

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-140	<b>Document Description:</b> Advisory Circular, AC 39-XX	<b>Project Lead:</b> Rob Romero	<b>Reviewing Office:</b>	<b>Date of Review:</b>
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<b>Commenter</b>	<b>Page &amp; Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
Boeing	Page 2 1.5.3	Note: This AC uses the general term “AMOC” to define an FAA-approved alternative method of compliance to the specific requirements of an AD or a change in the compliance time.	Improved paragraph flow	Move this note to under 1.5.2 instead of 1.5.3	Non-concur. Note placement acceptable as is.
Boeing	Page 2 1.6.2	Those actions can either be written directly into the rule portion (“body”) of the AD, or another document, such as an SB, can be referenced in the AD body and incorporated by reference in the AD. Compliance with the portions of an SB that are incorporated by reference in an AD is mandatory.	Sentence improvement	Those actions can either be written directly into the rule portion (“body”) of the AD; or into another document, such as an SB, that can be referenced in the AD body and incorporated by reference in the AD. Compliance with the portions of an SB that are incorporated by reference in an AD is mandatory.	Partially concur. Revised to read, “... (“body”) of the AD, or into another document, such as an SB, that can be referenced...”
Boeing	Page 4 2.1	For circumstances or situations not covered in this chapter, contact your local principal inspector (PI), your local Flight Standards District Office (FSDO), or the	FAA Order 8100.15B change 1 page 8-20 paragraph 8-9 (d) (9) includes the Certificate Holding District Office as a requirement for what is included on the 8100-9.	For circumstances or situations not covered in this chapter, contact your local principal inspector (PI), your local Flight Standards District Office (FSDO), your local Certificate Holding District Office (CHDO), or the responsible office	Concur

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		responsible office listed in the AD.		listed in the AD.	
Boeing	Page 4 2.2	Each AD contains instructions on the actions necessary to resolve an unsafe condition.	The word “resolve” implies final resolution. This is not the case for continued inspections as the safety issue is still present but mitigated.	Each AD contains instructions on the actions necessary to <del>resolve</del> mitigate an unsafe condition.	Non-concur. Wording is consistent with language in 14CFR39.11.
Boeing	Page 4 2.3.1.2	Answer: Maybe. If the AD specifically allows previously accomplished work, you do not need an AMOC. If the AD is silent on previously accomplished work or it is unclear whether the work done before the AD was issued is acceptable, contact the office responsible for the AD.	If the AD does not explicitly recognize the previously accomplished action then the operator requires an AMOC.	Answer: Maybe. If the AD specifically allows previously accomplished work, you do not need an AMOC. If the AD is silent on previously accomplished work or it is unclear whether the work done before the AD was issued is acceptable <del>contact the office responsible for the AD</del> an AMOC is required.	Concur
Boeing	Page 5 2.3.1.4	Answer: No. You cannot use a different fastener (or any part, material, or process) from what is specifically mandated in an AD without obtaining an AMOC, unless the procedures in the AD (or service information that	The answer does not read as a straight “No”. It includes a possible yes response therefore it should be “maybe”	Answer: <del>No</del> . Maybe. You cannot use a different fastener (or any part, material, or process) from what is specifically mandated in an AD without obtaining an AMOC, unless the procedures in the AD (or service information that was incorporated by reference) permit substitution. If you substitute	Non-concur. While you may be technically correct, the answer should default to “No” unless an exception is made somewhere.

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		was incorporated by reference) permit substitution. If you substitute another fastener without an AMOC, you violate §39.7 each time you operate the aircraft.		another fastener without an AMOC, you violate §39.7 each time you operate the aircraft.	
Boeing	Page 5 2.3.1.5	The AD requires me to perform actions in a service document by a certain date.	Clarify that the service document is the mandated document and not the one that is approved as an AMOC.	The AD requires me to perform actions in the mandated service document by a certain date.	Non-concur. An AD can't mandate something in AMOC. The sentence is clear that it is referring to the AD-mandated service document.
Boeing	Page 5 2.3.2.1	Answer: Yes. Pursuant to §39.17, if a change to a product affects your ability to accomplish the actions required by the AD in any way, you must request FAA approval of an AMOC. Unless you can show the change eliminated the unsafe condition, your proposal should include the specific actions you propose to address the unsafe condition.	Clarify that the change to the product is a repair. A repair is not typically viewed as a change. Remove situation guidance on what the proposal should include. If the situation guidance is retained then this guidance should be provided in each answer.	Answer: Yes. Pursuant to §39.17, if a change (in this case a repair) to a product affects your ability to accomplish the actions required by the AD in any way, you must request FAA approval of an AMOC. <del>Unless you can show the change eliminated the unsafe condition, your proposal should include the specific actions you propose to address the unsafe condition.</del>	Non-concur. The question is specific to a repair, but the answer is more generic in that it applies to any change (repair, alteration, etc.) The situational guidance is appropriate in that it shows there are two possible options.

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Boeing	Page 6 2.3.2.2.	Answer: Yes. You must comply with the specific requirements of the AD. Therefore, you or the DAH must apply for and obtain an AMOC if any action differs from the specific requirements of the AD.	The answer provides an option for “you or the DAH” which is not required. The question already states that the action is different than the AD, we suggest a revision to explain why the AMOC is required.	Answer: Yes. You must comply with the specific requirements of the AD. <del>Therefore, you or the DAH must apply for and obtain an AMOC if any action differs from the specific requirements of the AD.</del> and the repair must be different than the repair mandated by the AD.	Non-concur. Question already states that the repair received is different than the repair mandated by the AD..
Boeing	Page 6 2.3.2.3	Question: The AD requires that I visually inspect for cracks. However, the previous owner/operator installed a repair doubler that prevents me from inspecting. Do I need an AMOC?	We suggest adding the context of accomplishing the AD inspection since an AMOC would not be required unless they are attempting the AD inspection.	Question: The AD requires that I visually inspect for cracks. However, the previous owner/operator installed a repair doubler that prevents me from inspecting. I am attempting to accomplish the AD inspection. Do I need an AMOC?	Concur
Boeing	Page 6 2.3.2.3	Answer: Yes. Whenever you cannot comply with the specific requirements of an AD, you must seek an AMOC. In this case, you must either devise a new method to inspect the area identified in the AD, or show that the repair reinforces the area and redistributes the loads, so an inspection is no longer required. In either case, you must request and	We suggest to remove any situation guidance on what the proposal should include. If the situation guidance is retained then this guidance should be provided in each answer	Answer: Yes. Whenever you cannot comply with the specific requirements of an AD, you must seek an AMOC. <del>In this case, you must either devise a new method to inspect the area identified in the AD, or show that the repair reinforces the area and redistributes the loads, so an inspection is no longer required. In either case, you must request and obtain an AMOC to ensure compliance with the AD.</del>	Non-concur. Situational guidance is appropriate for this answer given that there are two options for a possible AMOC.

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		obtain an AMOC to ensure compliance with the AD.			
Boeing	Page 6 2.3.2.5	<p>Question: A structural modification required by an AD was accomplished on my aircraft. I have to do a repair in the region previously modified by this AD for a specific reason (such as corrosion, accidental damage, or cracks). Do I need to apply for an AMOC to install this repair?</p> <p>Answer: Yes. Any change or modification to the configuration mandated by an AD requires an AMOC.</p>	The question uses repair as the change and the answer includes “change” and “modification.” In some cases, a specification as to whether or not the responsibility established by a terminated AD ceases with a modification would be beneficial.	Answer: Yes. Any change (in this case a repair) or modification to the configuration mandated by an AD requires an AMOC. However, if the AD established a modification as a terminating action with no further action required, the subsequent repair to the modification does not require an AMOC.	Non-concur. Any change to an AD-mandated configuration, including a required modification, requires an AMOC.
Boeing	Page 6 2.3.3.2	Answer: Yes. You should propose an AMOC whenever you cannot comply with the specific requirements of an AD.	Consistency with prior wording in 2.3.2.3	Answer: Yes. Whenever you cannot comply with the specific requirements of an AD, you must seek an AMOC.	Concur
Boeing	Page 8 2.3.5	Answer: Yes. Unless the PMA part number is listed in the AD as an acceptable alternative, you need an AMOC to install any part number other than the one	Sentence clarification	Answer: Yes. Unless the PMA part number is listed in the AD as an acceptable alternative means of compliance, you need an AMOC to install any part number other than the one listed in the AD.	Non-concur. Current wording acceptable as is.

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		listed in the AD.			
Boeing	Page 8&9 2.3.8, 2.3.8.1, 2.3.8.2	<p>Answer: Maybe. Starting June 2011, some DAHs are adopting the “required for compliance” (RC) notation whereby the critical steps of an SB are identified with a notation of “RC”.</p> <p>2.3.8.1 If the SB incorporates this notation, and—</p> <ul style="list-style-type: none"> <li>• If the task is identified as RC, you must request an AMOC to deviate from this task; or</li> <li>• If the task is not identified as RC, you may deviate from the specific task using accepted methods in accordance with an operator’s maintenance or inspection program without an AMOC, provided the RC steps, including substeps and identified figures, can still be done as specified, and the airplane can be</li> </ul>	Remove the sub paragraph numbering. Inconsistent format may cause confusion.	<p>Answer: Maybe. Starting June 2011, some DAHs are adopting the “required for compliance” (RC) notation whereby the critical steps of an SB are identified with a notation of “RC”.</p> <p><del>2.3.8.1</del> If the SB incorporates this notation, and—</p> <ul style="list-style-type: none"> <li>• If the task is identified as RC, you must request an AMOC to deviate from this task; or</li> <li>• If the task is not identified as RC, you may deviate from the specific task using accepted methods in accordance with an operator’s maintenance or inspection program without an AMOC, provided the RC steps, including substeps and identified figures, can still be done as specified, and the airplane can be put back in an airworthy condition.</li> </ul> <p><del>2.3.8.2</del> If the SB does not incorporate the RC notation, and the task is in the mandated portion of the SB, you must request an AMOC to deviate from the requirements in the service</p>	Concur

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		<p>put back in an airworthy condition.</p> <p>2.3.8.2 If the SB does not incorporate the RC notation, and the task is in the mandated portion of the SB, you must request an AMOC to deviate from the requirements in the service instructions</p>		instructions.	
Boeing	Page 10 3.2.4	3.2.4 A complete and detailed description of the AMOC proposal, including the following (where applicable):	Section 3.2.4 is repair centric, and should also include alterations.	3.2.4 A complete and detailed description of the AMOC proposal, including the following (where applicable): ... 3.2.4.11 Alternative alteration.	Non-concur. This paragraph is generic in that it only refers to an AMOC proposal.
Boeing	Page 10 3.2.4.1, 3.2.4.2, 3.4.2.3	3.2.4.1 Article name. 3.2.4.2 Article numbers. 3.2.4.3 Article serial numbers.	It is questionable whether these are specific articles affected by the AD or the proposed AMOC articles; we suggest additional verbiage for clarification.	3.2.4.1 Affected article name and proposed AMOC article name. 3.2.4.2 Affected article numbers and proposed AMOC article numbers. 3.2.4.3 Affected article serial numbers and proposed AMOC article serial numbers.	Non-concur. Proposed wording does not add clarification.
Boeing	Page 12 3.4.3	An authorized designee of the FAA. . The AD will identify if AMOC approval authority is delegated.	Typographical error; remove extra space and period.	An authorized designee of the FAA. . The AD will identify if AMOC approval authority is delegated.	Concur

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Boeing	Page 16 4.3.3	<p>4.3.3 Question: Do I need an AMOC if I deviate from the AD before the required compliance time?            Answer: Maybe. Before the AD compliance time, changes/modifications to a product may be accomplished via acceptable methods (such as an operator's approved maintenance program). However, if AD compliance will be noted upon completion of this maintenance, even if it is before the required compliance time, and you have deviated from the steps required by the AD, you need an AMOC. If you do not note compliance with the AD at this time, no AMOC is necessary. Compliance with the AD, and a corresponding AMOC, will be required by the compliance time noted in the AD.</p>	<p>This appears that it would be better placed in Section 2.3 "When an AMOC is Necessary" as a FAQ.</p>	<p>2.3.X Question: Do I need an AMOC if I deviate from the AD before the required compliance time?            Answer: Maybe. Before the AD compliance time, changes/modifications to a product may be accomplished via acceptable methods (such as an operator's approved maintenance program). However, if AD compliance will be noted upon completion of this maintenance, even if it is before the required compliance time, and you have deviated from the steps required by the AD, you need an AMOC. If you do not note compliance with the AD at this time, no AMOC is necessary. Compliance with the AD, and a corresponding AMOC, will be required by the compliance time noted in the AD.</p>	<p>Non-concur. The answer is more related to returning the aircraft to service so it is better placed in this section.</p>

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Dassault Falcon Jet Corp	Pg 1 1.2	AUDIENCE replace language	This AC provides guidance for compliance with AMOC as well as Proposing one. The statement to include anyone in addition to owner/operators needs to be more clear.	Replace entire section with: <i>“This AC is for anyone who wishes to propose and/or comply with an AMOC. Anyone, including someone other than an owner/operator, may propose an AMOC.”</i>	Non-concur. In accordance with 14 CFR 39.19, anyone may propose an AMOC. However, the owner/operator is responsible for compliance.
Dassault Falcon Jet Corp	Pg 3 1.6.4	Add possible reason for AMOC “To correct errors in the AD”	Sometimes FAA copies EASA ADs incorrectly (loss in translation?) and the FAA AD is technically not correct.	Add 1.6.4.8 <i>“To address errors in the AD.”</i>	Concur
Dassault Falcon Jet Corp	Pg 15 4.2.2.	“Fleet” in this context is misleading. As written it contradicts 4.2.1.5 which says there can be a Global AMOC proposed by a DAH for (a “Fleet” of) one Model airplane, regardless of the owner/operator.	This paragraph as written implies that a “Fleet” only refers to a single operator’s “Fleet” of airplanes, meaning a quantity of one Make or model, owned/operated by one entity. “Fleet” can also mean all airplanes of the same Model regardless of the owner/operator. As in the case of Dassault Aviation, “The Fleet” of Falcon 7X’s refers to all Falcon 7X’s on the US registry, regardless of the owner/operator.	Clarify the question in 4.2.2. to read: <i>Is an AMOC Applicable to a Fleet of Aircraft operated by one entity the Same as a Global AMOC?</i>	Partially concur. Changed to read, “Is an AMOC Applicable to an Operator’s Fleet of...” Changed answer similarly.
Dassault Falcon Jet Corp	Pg 15 4.3.1	This paragraph says (or implies?) that all installers MUST contact their FAA office before using an	A DAH (and other entities described in 4.2.1) is allowed to apply for a Global AMOC from the Directorate, to	Delete the first sentence in 4.3.1 <i>“You are responsible for notifying your PI (or lacking a PI, the manager of the FSDO/CHDO)”</i>	Non-concur. This notification to the flight standards office is not

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		AMOC.	cover all serial numbers of a Model aircraft. The AMOC is already approved, It seems like a waste of time and additional workload and delay with no added safety value to say every user of such AMOC must also obtain local FAA approval to apply it.	<i>before you use an AMOC.</i> "	"approval." It is for awareness of the AMOC to the appropriate inspectors and was a direct result of the activities of the AD Aviation Rulemaking Committee activity circa 2009.