

**Clearance Record
DOCUMENT COMMENT LOG**

Originating Office: AIR-140	Document Description: Advisory Circular, AC 39-XX	Project Lead: Rob Romero	Reviewing Office:	Date of Review:
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Office	Commenter	Number of Comments	Comment Disposition				
			Adopted	Partially Adopted	Non-Concur	Concur-out of scope	Answered
AFS-330	Jim Anderson	2	1		1		
AIR-500	Rob Verdi	31	18	2	11		
AGC-200		31	21	1	9		
ANM-120L	Maureen Moreland	4		3	1		
ANM-120S	Phil Forde	1			1		
ANE-150		2			1		1
ASW-140		4	1		3		
ANE-140		17	5	2	9		1
Chicago ACO		7			5		2
ACE-115A		4		1	2		1
ACE-116W	Paul DeVore	4	2		2		
ACE-119W	Jose Flores	2					2

Commenter	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Concur
AFS-330 Jim Anderson 503-615-3275	Page 12, 3.4.1	“Your local PI. If you are an owner or operator, or otherwise have a PI for either maintenance or airworthiness, you must submit your proposal through your PI.”	Airworthiness includes both maintenance and/or avionics specialties.	“Your local PI. If you are an owner or operator, or otherwise have an airworthiness PI for either maintenance or avionics, you must submit your proposal through your PI.”	Concur

Commenter	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Concur
AFS-330 Jim Anderson 503-615-3275	Page 12, 3.4.3	“An authorized designee of the FAA. Send your proposal to the address listed in the AD. ”	This may lead to the PI(s) not being kept “in the loop”.	“An authorized designee of the FAA. Send your proposal to the address listed in the AD and your local PI. ”	Non-concur. Per Table 1 of Order 8110-3, approved delegated AMOCs are required to be sent to the PI. There is no need for the request to be sent as well.
Rob Verdi AIR-500	Title page and UNIVERSAL first paragraph	This advisory circular (AC) presents guidance for persons seeking approval of an alternative method of compliance (AMOC) to an airworthiness directive (AD).	This is the first usage of "airworthiness directive" in the document. To ensure consistency of formatting, since "AC" and "AMOC" are defined here, "AD" should be defined as well.	Please insert "(AD)" after "airworthiness directive", as below: "This advisory circular (AC) presents guidance for persons seeking approval of an alternative method of compliance (AMOC) to an airworthiness directive (AD)." Please ensure that all acronyms used in the document are defined on first usage.	Concur
Rob Verdi AIR-500	First TOC page	1.1 Purpose.	Please check all leaders next to section titles in the TOC. Many appear to have an extra space after the first dot. These extra spaces should be removed.	Please remove all extra spaces from leaders in TOC. See example below: "1.1 Purpose....."	Concur

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Rob Verdi AIR-500	First TOC page 2.2	AD Mandated Instructions	"AD Mandated" is a compound modifier of "Instructions"; therefore, it should be hyphenated.	Please insert a hyphen between "AD" and "Mandated", as below: "AD-Mandated Instructions"	Concur
Rob Verdi AIR-500	First TOC page 3.3	Who Approves an AMOC	"Who Approves an AMOC" is a question and should end in a question mark.	Please insert a question mark after "AMOC", as below: "Who Approves an AMOC?"	Concur
Rob Verdi AIR-500	1 1.1.1.2	Answers to common questions such as when an AMOC is necessary, changes that may require an AMOC, and how to document AMOC approval after completion.	There should be a comma after "common questions". For clarity and ease of reading, and so the sentence is presented in parallel structure, "what" should be added after "necessary" and "that" after "changes" should be deleted.	Please consider adding a comma after "questions" and "what" after "necessary". Also, delete "that" after "changes", as below: "Answers to common questions, such as when an AMOC is necessary, what changes that may require an AMOC, and how to document AMOC approval after completion."	Partially concur. Comma added as requested. Other changes not incorporated.
Rob Verdi AIR-500	1 1.1.2	Although it is not mandatory, implementation of any, or all, aspects of this AC will enhance the AMOC process, facilitate continued compliance with an AD, and reduce the potential for delays caused by incomplete	For ease of reading, the commas after "any" and "all" are unnecessary and should be removed.	Please remove the commas after "any" and "all", as below: "Although it is not mandatory, implementation of any or all aspects of this AC will enhance the AMOC process, facilitate continued compliance with an AD, and reduce the potential for delays caused by incomplete AMOC	Concur

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		AMOC proposals.		proposals."	
Rob Verdi AIR-500	1 1.3	The effective date for this AC is XX/XX/XX.	"XX/XX/XX" should be replaced with the appropriate effective date for this AC.	Please ensure that "XX/XX/XX" is replaced with the appropriate effective date for this AC.	Concur
Rob Verdi AIR-500	1 1.5.1	<p>A final rule of the following types of rulemaking documents issued by the FAA pursuant to part 39, including supersedures and corrections to those documents:</p> <ul style="list-style-type: none"> • Final rule after notice of proposed rulemaking (NPRM) or supplemental NRPM (SNPRM); • Final rule, request for comments (commonly referred to as an Immediately Adopted Rule (IAR), No Notice Final Rule (NFR), or Federal Register Version 	<p>This section is confusing. It is not clear what the author is trying to say here. This does not read like a definition and could confuse the reader. I understand that the author is defining ADs within the context of this AC; however, the structure and wording of this section is confusing.</p> <p>The FAA's website defines ADs as follows:</p> <p>"Airworthiness Directives (ADs) are legally enforceable regulations issued by the FAA in accordance with 14 CFR part 39 to correct an unsafe condition in a product. Part</p>	Please clarify what the purpose of this definition is and make appropriate changes to the language.	Non-concur. The paragraph defines the 3 types of final rules that the FAA issues as Airworthiness Directives. No changes necessary.

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		<p>of an Emergency AD (FRV)); or</p> <ul style="list-style-type: none"> • Emergency AD. 	<p>39 defines a product as an aircraft, engine, propeller, or appliance."</p>		
Rob Verdi AIR-500	2 1.5.2	<p>An AD contains the required method for resolving an unsafe condition on an aircraft, aircraft engine, propeller, or appliance. An AMOC provides an acceptable level of safety for a different way, other than the one specified in the AD, to address the unsafe condition.</p>	<p>This section is awkward and could be confusing to the reader. Please consider re-writing it.</p>	<p>The paragraph below is an example of how this paragraph could be written as a definition. If it makes sense in the context of this AC, please consider using it in place of the current text or changing it so that it works in the context of this section of the AC.</p> <p>"An AMOC is an approach or technique to address an unsafe condition which is different from those specified in an AD and which provides an acceptable level of safety for resolving an unsafe condition on an aircraft, aircraft engine, propeller, or appliance."</p>	<p>Non-concur. Wording is identical to currently published wording of Order 8110.103.</p>
Rob Verdi AIR-500	2 1.5.3	<p>As authorized by 14 CFR 39.19, anyone may propose a change to the compliance time stated in the AD if the proposal provides an acceptable level of safety.</p>	<p>This section does not read like a definition and could confuse the reader. Please add a sentence before this sentence to provide context for the reader.</p>	<p>In order to provide some context for the reader, please consider adding something to the effect of "A revision made by x to the compliance time in an AD" (where x is the person who is requesting the time change) before this sentence, as below:</p> <p>"A revision made by x to the compliance time in an AD. As</p>	<p>Non-concur. Wording is identical to currently published wording of Order 8110.103</p>

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				authorized by 14 CFR 39.19, anyone may propose a change to the compliance time stated in the AD if the proposal provides an acceptable level of safety."	
Rob Verdi AIR-500	2 and UNIVERS AL 1.5.3	As authorized by 14 CFR 39.19, anyone may propose a change to the compliance time stated in the AD if the proposal provides an acceptable level of safety.	<p>Since "14 CFR part 39" was referenced previously in the text, "14 CFR" should be replace by a section symbol.</p> <p>See section 10 of Order 1320.460, FAA Advisory Circular System, for a full explanation of the rules regarding references to 14 CFR. See abbreviated version below:</p> <p>1. First citation Do not insert § between CFR and section number. 14 CFR 25.571</p> <p>2. Second citation (of same part/section or section's same part) *§ 25.571 § 25.1529 part 25</p> <p>*spell out "section" when citing an appendix or beginning the sentence by citing a CFR section.</p>	<p>Please replace "14 CFR" with a section symbol, as below:</p> <p>"As authorized by §39.19, anyone may propose a change to the compliance time stated in the AD if the proposal provides an acceptable level of safety."</p> <p>Please ensure all 14 CFR citations in the document follow rules in section 10 of Order 1320.460.</p>	Concur

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			<p>3. Citing multiple paragraphs of a CFR section Use only one section symbol. § 25.613(a) through (c)</p> <p>4. Citing multiple CFR sections joined by conjunctions “and” or “or”</p> <ul style="list-style-type: none"> • And: Use double section symbols or pluralize “section” if it occurs at the beginning of a sentence. • Or: If the citations are joined by the conjunction “or” use a single section symbol for each citation (or singularize section). §§ 25.571 and 25.671, but § 25.571 or § 25.671 <p>Sections 25.571 and 25.671, but Section 25.571 or section 25.671</p>		
Rob Verdi AIR-500	2 1.5.4	A global AMOC is sometimes referred to as an “AMOC of general applicability,” a term used in some bilateral agreements. A global AMOC applies to two or	This definition is awkward and could be confusing to the reader. Please consider the changes in the next cell.	Please delete "is" and insert a comma after the first occurrence of "AMOC"; delete the comma and "a term used" after "applicability"; delete the period and "A global AMOC" after "agreements"; and change the semicolon after	Non-concur. Wording is identical to currently published wording of Order 8110.103

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		<p>more operators; it can be used to obtain an AMOC for multiple serial numbers or makes and models specified in an AD.</p>		<p>"operators" to a period. Also, capitalize "it" and insert "used by an X" (where X is the person or organization, whichever is correct/appropriate, seeking the AMOC) and insert "the" after "AMOC for", as below:</p> <p>Suggested edits: "A global AMOC, is sometimes referred to as an “AMOC of general applicability,” a term used in some bilateral agreements. A global AMOC applies to two or more operators.; It can be used by an X to obtain an AMOC for the multiple serial numbers or makes and models specified in an AD."</p> <p>With edits: "A global AMOC, sometimes referred to as an “AMOC of general applicability” in some bilateral agreements, applies to two or more operators. It can be used by an X to obtain an AMOC for the multiple serial numbers or makes and models specified in an AD."</p>	

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Rob Verdi AIR-500	2 1.5.7	Document used to convey service information (such as modifications or inspections) to owners/operators of products.	In order to maintain consistency with the other definitions, there should be a "The" at the beginning of this sentence.	Please consider inserting "The" at the beginning of this sentence and changing "Document" to lowercase, as below: "The document used to convey service information (such as modifications or inspections) to owners/operators of products."	Non-concur. Definition is identical to that used on AC 20-176.
Rob Verdi AIR-500	2 and UNIVERS AL 1.6.2	Those actions can either be written directly into the rule portion ("body") of the AD, or another document, such as an SB, can be referenced in the AD body and submitted to the Office of the Federal Register for incorporation by reference approval.	The use of "can" in this sentence seems incorrect. "May" might be more appropriate because, if I am reading it correctly, the sentence refers to FAA rules or conventions.	If the sentence refers to ability or capacity, leave as is. However, if the sentence refers to permission granted then "can" should be changed to "may", as below: "Those actions may either be written directly into the rule portion ("body") of the AD, or another document, such as an SB, may be referenced in the AD body and submitted to the Office of the Federal Register for incorporation by reference approval." Please change all similar occurrences throughout the document.	Non-concur. Wording is identical to currently published wording of Order 8110.103
Rob Verdi AIR-500	4 2.2	AD Mandated Instructions.	"AD Mandated" is a compound modifier of "Instructions"; therefore, it should be hyphenated. (See row 10 above.)	Please insert a hyphen between "AD" and "Mandated", as below: "AD-Mandated Instructions."	Concur

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Rob Verdi AIR-500	4 2.3.1.2	I complied with the referenced instructions in the service document revision referenced in the AD before the AD was issued.	The first use of "referenced" in this sentence seems redundant.	If the question will still make sense to the reader, consider removing the first use of "referenced", as below: "I complied with the referenced instructions in the service document revision referenced in the AD before the AD was issued."	Non-concur. The first "referenced" is necessary because a service document may contain the actual instructions, or it may reference other documents.
Rob Verdi AIR-500	4 and UNIVERS AL 2.3.1.3	Therefore, if the aircraft DAH did not obtain an AMOC approval for the later version of the service document, you will need to apply for an AMOC.	"Need to" should be replaced with "must".	Please replace "need to" with "must", as below: "Therefore, if the aircraft DAH did not obtain an AMOC approval for the later version of the service document, you will need to must apply for an AMOC." Please change all similar occurrences throughout the document.	Concur
Rob Verdi AIR-500	5 and UNIVERS AL 2.3.2.2	Yes, you must comply with the specific requirements of the AD.	To keep question/answer formatting consistent, insert a period after "Yes" and capitalize "you".	Please insert a period after "Yes" and capitalize "you", as below: "Yes. You must comply with the specific requirements of the AD." Please ensure all question/answer examples in the document are written using the same format: Question: Question text?	Concur

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				<p>Answer: Yes. Answer text. or Question: Question text? Answer: No. Answer text. or Question: Question text? Answer: Maybe. Answer text.</p>	
Rob Verdi AIR-500	6 2.3.3.1	You do not need an AMOC when the AD applicability statement is against the appliance and you no longer have the appliance installed.	It seems like the intended meaning of this sentence would be clearer if "and" after "appliance" were replaced with "if".	<p>Consider replacing "and" after "appliance" with "if", if the intended meaning of the sentence is maintained or made clearer, as below:</p> <p>"You do not need an AMOC when the AD applicability statement is against the appliance and if you no longer have the appliance installed."</p>	Non-concur. Clearer as is.
Rob Verdi AIR-500	8 2.3.5	There is a PMA-approved replacement part for the part listed in the AD.	The first use of "part" in this sentence seems redundant.	<p>Please consider deleting the first occurrence of "part", as below:</p> <p>"There is a PMA-approved replacement part for the part listed in the AD."</p>	Concur
Rob Verdi AIR-500	8 and UNIVERSAL 2.3.6.1	The DAH (or production approval holder (PAH)) delivered my aircraft with AD status records (indicating compliance with all applicable ADs).	For clarity and ease of reading, the parentheses around "PAH" should be replaced with brackets.	<p>Please consider replacing the parentheses around "PAH" with brackets, as below:</p> <p>"The DAH (or production approval holder [PAH]) delivered my aircraft with AD status records (indicating compliance with all</p>	Concur

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				applicable ADs)." Please change all similar occurrences throughout the document.	
Rob Verdi AIR-500	8 2.3.8	Starting June 2011, some DAHs are adopting the “required for compliance” (RC) notation whereby those critical steps of an SB are identified with a notation of RC.	The word "those" after "whereby" doesn't seem like the correct word here. "The" would be a better fit. Also, the second occurrence of "RC" should be in quotations since it is referring to a notation.	Please consider replacing "those" with "the" and putting quotation marks around "RC" at the end of the sentence, as below: "Starting June 2011, some DAHs are adopting the “required for compliance” (RC) notation whereby those the critical steps of an SB are identified with a notation of "RC"."	Concur
Rob Verdi AIR-500	11 3.3	Who Approves an AMOC.	"Who Approves an AMOC" is a question and should end in a question mark.	Please insert a question mark after "AMOC", as below: "Who Approves an AMOC?"	Concur
Rob Verdi AIR-500	11 3.3	There are some cases in which other persons may approve an AMOC as follows:	This sentence would be clearer to the reader if "The following" replaced "There" at the beginning of the sentence and "as follows" were deleted.	Please consider replacing "There" with "The following" and deleting "as follows", as below: "The following There are some cases in which other persons may approve an AMOC as follows :"	Concur
Rob Verdi AIR-500	11 3.3.1	A different FAA office manager.	In order to maintain consistency with the other cases in this section, "has been assigned" should be inserted at the end of this	Please consider inserting "has been assigned" after "manger, as below: "A different FAA office manager has been assigned. "	Partially concur. Changed to read, “A different FAA office manager is responsible.”

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			sentence.		
Rob Verdi AIR-500	12 3.4.1	Your PI is the person in the FAA most familiar with your operations, and can add insight into your request that may be helpful to the ACO when reviewing your proposal.	The comma after "operations" is unnecessary and should be deleted.	Please delete the comma after "operations" as below: "Your PI is the person in the FAA most familiar with your operations, and can add insight into your request that may be helpful to the ACO when reviewing your proposal."	Concur
Rob Verdi AIR-500	12 3.5	Please note that the FAA or authorized designee may request any AMOC proposal made via telephone be followed up by one of the other methods mentioned above. In any case, the information identified in paragraph 3.2 of this AC must be provided.	For clarity, consider inserting "that" after "request" in the first sentence. Also, to avoid using the passive voice, consider inserting "you must provide" after "In any case," and deleting "must be provided after "this AC".	Please consider inserting "that" after "request" in the first sentence. Also, insert "you must provide" after "In any case," and delete "must be provided after "this AC", as below: "Please note that the FAA or authorized designee may request that any AMOC proposal made via telephone be followed up by one of the other methods mentioned above. In any case, you must provide the information identified in paragraph 3.2 of this AC must be provided."	Concur

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Rob Verdi AIR-500	12 3.6 3.6.1	AMOC responses will either be in email or letter format, at the discretion of the FAA.	The intro sentence in section 3.6 refers to responses to "complete AMOC proposals." This sentence describes how responses will be issued ("in email or letter format"). Therefore, it would make more sense to move this sentence to before the sentence in section 3.6.	Please consider moving this sentence to before the sentence in section 3.6, as below: "AMOC responses will either be in email or letter format, at the discretion of the FAA. All complete AMOC proposals will receive one of the following responses:" Note: Moving this sentence to section 3.6 will affect all subsequent section numbers (e.g., 3.6.2 will become 3.6.1, 3.6.3 will become 3.6.2, etc.).	Non-concur
Rob Verdi AIR-500	14 4.1	4.1 General. This chapter provides guidance on the following topics: <ul style="list-style-type: none"> • Global AMOCs, • Returning aircraft to service, • Revoking an AMOC, • Foreign registered aircraft, • MCDA, • 24/7 AMOC support, • Sharing AMOCs with DAHs, • AMOCs for appliances including TSO-approved 	The format of this section is different than the previous "General" sections. If possible, it should be replaced with a short paragraph or sentence that provides context.	Please consider replacing this bulleted list with a sentence or two that provide context regarding what will be covered in the chapter. For example— "This chapter provides guidance on other considerations that AMOC applicants may need to consider." Or something to that effect.	Non-concur

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		articles, and • Previously approved AMOCs.			
Rob Verdi AIR-500	15 and UNIVERS AL 4.3.1	You are responsible for notifying your PI (or lacking a PI, the manager of the FSDO/CHDO) before you use an AMOC.	The word "lacking" is passive and non-specific. Please consider replacing with something along the lines of "if there is no PI in your area" or "in the absence of a PI".	Please consider replacing "lacking" with "if there is no PI in your area" or "in the absence of a PI" or whatever makes the most sense. Please change all similar occurrences throughout the document.	Non-concur. Wording is identical to language currently in use.
Rob Verdi AIR-500	17 4.6.3	If the AMOC is approved, a copy of the AMOC must be kept in the aircraft maintenance records.	To avoid the repetition of "AMOC", please consider replacing one occurrence of "the AMOC" with it.	Please consider replacing the one occurrence of "the AMOC" with "it", as below: "If the AMOC is approved, a copy of the AMOC it must be kept in the aircraft maintenance records." or "If the AMOC it is approved, a copy of the AMOC must be kept in the aircraft maintenance records."	Concur
AGC-200	Title Page	Add (AD) after "airworthiness directive" in the first sentence.			Concur

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AGC-200	1 1.4	First sentence, change “we” to “the FAA”			Concur
AGC-200	1 1.4	Third sentence, change “apply” to “applies”.			Concur
AGC-200	1 1.5.1	Delete current paragraph.	Replace with recommendation.	A “legally enforceable rule[] that appl[ies] to the following products: aircraft, aircraft engines, propellers, and appliances.” 14 CFR 39.3. This legally enforceable rule, including supersedures and corrections to the rule, may be promulgated with or without notice and comment depending on the circumstances.	Non-concur. Current wording acceptable as is.
AGC-200	2 1.5.2	Second sentence, change “way” to “method”			Concur
AGC-200	2 1.5.3	Suggest moving Note to 1.5.2			Non-concur. Note better positioned as is.
AGC-200	3 1.6.2	Second sentence, Change as recommended.		Those actions can either be written directly into the rule portion (“body”) of the AD or another document, such as an SB, can be referenced in the AD body and	Concur

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				incorporated by reference in the AD	
AGC-200	5 2.3.2.1	Answer: Change “propose” to “request”.			Concur
AGC-200	6 2.3.2.3	Answer: Change “propose” to “request”.			Concur
AGC-200	6 2.3.3.1	Answer: Change “is against the” to “applies to an”			Concur
AGC-200	6 2.3.3.2	Answer: Change “deactivated, or partially removed” to “altered, or repaired.”	Because we’re citing 14 CFR 39.15, we should use its language. Section 39.15 does not mention deactivating or partially removing a product. Rather, it states: “Yes, an airworthiness directive applies to each product identified in the airworthiness directive, even if an individual product has been changed by modifying, altering, or repairing it in the area addressed by the		Partially concur. Changed to read, “..even though it was modified, altered, or repaired, including deactivation or partial removal.

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			airworthiness directive.”		
AGC-200	7 2.3.3.4	First sentence, reword as recommended.		An AD applies to a technical standard order (TSO)-approved article.	Concur
AGC-200	10 3.1	Reword as recommended		This chapter provides guidance on submitting an AMOC proposal. It describes what an AMOC proposal should contain, and to whom and where to submit the proposal.	Non-concur. Current wording acceptable as is.
AGC-200	10 3.2	Reword as recommended	39.19 only requires that the applicant “[i]nclude the specific actions you are proposing to address the unsafe condition.”	Anyone may propose an AMOC. An AMOC proposal is not considered complete until the FAA receives the specific actions the requester is proposing to address the unsafe condition. The proposal should include the following:	Non-concur. Wording acceptable as is.
AGC-200	11 3.2.6	Change “their” to “its”			Non-concur. “Their” is referring to the requester, not the aircraft.
AGC-200	12 3.4.1	Second sentence, delete comma after “operations”			Concur

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AGC-200	13 3.6.4	Second sentence, change “response” to “approval”. Third sentence, change “acceptable” to “an AMOC approval.”			Non-concur. Language is identical to wording currently in use.
AGC-200	14 4.2.1.1	Change “can” to “may”			Concur
AGC-200	14 4.2.1.3	Change “can” to “may”			Concur
AGC-200	14 4.2.1.4	Change “their” to “his or her”. Change “can” to “may”. Change “it” to “the AMOC”.			Concur
AGC-200	14 4.2.1.5	Change “can” to “may”			Concur
AGC-200	16 4.4.2	Delete the comma after “revoked”			Concur
AGC-200	16 4.5.1	Change “We” to “The FAA”			Concur

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AGC-200	16 4.5.2	Change “We” to “The FAA”			Concur
AGC-200	17 4.6.2	Change “We” to “The FAA”			Concur
AGC-200	17 4.8	First paragraph, third sentence: change “include” to “provide” and “that” to “to permit”.			Concur
AGC-200	17 4.8	Example: Change “their” to “the DAH’s”			Non-concur. The use of there is clear in the sentence.
AGC-200	17 4.9	Change “against” to “that apply to”			Concur
AGC-200	18 4.9.2	Reword as recommended		The TSOA holder should indicate whether the requested AMOC proposal includes installation approval for the modified TSO article or whether additional approval is required.	Non-concur because the design change holder might not be the TSOA holder IAW FAA Order 8150.1.
AGC-200	18 4.11.3	Change “them” to “that person”.			Non-concur. Current wording acceptable as is.

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AGC-200	19 4.11.5	Change “We” to “The FAA” and “do” to “does”.			Concur
M. Moreland ANM-120L	Pg.5, para. 2.3.1.6	The answer to this question does not capture the very common case of an AD mandated SB that is written with “flexible language”, per AC 20-176. In that case, the operator may use their own procedures acceptable to the FAA.	The reader may be confused by the simple answer that does not cover a very common case.	Change the answer to recognize that there may be cases where an AMOC is not necessary. The answer should still be yes, but add the following after the existing answer: <i>“However, if the AD requires actions to be accomplished in accordance with a design approval holder’s service bulletin (SB) and that SB uses flexible language to refer to the standard practice manual (see AC 20-176), then the operator may use their own procedures acceptable to the FAA.”</i>	Partially concur. Added the following sentence, “However, if the specific instructions in the SB use flexible language (refer to AC 20-176) to refer to the second- or third-tier documents, then an AMOC may not be required.”
M. Moreland ANM-120L	Pg. 12, para. 3.4.2	This paragraph does not reflect the preferred way for AMOC requests to be submitted. It is confusing, although the most current AD format does have the ACO contact listed under Related Information, many of our AMOC requests are for older format ADs where the ACO contact is listed in	The information is not correct.	Change the 3 rd sentence (the one that begins “Send your proposal...”) to: <i>Send your proposal to the office identified in the AMOC paragraph of the AD. In many cases, the AD AMOC paragraph also gives an email address to submit AMOC requests to. That email address is the preferred method for submittal of AMOC requests. If your submittal contains a long</i>	Non-concur. Wording acceptable as is.

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		the preamble under “For further information contact”.		<i>document, the ACO may ask you to also mail a hard copy of the document so that the ACO does not have to print it. If there is no email address identified for AMOC requests, you may send your proposal directly to the attention of the person identified in the preamble as the contact for further information (older ADs) or to the attention of the person identified in the Related Information section of the AD (newer ADs).</i>	
M. Moreland ANM-120L	Pg. 12, para. 3.4.3	There is never an address listed in the AD for authorized designees.	The instruction to send AMOC proposals to the address listed in the AD (for the authorized designee) will never be correct.	Change to: <i>An authorized designee of the FAA. The AD will identify if AMOC authority is delegated. Send your proposal to the designee identified in the AD. For older ADs that do not include an AMOC delegation section, either contact the designee identified on a newer AD for the same model aircraft or contact the office identified in the AD to see if AMOC approval has been delegated.</i>	Partially concur. First sentence deleted as recommended.
M. Moreland ANM-120L	Pg. 16, para. 4.5.3	This is incorrect. There is no requirement for AMOCs for foreign registered aircraft to be submitted through Flight	For foreign registered aircraft they do not have a local flight standards PI and the IFOs do not oversee AD compliance for foreign	Change the paragraph to read: <i>4.5.3 Submit the required information in paragraph 3.2 of this AC to the individual or email</i>	Partially concur. Changed to read, “...of this AC to the appropriate person identified in

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		Standards.	registered airplanes. This is why the requirement to try and get comments from the IFO on AMOC requests for foreign registered aircraft has been dropped. We handle those (per Order 8110.103) by writing in the approval that they have to notify their PMI upon transfer of the aircraft to US registry.	<i>address identified in paragraph 3.4.2 or 3.4.3 of this AC</i>	paragraph 3.4.2 or 3.4.3 of this AC.”
Phil Forde ANM-120S	Page 4, Para 2.3.1.2	The answer provided is incorrect.	Work accomplished <u>in accordance with the service instruction revision listed in the AD</u> , but prior to the AD, unless the AD says no, is considered acceptable. They have, by definition, done the action before the compliance date.	This Q and A adds little value. Suggestion: “If I complied with an earlier revision of the service information than that listed in the AD, do I need an AMOC?”	Non-concur. Prior revisions to service documents is a separate question. This question is a common one that addresses incorporation of service information prior to the issuance of an AD.
ANE150	GENERAL -all pages	Many comments have been made on the draft Order that have a direct bearing on the AC; comments are NOT provided here for the draft AC which are associated with comments already provided for the Order	Comments on the Order are too numerous to duplicate in this spreadsheet but the goal is to ensure complete consistency between Order and AC	Once ANE150 comments, and others, are dispositioned, the AC will need to be revised for consistency with the Order in many areas	No specific changes recommended.

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ANE150	P12, Section 3.6	Is it appropriate to use Forms 8110-3 or 8100-9 when a designee is making a decision about an AMOC?	These forms are used for asserting compliance to the airworthiness standards and may not be appropriate for AMOCs (which provide an acceptable alternative to a Part 39 action)	Review and revise as necessary	Non-concur. A designee finds compliance to airworthiness standards. The method of documenting that compliance is an 8110-3 or an 8100-9 as appropriate.
ASW-140	3.2.8	3.2.8 States: "If the requester wishes to allow the AMOC response to be shared with the DAH, a statement to that effect."	Many DAHs have requested that their AMOCs be published in the Federal Registry. A statement from the requester is also needed to accomplish this request.	"If the requester wishes to allow the AMOC response to be shared with the DAH or published in the Federal Registry, a statement to that effect."	Non-concur. It is not appropriate to publish AMOCs in the Federal Register.
ASW-140	3.4	3.4 explains that you need to send your AMOC proposal to your local PI, AND the manager of the FAA office, AND an authorized designee.	An AMOC does not always need to be sent to all of these parties. E.g. ASW-140 does not delegate approval authority of AMOCs, so there is no need to send to an authorized designee. Also, a global AMOC and DAH do not have a local PI.	Recommend clarifying that global AMOCs do not need to be sent to a local PI. Recommend changing 3.4.3 to state: "An authorized designee of the FAA, if the FAA office responsible for the AD has authorized a designee to approve AMOCs."	Non-concur. 3.4 does not mean that an AMOC proposal has to be sent to each of these people. The AMOC proposal is sent to one of them, as appropriate.
ASW-140	3.4.1	3.4.1 States that AMOCs should be sent to the local PI. 8100.103A paragraph 3-8.d directs the FAA	To avoid duplication of efforts, 3.4.1 and 3.2 should ask the requester to submit any documentation from the	Update 3.4.1 and 3.2 to direct the requester to include any documentation received from the PI (comments, concurrence, etc.)	Non-concur. The order is clear that the ASE only sends the request to the PI if

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		reviewer to coordinate with the PI and give them an opportunity to comment.	PI (comments, concurrence, etc.) and at a minimum their contact information when they submit the AMOC to the FAA office. This will expedite review time of the AMOC.	and at a minimum their contact information.	the request came directly to the ACO, not if it was originally submitted to the PI.
ASW-140	4.11.2	4.11.2 states: "That office can provide information about AMOCs it has approved." Section 4.11.6 provides more detailed information regarding what the FAA office can provide.	4.11.2 provides a partial answer whereas 4.11.6 provides a more complete answer to the same question. Without the context in 4.11.6, the answer in 4.11.2 may be misleading.	Recommend deleting 4.11.2.	Concur
ANE-140	1 / 1.4 16 / 4.5.1 16 / 4.5.2 17 / 4.6.2 19 / 4.11.6	There are few instances of "we" and multiple instances of "the FAA." Either will do, but keep it consistent throughout.	Keep consistency of terminology throughout document	Change "we" to "the FAA"	Concur
ANE-140	2 / 1.5.2	Change "unsafe condition <u>on</u> an aircraft" to "unsafe condition <u>in</u> an aircraft"	To make it consistent with 39.5(a) rule language.	Change "unsafe condition on an aircraft" to "unsafe condition in an aircraft"	Concur
ANE-140	2 / 1.5.7	Change beginning of sentence from "Document" to " <u>Design approval holder's (DAH) document</u> "	Provides a more precise definition of a Service Bulletin	Change beginning of sentence from "Document" to "Design approval holder's (DAH) document"	Non-concur. Definition is consistent with same in AC 20-176.

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ANE-140	2 / 1.6.2	Change “of the AD, or another document,” to “of the AD, or another document <u>or its parts,</u> ”	Specific parts of an SB, rather than the whole document, can be referenced in an AD.	Change “... of the AD, or another document, ...” to “... of the AD, or another document or its parts, ...”	Non-concur. Regardless of whether it is partial or not, the “other document” is incorporated by reference, so the wording is acceptable.
ANE-140	2 / 1.6.2	Change “Compliance with an SB that is” to “Compliance with <u>the parts of</u> an SB that <u>are</u> ”	Specific parts of an SB are usually referenced in an AD.	Change “Compliance with an SB that is” to “Compliance with <u>the parts of</u> an SB that <u>are</u> ”	Partially concur. Changed to read, “Compliance with the portions of an SB that are”
ANE-140	2 / 1.6.3	Provide context clarification regarding the need for an AMOC.	AMOC is only required in a context of keeping the product airworthy without compliance with the letter of the AD.	Change beginning of paragraph to “To allow for continued airworthiness of a product to which an AD is applicable, an AMOC is required if an owner/operator cannot comply with the AD. An AMOC may also be proposed if an owner/operator finds a different way to comply with the actions specified in an AD. Chapter 2 ...”	Non-concur. An AD mandates corrective actions. If you cannot, or choose not to comply with the literal language of the AD, you must get an AMOC.
ANE-140	4 / 2.2	Change paragraph to make consistent with paragraph 1.6.2	Make consistent with 1.6.2	Change “holder’s (DAH) service <u>information,</u> which” to “holder’s (DAH) service <u>document, such as an SB or its parts,</u> which”	Non-concur. Wording acceptable as is.

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ANE-140	4 / 2.2	Do not need to redefine DAH acronym	“DAH” already defined on page 2, paragraph 1.5.7	Change “in a design approval holder’s (DAH) service” to “in a DAH service” if you agree with the change to par 1.5.7.	Non-concur. Recommended change to 1.5.7 not incorporated, so this is first use of DAH.
ANE-140	4 / 2.3.1.3	Remove “aircraft”	Unnecessarily specific to aircraft. Remove the word to describe all DAHs.	Change “if the aircraft DAH did not” to “if the DAH did not”	Concur.
ANE-140	4 / 2.3.1.3	Specify “global” AMOC	DAH's AMOC will be global.	Change “the DAH obtained an AMOC for the” to “the DAH obtained a global AMOC for the”	Concur
ANE-140	5 / 2.3.1.6	We do not agree with the answer to the question. This has the potential to create unreasonable and unnecessary circumstances. Our past practices have been to not necessarily require an AMOC for second, third and fourth tier documents. For example if the incorporated document requires an Ultra High Sensitivity FPI in accordance with SPOP 84 and an operator has their own Standard Practice Manual that contains an Ultra High Sensitivity FPI	Drilling down this deeply into referenced documents is unnecessary and not reasonable. There has to be a reasonable point where the AD ends and the provisions of 43.13 take over. Just saying that you need an AMOC for everything referenced in second and third tier documents has the potential to lead to unreasonable situations for example: writing an AMOC for a socket wrench instead of a box wrench.	Strike the question or provide a more thorough explanation which draws a clearer line where the AD ends and 43.13 requirements (other methods, techniques and practices acceptable to the administrator) take over.	Non-concur. This position was upheld in a legal interpretation issued on 1/27/14.

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		(not SPOP 84 verbatim), then we would not require an AMOC for the use of their SP manual. The operators SP manual has already been deemed a method, technique or practice acceptable to the Administrator. If however the operator wanted to use say just the High Sensitivity FPI from their SP manual, then we would likely require an AMOC and some justification as it is not the same level of inspection called out in the first tier document.			
ANE-140	12 / 3.4.1	Specifying concurrent submittal	Add additional clarification to who AMOC proposal is sent to	Change “In addition, you may send your proposal ...” to “In addition, you may concurrently send your proposal ...”	Non-concur. Current wording acceptable as is.
ANE-140	12 / 3.4.2	Confusing when saying AMOC should be sent to manager of office, but send it to contact person in AD. Do you send it to manager, contact person, or both?	Paragraph can be somewhat confusing as to who AMOC proposal is sent to.	Provide additional clarity. Perhaps say an AMOC request should be addressed to the office manager and sent/submitted to contact person or AMOC submittal instructions specified in AD. In ANE-140, we have generic AMOC submittal email address. Upon email submittal to this address, it gets routed to the	Non-concur. Current wording acceptable as is. The proposal is sent to the manager, but to the attention of the person identified in the AD.

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				appropriate personnel in the office.	
ANE-140	12 / 3.4.4	Specify who in the Military Cert. Office proposal should be sent to	Provide additional clarification	Change “The Military Certification Office” to “The <u>manager of the</u> Military Certification Office”	Concur.
ANE-140	13 / 3.6.4	Reiterate to the AC reader that the determination will be coming from a responsible office rather than the PI.	To provide additional clarification	Change “If the <u>FAA</u> or authorized designee” to “If the <u>responsible office</u> or authorized designee”	Non-concur. Wording acceptable as is.
ANE-140	16 / 4.5.3	AC should mention that direct submittal to responsible office is allowed.	Order 8110.103B (draft), [Paragraph 3-7.c reads that the responsible office's "coordination with the IFO is not required" for foreign AMOCs. In that light, applying for a foreign AMOC directly to the responsible office should be presented as a valid option.	Change “... Field Office (IFO), as applicable.” to “... Field Office (IFO), <u>or directly to the responsible office,</u> as applicable.”	Partially concur. Submittal to IFO not required. Paragraph changed to read, “Submit the required information in paragraph 3.2 of this AC to the appropriate person identified in paragraph 3.4.2 or 3.4.3 of this AC.”
ANE-140	General	The order specifies a few things that are not appropriate use of an AMOC (e.g. applicability only). These should be mirrored in the AC	Provide this same guidance in AC as this is useful information.	Mirror the order’s “not appropriate use of AMOC” into the AC	No changes made. It is unclear to what the commenter is referring. The draft order, paragraph 2-2, only lists that it is

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					inappropriate to use an AMOC to correct errors in an AD, information that is only pertinent to the FAA.
ACE-115A	Page 8, paragraph 2.3.6.2.	The “Answer” states that you must comply with the applicable AD or get an AMOC. A third option is to ‘show’ that your aircraft is in compliance somehow.	Just because you can’t get an AD status record from the DAH doesn’t automatically mean that the AD’s were not complied with.	Allow for some reasonable way to determine if the AD is already complied with in addition to the stated two options of ‘do the AD’ or ‘seek AMOC’.	No changes necessary. Regardless of whether you get at AD status record, your only options are to either show compliance with the AD or get an AMOC.
ACE-115A	Page 8, paragraph 2.3.8.1, second bullet	Careful with the statement “you may deviate...without AMOC”	Just because the task isn’t labeled RC doesn’t mean all deviations can be done without AMOC. Example: Step 2 calls for removal of panel xyz to gain access to AD affected area. This step is not labeled as RC. One could interpret the current language to mean that I don’t have to gain access. The real intent of leaving the RC label off the step is to allow for gaining access in other ways.	Add clarifying statement that the intent of steps not labeled as RC should still be accomplished and are essential to AD compliance. You can use the 50 gallon bucket, but the rinse is required for compliance.	Partially concur. Changed to read, “If the task is not identified as RC, you may deviate from the specific task using accepted methods in accordance with an operator’s maintenance or inspection program without an AMOC, provided the RC steps, including substeps and identified figures,

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					can still be done as specified, and the airplane can be put back in an airworthy condition.”
ACE-115A	Page 12, Paragraph 3.5	I would never accept a telephone call as an AMOC request.	No data to back up the request. I always insist on a written request after a phone call.	Remove ‘phone call’ as a submittal method. Also, remove the note that the ACO may ‘request’ written follow up. Implies that it’s not necessary.	Non-concur. Although rare, a phone is an acceptable method of requesting an AMOC.
ACE-115A	Page 12, paragraph 3.6.3	‘Acceptable level of safety’ is subjective.	Could lead to butting of heads if opinions differ. And they will.	Add statement that the acceptable level of safety is determined by the FAA or designee (when appropriate/applicable)	Non-concur. Wording acceptable as is.
Chicago ACO	Pg. 2 Para 1.5.2 and 1.5.3	The note in 1.5.3 seems to be a better definition of an AMOC and would be more appropriate in the AMOC definition. I presume that we cannot use it exactly because you cannot define a term using the term itself. I would, however propose alternate wording that brings it a little closer.	Consistency	Modify the AMOC definition as follows “... An AMOC provides an FAA-approved means, different than that specified in the AD, to address the unsafe condition and provide an acceptable level of safety.”	Non-concur. Wording acceptable as is and is consistent with wording in current order.
Chicago ACO	Pg. 2 Para. 1.5.3	It is not clear why this note is included under the definition of Change in Compliance Time. If it cannot be used under the	Clarity	Either move the note under the definition of AMOC or find another appropriate location for it.	No changes necessary. 14CFR39.19 explicitly mentions AMOCs and

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		AMOC definition, there may be a more appropriate place to put it.			changes in compliance times. The note is merely intended to say that we use the term “AMOC” to mean both.
Chicago ACO	Pg. 5 Para 2.3.2	We would suggest putting one non-structures example in this section.	Changes in the Area Addressed by the AD can be something other than just a structures change. As an example, the question in 2.3.3.3 is not really specific to an appliance. It could be software approved as part of type design. Therefore, this would be a great example to put in 2.3.2.	Move the Q and A re: software from 2.3.3 to 2.3.2.	Non-concur. The topic of 2.3.2 is “Changes in the Area Addressed by the AD.” The software example in 2.3.3 deals with a later revision of software, not that the software is changed or modified when AD compliance is originally sought.
Chicago ACO	Pg. 7 Para. 2.3.3.3	As noted in the previous comment, this does not appear to be appropriate for the appliance portion of the document.	The applicability goes beyond appliances.	Move to a more appropriate section. Potentially 2.3.2	Non-concur. See previous comment.
Chicago ACO	Pg. 8 Para. 2.3.6	Both the questions under this heading of “AD compliance before delivery” appear to be related to basic AD compliance rather than an AMOC.	Since the basic AC is related to AMOCs, the question should be specific to an issue of an AMOC rather than the basic AD.	Suggest either re-wording to the question portion more clearly applicable to an AMOC issue or removing.	Non-concur. These are frequently asked questions regarding whether an AMOC is necessary. Sometimes the answer is no.

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Chicago ACO	Pg 12 and Pg 16 Para. 3.4.4 Para. 4.6	The document states that AMOCs for military commercial derivative aircraft should be sent to the MCO. Typically, each AD has a paragraph that states which office is responsible for AMOCs for that AD. Each AMOC request should be sent in to that office. If an MCDA is affected the ACO should coordinate the response with the MCO.	Given that an AD is a regulation, the AC should not direct a different and contradictory course of action. The cognizant ACO and MCO should work together to issue the AMOC.	Suggest re-wording such that the AMOC request is sent in to the ACO identified in the AD. That ACO will then coordinate the response for any MCDA with the MCO prior to issuance of the AMOC.	Non-concur. If a particular operator has an MCDA, then their request should be sent to the MCO.
Chicago ACO	Pg. 12 Para. 3.6	Under this section it starts with “All complete AMOC proposals...”.	This raises the question as to what to do with incomplete proposals.	Modify 3.6 to address both complete and incomplete AMOC proposals. All AMOC proposals will receive one of the following responses. <ul style="list-style-type: none"> - Approval by the FAA or designee as appropriate - Denial - Request for additional information 	No changes necessary. The accompanying AMOC order clearly states that for incomplete proposals, the ASE requests additional information. This is not considered a response. If the requester subsequently fails to provide adequate information, then the AMOC is denied.

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Paul DeVore ACE-116W	Page 3, Para. 1.6.2	The paragraph states: Compliance with an SB that is incorporated by reference in an AD is mandatory. Some sections of SBs referenced in ADs are not normally mandatory.	Only the steps of the SB called out as required in the AD are mandatory.	Change the sentence to read: Compliance with <i>the portion</i> of an SB that is incorporated by referenced in an AD is mandatory.	Concur
Paul DeVore ACE-116W	Page 4, para 2.3.1.2	The last sentence of this paragraph states to contact the office that issued the AD. Other places in this document state to contact the “responsible office.”	Sometimes the office that issued the AD is no longer the responsible office.	Change to read: ...contact the office responsible for the AD.	Concur
Paul DeVore ACE-116W	Page 5, para 2.3.1.6	The answer states that you must accomplish the specific instructions in the SB, but doesn’t complete the thought regarding an AMOC.		Add: “unless you obtain an AMOC” to the last sentence of the answer in this paragraph.	Non-concur. Wording acceptable as is.
Paul DeVore ACE-116W	Page 8, para 2.3.6.2	The Question in this paragraph is whether or not a person needs to take action. The Answer states that you must comply “before flying the aircraft.” The answer doesn’t completely line up with the question.	There may be actions that are required, but the specific actions might not be due “before flying the aircraft.” Maybe the action is that an inspection needs to be done when the aircraft reaches 10,000 flight hours, but the airplane only has 100 flight hours when “received.”	Either remove the words “before flying the aircraft,” Or...Change the Answer to something like the following: “Yes. You must determine what actions are necessary and make sure you comply with the required actions, or obtain and implement your own AMOC.”	Non-concur. Wording acceptable as is. In your example, if an inspection was due at 10,000 hours, it would not be due for compliance.

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Jose Flores ACE-119W	Page 3, para 1.6.4	Should a sub paragraph be added for parts availability?	In the past AMOCs have been used to extend compliance time when parts are not available.	Suggest adding a subparagraph for parts availability.	No changes necessary. Parts availability would be covered under the current paragraph 1.6.4.3.
Jose Flores ACE-119W	Page 11, para 3.3	Should there be a discussion of the design approval for certification of type design associated with the AMOC?	Paragraph 3.3 discusses the approval of the AMOC, however many times the proposed design for the AMOC will require a design approval as well. In the past an STC or PMA approval is used for an AMOC. In some cases two ACOs may be involved. One ACO issues the design approval and the other ACO issues the AMOC approval.	Suggest adding a subparagraph explaining when type design approval is required.	No changes necessary. There is no guidance on when a certification project will be necessary. Usually it depends on the complexity of the proposed AMOC, and will be determined on a case-by-case basis. The accompanying order has some guidance for the ASE on this topic.