



# Federal Aviation Administration

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## Memorandum

Date: February 6, 2014

To: Manager, Transport Standards Staff, International Branch, ANM-116

From: Manager, Transport Airplane Directorate, ANM-100

Prepared by: Tim Backman, ANM-116

Subject: INFORMATION: Equivalent Level of Safety (ELOS) Finding for Instructions for Continued Airworthiness for Structural Inspections Tasks Derived from the Damage Tolerance Evaluation Required for Compliance with § 25.571 on the Airbus Model A350-900 airplane (FAA Project Number TC0544IB-T)

ELOS Memo #: TC0544IB-T-G-5

Reg. Ref.: §§ 21.50(b), 25.1529, 26.11; part 25 Appendix H

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This memorandum informs the certificate management aircraft certification office of an evaluation made by the Transport Airplane Directorate (TAD) on the establishment of an equivalent level of safety (ELOS) finding for the Airbus Model A350-900 airplane.

### Background

Title 14, Code of Federal Regulations (14 CFR) section 21.50(b) requires each design approval holder (DAH) to furnish a complete set of Instructions for Continued Airworthiness (ICA) to the owner of each type of aircraft, aircraft engine, or propeller upon its delivery, or upon issuance of the first standard certificate of airworthiness for the affected aircraft, whichever occurs later. Section 21.50(b) further requires that the ICA be prepared in accordance with the applicable airworthiness standards (i.e., §§ 25.1529, 25.1729, or 14 CFR part 26, as appropriate). Section 25.1529 allows the FAA to issue a design approval (new TC in this case) with incomplete ICA if a program exists to ensure completion prior to first delivery.

Individual Instructions for Continued Airworthiness (ICA) tasks are defined by the task title/description, the threshold/interval and the accomplishment procedures. Airbus will define all ICA tasks by title/description and the associated task threshold/interval prior to first delivery. However, Airbus proposed a program to defer completion of accomplishment instructions of certain tasks that extends past first airplane delivery. In the Airbus proposal, incomplete ICA

task accomplishment instructions for these deferred tasks will be made available to operators no later than three years prior to the lead airplane reaching the task threshold.

The only accomplishment instructions that can be deferred through this ELOS finding are for structural inspections tasks derived from the damage tolerance evaluation required for compliance with § 25.571 for the Model A350-900 type design approved with issuance of the type certificate (TC).

### **Applicable regulations**

§§ 21.50(b), 25.1529, 26.11; part 25 Appendix H

### **Regulation requiring an ELOS finding**

§ 25.1529

### **Description of compensating design features or alternative standards which allow the granting of the ELOS finding (including design changes, limitations or equipment need for equivalency)**

The process for completion of accomplishment instructions is considered a compensating feature that provides an ELOS to the level intended by § 25.1529. The primary elements of this process include:

- An FAA approved Airbus compliance document with the process description. This document will specify the conditions under which scheduled maintenance task accomplishment instructions may be deferred until after delivery. It will also document the process used to ensure that these accomplishment instructions are fully developed and published not later than three years prior to the estimated need date.
- An FAA approved Airbus document that clearly identifies the scheduled tasks for which accomplishment instructions are missing or incomplete by task title, threshold, and interval, plus a committed availability date for those deferred accomplishment instructions. Deferred tasks should be fully identified by task title, threshold, and interval prior to delivery of the first airplane or issuance of a standard certificate of airworthiness, whichever comes later. This document will be referenced in both the type certificate data sheet and airworthiness limitations section and is required prior to delivery of the first airplane or issuance of a standard certificate of airworthiness, whichever comes later.

### **Explanation of how design features or alternative standards provide an ELOS to that intended by the regulation**

The overall intent of § 25.1529 is to assure a complete set of ICA is provided to aircraft owners well before the actual tasks are needed to be accomplished and in adequate time to allow operators to plan for and incorporate them into their approved maintenance program. The agreed process avoids publishing non-mature accomplishment instructions, especially for complex or/and long-term tasks, but still provides operators with fully developed task accomplishment instructions that are published not later than three years prior to the estimated need date.

**FAA approval and documentation of the ELOS finding**

The FAA has approved the aforementioned ELOS finding in the Model A350-900 airplane issue paper G-5, titled “Instructions for Continued Airworthiness.” The applicability of this ELOS finding for deferred accomplishment instructions is limited to structural inspections tasks derived from the damage tolerance evaluation required for compliance with § 25.571 for the Model A350-900 type design approved with issuance of the type certificate (TC). Structural inspections tasks derived from the damage tolerance evaluation required for compliance with § 25.571 that are associated with design changes approved after TC are not included in the approval.

This memorandum provides standardized documentation of the ELOS finding that is non-proprietary and can be made available to the public. The TAD has assigned a unique ELOS memorandum number (see front page) to facilitate archiving and retrieval of this ELOS finding. This ELOS memorandum number should be listed in the type certificate data sheet under the Certification Basis section in accordance with the statement below:

An ELOS Finding has been made for the following regulation:  
 § 25.1529, Instructions for Continued Airworthiness. (documented in TAD ELOS Memo TC0544IB-T-G-5)

Original signed by  
*Mel Johnson*

Transport Airplane Directorate  
 Aircraft Certification Service

February 7, 2014  
 Date

ELOS Originated by: International Branch	Project Engineer: Tim Backman	Routing Symbol: ANM-116
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