

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

**DISPOSITION OF FIELD COMMENTS**

<b>Document No.:</b> AC 21-43A, Production Under 14 CFR Part 21, Subparts F, G, K, and O	<b>Project Lead:</b> Dawn LeBlond, AIR-112, (202) 267-1525	<b>AIR-100 Management Concurrence and Date:</b>	<b>Date of AIR-100 Disposition:</b> 4/28/15 – 6/10/15	
<b>Record of All Comments</b>				
<b>TOTAL COUNT</b> Total count of comments received: 126 Total count of comments adopted: 46 Total count of comments partially adopted: 6 Total count of comments non-concur: 48 Total count of comments outside of scope: 4 Total count of questions or statements answered: 22	<b>PUBLIC COMMENT</b> Total count of comments received: 6 Total count of comments adopted: 3 Total count of comments partially adopted: 1 Total count of comments non-concur: 2 Total count of comments outside of scope: 0 Total count of questions or statements answered: 0	<b>AIR-100</b> Total count of comments received: 30 Total count of comments adopted: 23 Total count of comments partially adopted: 3 Total count of comments non-concur: 3 Total count of comments outside of scope: 0 Total count of questions or statements answered: 1	<b>ANM-100</b> Total count of comments received: 23 Total count of comments adopted: 3 Total count of comments partially adopted: 0 Total count of comments non-concur: 16 Total count of comments outside of scope: 0 Total count of questions or statements answered: 4	<b>AIR-40</b> Total count of comments received: 22 Total count of comments adopted: 5 Total count of comments partially adopted: 1 Total count of comments non-concur: 3 Total count of comments outside of scope: 4 Total count of questions or statements answered: 9
	<b>ANE-100</b> Total count of comments received: 6 Total count of comments adopted: 0 Total count of comments partially adopted: 0 Total count of comments non-concur: 5 Total count of comments outside of scope: 0 Total count of questions or statements answered: 1	<b>AIR-500</b> Total count of comments received: 22 Total count of comments adopted: 12 Total count of comments partially adopted: 0 Total count of comments non-concur: 5 Total count of comments outside of scope: 0 Total count of questions or statements answered: 5	<b>AFS-1</b> Total count of comments received: 17 Total count of comments adopted: 0 Total count of comments partially adopted: 1 Total count of comments non-concur: 14 Total count of comments outside of scope: 0 Total count of questions or statements answered: 2	<b>ASW-100</b> Total count of comments received: 0 Total count of comments adopted: 0 Total count of comments partially adopted: 0 Total count of comments non-concur: 0 Total count of comments outside of scope: 0 Total count of questions or statements answered: 0
	<b>ACE-100</b> Total count of comments received: 0 Total count of comments adopted: 0 Total count of comments partially adopted: 0 Total count of comments non-concur: 0 Total count of comments outside of scope: 0 Total count of questions or statements answered: 0	<b>AMA-220</b> Total count of comments received: 0 Total count of comments adopted: 0 Total count of comments partially adopted: 0 Total count of comments non-concur: 0 Total count of comments outside of scope: 0 Total count of questions or statements answered: 0	<b>CSTA</b> Total count of comments received: 0 Total count of comments adopted: 0 Total count of comments partially adopted: 0 Total count of comments non-concur: 0 Total count of comments outside of scope: 0 Total count of questions or statements answered: 0	

## DOCUMENT REVIEW LOG – FIELD COMMENTS

### Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by AIR-100 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

Block 5: To be completed by AIR-100 PM, after receiving comments from field offices. Enter date of disposition.

The below columns to be completed by the Field Offices, except for “AIR-100 Disposition” column.

AIR-100 PMs disposition comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as one of the following:

● Adopted; ●Partially Adopted ● Non-Concur ● Concur but Outside of Scope (Will be considered in next change/revision) ●Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition: See Below
1.	Page 4; Para. 2-2	[AIR-111 LEGAL] Suggest removing the sentence that defines the intent of §§21.307 and 21.607, b/c it is not necessary.	The opening sentence is succinct in stating the reasons for all three rules.		Concur. Removed the sentence. [12MAR15]
2.	Page 4; Para. 2-2	[AIR-111 LEGAL] The last sentence references 15 elements outlined in paragraphs 2-3 through 2-17, we believe that those elements should be identified.	W/o identification, the reader does not know which items are considered to be elements, and as such could lead to confusion.		Non-concur. This is duplicative as the elements are identified as stated in paras 2-3 through 2-17. [12MAR15]
3.	Page 4; Para. 2-3.b.	[AIR-111 LEGAL] In the last sentence Instructions for Continued Airworthiness (ICA) is reference w/o a rule citation. Suggest referencing the ICA rule.	By referencing the rule associated w/ an instruction, the reader becomes aware that the requirement is regulatory and not a recommendation.	Suggest: “Pursuant to § 21.50(b), Instruction for continued Airworthiness ....”	Concur. Added reference to rule. [12MAR15]
4.	Page 4; Para. 2-4.a.	[AIR-111 LEGAL] The statement is made that “PAHs are required by the rule....” But no rule is quoted.	There should be a rule quoted so the reader can become knowledgeable as to the requirement.	Suggest removing the first sentence and revise the second sentence to read: “Pursuant to § 21.137(k), ensure proper storage, maintenance, and ....”	Concur. Deleted first sentence and revised second sentence to read: “Pursuant to § 21.137(k), PAHs should have procedures to ensure proper storage, maintenance, and...” [12MAR15]

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

5.	Page 5: Para. 2-5	[AIR-111 LEGAL] Suggest revising the first sentence so that it reads more correct.	Correct sentence structure helps the reader to understand the instructions that are being conveyed.	Revise to read: “Section 21.1(b)(10), defines a supplier as a person at any tier in the supply chain who provides a product, article, or service ....”	Non-concur. The verbiage in the AC is harmonized with the Decision Document that was available at time of drafting. [12MAR15] [03/26/15 updated decision document amends the definition of supplier. As a result, now concur with comment.]
6.	Page 5; Para. 2-5	[AIR-111 LEGAL] The last sentence miss quotes the rule, and must be revised.	The way the sentence is composed, tend amounts to rule making by AC.	Remove or revise to read as follows: “Section 21.137(c)(2) requires the PAH to include in their quality system written procedures for each supplier to report the PAH if a product ....”	Non-concur. The verbiage in the AC is harmonized with the Decision Document that was available at time of drafting. [12MAR15] [3/26/15. Partially concur. Removed “within the PAH’s quality system” from the last sentence to be more harmonized with the rule.]
7.	Page 11; Para. 2-13	[AIR-111 LEGAL] Suggest revising the paragraph so that it is more succinct.	A clear sentence assists the reader in understanding the information being offered.	Suggest: “Section 21.137(k) requires the PAH’s quality system to have procedures for .... Production approval holders must also retain these records ... critical components identified pursuant to § 45.15(c).”	Concur. Sentence was restructured to be more clear. [12MAR15]
8.	Page 12; Para 2-15.d.	[AIR-111 LEGAL] Revise the first sentence to make it more succinct, and delete the last sentence.		Suggest: “Pursuant to § 21.3, users of products ....”	Concur. Made paragraph more succinct. [12MAR15]
9.	Page 12; Para. 2-17	[AIR-111 LEGAL] Suggest revising the first sentence to make it more succinct.	The succinctness of a document makes it easier to comprehend by the reader.	Suggest: “ If the PAH intends to issue authorizes release documents such as FAA Form 8130-3, Airworthiness Approval Tag, the section titled “Issuing Authorized Release Documents” must conform to the requirements specified in § 21.137(o).	Concur. First sentence was revised in a manner similar to recommendation. [12MAR15]
10.	Page 34; Para. 6-10.c.(5)	[AIR-111 LEGAL] Renumber the last item as (6).			Concur. Last item was renumbered. [12MAR15]

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

11.	Page A-2. 3.a.	[AIR-111 LEGAL] Latest version of SAE 9100 is “C”.			Concur. Updated to latest version. [12MAR15]
12.	Page B-3. Para. 24	[AIR-111 LEGAL] Revise for correctness.		Suggest: “ <b>Supplier:</b> Persons, as defined in § 21.1(b)(10): Person at any tier in the supply chain who ....”	Non-concur. The verbiage in the AC is harmonized with the Decision Document that was available at time of drafting. [12MAR15] [3/26/15. Concur. Updated decision document changes the definition of supplier. This paragraph was amended to harmonize with most up-to-date rule language.]
13.	Page E-1; Para.1.	[AIR-111 LEGAL] Suggest revising the beginning of the paragraph so that it comports w/ the rule.		This appendix provides information, guidance, and procedures for a PAH showing compliance with § 21.137(0) when issuing authorized release documents, such as FAA Form 8130-3, Airworthiness Approval Tag, for aircraft engines, propellers, and articles.” <b>min:</b> “	Concur. Rephrased in a manner similar to suggestion. [12MAR15]
14.	E1, para 1.b.	[AIR-140] The last sentence uses outdated policy and cannot be complied with due to improper language.	8100.8 is no longer used to select DMIRs and it would be impossible for a PAH to conform to a directive written specifically for an FAA office	These procedures must ensure that individuals selected to issue authorized release documents meet the qualification requirements for an FAA DMIR with function code 03, as described in FAA Order 8000.95, <i>Designee Management Policy</i> .	Concur. Change adopted. [25MAR15]

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

15.	1, para. 1-4. E.	[AIR-100, B. Cook] The rule change does not define the terms accountable manager or authorized release document. [30MAR15]			Concur. Revising para. 1-4 to clarify that this revision has updates to reflect the amendment made to 14CFR part21. Revising para. 1-4.e to change the term “defines” to “explains.” [31MAR15]
16.	2 and 3, para. 1-8.	[AIR-100, B. Cook] This sounds like we are asking for the AM to describe to management their assigned responsibilities, delegated authorities, etc. [30MAR15]	That is not the intent of the rule. The intent of the rule is to have the PAH describe any “assigned responsibilities, delegated authorities, and the functional relationship of those responsible for quality to management and other organizational components.”  This could happen anywhere within the organization or the supply chain not just the AM.	I would suggest using the rule language	Concur. Restated to read: “this organization document must describe assigned responsibilities, delegated authorities, and the functional relationship of those responsible for quality to management and other organizational components. Additionally, the PAH must identify an accountable manager in this document.” [31MAR15]
17.	3, para. 1-8.b.	[AIR-100, B. Cook] Add §§ 21.138,308,608 [30MAR15]			Concur. Change adopted [31MAR15]
18.	4, para. 2-3.b.	[AIR-100, B. Cook] Where is the rule requirement for the ICAs to be kept current? [30MAR15]			The last sentence of §21.50(b) states: “In addition, changes to the Instructions for Continued Airworthiness shall be made available to any person required by this chapter to comply with any of those instructions.” [31MAR15]
19.	5. para 2-6.e.	[AIR-100, B. Cook] AS9100C [30MAR15]	If you are giving the name of the document, then do not change the title.		Concur. Title changed back. [01APR15]
20.	12. para 2-15.d.	[AIR-100, B. Cook] This paragraph is better suited under 2-16. Quality Escapes [30MAR15]		Move the paragraph to the next section.	Concur. Moved to 2-16.a. and subsequent paragraphs changed to b and c. [31MAR15]

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

21.	12. para 2-15.d.	[AIR-100, B. Cook] Users are not required to be notified. [30MAR15]		“PAHs are required by the rule to notify the FAA in accordance with §21.3, Reporting of failures, malfunctions, and defects.”	Partially Concur. Rewrote to state” Users of products or articles should be notified when those products or articles are recalled for unsuspected or known nonconformance. PAHs are required to notify the FAA in accordance with §21.3, Reporting of failures, malfunctions, and defects.” [31MAR15]
22.	12. para 2-17.	[AIR-100, B. Cook] Consider using “meets the requirements of” rather than “conforms to” in the first sentence. [30MAR15]			Concur. Change adopted. [31MAR15]
23.	A-1, 1.a.	[AIR-100, B. Cook] Why do we state “(or latest version)” on some Orders and ACs but not all of them? [30MAR15]		Remove in all cases	Non concur. TWE added “(or latest version)” to some orders and ACs due to new formatting requirements. Will work with TWE to determine if it needs to be added to all. [31MAR15]
24.	A-2, para 3.a.	[AIR-100, B. Cook] Why the revision letter on this standard and not on any other. [30MAR15]			Edits made as a result of legal review. Will work with TWE to determine proper formatting [31MAR15]
25.	B-1, para 1.	[AIR-100, B. Cook] Add §§ 21.138,308,608 [30MAR15]			Concur. [31MAR15]
26.	B-2, para. 13	[AIR-100, B. Cook] Why was the second sentence of the definition left out? [30MAR15]			Concur. Added second sentence. [31MAR15]
27.	B-3, para. 24.	[AIR-100, B. Cook] Use exact rule language. [30MAR15]			Non-concur. Exact rule language is already being used with the only change that the location of the definition is identified at the beginning of the sentence. [31MAR15]

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

28.	E-1, para 1.	[AIR-100, B. Cook] Reorganize to align with rule language. [30MAR15]		After “procedures” remove “for a PAH” and after “engines, propellers and articles...” add “manufactured by the production approval holder”	Concur. Change adopted. [31MAR15]
29.	E-1, para. 1.b	[AIR-100, B. Cook] No rule language to support using the word “must” in the sentence: “These procedures must ensure...” [30MAR15]			Concur, changed to “should” [31MAR15]
30.	E-3 , para 4.a.	[AIR-100, B. Cook] I think we should give specific instruction in the AC on what information goes into blocks 15, 16,&17 for a PAH with this authority. Specifically, block 16 “Approval/Authorization No.:	The public cannot be required to follow Orders	This should be added wherever we talk about completing the 8130-3 in the AC.	Partially concur. There are no blocks 15,16 or 17 on the 8130-3. However, instructions have been added under para 4.1. that clarify Blocks 13c and 14c, 13b, 13d, 14b, and 14d. [31MAR15]
31.	Page 12, Paragraph 2-17	[ANM-104B, T. Webster] References to “21.137(o)”	14 Code of Federal Regulations, Part 21.137 goes from (a) to (n); there is no 21.137(o)	Review and remove all noted non legitimate 14 CFR references; insert correct 14 CFR references if necessary or advise the reviewers that a 14 CFR 21.137(o) will be released and when to expect that release to be implemented.	Non-Concur. 14 CFR 21.137(o) is part of the new rule language.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

32.	Page 13, Paragraph 2-17.b.	[ANM-104B, T. Webster] References to “21.137(o)”	14 CFR Part 21.137 goes from (a) to (n); there is no 21.137(o)	Review and remove all noted non legitimate 14 CFR references; insert correct 14 CFR references if necessary or advise the reviewers that a 14 CFR Part 21.137(o) will be released and when to expect that release to be implemented.	Non-Concur. 14 CFR 21.137(o) is part of the new rule language.
33.	Page E-1, Appendix E, paragraphs 1 and 1.b.	[ANM-104B, T. Webster] References to “21.137(o)”	14 CFR Part 21.137 goes from (a) to (n); there is no 21.137(o)	Review and remove all noted non legitimate 14 CFR references; insert correct 14 CFR references if necessary or advise the reviewers that a 14 CFR Part 21.137(o) will be released and when to expect that release to be implemented.	Non-Concur. 14 CFR 21.137(o) is part of the new rule language.
34.	Page E-3, Appendix E, paragraph 4	[ANM-104B, T. Webster] References to “21.137(o)”	14 CFR Part 21.137 goes from (a) to (n); there is no 21.137(o)	Review and remove all noted non legitimate 14 CFR references; insert correct 14 CFR references if necessary or advise the reviewers that a 14 CFR Part 21.137(o) will be released and when to expect that release to be implemented.	Non-Concur. 14 CFR 21.137(o) is part of the new rule language.
35.	1-4, Explanations of Changes, page 1	[ANM-100, S. Vevea] Add space to part 21		“to 14 CFR Part 21”	Adopted.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

36.	1-4, Explanations of Changes, page 1	[ANM-100, S. Vevea] Indent subparagraph 1-4 e.	So it lines up under the previous subparagraphs.		Non-Concur. This paragraph was removed.
37.	2-2., Background, page 4	[ANM-100, S. Vevea] There is an extra period in the first sentence.	Is statement “Sections 21.307 and 21.607 require that a PAH establish a quality system that meets the requirements of § 21.137” being deleted?		Adopted.
38.	2-9.a., page 8	[ANM-100, S. Vevea] How does supplier furnished articles or services conform to purchase order requirements?	The use of the word “conform” seems incorrect in this statement.		Response to a statement. Conformity means the fulfillment of a requirement. The term, as used, is correct.
39.	2-17, page 12	[ANM-100, S. Vevea] There is no 21.137(o). Is there a subparagraph (o) being added?			Answer to a Question. 14 CFR 21.137(o) is part of the new rule language.
40.	2-17, page 12	[ANM-100, S. Vevea] Modify statement “...issuing these documents that conform to § 21.137(o).”	Documents don’t conform to a regulation. They are shown to comply with the regulation.		Adopted.
41.	3-6.f.(2), page 17	[ANM-100, S. Vevea] Articles conform to approved drawings. Is it correct to state conform to PAH requirements?			Answer a Question. Conformity means the fulfillment of a requirement. The term, as used, is correct.
42.	3-6.i., page 18	[ANM-100, S. Vevea] Same comment – conform to PAH requirements?			Answer a Question. Conformity means the fulfillment of a requirement. The term, as used, is correct.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

43.	Page 4 Paragraph 2-2	[ANM-108, T. Peplowski] Section 2-1 states: “The purpose of the chapter is to describe the criteria for establishing and maintaining the quality system required by §§ 21.137, 21.307, and 21.607.” Section 2-2 only mentions § 21.137.	Needs Clarification.	Add statement to 2-2 to clarify the requirements of §§ 21.307 and 21.607 are met by establishing the quality system in accordance with § 21.137.	Non-Concur. The rule is clear: Sections 21.307 and 21.607 refer back to § 21.137.
44.	Page 5 Paragraph 2-6.e. (1)	[ANM-108, T. Peplowski] AS9100A has been replaced. Current revision level is AS9100C.	AS9100C replaced previous revisions which may not be used	Replace “AS9100A” with “AS9100” or “AS9100C or later approved revisions.”	Non-Concur. The title of AS9006 is “Deliverable Aerospace Software Supplement for AS9100A”. A revision to AS9100 does not change the title of AS9006.
45.	Page 13 Paragraph 2-17. a.	[ANM-108, T. Peplowski] Current language uses the word “should” in (4) places to describe procedural requirements.	Does not require compliance.	Suggest changing the word “should” to must to better align with regulatory requirements of § 21.137(o).	Non-Concur. The use of “must” is reserved for regulatory requirements. This Advisory Circular is simply a method of complying with those requirements.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

46.	Page 16 Paragraph 3-6.e. (4)	[ANM-108, T. Peplowski] SAE AS9102A, “Aerospace First Article Inspection” Requirement has been replaced.	AS9102B replaced previous revisions.	Replace “AS9102A” with “AS9102” or “AS9102B or later approved revisions.”	Non-Concur. Since industry standards can be revised at any time with a result that the standard no longer acceptable to the FAA as a reference standard, only the revisions that have been reviewed and found acceptable will be listed in the AC.
47.	Page 17 Paragraph 3-6.f. (2) and Appendix B	[ANM-108, T. Peplowski] There is no definition in Appendix B for the term “first article” as referenced in the first sentence of this paragraph.	“First article” can have a broad definition to PAH’s. It could mean the first time receipt from a new supplier, the first run as a result of a design data revision, the first part produced after a machine setup for each production run, etc.	Create a definition for the term “first article” in Appendix B, and/or give some specific examples.	Non-Concur. This is not a rule requirement. The AC provides reference to a standard (AS9102A) which provides a definition and process for first article testing.
48.	Page A-2 Paragraph 3.6.b.	[ANM-108, T. Peplowski] AS9102A has been replaced. Current revision is AS9102B.	AS9102B replaced previous revision.	Replace “AS9102A” with “AS9102” or “AS9102B or later approved revisions”	Non-Concur. Since industry standards can be revised at any time with a result that the standard no longer acceptable to the FAA as a reference standard, only the revisions that have been reviewed and found acceptable will be listed in the AC.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

49.	Page B-1 Definition 2	[ANM-108, T. Peplowski] Airworthiness Approval. Document issued by the “FAA.”	With the release of § 21.137(o) this will no longer be true. Ref. pg 12 section 2-17.	Add language to reflect the authorization of a PAH to do airworthiness approvals.	Non-Concur. The FAA will continue to issue “Airworthiness Approvals” and PAH’s will be able to issue “Authorized Release Documents.” Both are documented on the same form (FAA Form 8130-3).
50.	Page B-1 Definition 8	[ANM-108, T. Peplowski] Could this be combined with Definition 2?	They are the same thing.	Combine with Definition #2.	Non-Concur. The FAA will continue to issue “Airworthiness Approvals” and PAH’s will be able to issue “Authorized Release Documents.” Both are documented on the same form (FAA Form 8130-3).
51.	Page E-2 Paragraph 3.b.	[ANM-108, T. Peplowski] “This requirement would include both PAH facilities and approved supplier locations.”	If a PAH issues 8130-3 tags at a supplier (including foreign suppliers), the FAA will need to be able to audit that function and those tags during normal oversight, which could be 36 months apart. For this to happen, the PAH should retain copies of these records at the PAH location which the FAA will audit onsite.	Add: If a PAH, issues 8130-3 tags at a supplier (including foreign suppliers) the PAH should retain copies (paper or scanned/digital) of all completed tags at the PAH facility for review by the FAA during any scheduled or unscheduled FAA audits.	Non-concur  Any records generated by a supplier that are needed to show compliance by the PAH to the regulations must be made available to the FAA. If the FAA, during our certificate management activity, determines that they want to audit the PAH for the issuance of the 8130-3 then we should inform the PAH so that they can have the records available.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

52.	Page E-3 Paragraph 3.h.	[ANM-108, T. Peplowski] Paragraph is very confusing as written.	Very confusing when reading. Reads like the FAA is authorized and not an individual.	Either add a comma after “FAA” or after the FAA state, “which person(s) (who) are authorized and the scope and limitations of their authorization.”	Non-concur. Commas are used to separate the items in the list, however it is not grammatically correct to add a comma after the list.
53.	Page G-2 Paragraph 3.d.	[ANM-108, T. Peplowski] Last sentence, “ ...of subpart G.”		Add 14 CFR Part 21 for clarity.	Non-concur. On page one of the AC in the Purpose and Audience paragraphs we reference 14 CFR, part 21 and 14 CFR, part 21 subparts F, G, K, and O. This should be sufficient to clarify who this AC is applicable.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

54.	pg5 para 2-5b and Appx G	<p>[AIR-40, B. Ryman] It may be helpful to address or illustrate how the multinational/multicorporate consortium fits into this statement.</p> <p>b. PAH Responsibilities. The PAH is ultimately responsible for <i>determining that all products and articles conform to their approved type design and are in a condition for safe operation.</i> <b>This responsibility cannot be delegated to, or relieved by the use of, approved suppliers, risk and revenue sharing partners, co-producers, or other service or manufacturing providers.</b></p> <p>2. Discussion. A multinational/multicorporate consortium consists of a United States manufacturer(s) and a manufacturer(s) located outside the United States that have agreed to form a single company for production of a particular product. A consortium company usually exists in name only, in that it does not physically manufacture a product in one location. The consortium company retains responsibility for the <i>design and quality of the product</i> for which the PC has been issued. <b>However, the consortium company may assign the manufacturing task to other partner companies or suppliers</b> located domestically or in combination with manufacturers located outside the United States.</p>	<p>There seems to be a contradiction as the Consortium PC holder is thereby a PAH.</p> <p>It is unclear if it would be the Consortium PC holders responsibility to under both of these paragraphs to 1- <i>determining that all products and articles conform to their approved type design and are in a condition for safe operation.</i> And 2- <i>retains responsibility for the design and quality of the product for which the PC has been issue.</i></p> <p>The relationship or difference between “<b>delegating responsibility</b>” and “<b>assigning the manufacturing task to other partner companies or suppliers...</b>” is unclear between the two sections.</p>	Provide further explanation or reference to better capture the level of nuance.	<p>Out of Scope. This revision addresses changes to Part 21 rule language.</p> <p>Pg 5 para 2-5b does not use the terms multinational/multicorporate consortiums nor does the FAA distinguish a difference for their responsibilities when granted a PC. All PC holders have the same responsibilities. It is always the PC holders responsibility to determine conformity and condition for safe operation whether granted to an individual person or to a multinational/multicorporate consortiums. The language clearly states that this responsibility cannot be delegated. The assignment of a manufacturing task is not the same as delegating responsibility for conformity and condition for safe operation. Since the responsibility remains the same no matter who the PC is granted to, no additional language is needed.</p>
55.	pg5 para 2-5b	<p>[AIR-40, B. Ryman] It may be helpful to align and define terms used in this statement with terms used to reference these entities in Order 8120.22 and .23.</p> <p>approved suppliers, risk and revenue sharing partners, co-producers, or other service or manufacturing providers</p>	Throughout our directive and advisory materials we are not consistent in our application and definition of terms.	Synchronize the terminology across the related and policy documents.	Partial concur. There is a SIG currently working on this.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

56.	pg5 para 2-5b	[AIR-40, B. Ryman] Statement: It seems like there should be an opportunity to reduce any duplicative oversight of the Supplier by the Multiple PAH's who would be responsible for overseeing them as part of their quality system. The FAA is shifting its burden but the duplication hasn't been resolved for the supplier. Is there something to incentivize the suppliers toward which would benefit the whole system?			Out of scope. Response to a statement. This is not a regulatory issue as the FAA does not regulate suppliers to a PAH. However, the industry has addressed this issue through the International Aerospace Quality Group and the use of the Industry Controlled Other Party process.
57.	Pg 12 para 2-17	[AIR-40, B. Ryman] This impacts existing bilateral/implementation procedures	AIR-40 will need to make note of this at an individual agreement management level. And partners will need to be notified formally. Once this AC is final something should trigger that activity- see recommendation.	In keeping with previous approach (e.g. letter about FAA Form 8130-3 changes...) AIR-100 should create a Letter: Notification of Significant Change to have AIR-40 send Partners based on the impact to existing BA/IPs.	Concur. AIR-100 is developing a communication plan and will advise AIR-40.
58.	Page 12-13 para 2-17 and throughout this AC.	[AIR-40, B. Ryman] This statement may need be revised see rational - "Guidance on this can be found in AC 21-2 (or latest version), Complying with the Requirements of Importing Countries or Jurisdictions When Exporting U.S. Products, Articles, or Parts."	During the Part 21 rewrite AC 21-2 was divided and AC 21-44 was created. AC 21-2 is the housing location for the SIR and the bulk of guidance to U.S. applicants was shifted to AC 21-44. AC 21-2 mostly recaps by limited reference the guidance in 21-44.	Confirm if reference as intended is accurate. It may be more accurate to reference one or both as appropriate throughout this AC as there is a symbiotic relationship between AC 21-2 and AC 21-44.	Answer to Question or Statement. Adding 21-44 will be a helpful reference in addition to 21-2. Added in para 2-17 and to the list of reference documents.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

59.	Page 20 para M. (3)	[AIR-40, B. Ryman] The last sentence is misleading as written. “If the supplier is located outside the United States, a bilateral agreement for airworthiness is in effect between the United States and the country of the supplier. The bilateral agreement will include provisions for United States’ acceptance of the types of articles or products produced under the supplier’s production approval.”	The separate statements and wording to include the use of the term “will” is misleading and detracts from the intent of this statement.	Merge these statements to be more accurate and flow with the subtler statements of paragraph m, (1), and (2). “For suppliers located outside the United States, a bilateral agreement for airworthiness containing provisions for United States’ acceptance of the types of articles or products produced under the supplier’s production approval is in effect between the United States and the country of the supplier.”	Out of Scope. This section of the AC is addressing a PAH’s ability to reduce their level of supplier oversight if the supplier is holder of a production approval from that country for the product or article being procured. This section of the AC is not addressing what is allowed to be imported from a bilateral country. As such, the language as currently worded is acceptable and requires no revision.
60.	Page 21 Paragraph o.	[AIR-40, B. Ryman] This wording doesn’t address the <i>acceptance</i> of certificate management performed by CAA’s when their systems are determined equivalent to the FAA.  “When a PAH uses a supplier in a country or jurisdiction that has a bilateral agreement with the United States, the FAA may use a bilateral partner CAA “ <i>to perform surveillance activities and/or conduct inspections</i> ” on behalf of the FAA.”	If the FAA has conducted an assessment of an authorities certificate management system and it has been established that the system produces equivalent level of safety than the Bilateral Agreements allow the FAA to accept that activity and system.	Consider mentioning or detailing in this AC or the 8120.23 the difference between accepting activity performed under another authorities CM system and asking an authority to perform on our behalf. Include more language about our acceptance of CAA CM of any suppliers also holding foreign POA/PAH: The FAA may accept the oversight of those suppliers holding foreign Production Approval for the products or articles being supplied to the FAA PAH under the terms of the BASA/IPA in most cases.	Out of Scope. This section of the AC addresses the subject of CAA performing oversight activities for the FAA and the PAH’s responsibility to provided assistance and/or data necessary for the CAA to perform that oversight. The results of that oversight activity is for FAA internal use and does not need to be addressed in an AC which provides instruction to industry.
61.	Page 21 Note 1.	[AIR-40, B. Ryman] Question / Statement : Will the Undue Burden Decision process identify if the supplier is already under surveillance by a CAA’s system that has been deemed equivalent to the FAA?	If yes it influences the decision in favor of the PAH using the supplier. If no it triggers an opportunity for partnership growth and FAA educational engagement toward globalization.	Consider within this Order the system connectivity and feeders that can be identified and activated at the root inquiry to minimize work load and repetitiveness later.	Response to a Statement. This is outside the scope of the revision to the AC.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

62.	Page 21 Note 2.	[AIR-40, B. Ryman] Comment/question: Is there any concern about if we are setting the CAA and US PAH up for a conflict of interest situation where by the PAH can influence the CAA in their accommodation provisioning... similar to legal interpretation about fair market value when assessing what we as federal employees can and can not accept? Or where by any corrupt CAA can extort the PAH?			Response to a Statement. This is outside the scope of the revision to the AC. In addition, this is not a condition where if a CAA does oversight of one of their PAH that happens to be a supplier to a US PAH that we must accept their findings. This is only done for the FAA at the FAA's request. If the FAA does not feel comfortable that the CAA can act in an independent manner or could be unduly influenced by their PAH, then the FAA should not ask for their assistance or accept any oversight data.
63.	general	[AIR-40, B. Ryman] Question/Statement: Does the FAA collect feedback from the PAH regarding audit experience for lessons learned and improvement areas? It may be beneficial to give the PAH/Supplier.. an avenue to provide the FAA feedback regarding these activities.	This could feed the FAA's decision making process toward which CAAs and focus areas need further developed.	Consider a way to have the PAHs / Suppliers provide feedback about their CAA audit experience when it's on the FAA's behalf.	Answer to Question or Statement. This is outside the scope of the revision to the AC.  This comment would be best addressed to Order 8120.23

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

64.	Pg 30 para 6-2 c	[AIR-40, B. Ryman] Statement: while taking training feedback from the field was provided that this is causes a lot of extra work that is very unpredictable within their work planning. The PAH's don't have enough information to know what specifically to notify the FAA about so they submit very comprehensive non-specific information the PI's spend a lot of time having to wade through to approve or decide doesn't need approval. They wondered if there was something that could focus' the necessity to make change submissions and to facilitate their review and standardize what they see.	Outside of scope possibly but food for thought if you want to innovate in the future office efficiency gain.		Answer to Question or Statement. This is outside the scope of the revision to the AC.
65.	Pg 30 6-3	[AIR-40, B. Ryman]	Bring forward the reference to those PAHs and Suppliers outside the U.S. in either paragraph a.	Insert "including any PAH's or Suppliers located outside the united states. "	Non-concur. This is redundant.
66.	General Throughout	[AIR-40, B. Ryman] Tense is off often in the lists of sub paragraphs.		Review tense.	Concur. Will have tech writer review for consistency.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

67.	General Throughout	[AIR-40, B. Ryman] Paraphrasing of rule and order language.	To facilitate future revisions it is more helpful to quote any information extracted from other documents rather than to paraphrase. It makes line of sight easier to follow and doesn't change the context when quoted. It also makes document updates when rule or order language changes easier. When paraphrasing over time different revisions can update the paraphrasing and take the actual intent out of harmony with the actual requirement which sets the users of the AC up for noncompliance.	Consider quoting rule language rather than paraphrasing.	Non-concur. AGC reviews all ACs prior to publication
68.	Pg 31 6-5	[AIR-40, B. Ryman] Statement: If it does not already have the ability, the FAA could benefit from PAH-PLR information from a global perspective.	Out of Scope for this AC but possibly for order language: Being able to see the global footprint of manufacturing nationally and internationally as it relates to the US would facilitate many interagency initiatives and feed the Administrators strategic objectives.	Consider how it would be possible to get corporate visibility of this information.	Answer to Question or Statement. This is outside the scope of the revision to the AC.
69.	Pg 32 paragraph 6-9 (b)	[AIR-40, B. Ryman] Yes, good.			Answer to Question or Statement. Thank you
70.	Appx B.	[AIR-40, B. Ryman]		Ensure consistency with Rule and other Order definitions avoid paraphrasing...	Concur. The terms listed in Appendix B that are defined by rule are exactly referenced in the AC.  The other terms are defined as used within this AC.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

71.	Appx C para (b)	[AIR-40, B. Ryman] Question: We have an AC that addresses extending a PC to a country with a bilateral... Will we address the subject of how this applies or does not apply to PC under TC? Perhaps in Order 8120.22 or AC 21-24 or a different AC?			Answer to Question or Statement. AC 21-24 “Extending a Production Certificate to a Facility Located in a Bilateral Airworthiness Agreement Country” addresses the extension of an existing PC into a country with bilateral. A holder of a TC that wishes to produce under Subpart F “Production Under Type Certificate Production does not hold a PC therefore the guidance provided in AC 21.24 is not applicable.
72.	Appx E para a.	[AIR-40, B. Ryman] “a. The use of authorized release documents by a PAH is not a requirement, but a choice. The PAH may choose to issue an authorized release document in the form of an FAA Form 8130-3 <b>for its product or article</b> or choose to use FAA personnel or designees when it needs this document. “	Not necessary to state. And seems to conflict with 1. Purpose: “This appendix provides information on and guidance for the PAH in developing procedures for a PAH to show compliance with 14 CFR 21.137(o) when issuing authorized release documents, in the form of FAA Form 8130-3, Airworthiness Approval Tag, for <b>new aircraft engines, propellers, and articles; and for used aircraft engines, propellers, and articles</b> when rebuilt or altered pursuant to 14 CFR 43.3(j).”	Remove “for its product or article” from the statement in para a.	Concur. Language has been amended.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

73.	Appx G para 3a	[AIR-40, B. Ryman] “The FAA considers the consortium company to be the applicant for the PC.”	Do we explain the relationship for consortium for production under TC?	Consider if it is relevant or necessary to address consortium for production under TC?	Answer to Question or Statement. As stated in the Comment box, the FAA considers the consortium company to be the applicant for a PC. If the consortium company is the holder of the TC it may apply to produce under Subpart F. If granted, then the consortium company should follow the guidance in Appendix C. No additional guidance is required.
74.	Appx G para 3b	[AIR-40, B. Ryman] “applicant, and the partner companies to be suppliers. “		Consider the definitions and use of terms “partner companies” as it relates comment 1, 2, and 4 above	Answer to Question or Statement. The AC does not define “partner companies” but does use the term in reference to the individual companies that make up a consortium. This does not mean that the term is exclusive to a consortium for the purpose of this AC. We have considered the use of the term “partner companies” and found it to be used correctly within this AC.
75.	Page G3 para F.	[AIR-40, B. Ryman] The fact that the actual manufacture of the applicant’s product may take place in a country outside the United States does not affect the applicability of FAA regulations and orders regarding the management and surveillance of the PC holder.		Consider adding “when the PC holder is domestic” or of the U.S. PC holder. If that would be an accurate clarification.	Non-concur. This AC provides guidance to manufacturers who wish to manufacture products or articles under Part 21, which implies that they would be operating under U.S. law and FAA regulations.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

76.	Pg 31 Para. 6-5	[ANE, MIDO-41, A. McGrath] States: the applicant manufactures <u>and</u> installs the interface component.	Currently, an engine manufacturer that our office manages installs an interface device manufactured by the airframe manufacturer. Requiring that the engine manufacturer physically manufacture the interface device would cause this PAH to still require an exemption. The applicant must have access to the interface component design data, but the applicant should not be required to manufacture the interface component.	Change sentences to state:  6-5. Applicants for a PC should ensure the PLR accurately reflects the product(s) it intends to manufacture and the interface components it intends to manufacture and <u>or</u> install.	Non-Concur. The language in the AC is aligned with the rule. In the new rule language, 14 CFR Section 21.142 is revised to state that the PLR lists every IC that the PC holder is authorized to manufacture and install. The PLR give the PC holder the authority to manufacture and install the ICs listed, it does not require that every IC produced under the PLR must be installed. Just as a PC holder can ship spares or products in a disassembled state so can they produce a ship ICs as spares or in a disassembled state.
77.	Pg 33 Para. 6-10c.(2)	[ANE, MIDO-41, A. McGrath] States: The interface component is manufactured <u>and</u> installed by the applicant.	Same as above.	6-10c.(2) The interface component is manufactured and <u>or</u> installed by the applicant.	Non-Concur. The language in the AC is aligned with the rule. In the new rule language, 14 CFR Section 21.142 is revised to state that the PLR lists every IC that the PC holder is authorized to manufacture and install. The PLR give the PC holder the authority to manufacture and install the ICs listed, it does not require that every IC produced under the PLR must be installed. Just as a PC holder can ship spares or products in a disassembled state so can they produce a ship ICs as spares or in a disassembled state.
78.	Appx. A. Pgs. A-1, A-2, Para. 1., 2., 3.	[ANE, MIDO-44, H. Cooper] After the notation to Orders, ACs and SAE documents, add “or latest version”, as with the other Order callouts.	“or latest version” is on some, but not all documents.	Add phrase for consistency	Non-concur. Or latest version was removed. Additionally, the FAA reviews documents such as the SAE industry standards. Only the documents that have been reviewed are approved for use as reference.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

79.	Appx. B, Page B-1, Item 8	[ANE, MIDO-44, H. Cooper] “Authorized Release Document”: Since this is to be for aircraft engines, props or articles, this must be referring to Form 8130-3, and the proper term for this form is “Authorized Release Certificate”.	Change terminology for 8130-3 tag to proper term	Change terminology for 8130-3 tag to the proper term.	Non-Concur. Authorized Release Document is the name of the document issued by the PAH. Authorized Release Certificate is the document issued by the FAA or it’s designees.
80.	Appx. B, Page B-2, Item 13	[ANE, MIDO-44, H. Cooper] “Interface Component:” is unclear as to meaning	Add some examples of what an “Interface Component” is.	Add some examples of what an “Interface Component” is.	Non-Concur. Adding examples would narrow the scope of interface component.
81.	Page 31, Para. 6-5, and Pages 33-34, Para. 6-10.c.	[ANE, MIDO-44, H. Cooper] It appears unclear why the ref. to “Interface Components” needs to be added to these paragraphs.	These requirements are no different than any item that needs to be added to a PLR		Answer to a Statement. Due to this being a new topic, details were added to ensure clear understanding. In addition, interface components are different from other items listed on the PLR. The listing of an IC on the PLR allows the PC holder to both produce and install the article onto its TC’d product. Any other article listed on the PLR is only for the production of the article ... not installation.
82.	Cover Page, Paragraph 1. Purpose	[AIR-500] The acronym “PAH” is established here for a plural usage: “This advisory circular (AC) provides information for production approval holders (PAH) pursuant to Title 14...”	Consistent use of acronyms	The acronym should be established in the singular at its first use if the originating office wants to use “PAHs” to indicate plural later in the document.  Can this first usage be: “...for a production approval holder (PAH) pursuant...”?	Answer to a Question. If a term is plural on first use, its acronym is still presented in the singular.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

83.	Cover Page, Paragraph 1 & Universal (see also P. 1 and page B-1)	[AIR-500] The part 21 title is listed as: “Title 14 of the Code of Federal Regulations (14 CFR) part 21, Certification Procedures for Products, Articles, and Parts...”	Accuracy of AC	The e-CFR lists the official title of this part as follows:  “PART 21—CERTIFICATION PROCEDURES FOR PRODUCTS AND PARTS” The word “Articles” does not appear. Please confirm the official title of this part of the CFR.	Answer to a Statement. The name of Part 21 has been changed as a result of the rule change.
84.	Cover Page, Paragraph 3 & Universal	[AIR-500] P. 3 states: “The purpose of this revision is to reflect amendment <b>XX</b> to 14 CFR <b>P</b> art 21.”  “Part 21” uses a capital “P”.	Completion of this AC  Consistent formatting	When will this amendment number be known? Please fill in the number once this information is known.  Please use “ <b>p</b> art 21” (with lower case “p”) here and throughout this AC.	Answer to a Statement. The number will be filled in once known. This occurrence of a capitalized “part” has been fixed. No other instances were present in the AC.
85.	Cover Page, Paragraph 6	[AIR-500] The final sentence is: “If you have any suggestions for improvements or changes, you may use the template provided at the end of this AC.”	Ease of reading	Please consider strengthening this sentence by adding the following clarifications: “If you have any suggestions for improvements or changes <b>to this AC</b> , you may use the template provided <b>in Appendix H</b> of this AC.”	Concur.
86.	Blank Page after cover page	[AIR-500] There is a blank page after the cover page and before the Table of Contents.	Consistent formatting	If this blank page serves no purpose, please delete it.	Answer to a Statement. There is one line of text on the blank page.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

87.	Page 1, Paragraph 1-2.	<p>[AIR-500] On the cover page, the following “Audience” is spelled out:</p> <p>“This AC affects applicants for a production approval or current PAH developing and maintaining a production system pursuant to the provisions of 14 CFR, part 21, subparts F, G, K and O.”</p> <p>Why is only “F” spelled out here on page 1?</p>	Consistency of text	Please clarify any discrepancy in the “Audience” portions of this AC and amend as necessary to eliminate any confusion that might arise.	Concur. Audience was changed on Page 1.
88.	Page 1, Paragraph 1-4. e.	<p>[AIR-500] The items a. – d. are aligned, but item “e.” is not aligned with the group above it.</p>	Consistent formatting	Please adjust the margin/indentation for item “e.” so that it aligns with the other items in its group.	This paragraph was removed entirely.
89.	Page 4, Paragraph 2-2	<p>[AIR-500] In the third line of 2-2, there is an extra period and extra spaces.</p>	Consistent formatting	Please delete the period and extra spaces after “...for safe operation. . “	Concur.
90.	Page 5, Paragraph 2-5	<p>[AIR-500] In 2-5. Supplier Control. Section 21.1(b)(10), defines a supplier as a person <b>that</b>...” there is a misplaced comma and “that” is used as a relative pronoun when “who” is preferred.</p>	Grammar	Please remove the comma after 21.1(b)(10), and replace “that” with “who.”	Concur. “Who” is already used.
91.	Page 5, Paragraph 2-6. e. (1) & Universal	<p>[AIR-500] Is there a title of a text included in the following: “Aerospace Standard (AS) 9006, Deliverable Aerospace Software Supplement for AS9100A”</p>	Consistent formatting	If there is a title of a publication here, consider placing the title in italics, as is used elsewhere in this AC. Please apply this formatting rule consistently.	Non-Concur. Consensus standards are not italicized.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

92.	Page 7, Paragraph 2-7 a.	[AIR-500] In the 5 <sup>th</sup> line, is “inspection marking” written correctly?	Proper and consistent use of terminology	From a search of the Web, I see a hyphen is used with this phrase: “The FAA agrees that the inspection/mark <sup>h</sup> ing requirement under proposed Sec. 121.803(b) does not apply to visual inspection.” What is the correct form: hyphen? backslash?  Also, does this term need to be explained? From a search for it on the Web, I see “inspection/mark <sup>h</sup> ing” appears only under AC 21-43, so this appears to be rare wording.	Response to a Question. This paragraph refers to a device that marks the inspection status. A hyphen was added between inspection and marking to avoid confusion.
93.	Page 11, Paragraph 2-13. a. (1)	[AIR-500] The final sentence in (1) ends with: “...to ensure both against degradation of records and the availability of these records.” The word order seems a bit awkward.	Ease of reading	Please consider switching the word order from “ensure both against” to “ensure against both.”	Non-concur. Text is clear as written. If “both” was moved to after “against” then the meaning of the sentence would change.
94.	Page 13, Paragraph 2-17. b. And the same on Page 14, 3-4.	[AIR-500] The first sentence of b. contains: “...is only applicable to a PAH that wants to issue an authorized release document.” “That” is used here as a relative pronoun when “who” is preferred.	Grammar	Replace “that” with “who” on both page 13 and page 14.	Non-Concur. Person, in this instance, can refer to a single person or to a company, so “that” is used.
95.	Page 19, Paragraph 3-6. j. (2)	[AIR-500] There is an extra space in the sentence between “changes” and “to.”	Consistent formatting	Please delete the extra space.	Concur.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

96.	Page 21, Paragraph 3-6. n. (4)	[AIR-500] The sentence states: “The PAH is required by the rule to assure access to its suppliers.” “Assure” is used here when “ensure” is the better word.	Ease of reading	Replace the word “assure” with “ensure,” as is used on page 22, 4-3. a. (3).	Concur. Assure was changed to ensure.
97.	Page 24, Paragraph 4-3. c. (2)	[AIR-500] c. (2) states: “Portable computer equipment, such as laptops, represent special risks from destructive software..” and the subject/verb agreement is wrong.	Grammar	Change “represent” to “represents” to agree with the singular noun “computer equipment.”	Non-concur. “Equipment” is a non-count or collective noun, which can be used to refer to a group. Both singular and plural verbs can be used after a collective noun.
98.	Page 25, Paragraph 4-3, d. (2)	[AIR-500] In this sentence: “Specific storage criteria for magnetic tapes includes the following...,” the subject/verb agreement is wrong	Grammar	Since “criteria” is plural (although often used in the singular), change “includes” to “include.”	Concur.
99.	Page B-1, Paragraph 1.	[AIR-500] The acronym for “production approval holder” is not used here.	Consistent formatting	Strike the words and replace with “PAH.”	Concur.
100.	Page B-3, Paragraph 24.	[AIR-500] “that” is used where “who” is preferred.	Grammar	Strike “that” and replace with “who” after the word “abbreviations.”	Concur. Language was change to be aligned with rule language.
101.	Page E-2, Paragraph 3. d. (4)	[AIR-500] (4) states: “Understanding and complying regulations pursuant to 14 CFR part 21 subparts H and L.”  Is the word “with” missing after “complying”?	Ease of reading	If appropriate to clarify the meaning here, add the word “with” after “complying.”	Concur.
102.	Page E-3, Paragraph 4. a.	[AIR-500] There is an extra space in the text after the word “from” in the 3 <sup>rd</sup> line.	Consistent formatting	Please strike the extra space between “from” and “FAA” in the 3 <sup>rd</sup> line.	Non-Concur. Paragraph has been changed so this no longer exists.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

103.	Page H-1, Paragraph	[AIR-500] The non-updated version of the Feedback form used here is missing the word “it” in the 3 <sup>rd</sup> line.	Ease of reading	Please insert the word “it” after “know about” in the 3 <sup>rd</sup> line, for: “...you may let us know about <b>it</b> by using...”	Concur.
104.	Cover page, paragraph 1., last sentence.	[AFS-1, G. Edwards] Sentence focuses on the needs of the PAH instead of regulatory compliance	The “needs” of the PAH are secondary, at best, to regulatory compliance. Must describe exactly what needs are being referred to, otherwise, it could be a “blank check”. Furthermore, does this AC actually do that? If this has to do with PAH system “scalability”, say that.  <b>Reoccurring theme</b>	Change: sentence, “... production system that meets the needs of the PAH <del>and is</del> <b>while remaining</b> compliant with the regulations.”  -or-  “... production system that <del>meets the needs of the PAH</del> <b>and</b> is compliant with the regulations.”	Non-Concur. The use of “and” indicates that the guidance provided within the AC will help the applicant or existing PAH meet both conditions.
105.	Page 1, paragraph 1-1.b., last sentence.	[AFS-1, G. Edwards] Sentence focuses on the needs of the PAH instead of regulatory compliance	The “needs” of the PAH are secondary, at best, to regulatory compliance. Must describe exactly what needs are being referred to, otherwise, it could be a “blank check”. Furthermore, does this AC actually do that? If this has to do with PAH system “scalability”, say that.  <b>Reoccurring theme</b>	Change: sentence, “... production system that meets the needs of the PAH <del>and is</del> <b>while remaining</b> compliant with the regulations.”  -or-  “... production system that <del>meets the needs of the PAH</del> <b>and</b> is compliant with the regulations.”	Non-Concur. The use of “and” indicates that the guidance provided within the AC will help the applicant or existing PAH meet both conditions.  The AC is to provide guidance on how the regulation can be met. It provides one way but not the only way to meet our regulations. The AC is not a prescriptive set of requirements but rather provides information to the applicant for or holder of a production approval for them to consider in establishing or maintaining its production approval

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

106.	Page 4, paragraph 2-2, second sentence	[AFS-1, G. Edwards] Sentence focuses on the needs of the PAH instead of regulatory compliance	The “needs” of the PAH are secondary, at best, to regulatory compliance. Must describe exactly what needs are being referred to, otherwise, it could be a “blank check”. Furthermore, does this AC actually do that? If this has to do with PAH system “scalability”, say that.  <b>Reoccurring theme</b>	Change: sentence, “... quality system that meets the needs of the PAH <del>and is</del> <b>while remaining</b> compliant with the regulations.”  -or-  “... quality system that <del>meets the needs of the PAH and</del> is compliant with the regulations.	Non-Concur. The use of “and” indicates that the guidance provided within the AC will help the applicant or existing PAH meet both conditions.  The AC is to provide guidance on how the regulation can be met. It provides one way but not the only way to meet our regulations. The AC is not a prescriptive set of requirements but rather provides information to the applicant for or holder of a production approval for them to consider in establishing or maintaining its production approval
107.	Page 3 Para1-8(a)	[AFS-1, G. Edwards] Both paragraph (a) and ( b) suggest that there are varying business models. The old AC 21-1B made a statement relative to an organizational structure that would ensure that any decisions with regard to workmanship, quality, conformity, safety, materials review, and corrective action be assigned so these actions are not unduly influenced by other considerations.	This type of statement is needed in today’s world with there being so many types of business models. A company needs to be conscious of decisions about Quality reporting to Engineering or Manufacturing before jeopardizing quality and safety for schedule. A suggestive statement here could make that awareness possible.	Add the statement: A company should address an organizational structure that would ensure that any decisions with regard to workmanship, quality, conformity, safety, materials review, and corrective action be assigned so these actions are not unduly influenced by other considerations.	Non-Concur. This requirement is above and beyond the requirements of the rule. The company is responsible for establishing an organizational structure that complies with the rule.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

108.	Page 5 Para 2-5(b)	[AFS-1, G. Edwards] Para 2-5(b) states in part “this section also requires the PAH to establish a supplier reporting process for products, articles, or services within the PAH’s quality system, that have been released from a supplier and subsequently found not to conform to the PAH’s requirements.” How does this affect suppliers who produce PMA and TSOA parts?	Almost every PAH who holds a PC uses PMA and/or TSOA parts. In some instances the PAH will modify the PMA or TSOA part for their unique installation. If the PMA or TSOA parts are ordered under their own part numbers and this is not how the PAH PC holder wants them is this reportable?  PMA and TSOA holders are required to report quality escapes under their own quality systems.	Add a sentence that recognizes suppliers of PMA or TSOA parts are required to report quality escapes under their own FAA approved quality system even for parts ordered by the PAH under the PMA or TSOA holder’s part numbers.	Non Concur. Paragraph 1-5. states that this AC applies to PMA and TSOA holders. Production approval can take the form of a PC, PMA or TSO authorization, as defined in §21.1.(b)(6). Therefore, PMA and TSOA holders, that are providing articles under their production approval, must have a procedure for addressing quality escapes in accordance with 21.137(n). If the PMA or TSOA holder is providing its article to another PAH then they must follow the reporting process required by the procuring PAH.
109.	Page 12 Para 2-17	[AFS-1, G. Edwards] Does this give the PAH the authority to issue 8130-3 tags for FAA Conformity purposes?	FAA conformity should be regulated to only designees who hold the appropriate function codes. The regulation and this AC seem to be vague on this.	Clarify that a PAH CANNOT issue FAA Form 8130-3 for FAA conformity purposes	Non-concur. The rule language is very specific under what conditions the PAH can issue the 8130-3. Neither the rule language, or the AC, need list all the conditions under which the PAH cannot issue an 8130-3.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

110.	Page 14 Para 3-3(a)	[AFS-1, G. Edwards] This is somewhat related to the comments for para 2-5(b) Para 3-3(a) states in part “the PAH’s requirements will depend on the complexity of supplied products or articles and whether or not the supplier holds a production approval for similar products or articles”	The wording is confusing. What does “...for similar products or articles” mean? It is open to interpretation. Does this imply that the holder of a TSOA for tires who supplies a non TSOA tire to the PAH gets less supplier control oversight than any other supplier? I can see this ONLY if they are supplying tires UNDER the TSOA but not for tires built outside the TSOA.	Clarify what “for similar products or articles” means.	Non Concur. The AC provides guidance for the establishment of a quality system. One element of that QS is supplier control. This section of the AC is describing what a PAH may consider when establishing requirements for a supplier provided product, article, or service. The AC explains that the PAH may strengthen or relax its supplier requirements based on whether or not the supplier is also a production approval holder. It further identifies a condition where the supplier is a PAH that is providing a product, article, or service similar (or possibly exactly the same except for marking) as the product, article, or service for which it received its production approval. We believe that the language is self-explanatory and does not need to be modified.
111.	Page 18 Para 3-6(i)	[AFS-1, G. Edwards] Who does the PAH report the supplier non-compliances too?	This may be more of an issue with 21.137 (c) 2 but WHO does the PAH have to report too?	The proposed language in neither the new rule nor this AC actually states who the PAH reports too.	Answer to Question or Statement Section 21.137(c)(2) requires the PAH to establish a process for reporting of supplier nonconformances. It has nothing to do with reporting of PAH reporting. The only reporting requirement for a PAH exists in 21.3

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

112.	Page 33 Para 6-10(c)	[AFS-1, G. Edwards] The whole concept of interface components is confusing. This implies that an engine manufacturer has to manufacture the interface component. (...PLR amended to allow the manufacture AND installation of an interface component.) What about interface components supplied by the AIRFRAME TC holder to the Engine or Propeller TC holder.	Airframe manufactures require many interface components that are not within the realm of the engine or propeller manufacturer capabilities.	Reword this to take into account customer supplied parts. In that, the Engine or propeller manufacture can be licensed the installation of the parts. Something like Para 6-10 (c) (2)(a) In the case of parts supplied by the customer, the installation of the interface components can be added to the PLR using the installation data licensed from them.	Non-Concur. The definition of interface component is provided in 21.1. It may be a supplier or customer supplied part, but interface components have nothing to do with who supplies the part. For the purpose of part 21 interface components has a very distinct definition. That means “an article that serves as a functional interface between an aircraft and an aircraft engine, an aircraft engine and a propeller, or an aircraft and a propeller. An interface component is designated by the holder of the type certificate or the supplemental type certificate who controls the approved design data for that article.” Not just anything can be an interface component.
113.	Page B-1 Para 2	[AFS-1, G. Edwards] This definition is in 21.1, do we need to state it again?	If so please make it match the rule definition. There are slight differences in how it is stated, which could lead to interpretation issues later down the road.	Match the rule interpretation	Non-Concur. With the exception of the word “mean” the definition matches the new rule definition. We do not believe this will lead to interpretation issues.
114.	Page B-1 Para 8	[AFS-1, G. Edwards] We assume this is referring to the FAA form 8130-3 and its new purpose for use by a PAH. The many titles of the 8130-3 tag are getting out of hand.	It is getting really confusing to talk about one form with THREE different names, only 2 of which are actually on the form.	Add to Para 8 verbiage that states “commonly referred to as FAA form 8130-3”. Keep in mind that many PAHs are already making a similar statement on company documents now.	Non-Concur. It is already clarified in Appendix E that this document is issued by using FAA Form 8130-3.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

115.	Page B-2 Para 13	[AFS-1, G. Edwards] The term Interface Component is relatively new and still confusing to many people.	This term is only used in selected parts of the industry	Please give samples, Such as “An Article that serves as a functional interface between an aircraft and an aircraft engine, and aircraft engine and a propeller, or and aircraft and propeller. For example Bleed Air control valves, engine or propeller Oil Pressure sensors or RPM transmitters or engine and propeller mounting brackets are just a few of the items considered to be Interface Components.”	Non-Concur. This definition is aligned with new rule language. Examples can limit the understanding of a term.
116.	Page E-1 Para 2	[AFS-1, G. Edwards] Delete the last sentence	Part 183 does not list Knowledge, experience, skills and training as the sentence implies. FAA Order 8000.95 does. There is also a potential for conflict between this para and para 1(b) Which states the PAH must ensure the individuals meet the requirements described in FAA Order 8000.95	Delete the last sentence. The issue is addressed in par. 1 (b).	Partially Concur. Section 21.183 is where the FAA allows for the appointment of designees. Paragraph 1.b. explains where to find the requirements. The sentence has been clarified to point back to FAA Order 8000.95
117.	Page E-1 Para 3	[AFS-1, G. Edwards] This paragraph implies the PAH does not need to keep a listing of the personnel allowed to issue 8130-3 tags.	The FAA will allow the PAHs to get out of control if the wording stays “Should”	Change the words “Should” to “Must”	Non-Concur. The word “must” is reserved for regulatory requirements.

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

118.	Page E-2 Para 3(b)	[AFS-1, G. Edwards] This para implies that the PAH can appoint these people at approved suppliers.	<p>#1 If we allow this to happen the program could get out of hand. The PAHs could allow anyone and everyone to do it</p> <p>#2 If the PAH is going to allow the suppliers to issue 8130-3 tags coming into the PAH's quality system it now becomes an "Administrative" use of the form and that is forbidden by Order 8130.21</p> <p>#3 What about FOREIGN Suppliers? Does the FAA want that to happen?</p> <p>#4 Unless a Supplier is also a PAH how can they issue 8130-3 Tags?</p>	<p>If we are going to allow this please change the wording of the last sentence to state. "This would include both the PAH facilities and approved suppliers with Direct Ship Authorization as agreed to by the local FAA managing office.</p> <p>Also, add a note that a non PAH supplier cannot issues 8130-3 tags.</p>	<p>Non Concur</p> <p>#1. Yes. The PAH is allowed to delegate responsibilities to their suppliers. It still needs to be under the production approval holder's system and it needs to be defined in the PAH's procedures as to how they are going to control it. The FAA has to approve those procedures. If we say they have sufficient control over who at the supplier is signing off, they still have to meet all the requirements of § 21.137(o).</p> <p>#2. The 8130-3 is used for when the product or article is leaving the production approval holders system (going out as an approved part). A supplier would not be allowed to issue a tag for a part that is not leaving the PAH's quality system.</p> <p>#3. We don't delineate between domestic and foreign suppliers. The PAH still has to show adequate control over the process.</p> <p>#4. They don't have to be a PAH because it is a delegated activity by the PAH to the supplier. This delegation must be described in the Organization document in accordance with §§ 21.135, 21.305, or 21.605. In all cases, the FAA has final approval of the quality system.</p>
------	--------------------	---	--	---	---

**DOCUMENT REVIEW LOG – FIELD COMMENTS**

119.	Page E-2 Para 3(d)	[AFS-1, G. Edwards] The requirement is identical to the training for designees who perform this function.	This paragraph implies training will be provided by the FAA as we do for designees.	Specify that the PAH has responsibility for development, delivery and adequacy of the training, not FAA.	Non-Concur. This paragraph does not imply that the FAA will provide this training. The PAH is responsible for training those who will issue the authorized release document. There is nothing stopping the PAH from availing themselves of any training that already exists that would meet their requirements, including FAA training that is available to the public.
120.	Page E-3 Para 4	[AFS-1, G. Edwards] This section does not address the record retention for 8130-3 tags.	Does the Rule have record retention requirements that are specific to Authorized Release Documents?	If so, address these requirements.	Answer to a Statement. The rule does not have record retention requirements specific to the authorized release documents. The rule does address the control of quality records in 21.137(k). Since the issuance of the authorized release documents are under the quality system the record retention requirement of 21.137(k) are applicable to the authorized release documents.