

<b>Company &amp; Group</b>	<b>Page &amp; Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
ACE-112DR	Page 1, paragraph 3a.	The Flight Standards Service Aircraft Evaluation Group (AEG) may use, at their discretion, this IP process for the maintenance and operations evaluations of applicants in support of certification projects.	AEG must provide DOMESTIC issue papers through the ACO PM and Directorate Project Officers.  Lack of visibility by Program Managers and Project Officers as well as -110 Standards Staff Managers could create program and TCDS challenges that need to be coordinated before they become a surprise.		Non concur. Not adopted. We have no authority to write procedures for AEG personnel to follow. Notice that we use “may use” and not “must use”. AFS has decided to write procedures for AEG personnel when using IPs in their FSIMS.
ACE-112DR	Page 2, paragraph 3d.	Add to first sentence that IPs are also used for validation items.	The draft AC says this elsewhere so should it here also.		Partially Concur. Referring reader to paragraph 5.i. for more info. instead.
ACE-112DR	Page 2, paragraph 3d.	Add to the last sentence that the acceptance of the CA’s IP should be done by FAA IP or FAA cover IP (CIP)	FAA as the VA has to document acceptance of the CA’s IPs in some method either on a cover IP or collector IP.		Non-concur. We defined CIPs and ACIPs further in paragraphs 3.k. and 3.l.
ACE-112DR	Page 2, paragraph 5c.	At the end of the paragraph, the current words say “For a new TC applications:”  Change this to say “For any new project (TC, STC or type design change) application	STCs and type design changes also can affect part 36 and part 34 not just new TCs.		Concurred. Adopted. Added at the end of the paragraph: “for certification projects (TC, amended TC, STC, amended STC) or for type

		that affects environmental”			design changes.”
ACE-112DR	Page 7 Figure 1	Add to the box on the flow chart – coordinate with the CAA on validation project along with the applicant for stage 3	We include CAA on stage2 -4 IP and the way this is written we only share the final stage 4 with CAA on validations. That is not correct. CAA is part of the IP process on validations.		Concurred. Adopted. Added the corrected flowchart.
ACE-112DR	Page B-1 paragraph 1	Add bullet item that Directorate serves as the validating authority on incoming certification projects	Directorate POs act as PM for the validation projects.		Concurred. Adopted. Added the suggested bullet.
ACE-112DR	Page B-1 paragraph 5	On last sentence change from program/project manager (PM) to program manager/project officer (PM/PO)	Directorate POs act as PM for the validation projects.		Non concurred. Not adopted. We already re-wrote item 5 entirely and your suggested text does not fit in the re-write. We did capture the intent of their comment in item 13 on the following page.
ACE-112DR	Page B-2 Paragraph 10	On page 10 change to PM or PO (originator)	Directorate POs act as PM for the validation projects.		Partially concurred. Partially adopted. Added your suggested statement in item 13 on the following page.

ACE-112DR	Page B-3, #13	Add statement that Project officers also act as the program managers for validation projects	Directorate POs act as PM for the validation projects.		Concurred. Adopted.
ACE112JJ	Page 2, 3c	For type certification projects, IPs are useful tools for keeping an unbiased uniform certification approach between applicants.	IPs are used internally as well... define with whom	“For type certification and validation projects, IPs are useful tools for keeping an unbiased uniform certification approach between applicants and the FAA as well as internally within the FAA between FAA policy, certification and validation offices.”	Non concur. Not adopted. Incorrect statement This unofficial use of IPs needs further discussion. However, it’s definitely an internal process and out-of-scope for this AC.
AIR-40	Par. 4.1.	Remove reference to Special Federal Aviation Regulations (SFAR).	FAA no longer issues SFARs.	Rewrite: “It also designated other applicable regulations and records any.....”	Non Concur. Not Adopted. There are a few SFARs still active and we do write IPs related to those SFARs, when applicable. For example, SFARs 92 and 111.
ANM-110	General	This AC has many common elements to the draft Order 8110.112A for which we provided extensive comments in June. The OPR should review comments to the order and ensure consistency with this draft AC.	Consistency with Order 8110.112A.	Review comments to Order 8110.112A in parallel with this clearance, to ensure consistency between the two documents.	Concurred. Adopted.

ANM-113	p. 1, ¶ 3a	The phrase “of accomplishing the necessary steps” in the first sentence doesn’t adequately describe why we use IPs in the type certification and type validation processes. IPs provide a structured means <u>to address certain issues</u> in the type certification and type validation processes.	The first sentence doesn’t concisely describe why we use IPs.	Change the first sentence to, “We, the Federal Aviation Administration (FAA), use IPs to provide a structured means to address certain issues in the type certification and type validation processes.”  1-8008470578	Concurred. Adopted.
ANM-113	p. 1, ¶ 3a	The last sentence informs us that AEGs may use the IP process. This sentence doesn’t fit or is misplaced. First, it talks about who uses it but it’s under the heading of paragraph 3, “Why we use IPs.” Second, we don’t say elsewhere in the body that AIR, Directorates & ACOs are the primary users of IPs. Delete it or move it to Appendix B, Roles of FAA Offices, under AEG.	This sentence doesn’t fit or is misplaced because it talks about who uses it but it’s under the heading of paragraph 3, “Why we use IPs” and we don’t identify other specific FAA organizations who use it except in Appendix B.	Delete the sentence, “The Flight Standards Service Aircraft Evaluation Group (AEG) may use, at their discretion, this IP process for the maintenance and operations evaluations of applicants in support of certification projects,” or add, “The Flight Standards Service Aircraft Evaluation Group (AEG) may use this IP process for the maintenance and operations evaluations of applicants in support of certification projects” to Appendix B.	Concurred. Adopted. Deleted. Info. Is already collected in appendix B, Item 3.
R. Thomas, ANM-100D	Pg. 1 Para. 3(b)	The use of the word “you” in the phrase, “...between you, the applicant...” implies a third party other than the applicant.	Possible confusion regarding the parties involved in an issue paper.	Suggest “you” be dropped and phrase revised to read, “...between the applicant and/or their representative...”	Concurred. Adopted. Change to third person.

ANM-113	p. 2, ¶ 3c	The last sentence could be expanded to provide more relevant information. Suggest changing it to, “They are also very useful and the established means to address novel design features, which don’t have FAA adequate FAA regulations or policy, or controversial technical issues.”	The last sentence could be expanded to provide additional, clarifying information.	Changing the last sentence to, “They are also very useful and the established means to address novel design features, which don’t have adequate FAA regulations, guidance, or are controversial technical issues.”	Non Concurred. Not Adopted. Suggested sentence does not fit here. It fits better later- on when discussing special conditions.
ANM-110	p.2, 3d	Paragraph incorrectly states that IPs are primarily used in validation programs to describe differences. Similar comments provided to draft Order 8110.112A.	Incorrect description.	Change paragraph to read “For type validation programs, if the FAA is the VA, we use IPs for the same purposes as for certification programs. In addition, we may use IPs to address differences between FAA and the foreign CA airworthiness standards and interpretations. We may also develop procedures with our bilateral partners to allow us to accept the CAs IP or equivalent in place of an FAA IP.”	Concurred. Adopted. We inserted the following more encompassing paragraph – “When the FAA is the VA, the FAA uses IPs to identify and resolve issues of particular interest to the FAA, including aspects of the design or proposed MoC that warrant further involvement (beyond familiarization) by the FAA. IPs may be identified by the FAA that meet any of the categories identified in this paragraph. In certain cases, even when FAA and CA airworthiness standards and interpretations are identical, the FAA still needs to write our own IP. For example, the FAA

					<p>writes IPs for ELOS (ESF) per 14 CFR 21.21(b)(1). Also, the FAA must write IPs on the certification basis (G-1), determination of compliance or compliance checklist (G-2), environmental considerations (G-3), and other unique import requirements (see FAA Order 8110.52, <i>Type Validation and Post Type Validation Procedures</i>, and the applicable bilateral agreements for more information). The FAA may also develop procedures with our bilateral partners to allow us to accept the CA's IP or equivalent in place of an FAA IP. The FAA may choose to document an issue by means of a cover IP (CIP) if the bilateral partner authority has produced an equivalent document that is acceptable to the FAA to track resolution of an issue.</p>
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ANM-113	p. 2, ¶ 4	Change title to, “Items Considered Significant Issues and Address in IPs.” “Handled by IPs” conveys less meaning/less descriptive to what the IP is accomplishing.	To clarify, be concise in the title of the section.	Change title to, “Items Considered Significant Issues and Addressed in IPs”	Concurred. Adopted.
ANM-113	p. 2, ¶ 4a	The first sentence contains a typo (“levels”).	Using “levels” is incorrect. The FAA has one “level” of safety in each airworthiness standard.	Change “equivalent levels of safety (ELOS) findings” to “equivalent level of safety (ELOS) findings.”	Concurred. Adopted.
ANM-110	p.2, 4.c.	Subparagraphs (1) (2) address particular environmental certification requirements and are thus not directly pertinent to an IP AC. They are also incomplete (e.g. (1) does not only apply to new TCs) so including the information in this AC is confusing and should be removed.	Clarity and consistency with the purpose of this AC.	Remove last sentence in c. Remove subparagraphs (1) and (2).  Leave the detailed requirements for environmental certification to other guidance – does not belong in an AC that describes how IPs are used.	Concurred. Adopted. Removed the two subparagraphs and revised paragraph to say – “The FAA must obtain certain information for compliance with U.S. statutory environmental requirements in addition to the 14 CFR requirements listed in the certification basis for certification projects (TC, amended TC, STC, amended STC) or for type design changes.”
ANM-113	p. 3, ¶ 4c(2) Note	The Note contains instructions to FAA personnel. Since this is an AC (instructions to applicants), it should be removed.	ACs should not contain FAA personnel instructions.	Remove Note.	Concurred. Adopted. Removed the note.

ANM-113	p. 3, ¶ 4e	This draft AC revision and Order 8110.112 use the terms “Method of Compliance” and “Means of Compliance” interchangeably. Need to standardize on one set of terminology.	Order 8110.112, Appendix A, defines the types of issue paper and uses the term “Means of Compliance” for the issue paper subheader.	Change references from “Method of Compliance” to “Means of Compliance.”	Partially concurred. Partially Adopted. Will leave it as “Methods of Compliance”.
ANM-113	p. 3, ¶ 4f	Add a sub-bullet to instruct applicants to provide compensating factors that are not proprietary.	There’s value to provide applicants relevant instructions in proposing compensating factors.	Add “(3) The applicants should not propose compensating factors that contain proprietary information since the ELOS memorandums are made public.”	Non Concur. Not Adopted. The applicant must always propose compensating factors to show compliance to the level of safety intended by the regulations, regardless of proprietary status. The FAA has procedures to safeguard the proprietary information from the public when publishing the ELOS memo.
ANM-113	p. 3, ¶ 4g	Change “The FAA develops IPs to address . . .” to “The FAA uses IPs to address . . .” The word ‘uses’ or ‘utilizes’ is more concise.	To improve clarity and be concise.	Change “The FAA develops IPs to address . . .” to “The FAA uses IPs to address . . .”	Concurred. Adopted.
ANM-113	p. 4, ¶ 4g Note	The note should include the missing important qualifiers (i.e., with respect to the state of technology foreseen when the applicable regulations where codified) about the novel or unusual design feature.	As stated, the note is not complete and is inaccurate.	Change the Note to “Note: Special conditions are not used to upgrade the applicable airworthiness standards when novel or unusual design features with respect to the state of technology foreseen when the applicable regulations where codified are	Concurred. Adopted. Added qualifiers to the note.

				not involved.”	
ANM-110	p. 4, ¶ 4i	<p>The term validation item (VI) is only used in the EASA bilateral agreement, and thus should not be used in this context.</p> <p>Also, the notion that IPs (or VIs) are <u>primarily</u> used to explain differences is not correct and should be avoided in order to avoid conflict with the EASA TIP</p> <p>Similar comments provided to Order 8110.112A</p> <p>As per comments to 8110.112A, it is recommended to remove the discussion of use of IPs in a validation program to an entirely separate section of the AC, since “type validation” is not a type of IP, per se, which is the focus of Para. 4. Rather, type validation is a type of project, for which IPs can be raised for any of the reasons covered in the other parts of Para. 4.</p>	<p>Avoidance of conflict with bilateral agreements.</p> <p>Correct explanation of how IPs are used in validation programs.</p>	<p>Replace entire paragraph with following, or preferable relocate all TV discussion to a separate section that can then refer back to section 4 for types of IPs:</p> <p>“For type validation programs, if the FAA is the VA, we use IPs to identify and resolve issues of particular interest to the FAA, including aspects of the design or proposed MoC that warrant further involvement (beyond familiarization) by the FAA. IPs may be identified by the FAA that meet any of the categories identified in 4. (refer to order 8110.52...and the applicable bilateral agreement)”. “In a validation program the FAA may choose to document an issue by means of a cover IP (CIP), if the bilateral partner authority has produced an equivalent document that is acceptable to the FAA to track resolution of an issue.</p>	<p>Concurred. Adopted. Adopted the proposed statement.</p>

R. Thomas, ANM-100D	Pg. 5 Para. 4(j) and 4(k)	These seem to be subparagraphs to paragraph i.	Editorial	Renumber paragraphs 4(j) and 4(k) as 4(j)(1) and 4(j)(2).	Non Concluded. Not adopted. Only CIPs fall under Type Validation.
R. Thomas, ANM-100D	Pg. 5 Para. 4(p)	Could not find referenced paragraph 3-1. a.(14).	Editorial	Delete or correct reference.	Concluded. Adopted. Corrected it to say item #12 of appendix C.
R. Thomas, ANM-100D	Pg. 7 Table 1	Note refers to, "...stages that will not be sent to the applicant." but A flow always has the PO transmit the issue paper to the applicant at each stage	Possible confusion regarding process.	Be more specific as to which and when stages might not be sent to the applicant. This might be accomplished via reference to other paragraphs in the AC.	Concluded. Adopted. Fixed the flowchart.
R. Thomas, ANM-100D	Pg. 8 Figure 1	General note 1 makes mention to the TCB or TCBM neither of which are mentioned in the proceeding Table 1.	No stated requirement or note for a TCB or TCBM anywhere prior in the document.	Revise to read, "This process can be applied whether or not a TCB is created."	Concluded. Adopted. Deleted TCBM from the note.
ANM-113	p. 8, Figure 1 General Notes, Note 5	"Standard Staff" is an incorrect reference.	Accountable directorates have "Standards Staff."	Change "Standard Staff" (two places) to "Standards Staff."	Concluded. Adopted.
ANM-113	p. 8, ¶ 6a	The first two sentences don't accurately describe the process.	The Standards Staff specialists and project officer also propose issue papers to the TCB.	Change the first two sentences to read "For type certification projects, new IPs are proposed to the TCB by technical specialists for technical issues in their areas (the OMT for ODA projects),	Partially concluded. Partially adopted. Rewrote it as: For type certification projects, new IPs can be proposed to the TCB by the standards staff specialists,

				Standards Staff specialists, and the PO, through the PM at any time during the process before final type certification.”	the PO, the PM, or by technical specialists for technical issues in their areas, through the PM. This can occur at any time during the process but before final type certification. For ODA projects, the OMT can propose new IPs (this also applies to the DSCO).
ANM-113	p. 9, ¶ 6i	Requiring the PM to obtain accountable directorate assistance in developing the FAA position and Conclusion sections is not required for all issue papers.	Requiring coordination prior to routing the issue paper is not needed if the ACO / OMT has sufficient information to complete the FAA position and Conclusion sections. The issue paper will be coordinated and signed at the accountable directorate.	Change the first sentence to read “The PM typically obtains accountable directorate . . .”	Concurred. Adopted. Inserted “typically”.
ANM-113	p. 10, ¶ 6m	The third sentence is unnecessary.	This paragraph discusses the IP Conclusion, so a sentence about coordination is not necessary.	Delete the third sentence “If coordination with . . .”	Non concurred. Not adopted. We think the coordination with the accountable directorate and the applicant is necessary to close out the IP.
R. Thomas, ANM-100D	Pg. 10 Para. 6(m)	Paragraphs refers to “other means” which is vague. Is there anyway this could be made more specific? Is there a procedure in place or a recommended path?	Vague statement could result in applicants going to their congressional representative rather than more measured steps through the agency.	Revise to be more specific or included a suggested path based on prior experience.	Concurred. Adopted. Took statements from Order 8110.112A and added it here.

ANM-113	p. 10, ¶ 6o	The second sentence is missing a comma and does not accurately describe the process.	Reopening an issue paper also requires concurrence with the accountable directorate.	Change the second sentence to read “An IP may be reopened if a new issue is identified, or at the applicant’s request, with the concurrence of the PACO and accountable directorate.”	Concurred. Adopted. Changed the second sentence as requested.
R. Thomas, ANM-100D	Pg. 10 Para. 6(o)	States “...project will not be closed...” Should this be “...will be closed...”?	Typo	Correct as appropriate.	Non concurred. Not adopted. There is no typo. It is “will not be closed”
ANM-100B	Page 10, Paragraph 6.o	The discussion for reopening an issue paper should be provided in a separate paragraph.	The discussion for reopening an issue paper seems to be a separate topic from the beginning discussion about the consequence of not complying with the criteria of an issue paper, outlined in the first sentence of Paragraph 6.o.	Move the discussion about reopening an issue paper to new paragraph 6.p. Further explain, if appropriate, that reopening an issue paper is also a revision to an existing issue paper for clarity.	Partially concurred. Partially adopted. Created subparagraph 7 p. but did not adopt your suggested additional statement because that is discussed already in paragraph 7 l.
ANM-113	p. A-1, Issue Paper Format	Stage and date are not needed in the FAA and applicant positions. Also, the applicant position does not need to be in a possessive form when the FAA position is not in a possessive form.	The use of stage and date can be confusing. Only the date of the issue paper containing the position is needed. Also need consistency when using, or not using, a possessive form.	Change the FAA position to “ <b>FAA POSITION:</b> (Date)” and the applicant position to “ <b>APPLICANT POSITION:</b> (Date).”	Non Concurred. Not adopted. We do this in both stages 2 and 4.
ANM-110	p. B-1, 5	Incorrectly states that IPs are used mainly to address differences – see previous comments and comments to draft order 8110.112A.  Also does not clearly state the VA/CA roles in the IP	Accuracy and clarity	Revise paragraph to read:  When the FAA is the VA, the FAA provides the CA an opportunity to comment on the IPs produced for that validation program. To the extent possible, the PM will	Concurred. Adopted. Revised paragraph as: For type validation programs, when the FAA is the validating authority (VA), the FAA provides the certificating authority (CA) an opportunity to comment

		process.		incorporate the CA position, verbatim, in the IP. A CA position is not required in a CIPP, since in that case the FAA is adopting the CA IP (or equivalent) directly, and is attaching that document to the FAA's CIP.	on the IPs produced for that validation program. To the extent possible, the program manager (PM) or project officer (PO) must incorporate the CA position, verbatim, in the IP. A CA position is not required in a CIP, since in that case the FAA is adopting the CA IP (or equivalent) directly, and is attaching that document to the FAA's CIP. The FAA also reserves the right to write IPs on other unique import requirements."
ANM-113	p. B-2, ¶ 10	The sixth bullet does not need to mention the development of the Conclusion section.	Applicants don't need this level of detail and they only need to know the PM will send them a signed copy of the issue paper.	Change the sixth bullet to read "Transmits the signed IP to the applicant; and"	Non concurred. Not adopted. Don't agree with your statement. Besides, there are orders out there which already mention that the PM develops and coordinates the conclusion section (8110.4C and 8110.112). And orders are available to the public from our FAA website and from RGL.

ANM-113	p. B-3, ¶ 13	The word “manager” should be plural.	Frequently, there is more than one accountable directorate manager involved in the IP coordination process.	Change “manager” to “managers.”	Non concurred. Not Adopted. There is no need to have multiple signature lines for more than one directorate manager. There is only one accountable directorate per aeronautical product. However, one can sign and the rest can use the grid instead.
ANM-113	p. C-1, ¶ 4	This draft AC revision and Order 8110.112 use the terms “Method of Compliance” and “Means of Compliance” interchangeably. Need to standardize on one set of terminology.	Order 8110.112, Appendix A, defines the types of issue paper and uses the term “Means of Compliance” for the issue paper subheader.	Change reference from “Methods of Compliance (MoC)” to “Means of Compliance (MoC).”	Partially Concurred. Partially Adopted. Changed reference to “Methods of Compliance (MoC)” throughout the document.
R. Thomas, ANM-100D	Pg. C-4 Item. 15	Uses the acronym “NAA” which is not defined anywhere in the document.	Editorial	Define “NAA” somewhere indocument.	Concurred. Adopted. Acronym NAA defined.
R. Thomas, ANM-100D	Pg. C-4 Items 15 and 16	These are written specifically to EASA and non-EU JAA members. Would not these procedures apply to most if not all of the CAAs we have bilaterals with?	Maybe too specific.	Revise to be more general or also include all validating CAAs.	Non Concurred. Not Adopted. Definition/description came from the source, TVP Order 8110.52.
ANM-113	p. C-2, ¶ 8	Orders do not apply to applicants.	Advisory Circulars are used to communicate guidance to applicants.	Change the first sentence from “Order 8110.48, <i>How to Establish the Certification Basis for Changed Aeronautical Products</i> ” to “Advisory Circular	Concurred. Adopted. Made the suggested change from the Order to the AC.

				21.101-1A, <i>Establishing the Certification Basis of Changed Aeronautical Products.</i> ” Also change the third sentence from “FAA Order 8110.48” to “Advisory Circular 21.101-1A.”	
ANM-113	p. C-3, ¶ 12b	Delete the reference to significant projects.	Order 8110.115 removed the term “significant project” (used in Order 8110.4C) and replaced it with “directorate involvement.”	Change to read “Accountable directorate project officer (for projects requiring directorate involvement).”	Concurred. Adopted. Made the suggested change.
ANM-110	p. C-4, item 18	Remove VI definition as not pertinent to this AC (see previous comments). Also, definition is incorrect per current EASA TIP, SSD are no longer defined as VI.	VI term is unique to EASA.	Delete item 18.	Concurred. Adopted. Removed item 18.
ASW-111	General Comment #1	Submit revised ACs with tracked changes so IT IS CLEAR what has changed from the previous version of the document.	Inefficient to review a revised document without the specific changes from the previous version being clearly identified.	Send revised documents with ALL changes shown.	Non concur. Track changes indicated by vertical lines along the margins of the affected pages/paragraphs/figures/appendices, etc. , etc. are done for Changes to a document, and <b>not</b> for Revisions.
ASW-111	General Comment #2	The common term “Reuse IP” is not mentioned in this document, yet the ACIP appears to be the new form of the Reuse IP.	Not clear if Reuse IPs are allowed to be used since not formally mentioned in this Order(?).	Add text to state, “Reuse IPs can be used prior to formal policy being published if the compliance criteria have been clearly defined,” If ACIPs replace the REUSE IP, make this clear in the document text.	Not Concur. Not Adopted. We do not allow for the re-use of IPs unless we are dealing with the same applicant... that is the purpose of the ACIP. It is defined in this AC and

					further explained in the Order 8110.112A, appendix E.
ASW-111	Pg. 4, para. I, last sentence.	Text states, “We also write IPs on the certification basis (G-1) and other unique import requirements (refer to FAA Order 8110.52, Type Validation and Post Type Validation Procedures, for more information).”	The FAA/EASA Technical Implementation Procedures should be referenced.	I recommend adding text that states, “ It should be noted that the FAA/EASA Technical Implementation Procedures (TIP) also provide acceptable guidance to address Type Validation requirements.”	Partially Concurred. Partially Adopted. We added to that last sentence, the following – “and the applicable bilateral agreements for more information.” This is because applicable BAs are more global than the EASA TIP.
ASW-190	Appendix B, pars. 1 and 7	What is the process for addressing repetitive IPs?	Sometimes an applicant has to repeat the same IP with the same conclusion many times for similar projects.	Place responsibility on the accountable directorate and AIR-100 to release policy/guidance to eliminate the wasted time (both applicant and FAA) of repetitive IPs.	Concurred. Adopted. Added the following sentence in both paragraphs – “When the FAA invokes an identical IP for numerous projects, this is indicative of mature policy suitable for written guidance such as methods, procedures, and practices acceptable to the FAA (e.g., an AC).”
ASW-190	N/A	IPs desperately need a software tool.	There is so much time wasted pursuing signatures from multiple people in multiple remote offices, twice, for each IP.	A software tool that controls the versions and gathers approvals of IPs would have a rapid ROI.	Concurred with comment but out of scope. Engineering Design and Production Approvals (EDPA) IT tool, when deployed, is designed to

					generate project docs and approval docs for ACOs and MIDOs, including templates for IPs.
AIR-500	58 Editorial Comments	See Below			
1.	Page 1, Subject:	Title case	Use only Times New Roman or Arial 11pt. font	Adjust font and formatting of header	Concurred. Adopted.
2.	Page 1, "AC No: Draft" & "Change:"	The words "DRAFT" and "Change" are not needed	Consistent formatting	Strike "DRAFT" and strike "Change:"	Concurred. Adopted.
3.	Page 1, header, below the solid line	short line is missing	Consistent formatting	Add short line	Concurred. Adopted.
4.	Page 1, paragraph 1.a.	The reference to "your role" is not clear; to whom does "your" refer?	Clarity for reader	Clarify to whom "your" refers	Concurred. Adopted.

5.	Page 1, paragraphs 1,2 & 3	The AC template calls for the first three paragraphs to be: 1. Purpose 2. Applicability 3. Cancellation (if applicable), or 3. Related Documents	Consistency	Change as per template	Concurred. Adopted.
6.	Page 1, paragraph 2	Each term is spelled out except for TSOA. Also, 14 CFR 21.8.(d) is referenced with no label or description	Clarity for reader	Spell out TSOA and then abbreviate (TSOA), and label the CFR reference	Concurred. Adopted.
7.	Page 1, paragraph 3	The title should be changed	Clarity	Change title of 3. to "The Purpose of IPs." and strike "Why We Use"	Concurred. Adopted.
8.	Page 1, paragraph 3.a.	The word "we" is not needed  Once this is struck, verb agreement is wrong	Consistent formatting	Strike "We" and start the paragraph with "The Federal Aviation..."  Also, strike the comma after FAA and add an "s" to "use" = "uses"	Concurred. Adopted.
9.	Page 1, paragraph 3.a.	The reference to "The Flight Standards Service...AEG" should use a possessive	Grammar	Change "Service" to "Service's"	Concurred. Adopted.

10.	Page 1, paragraph 3.a.	In the third sentence, it is unclear if the "they" in "they can be used" refers to IPs.	Clarity for reader	Replace "they" with "IPs" (if that is correct)	Concurred. Adopted.
11.	Page 1, paragraph 3.b.	To whom does "you" refer? Isn't the AC written for the applicant?	Clarity	Please clarify as needed	Concurred. Adopted.
12.	Page 2, paragraph 3.d.	There is a comma separating the noun and the verb. "...the office...determines..."	Grammar	Remove the comma after "...(policy owners)," and add an "s" to the "determine" for agreement.	Concurred. Adopted.
13.	Page 2, paragraph 4. a-c	It is not clear to the novice that G-1, G-2, and G-3 are types of IPs. The heading calls them "significant items"	Clarity for reader	Amend each definition at the start, as such: "G-1 is an IP that designates the ..." "A G-2 IP provides..." "A G-3 IP designates..."	Concurred. Adopted. Inserted " is an IP that...".
14.	Page 2, paragraph 4.a. and universal	The section symbol (§) is used incorrectly	Do not use the section (§) symbol or the word "part" or "section" when the reference follows "14 CFR." Only use the section symbol (§) when referring to different paragraphs/subparagraphs within the same section. For example, the correct way to cite is: 14 CFR	Remove section symbols per appropriate format	Concurred. Adopted.

			25.795(d). The incorrect way to cite is: 14 CFR § 25.795(d).		
15.	Page 3, paragraph 4.c.(2) Note:	The font size changes	Consistent formatting	Maintain font size with rest of the document	Concurred. Adopted.
16.	Page 3, paragraph 4.d.	The full wording of CAA should be in lower case	Accurate usage plus definition of CAA	Change "Civil Airworthiness Authority" to "civil aviation authority"	Concurred. Adopted.
17.	Page 3, paragraph 4.g.	There is a comma after the word "propeller" that needs to be removed	Grammar	Remove comma to read: "...engine, or propeller because of novel..."	Concurred. Adopted.
18.	Page 4, paragraph 4.g.(1)	The full wording of PACO should be in lower case	Proper usage	Spell out using lower case (before the acronym is properly abbreviated in upper case)	Concurred. Adopted.
19.	Page 5, paragraph 4.j.	The word Validation following FAA, should be lower case and not capitalized	Proper usage	Change upper case "V" to lower case "v" for the word validation	Concurred. Adopted.

20.	Page 5, paragraph 4.k.	"...previously-approved IP..." should not be hyphenated	Grammar	Remove the hyphen	Concurred. Adopted.
21.	Page 5, paragraph 4.o.	An "s" is missing from the first line, word "type"	Grammar/agreement	Add an "s" to the word "type" for: "For other types of FAA..."	Concurred. Adopted.
22.	Page 5, paragraph 4.p.	A comma is missing.  The full wording of TCB should be in lower case?  Also, the reference to paragraph 3-1.a(14) should be confirmed	Consistent formatting  and  accuracy of references	Add a comma in the first line after "policy,"  and Spell out as "type certification board (TCB)"  and please confirm the reference to paragraph 3-1. a.(14)	Concurred. Adopted.
23.	Page 5, paragraph 4.q.	The acronym AEG has already been defined, so the full wording is not needed in this title	Use of acronyms after first usage	Strike "Aircraft Evaluation Group" and "( )" and have title read: "AEG IPs."	Concurred. Adopted.
24.	Page 6, paragraph 5.c.	The established acronym MOC is not used here	Proper use of acronyms after first usage	Replace "method of compliance" with "MOC"	Concurred. Adopted.

25.	Page 7, Figure 1	This figure needs to be referenced in the text of the document and be located after it is referenced - or, move Figure to after paragraph 6 where it is referenced	Consistent formatting	Reference Figure 1 in text and locate it in its proper place within the document	Concurred. Adopted. Relocated figure at the end of par. 7.
26.	Page 7, Figure 1, inside the text box	Many of the words in the text box should be in lower case	Consistent formatting	Please change the second line in the text box to: "This process applies to type certification, type validation,..."	Non Concurred. Not Adopted. Text box in question is the title of the figure.
27.	Page 7, Figure 1, Note:	The note at the bottom of the page should be placed with notes on page 8	Consistent formatting		Non Concur. Not Adopted. The note at the bottom of the figure relates to sub-process A above the note.
28.	Page 8 - subtitle	The subtitle "General Notes:" is not needed	Consistent formatting	Strike "General Notes:" from the top of the page	Concurred. Adopted.
29.	Page 8, Note 1	The TCB and TCBM are not mentioned in the flow chart	Clarity	Please delete the reference to "TCB" and "TCBM"	Partially Concurred. Partially Adopted. Removed TCBM but kept TCB because it is in the process description paragraph.
30.	Page 8, Note 3	How does this note expand on the flow chart?	Clarity	Delete Note 3	Non-Concurred. Not Adopted. Revised figure resolved your comment.

31.	Page 8, Note 4	Some changes to the text are needed, including use of an acronyms	Clarity	Please change "Statement" to "statement" and use the acronym ELOS and MOC instead of the full wording for each	Concurred. Adopted.
32.	Page 8, Note 5	The line spacing seems wider for this Note than for Notes 1-4.	Consistency in text	Please make spacing uniform	Concurred. Adopted.
33.	Page 8, paragraph 6.	"Figure 1" is referenced here, so as per the comment above, the figure should be placed in the document after its first reference	Consistent formatting	Place the first reference to "Figure 1" before its appearance in the document	Concurred. Adopted. Moved figure to the end of paragraph 7.
34.	Page 8, paragraph 6.a.	In the 4th line, "individual" is modified by the impersonal "that"	Grammar	Replace "that" with "who" for: "...is the individual <b>who</b> will..."	Concurred. Adopted.
35.	Page 8, paragraph 6.a.	In the last sentence, the structure is awkward and not in keeping with what is done later in the AC with the AIR branches set aside with commas	Ease of reading and consistency in text of AC	Place each branch in parentheses, such as: "...Procedures Branch (AIR-110)..."	Concurred. Adopted.
36.	Page 8, paragraph 6.a.	There is an extra space between "the" and "System Performance" in the third line from the bottom	Consistent formatting	Please remove the extra space	Concurred. Adopted.

37.	Page 9, paragraph 6.b.	In the final sentence, is "emphasis" the proper word? "...the major <b>emphasis</b> of each IP is to..."	Clarity for reader	Replace "emphasis" with "purpose" if that is a better word choice	Concurred. Adopted.
38.	Page 9, paragraph 6.f.	Should the reference to "the Validating/Certificating Authority POSITION" be instead "importing/exporting CAA position"	Accuracy of text	Please fix as needed	Non Concur. Not Adopted. The correct term is "the Validating/Certificating Authority POSITION"
39.	Page 9, paragraph 6.h.	The branch name AIR-100 should be in parentheses.  Only the acronyms for MIDO and AEG should be used  CSTA should be set off in parentheses	Proper use of acronyms	Put AIR-100 as (AIR-100)  Strike the full wording for MIDO and AEG  Place CSTA in parentheses and remove the "s" (CSTA)	Concurred. Adopted.
40.	Page 10 - after 6.o.	The last sentence should be referenced as paragraph 7.  The end of the sentence should be changed, with a reference to Appendix D.	Consistent formatting	Create a paragraph 7. for the last sentence, and strike the last 6 words after "provided" and replace with: "...provided in Appendix D."	Concurred. Adopted. Added par. 8.
41.	Page B-1	The title of the appendix does not fully match the content	Clarity	Please retitle Appendix B. Not all listed in the appendix are offices.	Concurred. Adopted.

42.	Page B-1 All	The titles should be followed by a period and not a colon	Consistent formatting	Strike the colon and replace with a period.	Concurred. Adopted.
43.	Page B-1 paragraph 2	There is an extra "and" in the series of offices listed	Grammar	Please strike the "and" after (RCO) and add a comma in its place: "...Office (RCO), the Special..."	Concurred. Adopted.
44.	Page B-1, paragraph 3	Extra wording would help to clarify the sentence	Clarity	Please begin the sentence by adding words to that the sentence reads as follows: "AEGs are Flight Standard Service offices that are assigned to each aircraft..."	Concurred. Adopted.
45.	Page B-2, paragraph 6, title	The acronym should not have a "s"	Grammar	Strike the "s" from the acronym to read: (CSTA)	Concurred. Adopted.
46.	Page B-2, paragraph 6	CSTA'S are service resources	Clarify	Strike "-100" after "AIR"	Concurred. Adopted.
47.	Page B-2, paragraph 9	There is an extra comma in the text	Grammar	In the fifth line, strike the comma after "...for service difficulties"	Concurred. Adopted.

48.	Page B-2, paragraph 10	The word "the" should be inserted in 5 different places in the paragraph  Also, two apostrophe "s" are needed in the third bullet	Clarify	Please insert the word "the" before IP (in the second bullet), after "obtains" (in the third bullet), before "AEG" (in the fourth bullet), after "develops" (in the sixth bullet), and before "official" (in the seventh bullet).  In the third bullet, change "obtains the applicant position" to " obtains the applicant's" position and change "FAA" to "FAA's"	Concurred. Adopted.
49.	Page B-3, paragraph 12	The reference to "directorates" in the fifth bullet should have its own bullet	Clarify	Add a bullet to the list so that "directorates" (referenced in the fifth bullet) has its own bullet.	Partially concur.. Deleted directorates from the fifth bullet because it is covered in bullet number 6.
50.	Page C-1, Appendix C,	The format of Appendix C is different from that of Appendix B	Consistent formatting	Please use the format similar to Appendix B	Non-concur. Not Adopted. Format reflects needs of each appendix Such flexibility is allowed in the appendices, versus the main section of the AC.
51.	Page C-1, Term 2.	"EASA" is not defined	Clarity	Please define EASA.	Concurred. Adopted.

52.	Page C-1, Term 2.	In the last line, the full wording of CAA should be in lower case	Accurate usage	Covert "Civil Aviation Authority" to "civil aviation authority"	Concurred. Adopted.
53.	Page C-2, Appendix C, Term 8	The term " <b>significant change</b> " is defined, but in the definition it states that "The change is not extensive enough to be considered a <b>substantial change</b> ." Does that latter term also need to be defined?	Clarity for reader	Clarify as needed	Partially Concurred. Partially Adopted. Put in parenthesis (refer to 14 CFR 21.19) instead.
54.	Page C-3, 12.d.(4)	The term "FSDO" should be defined	Clarity	Please define FSDO	Concurred. Adopted.
55.	Page C-3, 14.d.	There is an extra space in "pilot- owner"	Consistent formatting	Remove the extra space in "pilot- owner"	Concurred. Adopted.
56.	Page C-4, 15.	"NAA" is not defined.	Clarity	Please define "NAA"	Concurred. Adopted.

57.	AC Feedback form	This form should be labeled as "Appendix D"  Page should be numbered "D-1"	Consistent formatting	Format the AC Feedback form as Appendix D.  Add "D-1" as page number.	Concurred. Adopted.
58.	AC Feedback form	In the 3rd line, the word "it" is missing.	Clarity for reader	As per email from Jim Hansen sent out 6/3/14, this form has a typo and is missing the word "it."  Please insert "it" after "...you may let us know about <b>it</b> by..."	Concurred. Adopted.
ANE-111	Page 4, paragraph g, after 'Note'	It is not clear that (1), (2) and (3) are the steps involved in issuing a Special Condition	This AC is about IPs, but these paragraphs discuss the process for issuing a Special Condition	Add a sentence or header before paragraph g.(1) that says, "The steps for processing a Special Condition that involve IPs are:"	Non concur. Not Adopted. Your recommendation is already covered in the middle of paragraph g. with these 2 sentences – "The FAA uses IPs to address novel design features for which there are no regulations or the regulations are inadequate. The FAA use IPs to develop the basis, need, and wording of special conditions."

ANE-111	Page 4, paragraph g.(2)	It is unclear whether the applicant or FAA takes action in this step	Does not say who takes this step; paragraph format not parallel to other paragraphs in the list.	Add the words, “The PACO will” to the beginning of the first sentence in paragraph g.(2).	Concurred. Adopted for clarity.
ANE-111	Page 4, paragraph g.(2)	Second sentence is not clear	It is unclear what ‘This is’ is referring to.	Re-write the second sentence in paragraph g.(2) to say, ‘ This is because the Special Condition is included in the certification basis to ensure the record of the airworthiness regulations applicable to the product or modifications is complete	Non Concurred. Not Adopted. Suggested edits for that sentence change meaning of statement.
ANE-111	Page 4, paragraph g.(3)	The first sentence is not clear.	The conditions for when the directorate will prepare an NPRM are unclear	Replace ‘The’ at the start of the first sentence of paragraph g.(3) with ‘Once the IP is closed, the....’	Concurred. Adopted suggested text for clarity.
ANE-111	Page 7, Figure 1 and page 8, paragraph 6	The layout of the document is confusing	Figure 1 appears with no preamble or mention earlier in the document	Move Figure 1, including the Notes, to be after paragraph 6.o. Change the reference in paragraph 6. To ‘Figure 1 below.	Concurred. Adopted. Moved figure towards end of paragraph 7.
ANE-111	Page 8, paragraph 6	The word, ‘Appendix,’ should be capitalized	Formatting	Capitalize the word, ‘Appendix’ in the second sentence.	Non concurred. Not adopted. AIR-500 DMO told us not to capitalize the word appendix in the main document.
ANE-111	Page 8,	The paragraph does not	It is not clear that the PM needs	Add a statement after the third	Concurred. Adopted.

	paragraph 6	address coordination of IPs that relate to any rules other than those owned by AIR-130, -140 or -150.	to coordinate the background and statement of issue with the PO and all relevant rule owner(s) in the accountable directorate(s). It is important that PM/PO/technical specialist coordination takes place at the initial draft stage to reduce re-writes during the grid process.	sentence (that ends with ‘Stage 1), that says that the PM must coordinate the background and statement of issue with the PO and relevant technical specialists. Suggest wording similar to that in paragraph 6.i. Change the related blocks in Figure 1 to include PM coordination with the PO and technical specialists.	Inserted “ The PM must coordinate the “BACKGROUND” and “STATEMENT OF ISSUE” with the accountable directorate specialists through the PO. ”  The figure has been revised accordingly.
ANE-111	Page 8, paragraph 6.b.	TCBM is not spelled out	Acronyms should be spelled out upon their first use	Change ‘Type Certification Board Meeting (TCBM)’	Concurred. Adopted.
ANE-111	Figure 1, section ‘circle A’	PO coordinates with PM, not ‘ACO	The PM coordinates the IP internal to the ACO. The PM is the PO’s focal point within the ACO.	Change the right-hand Project Officer block in section ‘circle-A’ of Figure 1 to read, ‘Coordinate revisions with the PM.’	Concurred. Adopted.
ANE-111	Page 9, paragraph 6.c.	The word, ‘Overall’ is unnecessary	‘Overall’ is redundant to ‘The first priority’	In the first sentence in paragraph 6.c. to begin, ‘The first priority is to....’	Non concurred. Not adopted. Do not consider “Overall” redundant.
ANE-111	Page 9, paragraph 6.d.	The word ‘should’ in the last sentence is incorrect	The word ‘would’ fits better in this location (meaning, ‘The FAA will’ as opposed to ‘The FAA might’)	In the last sentence of paragraph 6.d., change ‘should’ to ‘would.’	Concurred. Adopted.
ANE-111	Page 9, paragraph 6.e.	The second sentence repeats a concept enunciated in the first sentence. Also, the word ‘apply’ is used incorrectly.	The first sentence talks about having the applicant position before the FAA has a position. The second sentence quotes an example and then repeats that the FAA has the applicant position but not the FAA position. Also, ‘apply’ should be ‘occur.’	Delete the end of the second sentence in paragraph 6.e., after the acronym ‘ELOS.’  In the last sentence of paragraph 6.e., change ‘apply’ to ‘occur.’	Partially Concurred. Partially Adopted. Changed “occur” for “apply” but did not change the sentence with the example with the explanation.
ANE-111	Page 9,	Paragraph 6.j. is worded in a	Paragraph 6.j. implies that we	Change the first sentence in	Non Concurred. Not

	paragraph 6.j.	confusing manner	will show draft IPs to the applicants before they are issued. Paragraph 6.n says not (correct)	paragraph 6.j. to begin, ‘The PM will coordinate the intent to issue or revise an IP with you....’ Change the second sentence to begin, ‘If an IP is resolved without....’	Adopted. Par. 6j talks about the internally coordinated IP, whereas par, 6n talks about draft copies of IPs (not coordinated internally).
ANE-111	Page 9, paragraph 6.j. and Page 10, paragraph 6.k.	Use of TCBM/TCB is inconsistent.	Paragraph 6.j. refers to a TCBM but 6.k says impasses will be resolved by the PACO manager and/or directorate management. The TCB is the formal body that would resolve an IP impasse.	In paragraph 6.k., change ‘PACO manager and/or directorate management’ to ‘Type Certification Board (TCB).’	Non Concurred. Not Adopted. When impasse arises between FAA offices, the PACO manager or accountable directorate manager must resolve it. And not the members of the TCB( technical specialists, CSTAs, AEG, etc., etc.). When impasse occurs with the applicant, steps from subparagraph 7.m. must be followed.
ANE-111	Page 10, paragraph 6.m.	‘Resolution through other means’ is not defined.	The Consistency and Standardization Initiative describes the means for escalating issues when there is an impasse.	Change the fourth sentence in paragraph 6.m. to ‘If you are not satisfied with the conclusion reached through the IP process, we recommend that you seek resolution through the Consistency and Standardization Initiative (ref <a href="http://www.faa.gov/news/factsheets/news_story.cfm?newsid=10802">http://www.faa.gov/news/factsheets/news_story.cfm?newsid=10802</a> ).’	Non concur. Not Adopted. Recall that IPs are project specific and that they contain proprietary information. We rewrote the paragraph as – “ If the applicant is not satisfied with the conclusion reached through the IP process, further discussions, correspondence, or appeals must focus on new information or proposals. FAA’s responses to such

					efforts must refer to the current stage and date of the IP as well as indicate whether the new effort provides new information warranting a reconsideration of, and revision to, the IP, or the IP “CONCLUSION” stands as written.”
ANE-111	Appendix B.	Appendix B is not mentioned in the body of the document.	Standard practice not to add appendices not mentioned in the body of a document	Add a third sentence to paragraph 6., saying that the roles and responsibilities of FAA offices are described in Appendix B.	Concurred. Adopted.
ANE-111	Appendix C.	Appendix C is not mentioned in the body of the document.	Standard practice not to add appendices not mentioned in the body of a document	Add a fourth sentence (after incorporating the Appendix B comment above) to paragraph 6., saying that certain terms and definitions are described in Appendix C.	Concurred. Adopted.
ANE-111	General	AC should include headers for Background, Guidance	It is not clear what part of the AC is background, and what part is guidance.	Put paragraphs 5 and 6 under a section called ‘Guidance,’ or re-number with an overall Guidance paragraph before the existing paragraph 5. The overarching paragraph should say that prompt and complete responses to each point in the FAA position of an IP stage will ensure the timely resolution of the issue at hand.	Non concurred. Not Adopted. The flow of guidance material for IPs do not follow the typical Background, Guidance format. AC is written based on Roles and Responsibilities.

ANE-111	General	AC should include expectations of the applicant with respect to each of the types of IPs listed in (existing) paragraph 4.	It is not clear what the applicant is expected to provide the FAA in different circumstances (G-1 IP, ELOS IP, New Technology IP, etc.)	Add a paragraph between paragraphs 5 and 6 listing FAA expectations for applicant input for each type of IP listed in paragraph 4. a-h, l, m and n. Examples: G-1: Applicant to propose a certification basis at the PTCBM, including any potential Special Conditions or proposed Exemptions; ELOS IP: Applicant to provide details on their plans in lieu of direct compliance, why their plan results in an equivalent level of safety to the regulation, and listing the compensating factors.	Non Concur. Not Adopted. Roles and Responsibilities of all parties involved are described in each stage.
ANE-170	Page 8, Note 3	The existing wording in the AC listing both the program/project manager should not be changed.	Paragraph 1-11C of AC 21-40A states that the project manager will coordinate all aspects of a certification project. Also, paragraph 6.a. of this AC states that the PM must coordinate the IP and specifies that the PM is the program or project manager.	Note 3 should be :”The PACO program/project manager (PM) conducts MIDO or AEG coordination as well as CSTA coordination, as appropriate.”	Partially concurred. Defined Program manager/project manager (PM) in paragraph 7.a. before the Figure 1.
ANE-170	ALL	Draft Order 8110.112A was stripped of any reference to TSOA but in draft AC 20-166A we continue to make reference to TSOA.	The AC should match Order 8110.112A. If IPs are also used for TSOA as noted in several areas of the draft AC, then draft Order 8110.112A should also provide the same documentation ( i.e. the applicability of the flow chart in figure 1 of the draft order needs to match figure 1 of the draft AC.)		Concurred. Adopted. Added TSOA to the draft Order, including the Figure 1.

