

Order 8100.15 Revision A

Review and Implementation

Date:

7/25/2011



Federal Aviation
Administration



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Objectives

- **Review significant changes to Order**
- **Enable OMT members to identify affected areas of Order**

Note: This briefing assumes existing knowledge of ODA Order requirements and processes.

Parentheticals throughout refer to paragraphs in
8100.15A



Significant Changes.

- **Incorporation of new ODA types**
 - **Airman Knowledge Testing (AKT)**
 - **Air Operator (AO)**
- **Delegation of ICA**
- **Additional approval functions available for some ODA types**
- **Previously issued policy changes/deviations**
- **Addresses procedures for managing MCDA**
- **Incorporates requirement for applicant's certifying statement**



Impacts

- **Order is effective August 9, 2011**
- **Manual revisions must be submitted by December 7, 2011**
- **Must incorporate individual designees into ODA system as soon as possible**



Background

- **ODA holders authorized on behalf of the FAA**
 - Individuals performing functions make up ODA unit
- **Organizational delegation more efficient for FAA**
 - Focus oversight on organization rather than individuals-individual assessment responsibility of ODA holder
- **Organization Management Team**
 - Responsible for management of ODA holder and its project activity

Background (Cont'd)

- **ODA holders must follow applicable regulations and policies as appropriate to functions performed (2-4)**
- **All functions for cert work accomplished by ODA unit unless allowed by Order (2-7)**
- **ODA types managed under single manual unless otherwise allowed by FAA (2-5)**



Administrative Changes

- **General change to address part 21 revision**
 - Parts, articles, quality systems, references, etc.
- **Updated forms**
- **Additional information in sample manual-
incorporating information in the ODA
manual review guide.**



AIRMAN KNOWLEDGE TESTING AKT ODA



Airman Knowledge Testing ODA

- **Background**

- November 1989 - Introduction to Computer-Based Testing
- February 1993 – Expanded testing
- December 2006 – Canadian Conversion Exams
- October 2010 – Transition to ODA



Airman Knowledge Testing ODA

- **Responsibilities**

- Deliver airman knowledge test on behalf of the FAA
- Testing center facility and personnel management, administration and delivery of airman knowledge tests, and issuance of Airman Knowledge Test Reports to airman applicants



Airman Knowledge Testing ODA

- **Managing Office**

- Airman Testing Branch, AFS-630
 - Manages the AKT ODA Program
 - Develops, Reviews, and Revises Knowledge Test Questions, Handbooks, Test Supplement Guides, and Practical Test Standards



Airman Knowledge Testing ODA

- **Oversight**

- Airman Testing Branch, AFS-630
 - Inspection of the ODA Holder
 - Inspection of the ODA Unit members and testing centers
 - Electronic surveillance
 - OMT quality assurance programs



Airman Knowledge Testing ODA

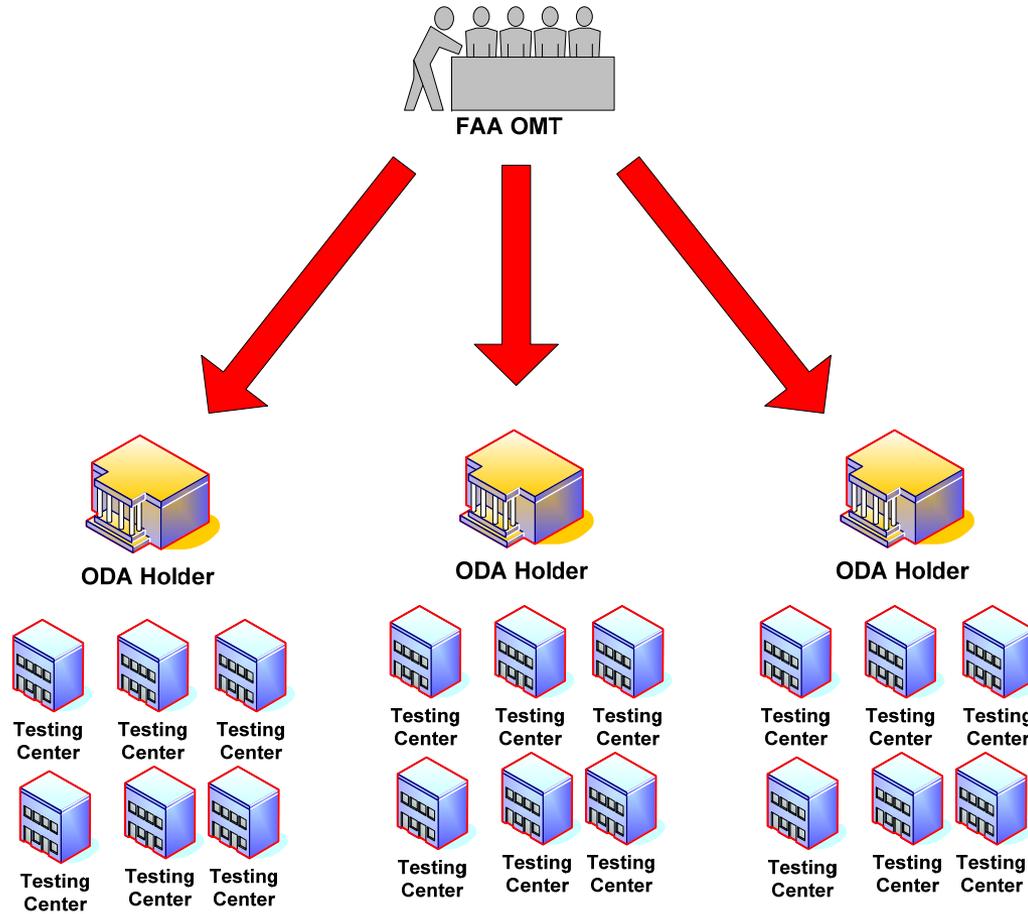
- **Qualifications requirements in FAA Order 8100.15A and Order 8080.6 to become an ODA. The application, selection, and appointment process is outlined in Order 8100.15A**
 - The prospective AKT ODAs must clearly demonstrate competence in these areas:
 - Computer Technology
 - Computer-based test administration
 - Maintenance and support of the test delivery system

Airman Knowledge Testing ODA

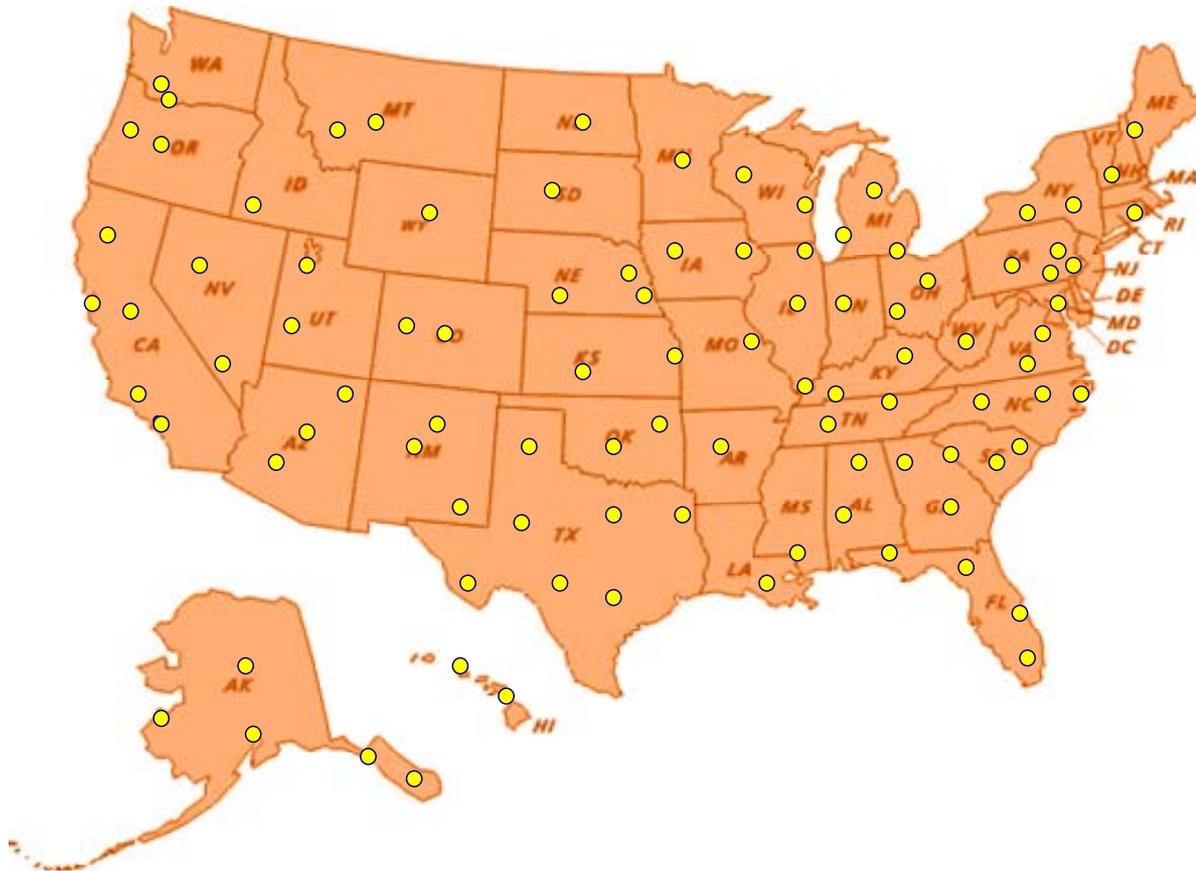
- **Authorized Functions**

- Delivery of airman knowledge tests
- Issuance of officially embossed and verifiable Airman Knowledge Test Reports to be used by applicants towards the airman certification process.
- Accuracy, control, and security of Airman Knowledge Test Data
- Testing center facility and personnel management

Airman Knowledge Testing ODA



Airman Knowledge Testing ODA



Number of Active
ODA Testing Centers

Domestic	800
International	9

Airman Knowledge Testing ODA



- **Test and Data Accuracy And Security**
 - Computer Protection
 - Notification of System Changes
 - Unauthorized access to applicant data is prohibited
 - Test Question Banks
 - Testing Computers

Airman Knowledge Testing ODA

- **Policy**
 - 14 CFR Part 183.41 – 63
 - FAA Order 8100.15A
 - Application, Selection, and Appointment
 - Oversight
 - Renewal, Suspension, and Termination
 - Chapter 14
 - AKT ODA Holder Qualifications
 - AKT ODA Unit Member Qualifications
 - FAA Order 8080.6
 - Program Background
 - Testing Center Qualifications
 - Testing Procedures
 - Applicant Eligibility and Authorization Requirements
 - Data Specifications



Airman Knowledge Testing ODA

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AIR OPERATOR AO ODA



Air Operator ODA

- **Responsibilities**

- Conduct certification functions towards issuance of Rotorcraft External-Load (14 CFR part 133) Operator Certificates
- May be consulting firms or 14 CFR part 133 certificated operators with significant experience conducting rotorcraft external-load operations



Air Operator ODA

- **Qualifications**

- Integrity
- Organizational Model
- Experience
- Resources
- Facilities

- **Experience**

- Operator certification functions
- Compliance with FAA regulations and guidance
- Aircraft airworthiness inspections
- Operational checks
- Administrative processes



Air Operator ODA

- **Managing Office**

- Geographic FSDO is the Appointing/Lead Managing Office for AO ODA functions
- Evaluation Panel also includes the associated Regional Office

Air Operator ODA

- **Applicant may apply for up to 7 function codes**
 - Each function must be addressed in ODA Procedures Manual



Air Operator ODA

- **Function Codes:**

- 15010 – Review Application for Operator Eligibility
- 15020 – Evaluate Rotorcraft Load Combination Flight Manual (RLCFM)
- 15030 – Administer Chief Pilot Knowledge and Skill Test
- 15040 – Administer Operational Flight Check(s)

Air Operator ODA

- **Function Codes (cont)**
 - 15050 – Conduct Rotorcraft and Equipment Airworthiness Inspection
 - 15060 – Conduct Base Inspection
 - 15070 – Issue Operating Certificate and Authorizations



Air Operator ODA

- **Limitations**

- OMT imposed limitations
- Issue authorizations for Class D loads or IFR operations unless approved by OMT
- Renew or amend an operator certificate
- Deviate from FAA regulations, policy, or guidance



Air Operator ODA

- **Procedures Manual Requirements**
 - Basic Contents from 8100.15, App. B
 - Process for completing Air Operator Certification functions
 - Process for AO ODA Unit Member selection and appointment
 - Format for reporting certification activity



Air Operator ODA

- **Records Requirement**
 - Basic Record Requirements from 8100.15
 - FAA Letter of Designation
 - Tests or Evaluations Conducted
 - Inspections
 - Certification Files
 - Supporting Documentation
 - FAA Administrative Actions
 - FAA Enforcement Actions



Air Operator ODA

• References

- 14 CFR parts 91, 133, and 183
- FAA Order 8100.15
 - Application, Selection, and Appointment
 - Oversight
 - Renewal, Suspension, and Termination
 - Chapter 15
 - AO ODA Holder Qualifications
 - AO ODA Unit Member Qualifications
- FAA Order 8900.1
 - Operations Unit Member Qualifications
 - 14 CFR part 133 Certification Process
- FAA Order 8100.8
 - Airworthiness Unit Member Qualifications



Air Operator ODA

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ICA Delegation



ICA Delegation

TC STC PMA

- **Perform Review and Acceptance of ICA**
 - Function codes 8180, 11180, 13180

- **Limitations** (8-5d) (11-4e) (13-4f)
 - Security Related, including military
 - Changes associated with ADs, AMOCs,
 - Projects using MRB or MTB processes.



ICA Delegation (Cont'd)

- **Acceptance performed by ODA administrator**
 - Based on compliance with procedures for ICA development and review
 - No specific “ICA” unit member
- **AEGs must determine organization capable based on history/experience**
- **ACO and AEGs must approve procedures for ICA development/review**



ICA Delegation (Cont'd)

- **Manual must address** (8-6i(1)) (11-7j(1)) (13-6e(1))
- **Process to determine whether ICA/revisions required and impact assessment**
- **ICA development/review process.**
- **Acceptance of ICA by ODA administrator**

ICA Development Process Requirements

- **Identification of departments/personnel involved in developing and reviewing ICA.**
- **Identification of specific personnel, skills or training as required.**
- **Reconciliation of ICA with design data**
- **Validation of maintenance tasks as necessary**
 - Rationale to determine when maintenance tasks don't require validation.
- **Approval of ALS**
- **Verification that ICA meet requirements of 8110.54.**



ICA Delegation-Implementation

- **ODA holder/OMT lead coordination**
- **AEG determination of capability**
 - May involve multiple AEGs
 - Provide rationale for denial of ICA authority
- **Development of procedures**
 - AEG, ACO and ODA holder collaborate on process requirements
- **Submittal of application/procedures manual**

ODA Holder Changes



ODA Holder General Changes

- **Site visits to manage inspection UM activity required every 18 months** (3-14a)
- **Clarified that conflict of interest avoidance is responsibility of ODA holder, not UM** (3-6)
- **MOU signed only by ODA holder** (3-7c)
- **Requirements for ODA unit listing** (3-13h)



ODA Holder General Changes

(3-13)

- **Clarify UM selection process requirements**
 - All UMs must be “prescreened” by OMT using DIN and other FAA databases (quick check for known performance issues)
 - Review appointment decisions of UMs that aren’t existing designees (Verify appointment process and decision)



ODA Holder General Changes

- **Noise UMs must be coordinated with AEE-100 by ODA holder or OMT (3-13e)**
- **OMT must be informed if UM removed for performance reasons (3-13h)**



ODA Holder Changes (Cont'd)

- **Self-audit includes evaluation of each UM annually** (3-13h)
- **Manufacturing and airworthiness summary activity reports submitted quarterly** (3-16a)
 - New format for report (Appendix A Fig. 10)
- **Notification of potentially unsafe conditions required within 24 hours** (3-18c)

ODA Holder Changes (Cont'd)

- **Clarify appropriate use of FAA forms** (3-20)
 - FAA Forms required if applicable to function
 - FAA Forms may only be tailored by marking up deletions/additions
 - Mark-Ups must be visible on electronic forms
- **Inspection UMs at suppliers** (3-21)
 - May only perform functions at supplier or sub-tier supplier
 - Approvals may only support articles produced by supplier

ODA Holder Changes (Cont'd)

- **Function code for issuance of standard airworthiness certificates includes amendments**
- **Revised TC/STC certification plan content (App D)**
 - Resolve differences with 8110.4 requirements
 - Clarify that material required in cert plan must be addressed
- **Notification no longer required for manufacturing activity out of area**



ODA Holder Changes (Cont'd)

- **New manual requirement for FAA access to suppliers** (App B, Sec 19)
 - For the purpose of inspecting the facilities, product/articles and records related to the functions performed under this authorization
 - Oversight expectations for any ODA should also apply to all suppliers

FAA/OMT Changes



FAA/OMT General Changes

- **MOU not signed by FAA** (4-4) (App A Fig 14)
- **LOD no longer specifies authorized functions-only PM** (4-4)
- **Single AEG manager may sign PM on behalf of other AEGs** (4-4)

FAA/OMT General Changes (Cont'd)

- **Geographic Coordination for OMT** 5-7
 - The OMT must coordinate with geographic offices as needed to provide needed OMT members
 - OMT may oversee remotely if desired.
 - The geographic office will provide OMT personnel if requested



FAA/OMT General Changes

Appendix B

- **Both MIO and MIDO managers must sign ODA PM signatures**
 - Managers signature required from the Appointing Office and the Managing Office(s)



FAA/OMT General Changes (Cont'd)

- **Local office manager may sign letter of designation after notifying directorate/regional office. (4-4)**
- **OMT lead decides which OMT members coordinate on manual, PNL review, etc. (5-3b, 11-7c)**
- **AIR-110 coordination on manuals (5-3b)**

FAA/OMT General Changes (Cont'd)

- **Activity Outside The United States**
 - The ODA holder must notify the OMT prior to performing any function in a foreign country
 - OMT may need to coordinate with the FCAA per the BAA or BASA
 - Prior FCAA coordination is required for those countries with which the United States does not have an aviation bilateral agreement



FAA/OMT General Changes (Cont'd)

- **ACO may retain limited certification records**
(5-3h)
- **Supervision/Inspection Records** (5-4h, 6-5g)
 - May be retained electronically
 - Differently formatted electronic means
- **Corrective action may be verified without visit to facility** (5-6e)
 - Requires coordination with OMT lead manager

FAA/OMT General Changes (Cont'd)

- **Evaluation panel must coordinate with AEE-100 prior to granting noise authority (4-3d)**
- **Only OMT lead must be identified in DIN (16-2)**



FAA/OMT General Changes (Cont'd)

- **DOIP Procedures**

- Clarify that safety related discrepancies must be investigated for need for AD. (6-5h)
- Eliminate PM non-compliance discrepancy type
- Additional data fields on discrepancy record (App A)
- Additional instructions for discrepancy records
- Report sent to OMT lead within 30 days (6-6a)
- Word format copy of report to AIR-110
- Minor changes to criteria and related forms

FAA/OMT General Changes (Cont'd)

- **Change in Ownership**

3-11b

- Company name change or a corporate merger may be executed by reissuing the ODA letter of designation and the MOU, along with revising the procedures manual to reflect the new name



Military Commercial Derivative Aircraft



Procedures for MCDA Projects

TC STC

- **Procedures for MCO interface** (8-14, 11-16)
 - Must address procedures in manual
 - Submit PNL to both OMT and MCO including info required by 8110.101
 - OMT must concur with delegation of project, may participate for oversight
 - MCO approves cert plan, coordinates CPN, responds to PNL, oversees project



Procedures for MCDA Projects

TC STC

- **Data package sent to both OMT and MCO
(8-14, 11-16)**
- **Service difficulties coordinated with both offices**
 - MCO responsible for investigation, coordination with OMT lead
- **MCO members involved with ODA projects must complete supervision record annually**
- **MCO personnel may participate in DOIP inspections**

Procedures for MCDA Projects

8-7g, 11-9

- **Prototype installations for MCDA may be conducted at military/contractor facility**
- **ODA holder's repair station must be authorized for the type of work under 145.203(b)**



Certification Activity – TC/STC



Certification Activity- TC/STC

- **Address requirements for certification activity prior to PNL response** (8-6, 11-7)
 - Manual may define activity that may be performed without specific authorization, or
 - Activity authorized by PNL response, interim authorization.

Certification Activity- TC/STC

- **Applicant's Certifying Statement** (8-6a, 11-7k)
 - ODA holder must ensure applicant completes certifying statement per 21.20, 21.97 prior to completion of FAA Form 8100-11



Certification Activity- TC/STC

Off-site prototype installations (8-7g, 11-8, 11-9)

- **Only at FAA-certificated facility**

- authorized to approve the type of altered product for return to service

- **Public use military may be accomplished by ODA holder at military/contractor repair facility**

- -ODA holder's repair station must be rated for type of activity under 145.203(b)

Certification Activity- TC/STC

Off-site prototype installations

- Inspection UM must be present to perform in-process and final installation conformity inspections
 - For activity that could affect any previously conformed articles or installations whose conformity could not be subsequently re-established
 - ODA holder must ensure that unit members complete any required conformity inspections on encased or otherwise not readily visible installations

Certification Activity- TC/STC

- ELOS findings only submitted if identified as a specific finding. (8-6g)(11-7h)
- Submittal of 8100-9s not required for foreign findings. (8-6l)(11-12)

TC ODA Changes



TC ODA Changes

- **New Function Codes** (8-3)
 - 8061 Issue/amend standard airworthiness certificates
 - 8170 Issue FAA Form Form 8130-31 Statement of Conformity, Military Aircraft
 - 9180-Perform Review and Acceptance of ICA



TC ODA Changes (Cont'd)

- Clarification of limitations on life limits (8-4)
- FAA must approve:
 - Reduction or elimination of life limits on life-limited components.
 - Reduction of life limits or new/different inspection requirements to address an unsafe condition
- Alteration/Repair activity reports submitted quarterly or more frequently as required by OMT. (8-5b)

TC ODA Changes (Cont'd)

- Coordination with Directorate. (8-6c2)
 - All major changes must be coordinated via CPN process unless directorate agrees notification not required.
 - PM must identify types of changes which don't require notification.

TC ODA Changes (Cont'd)

- Supplier management plan not required for TC project if addressed in ODA manual (8-6m7)
- Provisions for repair specification approvals (8-9a)
- Provisions for statement of completion for repair or alteration approvals which address all aspects of repairs (8-9b)

TC ODA Changes (Cont'd)

- **AMOCs**

(8-10)

- Clarifies authority applies AMOCs for AD with structural aspects.
- Provides for approval of global AMOC under specific criteria
- Allows for the approval of alternate inspection methods
- Delegated AMOCs distributed per 8110.103
- May approve global AMOCs for administrative changes to SBs



TC ODA Changes

- **Approvals for FAA-managed Projects** (8-15)
 - Applies to engineering functions
 - Approve data/find compliance
 - Approve operational/repair information
 - Approve airworthiness limitations
 - Establish conformity inspection requirements
 - Perform compliance inspections
- **Project involves ODA holder's product**
- **Use of approvals discretion of project managing ACO.**

TC ODA Changes

- **Misc.**

- TIA issued prior to flight testing rather than at pre-flight board meeting (8-16j)
- FAA letter not required to document specific findings (8-16r)

PC ODA Changes



PC ODA Changes

- **New Function Code** (9-3)
 - 9170 Issue Statement of conformity, military aircraft
FAA Form 8130-31
- **Conformity inspection functions 9080, 9090 may include test witnessing** (9-3)
 - UM must be authorized per the ODA manual
 - Witnessing by inspection UM must be authorized by project-managing ACO.

PC ODA Changes (Cont'd)

- **FC 9063 Issue Domestic Airworthiness (9-3) Approvals**
 - Now applies to used rather than rebuilt

PC ODA Changes (Cont'd)

- **PLR Audits** **(9-6)**
 - The ODA unit must schedule and conduct a PLR certification and product audit plan per FAA Order 8120.2
 - Refer to FAA Order 8100.7 for PLR audit evaluation criteria
 - The ODA unit must notify the ODA holder in writing of the PLR audit results

PC ODA Changes (Cont'd)

- **PLR Audits** **(9-6)**
 - ODA unit must perform conformity inspections identified in the “comprehensive conformity inspection plan”
 - ODA unit must verify all conformity inspections satisfactory before PLR amended
 - Refer to FAA Order 8100.7 for PLR audit evaluation criteria

PC ODA Changes (Cont'd)

- **Clarify that conformity inspections may be performed in support of CAA programs (9-7)**
- **Recommend use FAA letterhead for operating limitations (9-8b)**



TSOA ODA Changes



TSOA ODA Changes

- **May perform conformity inspections for FAA or CAA-managed projects (10-4b)**



STC ODA Changes



STC ODA Changes

- **New function codes** (11-3)
 - 11130 Approve Data for Major Repairs and/or Major Alterations
 - 11170 Issue Statement of conformity, military aircraft FAA Form 8130-31
 - 11180 Perform Review and Acceptance of ICA

STC ODA Changes (Cont'd)

- **Clarification of limitations on life limits** (8-4)
- **FAA must approve :**
 - Reduce or eliminate life limits on life-limited components.
 - Reduction of life limits or new/different inspection requirements to address an unsafe condition
- **STC ODAs may utilize data approvals from a TC ODA** (11-7b1, 11-7a1, 11-7g)

STC ODA Changes (Cont'd)

- **Issuance of STCs.** (11-7L)
 - Managing ACO or ODA holder must submit Word format copy of STC to AIR-110 within 60 days.
 - Eliminate "-D" from STC Number
 - May only amend STCs held, or if the ODA holder was involved in issuance of STC (11-7n)

STC ODA Changes (Cont'd)

- **New Data Approval Functions for FAA-managed projects (11-13)**
 - ODA holder is applicant or project involves articles manufactured by ODA holder
 - Use of approvals discretion of project managing ACO.

STC ODA Changes (Cont'd)

- **New Data Approval Functions for FAA-managed projects (11-13)**
 - Engineering and conformity functions
 - Approve data/find compliance
 - Approve operational/repair information
 - Approve airworthiness limitations
 - Establish conformity inspection requirements
 - Perform compliance inspections
 - Determine conformity of articles, test setup, installations

STC ODA Changes (Cont'd)

- New Data Approval Functions – Major Alteration/Repair Data (11-13)
 - Repairs related to STCs held or issued
 - Alteration data to approve installation deviations
- Must submit quarterly reports of repair/alteration activity (11-5e)

MRA ODA Changes



MRA ODA Changes

- **Function Codes 12061 and 120610** (12-3)
 - to align with DAR FCs from FAA Order 8100.8
- **Changed Function code 13064 to eliminate “newly overhauled” limitation**
 - Issue Export Airworthiness Approvals (function code 13064) for new or used articles (as defined by 14 CFR part 21)
- **Issue special flight permit for overweight**
- **Incorporated aspects for repair specs** (12-6)

MRA ODA Changes (Cont'd)

- **MRA Airworthiness Activity-Out of Area (12-9)**

- ODA holder must submit written request to OMT at least 7 days prior
- AFS OMT representative will coordinate with geographic office
- Geographic office will provide OMT with written response to request
- OMT will provide written response to ODA holder

MRA ODA Changes (Cont'd)

- **Certification Files**

(12-7, 12-8)

- The ODA unit must send the airworthiness certification files to the OMT lead.
- In the case of an OMT consisting of more than one office, the OMT may distribute the files among the offices, based on mutual agreement.
- The OMT may direct the ODA holder to send files directly to the processing office.
- The FSDO responsible for the geographical area where the product is located may process the files

MRA ODA Changes (Cont'd)

- **Procedure Manual Requirements** (13-12)
 - Removed:
 - Differentiating between major and minor repairs.
 - Differentiating between repairs and alterations.
 - Added:
 - Verification that ICA have been addressed prior to statement of completion

PMA ODA Changes



PMA ODA Changes

- **New Function Codes** (13-3)
 - 13130 Approve data for major repairs
 - 13180 Perform Review and Acceptance of ICA



PMA ODA Changes (Cont'd)

- **PMA Processes**

- Revised required content for PNL submittal. 13-6a and 13-7a

- **T&C PNL now requires "conformity plan or requirements for production aspects"**

- **Licensing PNL no longer requires**

- Installation eligibility

- Assessment of the criticality of the part

- Location of manufacturing operations

- Now requires PMA assist letter and reference to STC number

PMA ODA Changes (Cont'd)

- **T&C Process Changes-Life limited or critical articles**
 - PNL to be coordinated with CMACO prior to OMT concurrence and (13-4e)
 - Coordinate with accountable directorate by CPN (13-6b)
- **Ensure applicant's certifying statement for T&C complete per 21.303(a)(5) (13-6g)**

PMA ODA Changes (Cont'd)

- **New Data Approval Functions for FAA-managed projects** (13-8)
 - ODA holder is applicant or project involves articles manufactured by ODA holder
 - Use of approvals discretion of project managing ACO.

PMA ODA Changes (Cont'd)

- **New Data Approval Functions for FAA-managed projects** (13-8)
 - Engineering and conformity functions
 - Approve data/find compliance
 - Approve operational/repair information
 - Approve airworthiness limitations
 - Establish conformity inspection requirements
 - Perform compliance inspections
 - Determine conformity of articles, test setup and installations

PMA ODA Changes (Cont'd)

- **Approval of Major Repair Data** (13-8c)
 - Repairs to articles produced
 - Includes repair specifications
- **Misc.**
 - May do conformity on CAA managed projects. (13-10a)
 - Do conformity inspection on any type of certification project, was TC or STC (13-10)
 - Minor changes to PMA supplement format.
Appendix a, Figure 21-24

Wrap Up



Next Steps

- **Determine impact of revision on your ODA holders**
 - Are changes to procedures manual required?
 - Should existing designees be incorporated into ODA?
- **Discuss with ODA holders**
 - Develop plan for manual revisions to be submitted by December 7, 2011

For More Information

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