIDANCE IDENTIFIED FOR REVIEW

Guidance reviewed:

- Order 8900.1, Volume 3, General Technical Administration
- AC 120-16E, Air Carrier Maintenance Programs
- AC 120-79A, Developing and Implementing an Air Carrier Continuing Analysis and Surveillance System
- Air Transportation Oversight System (ATOS) Data Collection Tools (DCTs)
- FAA-IR-M-8040.1, Airworthiness Directives Manual

Guidance possibly impacted by IRT recommendations and/or our proposals:

- Order 8900.1, Volume 3 - new chapter titled *AD Management Process*
- AC 39-xxx - new AC titled *AD Management Process*.
- AC 120-16E
- AC 120-79A
- ATOS DCT 1.3.6

SUMMARY SHEET
Airworthiness Directive Implementation Aviation Rulemaking Committee

FAA Organization-Procedures Working Group

Compliance Planning Subgroup

WORKING GROUP PROPOSAL TO ADDRESS THE RECOMMENDATION(S)/FINDING(S)

The FAA WG proposes to develop a new chapter within Order 8900.1, titled *AD Management Process*. An AC, also titled *AD Management Process*, should also be developed and published on the Federal Register. Both the new chapter in Order 8900.1 and AC 39-xxx will address the six elements of an effective AD management process as identified below:

- Planning
- Support
- Provisioning
- Implementing
- Recording
- Auditing

The AD management process will also be incorporated into AC 120-79A and AC 120-16E. These updates, which are contingent upon the publication of AC 39-xxx, is not scheduled to meet the deadline of June 2011.

As detailed in the Implementation Plan below, AFS-900 will incorporate the new AD management process into the following:

- Training Course No. 25704, Foundation for Principal Inspectors.
- Department of Transportation's electronic Learning Management System (eLMS) Training Course No. 2710009.
- ATOS DCT 1.3.6

ALTERNATIVES CONSIDERED

The ADIWG considered publishing the recommended AD management processes in a new ATA process specification (i.e., No. 118). However, since overseeing ASIs would be the only external party to these airline-internal processes, and since the processes apply universally to maintainers, the FAA WG recommended use of an AC.

The new AC for AD management process was considered for placement within the 120-xxx code. However, further analysis determined this new AC was needed for all aviation industry and, as such, AC 39-xxx was created.

The FAA WG considered the IRT's recommendations as valid; thus, no other alternatives were considered.

FAA Organization-Procedures Working Group

Compliance Planning Subgroup

IMPLEMENTATION PLAN

Based on the IRT's recommendation, the FAA WG will develop the following policy and guidance regarding the AD management process:

1. Order 8900.1, a new chapter titled *AD Management Process*.

2. AC 39-xxx, titled *AD Management Process*, which will also be published on the Federal Register.

   NOTE: Both the new chapter for Order 8900.1 and AC 39-xxx will address the six elements of an AD management process as identified below:

   - Planning
   - Support
   - Provisioning
   - Implementing
   - Recording
   - Auditing

3. AC 120-79A: Revision for the AD management process.

4. AC 120-16E: Revision for the AD management process.

   NOTE: Updates for AC 120-79A and AC 120-16E are contingent upon the publication of AC 39-xxx and are not scheduled to meet the deadline of June 2011.

AFS-900 will incorporate the new AD management process into the items below. The two training courses identified are currently being revised to address AD ARC recommendations and are expected to be completed by July 2011.

- Training Course 25704, Foundation for Principal Inspectors.
- Department of Transportation's eLMS for AD Training Course No. 2710009.
- ATOS DCT 1.3.6

SUMMARY SHEET
Airworthiness Directive Implementation Aviation Rulemaking Committee

FAA Organization-Procedures Working Group

Compliance Planning Subgroup

ASSUMPTIONS/CONSTRAINTS

The IRT assumed that the FAA does not provide timely information regarding ADs. However, the FAA WG believes this is an incorrect assumption because ADs are posted in the Federal Register both as a Notice of Proposed Rulemaking and also as a Final Rule. These documents are readily available from both the Federal Register and from the Regulatory Guidance Library via the following links:

- http://www.gpoaccess.gov/fr/
- http://www.airweb.faa.gov/Regulatory_and_Guidance_Library/rgAD.nsf/Frameset?Open Page

Both web sites provide a subscription service, which will generate an email notification. Any individual may receive notification by make and model regarding an aircraft engine or product.

ISSUES FOR WORKING GROUP CONSIDERATION

None.

ISSUES FOR ARC CONSIDERATION

The AD management process will be new policy and procedures for the FAA community and some air carriers. As with all major changes, it will take time for people to embrace, accept, and act upon these changes.

The ARC approval of the FAA WG's recommendations and the follow-through support regarding proposed guidance publication is needed for closure.

SUMMARY SHEET
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RECOMMENDATION NO. 2

The following is copied directly from the IRT report, Recommendation No. 2.

The FAA should provide timely information about new AD requirements, in advance of compliance dates, to all relevant FAA field offices. Those offices should then be responsive to any carrier that requests assistance in the form of *progress-towards-compliance* audits or reviews, in advance of the AD compliance dates. The FAA should revise its workload management systems (including ATOS), so that it can accommodate such requests.
The IRT believes that this particular form of collaboration should benefit the airlines and the FAA, while protecting the traveling public by reducing the chances of major disruptions.

APPENDIX

Not Applicable.