

**Clearance Record
DOCUMENT COMMENT LOG**

Originating Office:	Document Description: FAA Order 8100.15A, Organization Designation Authorization Procedures	Project Lead:	Reviewing Office:	Date of Review:
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#	Company /Group	Pg	Para.	Comment	Rationale for Comment	Recommendation	Disposition
1.	United Airlines ODA	6		Figure 2-2 Legend: Primary FAA Office – M=MIDO; O=FSDO and S=AFS-630, but does not show ACO for E.	For consistence there should be a legend for E.	Add E=ACO for consistence.	Non-concur. There are no ACO function codes in Figure 2-2 therefore there is no need to include E=ACO in the legend.
2.	Boeing		(None)	The draft Order has deleted language related to requesting deviations from the Order.	Without the possibility of a deviation, the draft Order mandates strict compliance with the Order as written. This is not practical when actually applied to an organization. Experience shows that FAA Orders do not explicitly fit all situations and therefore some process must be in place for deviations.	Insert language allowing requests to deviate from the Order, with specific criteria that must be included in the requests.	Concur. Deviation language added to Appendix G, 702.
3.	Sikorsky Aircraft Corp.	B-11	10: Guidance Material	Section 10: Guidance Material should be removed entirely	This requirement was removed from Section 3-9 Procedures Manual Requirements, therefore it should be removed from the sample procedures manual.	Remove section 10 in its entirety.	Non-concur. Paragraph 3-9(b)(20) still includes the requirement for obtaining and maintaining related regulatory and guidance material. This requirements still exists.

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4.	HBC	C-3	1-1	Statement of Condition: includes term FAR.	Should be CFR.	Please delete FAR.	Concur. "FAR" text will be deleted as recommended.
5.	Garmin	116	11-12	In the section dealing with approval of foreign regulations, this proposed revision deleted the instructions to submit the original 8100-9 to the ACO and to submit the data if recommend. It is not clear by this deletion if that requirement has changed or gone away.	Since the requirement existed previously, it would be better to clearly state the intent rather than simply delete. E.g. Do I submit the original or a copy?	Clarify the intent of the deletion.	Non-concur. ODA provided Substantiation data is at the discretion of the FAA. Requirement to submit original 8100-9 no longer exists.
6.	Garmin	116	11-13 a	Why limit this activity to engineering functions? If as a supplier STC ODA, we do a test (e.g., a HIRF test on our avionics, in support of the FAA managed TC program), is there any good reason we cannot also do the conformity inspections needed to support the test?	Allow the STC unit to also handle conformity inspections associated with the engineering approval package they are providing in support of the FAA-managed program. There seems to be no reason not to take advantage of the ODA processes and procedures to alleviate FAA workload in this activity.	Allow conformity inspections to be delegated to the STC ODA for FAA-managed programs.	Concur. Revised accordingly. Paragraph b. states that an STC ODA holder can design and perform conformities on articles in support of a TC ODA. Therefore this STC ODA holder should be able to do conformity inspections if a project is managed by the FAA. Add function codes 11090 and 11100 to the list of codes in paragraph 11-3.0 not 11-13a.

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7.	Duncan Aviation	118	11-15	<p>How does this compare or differ from paragraph 11-13 c?</p> <p>What about activity reporting that is required under MRA? Does the repair or alteration data approved as a deviation to an STC require reporting as with MRA?</p>	Clarification	Clarify and put all requirements in one paragraph.	Concur. Deleted 11-15.
8.	Garmin	118	11-17	<p>In the past, for small commercial derivative projects, some ACOs have allowed ODAs to submit to the ACO as normal and they coordinated with the MCO who were typically not involved after this initial coordination. While the process outlined in the order is likely required for larger programs it seems overly complicated for a simple small STC project.</p>	<p>Consider simpler process for small STCs. Is there no way to apply to the ACO as normal and let the FAA coordinate internally as needed? Order 8110.101 section 8 seems to suggest applicants using a delegated organization should contact their ACO and the MCO would coordinate with their ACO.</p>		<p>Non-concur. Rationale: Under the terms of the FAA/Armed Services Memorandum of Agreement, the MCO is the office responsible for administration for all military projects. These responsibilities include standardization of all certification activity conducted for the military, serving as the FAA POC to the military for the project, and authorizing cost accounting codes. All certification projects must start with the MCO. For these projects to be</p>

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							conducted by an ODA, the project must be coordinated between the MCO and responsible OMT prior to the project being accepted. Order 8110.101 may require revision now that procedures for ODA military projects have been defined.
9.	Garmin	121 - 122	11-19	The acceptance of ICA is heavily focused on the process on which it is developed not on the review for acceptability. Why is it so important who the applicant uses to develop the document? Instead, it should be important who the ODA has involved in the review and acceptance process. It is the same thing as what is done for type design. The ODA procedures do not govern who in the applicant's organization can	The applicant should be able to use anyone within their organization to develop data including the ICA. The acceptability of that data will be ensured by the ODA review process. In many organizations, the ODA cannot dictate who develops the actual documents but can enforce who is required to review/approve, the criteria by which the review/approval is determine to be acceptable, and the qualifications of the UMs. An applicant could in theory assign a simple ICA change to a junior tech pub writer today but under this new process they couldn't do so unless that person completed internal and FAA training. Given turnover within organizations,	Change this process to be less focused on the development of the ICA and more on who can determine acceptability on behalf of the AEG, the criteria required to determine acceptance, and the qualifications/training these UMs/administrators need to have.	Non-concur. The ODA holder must train those compiling the data for ICA acceptance, regardless of whom is accomplishing the work.

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				<p>develop a drawing. The ODA governs who has to approve the drawing and what the approver's qualifications are but not the designer's qualifications. If the ODA inspection UMs, engineering UMs, and administrator review the ICA and ensure all aspects of the Order have been met and the ICA is acceptable, why is it necessary to have the developers attend the identified training? We would not object if the requirement was that the UMs or administrators doing the review on behalf of the AEG had to be trained but it is overly restrictive to require the individuals developing the documents in the ODA holder's organization be trained.</p>	<p>etc., it seems more efficient to train the few acceptable reviewers than the many possible authors of these deliverables.</p>		

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10.	Garmin	102	11-3 o	<p>This paragraph allows for the STC ODA to perform some functions for non-ODA projects where the ODA holder is the applicant or in support of other FAA managed programs. The ability to approve packages in support of other applicant FAA projects is a great step forward for ODA. However, the statement that the ODA can do these functions for FAA managed projects for which the ODA holder is the applicant seems to contradict an earlier proposed changes (1-5 and 2-7) that says an ODA holder must use their ODA to conduct projects within the ODAs authority,.</p>	<p>This section seems to contradict previous sections (1-5 and 2-7) with regard to projects where the ODA holder is the applicant.</p>	<p>Clarify the intent</p>	<p>Non-concur. No contradiction. No changes required. FAA managed projects are considered standard certification procedures.</p>
11.	Boeing	103	11-4.e.(1)	<p>This paragraph of the draft Order states: <i>“e. ICA ACCEPTANCE. No ODA holder may</i></p>	<p>FAA Order 8110.101, paragraph 11-5.(b), requires ICAs on Military Commercial Derivative Aircraft (MCDA) to be provided in commercial format.</p>	<p>Revise the draft Order to allow the AEG to determine whether it needs to review a particular ICA as part of</p>	<p>Non-concur. The statement is clear it is for security related ICA’s and the note says the OMT may limit delegated ICA</p>

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				<p><i>accept ICA for:</i></p> <p><i>(1) Security-related projects (military/homeland security, etc.).”</i></p>	<p>The general requirement for allowing delegation of the function code 11180A is that the ODA holder must successfully demonstrate the capability to develop acceptable ICAs.</p> <p>If an ODA holder has significant experience in working with MCDA programs, including the understanding of both the Technical Order format, content, and processes, and the Commercial Format, it should be recognized as capable of presenting acceptable ICAs to the AEG.</p>	<p>the Certification Program Notification (CPN) or delegate to those ODAs with a proven record.</p>	<p>review and acceptance by project product types.</p>
12.	Learjet	104	11-6 (a)	<p>The ability to be able to use fixed military repair facilities is good for public-use aircraft. However, it would better if these facilities could be used for any aircraft where the prototype alteration is being performed for the military.</p>	<p>Last year we performed four STCs on aircraft that were going to be leased to the US Air Force after the STCs were completed. The projects were run through the MCO. In this case the aircraft did not become public use until after we finished.</p>	<p>Allow the use of fixed military repair facilities for any STC project where the prototype alteration is being performed for the US DOD.</p>	<p>Non-concur. STC on a civil aircraft must be prototyped at an approved facility.</p>

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13.	Learjet	108	11-7 (e)	<p>This paragraph has been changed to require the OMT Lead to only respond to acceptable PNLs.</p> <p>There is now a requirement for written OMT concurrence prior to UM performing authorized functions.</p>	<p>It is desirable to receive a response to all PNLs.</p> <p>This requirement does not account for the complexity of the activity (i.e. simple, routine, new/novel, highly complex) and prevent any activity from happening unless a separate written request is made.</p> <p>Some activities are low risk. Creating the requirement to request permission to do something that is within the authorization for a low risk/routine activity will add a burden to the holder/unit and the managing office.</p>	<p>Restore the original wording</p> <p>Make the requirement for written concurrence operate on a well defined graduated scale.</p>	<p>Partial concur. Deleted language, "... that the OMT finds acceptable..."</p> <p>ODA holders must be authorized in their PM to prescribe what authorized functions can be performed prior to written concurrence. For TC Chapter also. Added language to allow ODA holders PM to prescribe authorized functions that may be performed prior to written concurrence.</p>
14.	Learjet	112	11-7 (n)	<p>Amendment of STC is being restricted.</p>	<p>Presently ODAs and non-ODAs can amend STCs that were originally issued by someone else. This change restricts ODA from doing the amendment, but not non-ODAs.</p> <p>This would mean that as an ODA we could not amend an STC that we have purchased.</p>		<p>Concur. STC ODA holder must own or been involved with the issuance of the STC. No clarification needed.</p>

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15.	Garmin	106	11-7 b(1)	It seems that the tense of the sentence is not correct. At the stage of PNL submittal, shouldn't the TC holder's ODA administrator's letter indicate what approvals will be provided by the TC ODA in support of the STC program? Current wording implies these approvals have already been made.	Incorrect tense	Change the phrase "data approvals provided" to "data approvals that will be provided" in the current sentence	Concur. Added, "...provided, or will be provided..."
16.	Garmin	107 - 108	11-7 d (3)	The third and last sentences seem redundant and possibly contradictory to each other. One says in all cases the AEG will evaluate several aspects including the AFM. The last sentence says the AEG may evaluate the AFM.	Redundant and possibly contradictory statements	Remove unnecessary wording to clarify the intention.	Concur. Revised to read: "Determine compliance in areas evaluated by the AEG. If the ICA function has been authorized, the AEG will perform evaluation in the following areas: operational suitability, changes to the master minimum equipment list, AFM, crew qualifications, and emergency evacuation demonstrations."

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17.	Garmin	111	11-7 k	The FAA has removed the need to add the –D to ODA managed STCs. It is assumed but not stated that those already issued with a –D can stay with the –D forever.	It would be a significant amount of non-value added work to update existing STCs and associated deliverables that call out the STC number to remove the –D.	Add a note stating that those existing STCs issued with a –D per the previous requirements may retain the –D indefinitely	Non-concur. No clarification or guidance is required with regard to reissuing STCs to remove “–D”.
18.	DERT	108	11-7e	The cited paragraph states that “[t]he OMT lead will respond to the ODA holder formally, in writing, after receiving a PNL that the OMT finds acceptable.”	There is no onus on the FAA to provide a timely response to the ODA Holder’s PNL, and there is no requirement to detail deficiencies in the PNL on which historical evaluations and audits can be conducted. (Reference Standardized Technical Evaluation Criteria section 2 items 2-1 through 2-5 inclusive.	The cited paragraph should state that “[t]he OMT lead will respond to the ODA holder formally, in writing, within 30 days after receiving a PNL that either the OMT finds the program to be acceptable, or that additional information is necessary to render a determination of acceptability; a list of any discrepancies or additional items required will be provided.”	Non-concur. Current language provides the OMT flexibility when responding to and addressing PNL issues.
19.	Bell Helicopter Textron	108	11-7e	OMT has 30 days to respond to an STC PNL, but what recourse does the ODA have if the OMT surpasses 30 days?	We rarely had our OMT respond to a PNL within 30 days of our submittal	For this requirement on the OMT to have any teeth, the order needs to create some parameters for recourse by the ODA	Non-concur. Current language provides the OMT flexibility when responding to and addressing PNL issues.

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20.	Flight Structures, Inc.	112	11-8	<p>Flight Structures, Inc. believes that the requirement for “all prototype installations must be accomplished at facilities authorized to approve the altered product for return to service in accordance with 14 CFR part 43” is too restrictive, does not support industry needs and adds no additional level of configuration control relative to ODA managed programs.</p>	<p>STC ODAs are routinely involved with STC programs that reconfigure the complete interior of transport category airplanes for airline customers that operate airplanes registered in the United States (US) or foreign registered.</p> <p>STC ODAs often function as the prime integrator and STC holder for programs that include component level certification and installation of in-flight entertainment systems, overhead stowage bins, monuments (closets, lavatories, galleys, etc), crew rests, lighting systems, seat actuation systems, sidewalls and ceilings that are designed and produced by companies in the United States (US).</p> <p>Many foreign airline customers utilize modification facilities that are regulated by foreign civil aviation authorities (FCAA) and are not approved under 14 CFR Part 43 but are equally regulated by EASA or the local FCAA. As such, ODA privileges cannot be utilized and the programs must be managed by the FAA.</p>	<p>Order 8100.15 should allow prototype installations to occur at FCAA regulated facilities where a bilateral airworthiness agreement with the US exists with the respective country or at facilities that are EASA approved and where the cognizant FCAA agrees to grant the return to service after STC issuance for the altered product.</p>	<p>Non-concur. Draft language is appropriate for ODA holder authority.</p>

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					<p>A return to service in accordance with 14 CFR Part 43 cannot be accomplished on a non-US registered airplane as 14 CFR part 43 privileges can only be exercised on US registered airplanes without a special request from the FCAA to the FAA.</p> <p>Additional burden is placed upon the FAA to manage such programs and the STC applicant must accomplish the program in accordance with FAA scheduling which may delay aircraft return to service following program completion.</p> <p>The prototype installation for all complex interior reconfigurations are conformed to the type design data and all necessary compliance testing is accomplished by appropriately authorized ODA inspection unit members (who are all sanctioned by the FAA), therefore no additional integrity or configuration control is introduced by the requirement.</p>		

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					<p>STC ODAs are placed at an economic disadvantage as airlines expect ODA privileges to utilized and have awarded programs to non-ODA companies who unjustly commit to FAA flow times for STC issuance upon project completion. The airline perception is that STC ODAs are accustomed to utilizing ODA privileges and would not be as competitive and efficient as a non-ODA applicant in an FAA managed program.</p> <p>In accordance with Order 8100.15, ODA manuals include complete evaluation criteria for off-site facilities that include assessment of facilities, personnel qualification/records, calibration, material handling, work records, quality records, part segregation, etc.</p>		
21.	Duncan Aviation	112	11-8	typo	confusing sentence	redundancy within sentence	Non-concur. Nothing confusing or redundant.
22.	Duncan Aviation	112	11-8	Possible error in reference.		Verify if last sentence should refer to paragraph 11-8f or 11-9.	Concur. Revised accordingly.

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23.	DRB Aviation Consultants	112	11-8 b.(2)	Using the term “installation portion of the project” is too vague.	Two different FAA offices (MIDO and ACO) already have two different interpretations of the meaning of “installation portion” of the project. The MIDO opines that the Inspection Unit Member (IUM) must be on-site from the installation of the first article (part) until the finish of the TIA testing. The ACO opines that the “installation portion” of the project may start and stop several times during the project, and thus the IUM need not be on site for the entire project – only when installation are taking place. The difference can have a large financial impact on a large STC project if the ODA does not have an IUM who is employed by the modification center. Current FAA STC projects have no such requirement.	Change “installation portion” to “installation portions”, or add other clarification verbiage to define specifically when the IUM must be on site.	Non Concur. The FAA expects ODA holders to have the professional competence, and integrity to manage and oversee all projects for which they have been granted authority. This includes ensuring that any “installation” has been properly supervised and completed. Interpretation belongs to the FAA, so we must ensure that it is consistent across all offices. AIR-200 will confer with ACOs and MIDOs to ensure consistency.
24.	Boeing	112	11-8.b.	This proposed paragraph would require Inspection unit members to be on site full-time during prototype installation activity and during maintenance that may	As part of a General Aviation Manufacturers Association (GAMA) workshop in 2007, Boeing presented a position that the requirement to have an inspection Unit Member on site full-time, as stated in the Order, was more restrictive than an	The level of ODA inspection on-site presence should be addressed in the Conformity Plan.	Partial Concur. Paragraph clarified to address requirement to be on site as needed to perform conformity inspections and if repair/alteration activity could affect conformity.

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				<p>affect the prototype alterations.</p> <p>Note: This requirement is also in paragraph 8-7.b.(2) for TC ODA.</p>	<p>FAA-managed program where the FAA or Designee is on site as required to oversee and perform their duties. This requirement also creates an additional financial burden on Delegated Organizations. There have been instances where that has been a deciding factor in determining whether to use the delegated organization for a particular project or subcontract to a non-delegated third party that uses the FAA for management. As a result, this requirement, in some instances, is driving work back to the FAA and using more FAA resources. We consider that the aspects addressed in the requirements for inspection UM presence can be achieved through ODA Repair Station Oversight, Certification, and Airworthiness Integration efforts.</p>		
25.	Duncan Aviation	126	12-5 b.	<p>This is a separate, but similar report as required by para. 3-16. See comment regarding that paragraph.</p>	<p>For consistency, simplicity and remove confusion.</p>	<p>Combine the reporting requirements into one report.</p>	<p>Non-concur. An MRA ODA may be authorized airworthiness functions and/or data approval functions. Therefore, it may not be applicable to require the combination of these reports.</p>

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26.	Bell Helicopter Textron	127	12-7	For out of geo airworthiness certification, ODA holder must go through OMT FSDO who in turn coordinates with the other FSDO	This notification method is onerous and burdensome; it overcomplicates a simple process	Remove this requirement and allow the ODA to notify the out of geo FSDO	Non-concur. This process aligns ODA with the DAR-T policy for similar functions. The same concerns this is meant to address with DAR-T's and applicants still exist for ODA's.
27.	Duncan Aviation	129	12-9 a. (10)	There is a lack of overall guidance as to what is expected for repair specification approvals.	Too vague	Add additional information or reference to other documentation for guidance, including information as to what specific approval authority might be required to be indicated in the UM List for an Engineering UM.	Non-concur. The ODA holder should have experience generating repair specifications. Additional guidance can be obtained from 8110.37, paragraph 12-8.f. of this order or the OMT lead.
28.	Wencor	143	13-10	2 nd Par. reads: "Conformity inspections must be accomplished in accordance with the guidance in Order 8110.4." Revise to read: "Conformity inspections must be accomplished per the general guidance in Order 8110.4 and as documented in the ODA procedures	Order 8110.4 is directed at Type Certification for major type design projects such as aircraft, engines or propellers and represents a major over kill in many respects when applied to PMA project development. Hence, the ODA procedure manual should be the guiding requirements for conformity inspections. Example: Chapter 3 Par 11. Conformity Inspections. Conformity inspections are at the		Non-concur. "Conformity inspections are at the discretion of ACO or MIDO. The need for these inspections depends on part complexity, criticality and applicant capabilities... However, an inspection of the first article by the applicant may demonstrate conformity for simple, non-critical parts. FAA Order 8110.42 is specific to the PMA process and currently depicts the process

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				manual.”	discretion of ACO or MIDO. The need for these inspections depends on part complexity, criticality and applicant capabilities. Conformity inspections ensure that a modification or replacement part complies with an approved design and confirms that the associated manufacturing facilities have the capabilities to produce this design. Also the inspections are a prerequisite for FAA certification tests. However, an inspection of the first article by the applicant may demonstrate conformity for simple, non-critical parts.		graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program and Order 8100.15 does not change anything about that process. Also please note the comment regarding simple, non critical parts.
29.	Wencor	143	13-11	This section requires a corrective action proposal to be submitted to the FAA within 24 hours if the OMT finds that a supplement was issued for a part not eligible. Recommend this to be revised to read: “The ODA holder must submit a corrective action proposal to the FAA within 24 hours for a Critical Part and within 5 days for a non-critical part.”	The 24 hours is suitable for a Critical Part, however, for a Non-Critical Part a longer time period is requested such as 5 working days.		Non-concur. Though Order 810.42 discusses “simple, non-critical parts” in the context of the PMA process, there is no regulatory definition for such parts. However 8110.42 does define a “critical” part. We cannot make changes to the PMA ODA process independent of the PMA process (8110.42).

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30.	Wencor	144	13-12.b(2)	Same comment as on Sect. 13-6. a.(2)(c) refers to the Conformity Inspection Plan (CIP) as stated: “Conformity plan or requirements for production aspects.” It makes no allowance for simple, non-critical parts that only require a PAH’s First Article Inspection (FAI) instead of a full RFC driven FAA Conformity Inspection where CIP is useful. Requiring the CIP for simple PMA parts is wasteful and the CIP should be allowed to be consolidated into the CP.	Avoids extra paperwork, coordination and costs. Requiring the CIP for simple PMA parts is wasteful and the CIP should be allowed to be consolidated into the CP for these cases.		Non-concur. This is currently out of the scope of this revision. FAA Order 8110.42 is specific to the PMA process and currently depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program and Order 8100.15 does not change anything about that process. Again, Conformity inspections are at the discretion of ACO or MIDO and the need for these inspections depends on part complexity, criticality and applicant capabilities. We cannot make changes to the PMA ODA process independent of the PMA process (8110.42).
31.	Wencor	144	13-12.b.	The last sentence states: “The ODA unit members will review the data package and, upon finding that the data shows compliance with the applicable airworthiness requirements, will	This would then be a more correct statement.		Non-concur. This order states in various locations that ODA UMs must follow their ODA procedures manual. There would be no benefit to adding that statement once again.

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				approve the data.” Please add: “.. per the requirements in the ODA procedures manual.”			
32.	Wencor	133	13-3.e.(2)	Add to FC 13064 Issuing Export 8130-3 tags: “Also may issue airworthiness 8130-3 tags for standard parts when requested by customers for extra assurance of acceptable parts.”	Reasons: <ol style="list-style-type: none"> 1) Several foreign customers and country agreements require 8130-3 tags for all aircraft parts even including Standard parts. 2) Improves aircraft safety by adding an additional inspection on standard parts. 3) ODA MFG UMs are already trained in issuing 8130-3 tags and the added burden will be offset by not requiring to hire DARs to do this function. 		Non-concur. The use of 8130-3 tags is a government to government protocol. AIR-200 does not support the practice of issuing 8130-3 tags just to provide customers an “extra assurance of acceptable parts.” Such action is not an FAA requirement and to do so can create or support a false perception that it is a requirement.
33.	Wencor	134	13-4.a	The section as written can be abused or over restrictive by the OMT. It states: “ The OMT may impose any limitations on an ODA holder's authority, as warranted by the ODA holder's staffing and experience, that the OMT determines	Request consideration for issue identification and corrective action by the ODA before the OMT imposes restrictions beyond those in the approved ODA procedures manual. i.e. Recommend adding: “When the OMT identifies an issue that may require imposing a restriction on the ODA, the first step must be a written notification		Non-concur. Delegation is a privilege not a right and the FAA may impose any limitation on a designee acting on the FAA’s behalf. The rationale for comment (recommended language) is too restrictive for the FAA.

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				appropriate. The OMT must limit the authority based upon the qualifications and capabilities of the ODA unit members.”	describing the issue and request for corrective action by the ODA. If the ODA response is found to be ineffective, then the OMT may impose additional restrictions by a letter approved by the ACO manager.”		
34.	Wencor	134	13-4.c.	<p>Add: “Note: Minor design feature differences from the PAH holders past PMA experience shall not be cause to exclude new projects from the ODA as long as the holder has demonstrated:</p> <ol style="list-style-type: none"> 1) At least one similar PMA experience, 2) The new project’s basic design and application are similar, and 3) The part is assessed as non-critical. 	This is needed to clarify ODA delegation and avoid overly restrictive interpretations of out-of-scope by OMT members.		Non-concur. The current text (13-4.c) for allowing PMA ODAs to grant test and computation “... for the types of products... ,” seems quite reasonable. Interpretation belongs to the FAA, however FAA personnel should not derive this to mean “ exactly the same ” in prescribing to this text. On the other hand, the recommendation by Wencor would be too prescriptive.
35.	Wencor	135	13-6.a (2) (c)	Section a.(2)(c) refers to the Conformity Inspection Plan (CIP) as stated: “Conformity plan or requirements	The CP and CIP are approved by the Engineering UM and adding the CIP element to the CP for simple parts is requested to reduce cost and schedule impacts.		Non-concur. Though Order 8110.42 discusses “simple, non-critical parts” in the context of the PMA process, there is no regulatory definition for such part.

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				for production aspects.” It makes no allowance for simple, non-critical parts that only require a PAH’s First Article Inspection (FAI) instead of a full RFC driven FAA Conformity Inspection where CIP is useful. Requiring the CIP for simple PMA parts is wasteful and the CIP should be allowed to be consolidated into the CP.	The PAH quality system should have a requirement that all new PMA prototype parts will receive a FAI, hence, the CIP is redundant and not needed. Recommend adding the following: “For simple and non-critical parts the CP may also satisfy the requirement for a CIP by an entry that FAI only is planned at the PAH location, unless the ODA determines that FAI must be conducted at a remote location.”		However 8110.42 does define a “critical” part. FAA Order 8110.42 is specific to the PMA process and currently depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program and Order 8100.15 does not change anything about that process. Also authorizations granted by the FAA to ODAs will vary based on an organization’s experience and expertise among other factors.
36.	Wencor	135	13-6.a.(2) (f)	Add Note: “Note: Installation eligibility may also be established from the FAA PMA website as applicable.”	This needs to be clarified since most ACOs allow it but some do not and it is a competitive issue for PMA companies.		Non-concur. This paragraph is not the appropriate place to prescribe how installation effectivity is established
37.	Wencor	136	13-6.b	Add: “NOTE: The OMT Lead can perform the review for all simple and non-critical part projects to avoid undue delay in the review process.”	In our opinion, all simple and non-critical part projects need not be delayed for up to 30 days waiting for a specific OMT Engineer to do the review, comment and delegation to an experienced ODA.		Non-concur. The recommended note is not needed as the OMT lead has the discretion to utilize FAA resources to manage ODA holders.
38.	Wencor	137	13-6.d.(2)	Add notes: “Note 1: Approval by the Engineering Unit Member represents	Avoid confusion by OMT members.		Non-concur. Same rationale regarding simple, non-critical parts. Reference: Though Order 8110.42 discusses “simple, non-

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				<p>RFC issuance even when the PAH elects to have a focal point distributing and tracking to closure RFCs.”</p> <p>“Note 2: RFCs are not required for simple non-critical parts subject to only PAH First Article Inspection (FAI).”</p>			<p>critical parts” in the context of the PMA process, there is no regulatory definition for such part. However 8110.42 does define a “critical” part. FAA Order 8110.42 is specific to the PMA process and currently depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program and Order 8100.15 does not change anything about that process. Also authorizations granted by the FAA to ODAs will vary based on an organization’s experience and expertise among other factors.</p>
39.	Wencor	137	13-6.e.(2)	<p>Add: “A conformity inspection plan (CIP) is not required for FAI of simple non-critical parts.”</p>	<p>Avoid confusion by OMT members.</p>		<p>Non-concur. Same rationale as for above discussion on simple, non-critical parts above. Reference: Though Order 8110.42 discusses “simple, non-critical parts” in the context of the PMA process, there is no regulatory definition for such part. However 8110.42 does define a “critical” part. FAA Order 8110.42 is specific to the PMA process and currently</p>

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							depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program and Order 8100.15 does not change anything about that process. Also authorizations granted by the FAA to ODAs will vary based on an organization's experience and expertise among other factors.
40.	Wencor	137	13-6.e.(3)(b)	Add: "(A 8130-3 form is not required unless the RFC calls for it, testing is required or the part is to be shipped outside of the PAH quality system control, such as for fit checks or customer review.)"	Adds clarification and helps avoid confusion by OMT members.		Non-concur. FAA Order 8110.42 is specific to the PMA process and currently depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program and Order 8100.15 does not change anything about that process. Also authorizations granted by the FAA to ODAs will vary based on an organization's experience and expertise among other factors.
41.	Wencor	138	13-6.g.	The revised order uses " Fabrication Inspection System Quality system " to replace the older term " FIS ".	Less confusing and shorter. Then subsequent usage can be simply: "MQS"		Concur: This is only a typographical error, and should only say "Quality System." Revised accordingly.

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				Recommend using instead: “Manufacturing Quality System (MQS)”			
42.	Wencor	138	13-6.h (2)	Refers to Appendix A but would be more complete to expand to read: “per Appendix A, figures 21 through 23 as applicable.”	To be a more complete call out.		Concur. Revised to include figures 21-24.
43.	Wencor	139	13-6.i (1)	This requires among others items submittal of a “conformity inspection report” to the MIDO, yet it is not clear what is required here? CIP?, ODA Audit Report on 8100-1? Or what?	Needs to be clarified and specifically state what is required. Recommend replacement by: “Supplemental Audit Report documented on form 8100-1”		Non-concur. FAA Order 8110.42 is specific to the PMA process and currently depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program (and Order 8100.15) does not change anything about that process. Also authorizations granted by the FAA to ODAs will vary based on an organization’s experience and expertise among other factors.
44.	Wencor	142	13-9	The 2 nd sentence states: “The PMA holder must complete an application in accordance with subpart L. The ODA	Delete this wording to avoid confusion.		Concur. Rewrite second sentence to read, “The ODA unit must ensure the requirements of 14 CFR part 21, subpart L are met.”

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				unit must review the application.” Yet 14 CFR Part 21, subpart L does not require an application for exporting of PMA parts.			
45.	Boeing	2	1-5	Allowing 60 days from the signature date for the Order to be effective does not allow adequate time for current ODA holders to assess the impact of the revision and incorporate any changes to processes that may be required	Working through changes to the Order in large organizations requires lead time that exceeds 60 days. The current wording does not allow for sufficient time for existing ODAs to review and incorporate changes to processes, proven by issues with short flow implementation of Order Changes. Revisions to approved ODA Procedures Manuals will be required to accommodate the changes in this Order revision, and we are concerned that FAA (AIR-140) may not have resource capacity to review and approve all these changes within such a short window.	Add an allowance for 12 months for existing ODAs to revise and receive approval of changes to their ODA procedures manual.	Non-concur. ODA holders with large organizations that believe they need more time to revise their procedures manual may apply for a deviation to this order.
46.	Learjet	2	1-5	Effective date (60 days) is too short.	I presume this would mean that the PM must be revised and FAA approved within 60 days of the Order being published. This time period is too short. Even though a draft has been published it is impossible to determine what	Allow up to 180 days to revise and gain approval of PM revisions from the published date of the Order.	Non-concur. ODA holders that believe they need more time to revise their procedures manual may apply for a deviation to this order. A request for extension to revise

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					<p>content may change or be removed before the Order is finalized. Some of the changes required will be quite extensive. As a PC/MRA/STC ODA the generation of procedures to allow the use of Engineering UMs on FAA managed projects will require a lot of work.</p> <p>Also we cannot control how quickly the managing office reviews/comments on a revised PM.</p>		<p>their procedures manual should be handled on a case by case basis.</p>
47.	Wencor	2	1-5	<p>2nd Sentence states: “ODA holders which use Designated Engineering Representative (DER)s to perform functions that are now available under the ODA program have 90 days to add those DERs to their unit member staff. The managing ACOs must take action after 90 days to terminate those DERs that are no longer required.” This is not realistic for companies with part-</p>	<p>It is too cost and schedule impacting to a company to staff-up their ODA to add Repair DER function when it is only needed periodically. Smaller companies that only periodically need the services of a Repair DER cannot afford the staffing and backup to maintain qualified ODA UMs with Repair DER equivalent experience and can be subject to schedule delays when the technical support choice is restricted to just ODA Engineering UMs. Request revision of this section to drop the 90 days requirement and make the addition to ODA as</p>		<p>Non-concur. ODA holders that believe they need more time to “staff-up” and add “available” functions, may apply for a deviation to this order. A request for an extension of this guidance should be handled on a case by case basis.</p>

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				time use of Management DERs to have to staff up and add this “available” function to their ODA.	optional.		
48.	Cessna	2	1-5	Effective Date. <i>This order is effective 60 days following the signature date.</i> <i>airman knowledge testing and air operator...</i> “airman” should be capitalized.	Grammar	Capitalize “airman”	Concur. Revised accordingly.
49.	Cessna	2	1-6.a.	<i>...the FAA may delegate to ...on behalf of the FAA Administrator is authorized by statute to issue...</i> Does not appear to be grammatically correct. Should “is” be “as”?	Grammar	Change “is” to “as”	Concur. Revised accordingly.
50.	Cessna	2	1-6.b.	Suggest adding <i>This program replaced the DOA, DAS, ODAR and SFAR 36 delegation programs effective November 14, 2009</i>	To provide historical background		Non-concur. The recommended statement that ODA replaced DDS (and ODAR) delegation programs is not entirely true because ODA also added delegation capabilities.

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51.	Learjet	B-13	19	All UMs are required to meet the requirements of 8100.8.	This requirement is already included in the procedures.	Remove redundant requirement.	Concur. Deleted redundant text (see paragraph 3-5.b.(1), c.(1), Appendix B (5. page B-8),
52.	Garmin	4	2-4 d	This rev added “for installation approvals, such as TC or STCof FAA managed certification projects.” The additional text confuses the authority not clarifies it.	Avoid confusion	Recommend that it say “Holders of a TSOA ODA may issue airworthiness approvals and determine conformity of parts, test articles and test set-ups in support of FAA managed TC/STC projects” This recommendation makes the description consistent with the wording of the function codes it relates to and avoids the confusing text currently proposed.	Concur. Revised accordingly.
53.	HBC	C-3	2-8	Statement of Condition states: Procedures include, as a minimum: Method of determining if the design change is “substantial”	How can an ODA unit make a determination of substantial when per 14 CFR 21.19 this is found by the Administrator.	Please clarify.	Non-concur. An ODA holder must follow the same process the FAA uses for standard certification programs (see FAA Order 8110.4)
54.	Learjet	B-8	3	This section appears to require UM reporting paths to be added to the PM.	This will cause frequent revision to the PM. This requirement is presently	Continue to permit UM report paths to be in the UML and not require it to be part of the PM.	Non-concur. UM reporting paths have always been required to be in section 3 and appendix

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					addressed in our UML. That allows it to be maintained as UMs are added and deleted.		B of the ODA PM. Reporting paths by title (staff position) not individual name should not change frequently.
55.	Learjet	17	3-10	Temporary UMs are not defined elsewhere in the Order.	The Order “hints” at temporary UMs, which could be very useful, but provides no guidance and/or requirements other than mentioning lesser training requirements.	Fully develop the authorized uses and requirements for temporary UMs.	Non-concur. Temporary UMs are UMs that may be used for a limited time or project specific. Temporary UM example provided in paragraph 3-10.b.
56.	Duncan Aviation	17	3-10 b.	What constitutes “temporary ODA UMs. What are the requirements to approve and manage temporary UMs. If they are “project specific”, does the UM list have to be updated for one project and revised again to remove them after the project?	Confusion and consistency	Add procedures on how to identify, approve and manage temporary UMs.	Non-concur. Temporary UM example provided in paragraph 3-10.b. UM listing guidance is provided in paragraph 3-13.h. The ODA holder is responsible to provide procedures for the selection, use of and updating the UM listing for temporary UMs.
57.	Sikorsky Aircraft Corp.	18	3-11 c: Duration of Appointments - Change to the	Requirement for notification of “anticipated” changes is too restrictive	“Anticipated” is too broad of a term, especially when applied to larger corporations where various changes can be discussed but never implemented.	Change “anticipated” to “planned.”	Non-concur. Anticipate accurately conveys the act of addressing something imminent. Paragraph 3-11.c. accurately provides guidance on notification of changes to the ODA unit that will happen, not

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			ODA Unit				those changes discussed that may never be implemented.
58.	DERT	19	3-13	No requirements or explanatory material are provided or required in the manual with respect to the selection and appointment of a replacement ODA Administrator.	This content is missing from the manual requirements here and in Appendix B.	There should be some separate section that addresses the procedures whereby the ODA Holder identifies and selects an ODA Administrator, and gains approval of the OMT, and revises the manual accordingly.	Non-concur. The OMT selects the ODA administrator.
59.	Learjet	20	3-13 (h)	The requirement to provide the UML to the OMT is included twice.		Fix wording.	Concur. Removed redundant wording.
60.	Learjet	21	3-13 (h) 2 (b)	This requires the procedures to specify the format of the listing. This is unclear. Does this mean whether is hardcopy or electronic or does it mean specific formatting characteristics of the document? If the latter why does this matter	The requirement is vague.	Provide better definition of the requirement.	Non-concur. The definition of the term format includes structure, presentation, organization, arrangement, storing, printing, display and medium (paper/electronic). Therefore, we feel this requirement is not vague.

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				since the initial UML style/format/content would have to be found acceptable by the managing office.			
61.	Duncan Aviation	20	3-13 h.	What about requirements for temporary delegation of UMs for special or one-time approvals?	Guidance indicates ODAs may obtain concurrence from the OMT for utilizing a UM for special purposes. There is little guidance as to how these special delegations are documented.	Add clarification here if they must be added to the UM list or reference to where guidance may be found.	Non-concur. The term “active” is self explanatory. If a temporary UM is active, or being utilized, they must be added to the UM listing.
62.	Wencor	19	3-13.a	Add that the OMT will provide feedback on new candidates within 20 days maximum.	Time limit is needed to avoid excessive delays by the OMT that have been experienced.		Non-concur. Time limit would place unforeseen and unrealistic constraints on the OMT.
63.	Boeing	19	3-13.a.	The proposed Order states: <i>“a. OVERVIEW. ... The OMT will inform the ODA holder if the FAA is aware of any information that indicates that the individual has demonstrated a lack of care, judgment, or integrity, or is unsuitable to act as an ODA unit member. Additionally, in some</i>	We recommend revising this text to ensure clarity concerning the OMT’s review of a unit member (UM) application prior to appointment. As written, the draft text implies that the OMT could request this review at any time. The intent is not for the OMT to review application packages once they have approved the ODA holder to appoint their own UMs. The revised Order and current Order already state that after 2 years the OMT need not review application packages.	Revise the paragraph to state: <i>“a. OVERVIEW. ... The OMT will inform the ODA holder if the FAA is aware of any information that indicates that the individual has demonstrated a lack of care, judgment, or integrity, or is unsuitable to act as an ODA unit member. Additionally, in the case</i>	Non-concur. OMT has discretion to review UM appointment decisions as they feel necessary.

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				<i>cases the OMT may review ODA unit member appointments before the ODA holder may add a new ODA unit member to the staff. See paragraph 3-13.d. of this Order.”</i>		<u>where the OMT has not given authority for the ODA holder to appoint unit members, those unit member appointments must be presented to the OMT before they are added to the staff. See paragraph 3-13d of this Order.”</u>	
64.	Cessna	21	3-13h.(2)	<i>The procedures must describe: What procedures? Unit member Listing?</i>	Unclear		Non-concur. 13-3.h. refers to the UM listing. The ODA PM must describe items (a) through (e).
65.	DERT	21	3-14	There is no requirement in the subject section that compels the ODA to conduct a self audit that addresses each of the Standardized Technical Evaluation Criteria in appendix C	By evaluating these “standard” criteria, an ODA holder could at least ensure they met the minimum requirements for an FAA evaluation, and the OMT would have some objective evidence that the ODA Holder was properly evaluating the minimum areas of consideration.	The subject section should state that the self audits must include the criteria in appendix C	Non-concur. Although utilizing the criteria in Appendix C would be a good place to start for an ODA holder self audit, it is not all inclusive. Requiring the use of Appendix C may place constraints on ODA holders. ODA holders may create their own criteria which the OMT may find satisfactory.

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66.	Garmin	21	3-14	This revision changed the time interval for self audit from annually to every 12 months. The annual requirement allowed some flexibility for scheduling. An ODA could do an audit early in August one year because of workload and availability of suitable auditors, but still meet the annual requirement the following year when they did the next audit in the following October. By making this change, if you do an audit early due to availability of auditors etc, then the 12 month clock means it will have to based on that date from now on.	To have reasonable flexibility in scheduling of audits. Has the FAA review of ODA self audits and FAA findings during technical inspections shown that this change is warranted? Seems unlikely that the timeframes being discussed would make any difference in the safety of the product.	Retain the once annually requirement	Non-concur. The intent of policy is for ODA holders to perform self audit, every 12-months. By definition, annually is every 12-months but clarification was needed.
67.	Learjet	21	3-14 (a)	An on-site visit is required by the ODA holder to each ODA inspection UM.	On-site is vague. Where does this really mean? Some inspection UMs are independent contractors. They do not have a facility to visit other than their home. The conformity activity is not always	Define on-site. Allow virtual meetings, conference calls, or video interaction.	Non-concur. There is no means to ascertain the performance of certain required ODA holder supervision/self-audit requirements in a virtual environment. This can

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					performed on a fixed schedule, so “catching” them on the road for an on-site visit will be tricky.		amount to an abdication of responsibilities
68.	Boeing	21	3-14.	<p>The proposed Order states:</p> <p><i>“3-14. SELF-AUDIT. The ODA holder must perform self-audits that evaluate the ODA unit members, the ODA processes, and compliance with all applicable FAA regulations and policy. A self-audit must be performed at least once every 12 months, and as requested by the OMT...</i></p> <p><i>a. PERSONNEL. The self-audit must include evaluation of the ODA unit members using the processes and criteria contained in Order 8100.8 or Order 8900.1, Flight Standards Information Management System, as appropriate for the</i></p>	<p>With over 500 Unit Members, an on-site visit scheduled every 12 months for each person will be extremely difficult, if not impossible, for Boeing to achieve. In addition, with work schedules changing each year, it is not feasible to guarantee that there will be work at any specific location to audit. Per Order 8100.15A, paragraph 5.3.c.(2), the OMT still verifies that the ODA holder performs the self-audit annually.</p>	<p>Revise the paragraph to state:</p> <p><i>“3-14. SELF-AUDIT. The ODA holder must perform self-audits that evaluate the ODA unit members, the ODA processes, and compliance with all applicable FAA regulations and policy. A self-audit must be performed at least once every 12 months calendar year, and as requested by the OMT.</i></p> <p><i>a. PERSONNEL. The self-audit must include evaluation of the ODA unit members using the processes and criteria contained in Order 8100.8 or Order 8900.1, Flight Standards Information Management System, as appropriate for the</i></p>	Non-concur. Intent is 12 months, not calendar year.

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				<i>functions performed by the ODA unit member. The self-audit must include review of individual ODA unit members' work for accuracy. This includes ODA unit members located at suppliers or at other locations away from the ODA holder's facility. The ODA holder must make at least one on-site visit every 12 months to manage an ODA inspection unit member's activity."</i>		<i>functions performed by the ODA unit member. The self-audit must include review of individual ODA unit members' work for accuracy. This includes ODA unit members located at suppliers or at other locations away from the ODA holder's facility. The ODA holder must make at least one on-site visit every 12 months calendar year to manage an ODA inspection unit member's activity."</i>	
69.	Wencor	21	3-14.b	Revise that last sentence to read: "The ODA holder must make at least one on-site visit every 12 months to manage an ODA inspection unit member's activity, however, teleconference interviews may be used if samples of past records are reviewed	Travel expenses can be an unnecessary expense for well qualified and well performing Manufacturing UMs. On-site visits are an over kill requirement. Desk reviews such as this have been regularly used by the ACO in managing designees.		Partial Concur. Changed to require at least one on-site visit every 18 months to manage an ODA inspection unit member's activity.

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				and found to be accurate and complete.”			
70.	Sikorsky Aircraft Corp.	21	3-14: Self-Audit, first paragraph	The word “general” was removed from the last sentence of the first paragraph “The procedures manual must contain the ODA holder’s <u>general</u> audit procedures.”	The detail required for audit procedures in the procedures manual should not be too restrictive in order to allow for changes based on the conduct of past audits and the need for revision to procedures to make any audit meaningful and comprehensive.	Put “general” back in the sentence “The procedures manual must contain the ODA holder’s <u>general</u> audit procedures.”	Non-concur. Self audit procedures must be defined for appropriate and effective OMT management of the ODA holder.
71.	Sikorsky Aircraft Corp.	21	3-14a: Self-Audit – Personnel	On-site visit should not be required	Stipulation that an on-site visit must be made annually is unnecessary. adequate oversight can be accomplished remotely.	Remove last sentence of 3-14 a. “The ODA Holder must make at least one on-site visit every 12 months to manage ODA inspection unit member’s activity.”	Partial -Concur. Interval changed to 18 months.
72.	Duncan Aviation	22	3-16	Under MRA, a similar activity report is to be submitted for airworthiness and alteration/repair activity (ref. 12-5 b.).	Clarification	Procedures in this paragraph should at least reference the MRA requirements so as to ensure it is understood the difference. Should also consider combining the report into one.	Concur. Added 12-5.b.(2) to 3-16, new section b.

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73.	Duncan Aviation	22	3-16 a.	Incorrect reference.		“figure 9” should be “figure 10”.	Concur. Revised accordingly.
74.	Sikorsky Aircraft Corp.	22	3-16 a: Work Activity Reports	Incorrect Reference in first paragraph	SAR Form is figure 10 in Appendix A	Change Appendix A, figure 9 to Appendix A, figure 10	Concur. Revised accordingly.
75.	Sikorsky Aircraft Corp.	22	3-16 a: Work Activity Reports	Should allow for use of a similar form	Summary Activity Report located in Appendix A, Figure 10 is not an official FAA Form. Therefore, ODAs should be able to use their own format so long as all of the requested information is present.	Add “or a similar form.”	Concur. Revised accordingly.
76.	Boeing	22	3-16.a.	The proposed Order states: <i>“a. MANUFACTURING AND AIRWORTHINESS. The ODA unit must complete and document its manufacturing and airworthiness activity on the summary activity report as shown in appendix A, figure 9.”</i>	1. The incorrect figure is referenced in the text. It should be figure <u>10</u> rather than figure 9. 2. With regard to figure 10 (Summary Activity Report form), it is not clear why TC and PC activity are separated This will likely cause much confusion for Unit Members and the accuracy of our data could be in jeopardy. We suggest that reference to figure 10 clearly specify that it is an <u>example</u> of an activity report. (The form is also missing MRA.)	Correct the text to state: <i>“a. MANUFACTURING AND AIRWORTHINESS. The ODA unit must complete and document its manufacturing and airworthiness activity on the summary activity report; as <u>an example is shown in appendix A, figure 10.</u>”</i>	Concur: Revised to read figure 10. Also, revised as recommended to make more accurate.

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77.	United Airlines ODA	22	3-16a	Reference to appendix A, figure 9 manufacturing and airworthiness unit activity report should be Appendix A figure 10	Correct reference.	Replace figure 9 with fig. 10.	Concur. Revised accordingly.
78.	Cessna	22	3-16a.	Appendix A. figure 9 Should be " <i>figure 10</i>)	Incorrect reference		Concur. Revised accordingly.
79.	Wencor	22	3-17	Add: "Retained records may be paper copies or electronic copies as documented in the PAH approved ODA procedures manual."	Clarifies that electronic records are acceptable when so documented in the ODA procedures manual. Settles questions coming from OMT members.		Non-concur. Guidance provided in paragraph 3-17.c.
80.	Sikorsky Aircraft Corp.	23	3-17 c: Records Storage and Identification	The requirement for ODA documentation to be organized in a manner that is compatible with the FAA records control system described in Order 1350.14, Records Management is too restrictive.	The procedures manual should be adequate to define how records are kept.	Add "or a comparable procedures as set forth in the approved procedures manual."	Non-concur. As an FAA designee, when performing functions on behalf of the FAA, an ODA holder records control requirements should match the records control requirements for the FAA.
81.	Wencor	23	3-17.a	Delete sub-sentence (8) "Any correspondence between the ODA holder and the OMT related to	The requirement as stated is subject to interpretation to include any or all memos, letters, e-mails, notes etc., exchanges between the ODA and the OMT. The bulk of		Non-concur. As an FAA designee performing functions on behalf of the FAA, an ODA holder records control

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				<p>functions or activity performed with the authorization.” This data is not needed to be retained indefinitely. We request instead that it be retained a minimum of two years and exempt miscellaneous e-mail exchanges on non-essential topics such as scheduling meetings, general questions or clarifications, revision coordination, general topics not directly supporting the ODA certification and approval of a project.</p>	<p>this information does not support directly the technical data of PMA projects approved by the ODA and are too costly to maintain, sort and retain forever.</p>		<p>requirements should match the records control requirements for the FAA.</p>
82.	Duncan Aviation	24	3-18 d. (1)	typo		<p>“part of the this investigation” should be “part of this investigation”</p>	<p>Concur. Revised accordingly.</p>
83.	Bell Helicopter Textron	24	3-18(d)(2)	<p>ODA holder has 30 days to submit its determination of the cause of the condition and proposed remedial action</p>	<p>30 days to determine cause and report corrective actions is too restrictive. How long it takes to determine the cause of the condition is dependent on the nature of the issue</p>	<p>Remove the time frame or supply wording that allows for an extension of that time if the OMT agrees</p>	<p>Concur. Added, “...or as required by the OMT.”</p>

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84.	Boeing	24	3-19.	<p>The proposed Order states:</p> <p><i>“3-19. CORRECTIVE ACTION. The ODA holder must implement corrective action to address any unsatisfactory conditions with the organization's procedures or performance. The ODA holder must show a willingness to do this and be proactive in incorporating improvements into its ODA system. Failure to implement needed corrective action is reason for the FAA to suspend or terminate an ODA.”</i></p>	<p>In this paragraph, is the FAA referring to “ODA procedures” or to “ODA holders ‘QMS procedures’”? Clarification is needed.</p> <p>(For Boeing, QMS violations would fall under our PC 700 CM, managed via the CMO.)</p>	<p>Clarification is needed to ensure the intent of this paragraph is understood.</p>	<p>Concur. Added “...ODA” procedures....</p>
85.	Learjet	9	3-2 (& 1-5)	<p>This paragraph appears to say that if a function/capability exists and is available under the ODA program the ODA holder must use UMs to perform that function</p>	<p>It is unclear exactly what is required in terms of a PM revision (changes to limitations, etc) to support these functions being performed by the UMs.</p> <p>It is apparent that doing this will require the conversion of DERs to</p>	<p>Making this capability a strongly encourage option instead of a mandate would allow ODA holders to support the reduction of designees (DERs) in a more orderly fashion.</p>	<p>Non-concur. Intent is all activity to be performed under the ODA unit not individual designees.</p>

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				on their FAA managed (non-ODA projects).	UMs. When the ODA holder uses contract/consultant DERs on their FAA managed projects they cannot “force” that person to become a UM. They may not want to be subject to the training and oversight of another ODA unit. This could result in the ODA holder having to change designee in the middle of a project.	If it was permitted to continue using the designee on the projects that they are already approved for, that would support the initiative without excessive disruption.	
86.	Duncan Aviation	25	3-21	Marking up FAA forms to make them applicable to ODA causes confusion and unnecessary work.		Allow ODA to develop and obtain OMT approval of ODA forms that parallel or mimic FAA forms. Or, the FAA should create forms applicable to just ODA.	Non-concur. ODA holders are allowed to develop and obtain OMT approval of ODA forms that parallel or mimic FAA forms. However, the FAA also provides ODA holders flexibility to “mark up” FAA forms.
87.	Sikorsky Aircraft Corp.	9 10 20 25 78	3-3 3-4(e) 3- 13(g) 3-20 8-8(a)	Remove or lessen imposed constraints on / hindrances to Holder’s international ODA operations & growth strategies	Commenter contends that it is not required for ALL of a Holder’s ODA facilities to be located in the US, only that it have a US presence. Ref. Federal Register Vol. 70, No. 197 10/13/2005 Disposition of Comments to Final Rule. Supervision of Unit Members is an ODA responsibility & should pose no undue burden upon the FAA regardless of location. ODA UMs need not be US residents.	Revise Order accordingly	Partial concur with 3-4(e). Added ODA holder“primary” facilities to be located in the U.S.

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					ODA UMs need not be US citizens.		
88.	Boeing	10	3-4.e.	The draft Order states: <i>“Each ODA holder's facilities must be in the United States.”</i> While we agree that the ODA holder’s main facility should be in the US, it is impractical to require <u>all</u> facilities of an ODA to be in the US.	The current wording implies <u>all</u> facilities must be located in the US. This is not practical for a large ODA and does not reflect the current business environment.	Revise the language to state: <i>“The ODA holder’s <u>primary facility</u> must be located in the United States.”</i> Alternatively, clarify that <u>all</u> parts of the ODA need not be in the US.	Concur. Added“primary” facilities to be located in the U.S.
89.	Wencor	11	3-5 b.1	Add: “A ODA Engineering Unit Member may be expanded within previous DER delegation areas if: 1) The past DER appointment was reduced only for inactivity and 2) Not more that 7 years have lapsed and the UM is still considered eligible based on experience	If a UM has recent DER experience and is needed for that experience beyond the current DER letter of delegation, expansion should be allowed at the discretion of the ODA to avoid excessive delays.		Non-concur. Expansion of authority must be defined in their ODA PM.

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				and knowledge. Otherwise if the above conditions are not met the UM must provide full documentation per order 8100.8.”			
90.	Wencor	12	3-5 c.5	Add: “Two years or more experience inspecting tests or performing testing may be substituted for the required experience performing conformity inspections of test setups when the Manufacturing UM has met the other qualification requirements for performing article conformity inspections.”	A Manufacturing UM initially only delegated to perform article conformity inspections could not ever be expanded to perform test setup conformity with the current wording, even if his/her background was found to include more than two years of test inspection or testing as a test technician or Test Engineer.		Non-concur. The commenter’s rationale may be correct; however, this is the experience that the FAA currently expects these individuals to show prior to becoming ODA unit members. Given the number of ODA’s in existence, this does not appear to be an unrealistic requirement.
91.	DERT	11 12	3-5a6(b) 3-5d1(b)	The cited paragraphs states “[h]ave a willingness to serve the aviation community.”	This is a subjective statement with no defined method to evaluate this condition	This statement needs to be removed from these paragraphs.	Non-concur.
92.	HBC	13	3-6 b.	Remove the phrase “senior enough.” Also, remove the comma after “the FAA” and before “without undue	The phrase “senior enough” is vague and unsophisticated.	Replace with: “The ODA administrator must have sufficient authority within the organization to ensure the ODA unit	Non-concur. The term “senior enough” implies more than just “sufficient authority” but speaks to longevity and experience.

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				pressure.”		is able to administer duties for the FAA without undue pressure or influence from other organizational segments or individuals.	Comma placement is correct.
93.	Boeing	14	3-7.c.	<p>The proposed Order states:</p> <p><i>“c. CHANGES TO ODA HOLDER SIGNATORIES. Any time an ODA holder signatory of the MOU changes, the replacement must sign a revised MOU. If an ODA holder's new senior management refuses to sign the MOU, we must terminate the ODA. An MOU addendum which reflects the name and title of the new management official may be used at the discretion of the OMT lead.”</i></p>	<p>We recommend revising this provision to include a provision allowing the ODA time to implement the change. For example, if there is a change at 12:00 noon on 1/6/2011, and the MOU is not changed or revised at 12:15 pm or even the next day, we should still be compliant with the requirement.”</p>	<p>Revise the paragraph to state:</p> <p><i>“c. CHANGES TO ODA HOLDER SIGNATORIES. Any time an ODA holder signatory of the MOU changes, the replacement must sign a revised MOU. If an ODA holder's new senior management refuses to sign the MOU, we must terminate the ODA. An MOU addendum which reflects the name and title of the new management official may be used at the discretion of the OMT lead. <u>The ODA holder shall replace the MOU within 90 days of change.</u>”</i></p>	<p>Non-concur. Updating the MOU should not take 90 days. To streamline updating the MOU process, this revision provides the option of completing an addendum.</p>

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94.	DERT	15	3-9	There is insufficient explanation regarding the incorporation of existing company procedures, to wit: the “company procedures when incorporated or referenced, those procedures become enforceable just as if they were stated in the manual.	Some ODA’s have been told by their OMT’s that by referencing “company” or “desktop” procedures in the ODA PM, the provisions of those documents are not enforceable, thus the ODA PM becomes a policy manual in lieu of an actual procedures manual.	Some of the guidance from the AIR140 <i>ODA Procedures Manual Review Review Considerations</i> dated 11/8/07 should be incorporated, in particular with respect to the use of “company procedures”	Non-concur. Policy does not need to clarify reference documents. See 5-3.c.(3).
95.	Cessna	16	3-9.b (11) Second sentence	<i>Include both standardization, recurrent, and in-house training.</i> “Both” is followed by three items, “both” usually infers two.	Number alignment		Concur. Revised accordingly.
96.	Boeing	29	4-3.b.(1)	The proposed Order states: <i>“NOTE 2: The appointing office must inform the appropriate headquarters office representative(s) of all ODA applications it receives. Headquarters specialists from AIR-100, AIR-200, AFS-</i>	We request that this section be revised to document that, if other FAA Headquarters specialists want to request or impose limitations to the ODA holder, then those limitations must be coordinated with the managing ACO first.	Add the following text to Note 2: <u>“... Those limitations or requirements must be presented to the appointing office during the EP and prior to submittal to the ODA holder.”</u>	Non-concur. Limitations can imposed by the FAA at any time.

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				<p><i>300, or AFS-800 may participate in evaluation panel activity (such as review and comment on the ODA holder's procedures manual) as they determine necessary, but are not considered official EP members. Each headquarters office will determine its participation based on the desired functions and the need to be involved in the appointment decision. Each headquarters office may impose any limitations or requirements they deem appropriate with regards to the authorization, including the ODA holder's procedures manual content and format."</i></p>			
97.	Sikorsky Aircraft Corp.	34 - 40	5-3 5-4 (d)(e)(f)	<p>FAA OMT Supervision (specifically relevant</p>	<p>The HOLDER is responsible for supervision of each individual – Ref. FAA Memorandum dated</p>		<p>Non-concur. OMT Supervision of UMs is a necessary and critical</p>

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)(g)	to the performance of ODA Unit Members) is un-necessary to accomplish adequate FAA oversight	<p>Mar 09, 2009 Subject: Designee Support for Companies holding ODA.</p> <p>Commenter cites requirements for FAA Inspection of an ODA (14 CFR §183.59 + Order 8100.15 Sects. 5 & 6 AND standing requirement that an ODA Unit perform self-audits to evaluate itself & its UMs, + Report results to OMT & subsequently implement corrective actions (Order 8100.15 Sect. 3-14)</p> <p>Supervision of Unit members is already thoroughly addressed without need for further treatment in Supervision requirements of Sect. 5</p> <p>UM-specific oversight actions in the context of supervision (e.g. review of submittals) should be removed from Supervision content.</p>		element of oversight.
98.	Wencor	35	5-3 a.3	<p>The 3rd sentence has a built-in conflict. It reads: “Written concurrence must be obtained from the OMT prior to unit members performing authorized functions.”</p> <p>For a PMA ODA, the</p>	<p>Reword to avoid the apparent conflict. Suggest as follows:</p> <p>“Written concurrence must be obtained from the OMT prior to unit members performing final approvals related to authorized functions.”</p>		Non-concur. PNL is project notification and requires OMT coordination. The project is not authorized until the ODA holder has received OMT concurrence. There is no benefit in differentiating between

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				PNL requires signature approval by the assigned Engineering UM on the following: <ul style="list-style-type: none"> o Certification Plan (CP) o Safety Criticality Report o ICA Impact Assessment 			authorized functions and final approvals.
99.	Learjet	35	5-3 (a) 3	There is now a requirement for written OMT concurrence prior to UMs performing any authorized functions.	<p>This requirement does not account for the complexity of the activity (i.e. simple, routine, new/novel, highly complex) and prevents any activity from happening unless a separate written request is made.</p> <p>Some activities are low risk. Creating the requirement to request permission to do something that is within the authorization for a low risk/routine activity will add a burden to the holder/unit and the managing office.</p>	Make the requirement for written concurrence operate on a well defined graduated scale.	Non-concur. Deleted the language in 5-3(a)3 as it is redundant to 8-6.b.(1) and 11-7 (e).
100.	Sikorsky Aircraft Corp.	35	5-3 a(3): Managing Program	Paragraph is not consistent with Section 8-6 in that it does not acknowledge that some activity does not need OMT	Section 8-6 provides an allowance for projects that “may be performed without submittal of a program notification letter.”	At the end of the first sentence add “, if required.”	Non-concur. Exception is defined in Chapter 8 for TC ODA only. No need or benefit to address in Chapter 5.

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			Activity	review of a program notification letter.			
101.	Sikorsky Aircraft Corp.	36	5-3 c(3): Supervision Overview - Records – Assessing Performance	Holder / Unit Compliance with Co. internal processes is peripheral to the function of the ODA Unit and probably marginal to scope of supervision as intended by the Order.	PM may references Holder Company internal procedures & processes, but since they are not functions performed on behalf of the FAA, PM should be viewed as standing alone for the purposes of FAA oversight Commenter contends that OMT Supervision is intended to verify adherence to the procedures relevant to actions leading to the issuance of a certificate or other approval.	Under Verifying compliance with procedures, delete the phrase: “and referenced internal processes.”	Non-concur. ODA PM contains those procedures performed on behalf of the FAA which are subject to oversight.
102.	Bell Helicopter Textron	34	5-3(a)(2)(a)	OMT must obtain AIR-140 concurrence on Procedures Manual Changes for specific ODA Types	This new requirement is burdensome and can add unnecessary delays to the implementation of procedures. What is the value in adding another layer of review?	Remove the requirement	Non-concur. Headquarters policy office(s) will remain involved and provide guidance and ensure adherence to policy. However, ACO(s) may be authorized to act on our behalf.
103.	Cessna	37	5-4.c.	Last sentence appears to be missing a word	Grammar	Add “ <i>be</i> ” <i>Supervision visits cannot BE performed in lieu of the Delegated Organization Inspection Program</i>	Concur. Revised accordingly.

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104.	Bell Helicopter Textron	43	5-7a	8100.15A recommends that the OMT include representatives from geographic areas where ODA Holder has facilities	For larger ODA Holders, this could significantly increase the size of the OMT which will likely add unnecessary delays for approving manual changes, PNLs, etc.	Remove the recommendation from 8100.15 Rev. A; out of geo notification should suffice	Partially Concur. Revised last sentence from “..have facilities...” to “..regularly perform delegated functions...”
105.	Learjet	B-15	6	CPI 2 nd edition, 8110.4 and this Order all contain requirements for PSCP content.	Having three different, but overlapping, lists of requirements for PSCPs is not efficient. The requirements in item 6 are high level which supports the notion that the PSCP is a plan. However, ACO specialists often interpret this requirement (and corresponding 8110.4) requirements to mean that the PSCP must have detailed descriptions of test points that are from test plans that have not been written at the point in time at which the PSCP is submitted.	Provide one set of requirements for PSCP content.	Non-concur. Certification plans for ODA holders are defined in this order.
106.	Duncan Aviation	48-49	6-4 b. (2)	punctuation errors in first sentence		Look at revising punctuation and eliminating the comma at end of sentence.	Concur. Revised accordingly.
107.	HBC	49	6-4 b. (2)	Listing of FAA orders to be understood by team members has a badly placed comma.		Remove the comma from behind 8080.6 and add a comma immediately after 8900.1.	Concur. Revised accordingly.

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108.	Garmin	51	6-5 h(2)	Procedural Manual non-compliances have been incorporated into regulatory non-compliances.	While Garmin agrees that willful failure to follow the procedures manual should be enforced as a regulatory non-compliance, it seems overly stringent to consider all non-compliances to the procedures manual under this category. In addition to the absolute minimum required by the FAA Order, procedures manuals often have steps included to ensure an easier or more consistent approach to various activities and its possible that failure to follow some of those aspects would not result in a safety issue or non-compliance to any other rules or policy. While those issues still must be addressed, it seems harsh to consider them a regulatory non-compliance. The result of this change would be for companies to take those aspects out of the manual resulting in a potentially less controlled process just to avoid getting regulatory non-compliances.	Retain the procedures manual non-compliance but provide guidance on when to use each.	Non-concur. ODA PM noncompliance are regulatory non-compliance per 14 CFR 183.57.
109.	HBC	51	6-5 h. (2)	Elimination of the “Procedures Manual Non-compliance” and use of “Regulatory	There does not seem to be any guidance for the OMT on when to issue such non-compliances. It is beneficial when OMT leads are	Provide guidance for DOIP team leads and OMT leads on when to issue a “Regulatory	Partial concur. Outside the scope of this revision. A team is revising the DOIP program. This

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				Non-compliance” when a procedures manual is not followed is potentially problematic.	responsive to ODA holder’s requests for manual changes. Delayed response to requested manual changes can create situations that are “Regulatory Non-compliances.”	Non-compliance.” Provide examples of a “Technical Discrepancy.” Avoid assuming all past Procedures Manual Non-compliances would’ve been Regulatory Non-compliances. It is likely the classification of “Technical Discrepancy” has been misused and under-used due to misunderstanding.	comment will be provided to the DOIP improvement team.
110.	HBC	52	6-6 a.	The DOIP team lead will now have 60 days to submit his report to the OMT lead and other FAA groups, up from 30 days in the current revision.	ODA holders will not know which findings must be corrected for 90 days.	Provide justification for the doubling of time to prepare and submit (internally within the FAA) a DOIP audit report.	Concur. Report submittal requirement has been changed back to the original 30-day requirement.
111.	Sikorsky Aircraft Corp.	53	6-6 d: Post Inspection Activity – Corrective Action	Does not take into account the FAA’s observance of an ODA holder’s dispute(s) with an Inspection team’s finding of discrepancy(s).	If a discrepancy is being disputed by the ODA holder, corrective action should be postponed until dispute resolution is complete.	At the end of the first sentence of 6-6 d add “except for those findings for which a formal request for review and disposition has been submitted by the ODA holder.” For those discrepancies that	Non-concur. ODA holder must take corrective action as required by the OMT.

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						<p>have gone through the dispute resolution process and have been deemed valid according to the process in Section 6-6c, the authorization holder must perform corrective action.</p>	
112.	Learjet	B-9	7 b	<p>More information is needed for the expectations and role of the “Advisor”.</p>	<p>The role described for the “Advisor” includes items that are presently accomplished by an administrator and/or a Designee (UM) Process Coordinator.</p> <p>If you make the comparison to an ACO advisor, that person is typically an ACO Engineer. The ODA holder may not have the capacity to allow one of their UMs to perform administrative functions such as reviewing the application for general items.</p> <p>We also believe that the ODA unit’s administrative team is more familiar with the overall application requirements and therefore better suit for reviewing the general items. Naturally the technical items in the application cannot be reviewed by a member of the ODA unit’s administrator</p>	<p>Allow flexibility in how and who does the non technical review.</p>	<p>Non-concur. The advisor role must be accomplished by a person of the same technical discipline as the proposed UM.</p>

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					who does not possess suitable technical knowledge/experience.		
113.	Learjet	E-1	8	Evaluation Panel also means the (ODA) Panel reviewing potential UMs.		Add alternative meaning.	Non-concur. ODA holders can use any term, word or phrase to identify a team of individuals which determine qualifications of a prospective UM.
114.	Sikorsky Aircraft Corp.	79	8-10: Data Approvals in Support of Certification Projects	Make clear that this section is for certification projects for which the ODA Holder is not the applicant.	This section is confusing without noting that it refers to project in which the ODA holder is not the applicant, but is supporting another ODA.	Rename section "Data Approvals in Support of Certification Projects for Other Applicants."	Concur. Paragraph 8-10 has been deleted due to redundancy with paragraph 8-14.
115.	Cessna	88	8-15.x	<i>Airworthiness Approvals</i> Delete this paragraph	TC ODA has no function codes for airworthiness approvals	Delete paragraph	Concur. Revised accordingly.
116.	Bell Helicopter Textron	88	8-16	Does function code for ICA review and acceptance also allow ODA's to approve FMS without AEG review	Although ODA may approve Flight Manual Supplements, they must be reviewed by the AEG prior to ODA approval; if ICAs can be approved without AEG review, why not FMS?	Clarify whether the an ODA granted the new ICA approval and acceptance function can also approve FMS without AEG review	Non-Concur – no change

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117.	HBC	88	8-16 (a)	Paragraph formatting using (a) is inconsistent.	First paragraph after section numbers are lettered with no parenthesis.	Please change (a) to a.	Concur. Revised accordingly.
118.	HBC	88	8-16 (a) (4)	“(eg, engineering, technical publications..” needs to be corrected.	e.g. is the abbreviation for <i>exempli gratia</i> (for example)	Please change “eg,” to “e.g. “	Concur. Revised accordingly.
119.	Cessna	62	8-3.d.	<i>Issue Airworthiness Certificates and Approvals</i> Suggest deleting “and Approvals”	TC ODA has no function codes for Airworthiness Approvals	Delete “and Approvals” from title	Concur. Revised accordingly.
120.	Boeing	62	8-3.f. and g.	Paragraphs 8-3.f. [<i>“Determine Conformity of Articles and Test Articles (function code 8080)”</i>] and 8-3.g. [<i>“Determine Conformity of Test Setup (function code 8090)”</i>] are inconsistent with regard to test articles and test setups. Paragraph f. has no reference to approved test plans, whereas paragraph g. has a statement that requires approved test plans.	Submitting Requests for Conformity (RFC) and performing conformities on test articles and test setups should only be contingent upon released engineering data that is under revision control.	Revise paragraph g. as follows: <i>“g. DETERMINE CONFORMITY OF TEST SETUP (FUNCTION CODE 8090). A TC ODA unit may determine whether a test setup conforms to the design data as required by approved test plans.”</i>	Non-concur. ODA procedures are derived from applicable policies Order 8110.4 (page 43) requires that test plans are to be approved. The FAA may choose to grant additional authority to a particular ODA holder based on its expertise and experience, and reflect so in the applicable Procedures Manual. However, a change to this function code would make it apply too generally and therefore limit its use.

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121.	Cessna	62 & 64	8-3c and 8-4b	It seems that these sections contradict each other. Cessna requests that these paragraphs be revised for clarification.	Confusing as written	The ODA can reduce the life limits, add new part numbers with the same life-limit, but cannot extend the life limits of parts published in the original Airworthiness Limitation Section (Chapter 4 of the MM) of the Maintenance Manual.	Partial concur. Revised to state that the FAA must approve any reduction or elimination of life limits on life-limited components
122.	Bell Helicopter Textron	63, 64. 103	8-4(b)(4) & (6) 11-4(c)(4) & (7)	The ODA is not authorized to approve any life limit changes	The ODA not being authorized to approve any life limit changes seems to contradict Function Code 8050 & 11050 which allows the unit to approve changes to the ALS.	Please clarify this apparent inconsistency	Concur. Revised to allow ODA holder to approve extension of life limits.
123.	Sikorsky Aircraft Corp.	64	8-5 a(4) Record s	Is not considered necessary that Project Records must include a list of prototype products by make, model, serial # and registration #	Commenter contends this action provides no obvious additional benefit or value to the FAA and further is burdensome to the Holder / Unit.	Delete (4) in its entirety	Non-concur. Regulatory requirement. 14 CFR 183.61.
124.	Learjet	65	8-6 (b) 1	Requirements (i.e. requesting and obtaining concurrence) from 5-3 (a) 3 are duplicated.			Non-concur. Chapter 5 provides general supervision requirements regarding PNL. Chapter 8 provides greater detail regarding PNL requirements and written

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							OMT concurrence for TC ODA.
125.	Learjet	65	8-6 (b) 2	<p>It is unclear if the CPN process is expected to be executed by the ODA holder/unit or by the managing office.</p> <p>If it is not the managing office, will the ODA holder/unit be provided access to the CPN system to generate the notification?</p>		Define who is responsible for the CPN.	Non-concur. No clarification required. Paragraph 8-2.b.(2) states, "The notification must be accomplished by the normal certification project notification (CPN) process described in Order 8110.4."
126.	Learjet	68	8-6 (h) 1	It states "The ODA holder must develop and submit ICA for any new or changed type design. Unless the ICA review has been authorized".	<p>Not all type design changes cause a change to the existing ICA. In such cases an impact assessment is sent to the AEG for acceptance.</p> <p>Although 8-6 is about "Type Certification Program" the requirements in 8-6 (h) 1 are not clearly restricted to new TC, amendment and major change projects, which means that these requirements could be considered to apply to minor changes to data.</p>	<p>Change requirement to account for where a new or changed ICA is not required.</p> <p>Make it clear that the ICA coordination requirements do not apply to minor changes.</p>	Partial Concur. An impact assessment is allowed to satisfy the ICA requirement for any change per 8110.54A including a minor change. The paragraph only prescribes AEG review of ICA for changes that require program notification (not minor changes).

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127.	Learjet	70	8-6 (1) 3	Although largely unchanged from the previous revision, these requirements overlap with those contained in the sections that deal with UM selection and appointment.	Duplication of requirements.		Non-concur. Paragraph 8-6 (1) 3. specifically provides guidance for supplier UMs.
128.	AeroMech	65, 106, and C-14	8-6 a, 11-7 b, and Appendix C, item 2-12	Definition of PNL content is different for TC ODAs and STC ODAs. For TC ODAs the PNL is a cover letter that is submitted concurrently with STC application, cert plan, and conformity plan. For STC ODAs the PNL is defined to <u>include</u> the STC application, cert plan, and conformity plan.	The PNL definition for STC ODAs would require the PNL cover letter and STC application to be routed to all of the UMs involved a project. AeroMech finds no value-added in routing these particular items. Item 2-12 of appendix C (p. C-14) also checks for coordination of the PNL which resulted in an observation during our FAA inspection since, to date, we do not route the cover letter and application to all UMs that will be part of the project	Make PNL definition for the STC ODAs (p. 106) match the definition for TC ODAs (p. 65) such the PNL will be defined only as the cover letter. Change “Statement of Condition” for item 2-12 of appendix C to read “Procedures include a method to coordinate the certification plan and conformity inspection plan internally with engineering, flight test, and inspection unit members as required prior to submitting the letter to the FAA.”	Non-concur. No additional burden on ODA holders and UMs to include the PNL cover letter and TC/STC application.
129.	HBC	65	8-6 a.	The second sentence should be re-written to “notify” instead of “coordinate.”	To <i>coordinate</i> implies communication from both a sender and a recipient. A better approach would be to notify the	Please re-word the second sentence to read: “For major changes to existing products, an	Non-concur. Draft language has been coordinated with FAA directorates.

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					accountable directorate. Do not burden the accountable directorate with the task of sending back a reply. Also, it would be a burden to the companies to have to wait on the accountable directorate to respond.	ODA unit may conduct certification activities only after <i>notifying</i> the accountable directorate as necessary.”	“Coordination” is the accurate word.
130.	Sikorsky Aircraft Corp.	68	8-6 h (1): AEG Functions – ICA	Needs qualifier for first sentence “The ODA holder must develop and submit ICA for any new or changed type design.”	ICAs are not always required.	Add “if required” after new or changed type design.	Partial concur. Revised to read: “...or impact assessment...” after ICA in first sentence.
131.	Sikorsky Aircraft Corp.	65	8-6(b)(1)	PNL Response should be expected to be received by an ODA Unit within a reasonable time following submittal for Type design change projects performed under TC ODA as well as for STC projects performed under STC ODA.	TC section of Order (Ch. 8) should be consistent with STC section (Ch. 11) with regard to PNL response. Ref. Para 11-7(e) on P. 108 – OMT 30 day response to a submitted PNL Commenter accepts that New TC (complex) project PNLs could be exempt from the specified interval.	Revise Order accordingly	Non-concur. STC PNL response of 30-days was established as a result of legacy policy. No PNL response time has been established for other certification projects.
132.	Sikorsky Aircraft Corp.	70	8-6(1)(4) Ch. 11	Include (limited) Acceptability of External Approvals	Commenter proposes that a Unit Member of another ODA holder (not necessarily a supplier on a given project) may make an approval in support of that project	Revise Order accordingly	Non-concur. Use of external approvals is limited. ODA holders are responsible for completing all certification activity

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					<p>if UM possesses the correct function code and applicable authorizations, and is not prohibitively limited.</p> <p>Acknowledge that an existing TSOA or other design approval is an example of an acceptable external approval even though approval was not performed by the Holder's ODA Unit.</p>		under their ODA authority.
133.	Boeing	65	8-6.a.	The text of proposed paragraph a. (" <i>Program Notification Letter</i> ") contains several differences from the previous revision of the Order. It is not clear what the intent of these new changes is.	This paragraph adds a requirement to notify the accountable Directorate for major changes to existing projects. This appears to be a notification that is separate from the Program Notification Letter requirement to the OMT.	Clarify the intent of the section by separating the requirement for notification of the Directorate from the requirement to submit Program Notification Letters to the OMT.	Non-concur. Draft language has been coordinated with FAA directorates and FAA field offices. PNL notification initiates directorate notification.
134.	Boeing	65	8-6.a.(2)	<p>[Related to our Comment # 26 of 30.]</p> <p>This paragraph describes what items the ODA administrator must submit to the ACO with each program notification letter (PNL). One of the items is described</p>	The sample conformity inspection plan shown in Appendix A, Figure 15, is only suitable for an STC ODA or for a TC/PC ODA doing post-delivery airplane modifications. It is not suitable for a TC/PC ODA performing major design changes to production airplanes under the ODA holder's Production Certificate. Therefore, each of	<p>Revise sub-paragraph a.(2) as follows:</p> <p><i>"(2) A conformity plan containing the relevant information shown in appendix A, figure 15 of this order, and ..."</i></p>	Concur. Revised subparagraph (2) to read as follows: "A conformity plan showing relevant information such as that shown in..."

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				<p>in sub-paragraph a.(2) as:</p> <p><i>“(2) A conformity plan containing the relevant information shown in appendix A, figure 15 of this order, and ...”</i></p>	<p>the items shown in the Figure 15 sample conformity plan would not necessarily be a part of <u>every</u> conformity plan. This should be made clear. Appropriate requirements for a conformity plan are spelled out in Order 8110.4C.</p>		
135.	Boeing	65	8-6.b.(1)	<p>The proposed text states:</p> <p><i>“(1) OMT COORDINATION. Upon receiving a PNL and the included information, the OMT lead will coordinate them with the responsible OMT members. The OMT members will determine their involvement in the program. The OMT lead will respond to the ODA administrator in writing. <u>Written concurrence must be obtained from the OMT prior to unit members performing authorized functions.</u> <u>Written</u></i></p>	<p>This new requirement for written concurrence <u>prior</u> to Unit Members performing authorized functions jeopardizes current Boeing “Early Cert” procedures as detailed and approved in our Procedures Manual (BPM 15.H.),</p> <p>The proposed text is also counter to the concept of delegation and implies no ability for an organization to have projects for which it is pre-determined there will be no FAA involvement. This provision would remove existing FAA delegation and could lead to project delays and FAA work statement issues.</p>	<p>Either delete the requirement or revise the paragraph to clearly state that those areas/activities for which the ODA unit is delegated or partially delegated (e.g., “Early Cert”) to find compliance may proceed once the project is initiated and prior to OMT review.</p>	<p>Concur. ODA holders must be authorized in their PM to prescribe what authorized functions can be performed prior to written concurrence. Added language to allow ODA holders PM to prescribe authorized functions that may be performed prior to written concurrence.</p>

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				<p><i><u>concurrence is usually accomplished within the program notification letter (PNL) response. However, written concurrence may be requested prior to PNL response. The OMT must review each PNL and determine what FAA involvement is required. The OMT may delegate all aspects of the program, or retain some parts for FAA approval as it determines necessary. The FAA response should include direction to the ODA unit to recommend approval, on FAA Form 8100-9, Statement of Compliance With Airworthiness Standards, of those specific findings to be made by the FAA.</u></i></p> <p>[highlighting added]</p>			

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136.	Boeing	65	8-6.b.(2)	Paragraph b.(2) (“ <i>Other FAA Coordination</i> ”) notes that projects for which no PNL is generated are allowed.	This section conflicts with the content in paragraph 8-6.b.(1). It is unclear whether a delegated project may proceed without a CPN response. Paragraph 8-6.b.(2) implies the ODA may not proceed without the CPN response from the appropriate directorate.	Clarify language in the paragraph 8-6.b.(1) to align with 8-6.b.(2).	<p>Partial Concur: Distinction is needed to clarify that the PNL Process and the CPN process are separate and distinct processes. Section 8-6.c.(2) is re-written – to point to the new CPN order 8110.115 (due to be released late FEB 2011 or early MAR 2011) and to clarify that the directorate may make agreements with the ODA on the “types of projects” that would not require notification provided this is documented in the procedures manual.</p> <p>Paragraph 8-6.c.(2) now reads: (a) Certification Project Notification (CPN). The CPN process is a separate and distinct process from the one used to coordinate the PNL. All major changes in type design, even those which do not require a PNL, require notification to the accountable directorate</p>

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							<p>using the CPN process established in FAA Order 8110.115 unless the accountable directorate agrees that some types of projects do not require a CPN. The procedures manual must address the types of projects, if any, which may be accomplished without directorate notification. The ODA holder must work through the OMT to obtain accountable directorate concurrence for the types of projects for which they propose directorate notification is no longer necessary.</p> <p>(b) Undue Burden Decision Paper. When required, the OMT will develop an undue burden decision paper as described in FAA Order 8100.11.</p>
137.	Boeing	67	8-6.f.	As written, proposed paragraph 8-6.f. [<i>Compliance Findings for Equivalent Level of Safety (ELOS)</i>]	Due to the length of time for these determinations to be approved by the FAA, this could limit testing, which may in fact enhance the over-showing of	Revise the text of this paragraph to allow the flexibility to reach a working agreement with the FAA that will allow	Non-concur. Nothing in this paragraph precludes the testing and the finding can't be made until the ELOS is granted.

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				<p><i>Provisions”] would prevent the ability of the ODA to develop a plan in coordination with the FAA prior to approval of the final ELOS. This prohibits the development of an interim method of compliance that allows for “at-risk” testing.</i></p>	<p>compliance.</p>	<p>testing to proceed with a “recommend approval” option until the ELOS is finalized and issued.</p>	
138.	Boeing	70	8-6.1.(2)	<p>The proposed Order states:</p> <p><i>“I. SUPPLIER WORKING ARRANGEMENTS. (1) Two methods of using supplier resources for a certification project are available to the ODA holder: (4) ADDITION OF ODA UNIT MEMBERS. The ODA holder may appoint ODA unit members located at the supplier. (5) USE OTHER ODA HOLDER'S APPROVALS. Another ODA holder</i></p>	<p>The text is too restrictive. It would limit the use of ODA-to-ODA approvals because:</p> <p>(1) the ODA holder must be delegated both compliance and conformity; and</p> <p>(2) it is only applicable for TC/STC holders using a supplier ODA.</p> <p>Further, Industry has presented proposals to FAA (AIR-140) on optimal ways to recognize approvals from another ODA without having to specifically add Unit Members from the other ODA to its staff.</p>	<p>Revise paragraph 8.6.1.(2) to remove these two limitations.</p>	<p>Non-concur. The FAA expects an ODA holder to be accountable for its suppliers. This is consistent with requirements of any regular(non-ODA) TC/STC project as described in 8110.4</p> <p>Also, AIR-200 is not aware of any proposals presented as alternate means to recognize approvals between ODAs as indicated.</p> <p>Revised items (4) and (5) in the referenced paragraph to read correctly as (a) and (b)</p>

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				<p><i>may, within its limitations, provide approvals for a project. (2) If either method is used, the TC ODA holder responsible for the certification project is ultimately responsible for the compliance findings and conformity approvals on the project and the integration of the approvals into its ODA system."</i></p>			
139.	Boeing	75	8-7	<p>This proposed paragraph raises concerns with regard to foreign-registered aircraft. Foreign-registered aircraft are returned to service under the regulations of the country of registry, and the oversight over the maintenance approval for return to service is overseen by the authority that issued the maintenance authorization. The</p>	<p>This provision, as proposed, is more prescriptive, and provides no justification for its inclusion. The FAA (Flight Standards Service, AFS) has agreed that the Order wording is an issue.</p>	<p>This section needs further discussion with AFS and Industry regarding off-site projects and alternative approaches to recognition of maintenance systems internationally, where foreign-registered aircraft require alterations that require FAA certification.</p>	<p>Non-concur. Added language clarifies that intent of requirement is that in the case of foreign-registered products, the off-site facility must be authorized to approve that "type" of altered product for return to service, not necessarily the specific product that is being altered. Approval for return to service is still the responsibility of the state of registry.</p>

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				proposed Order is in conflict with this. Additionally, in most cases, airplane manufacturer service bulletins that require compliance and conformity are scheduled into the maintenance schedule of the registered owner/operator.			
140.	Sikorsky Aircraft Corp.	75	8-7 b(3): Off-site Personnel and Processes	Incorrect form reference in 8-7 b(3).	ODA Engineering UMs do not document acceptance of deviations on an 8100-9.	Remove “on FAA Form 8100-9”	Concur. Revised to read 8100-1.
141.	Boeing	78, 25	8-8. 3-20.	Paragraph 8-8 (“Other Off Site And International Activities”) and paragraph 3-20 (“ <i>Activity Outside The United States</i> ”) only allow requesting technical assistance of a non-US CAA if the CAA restricts the use of ODA holder personnel in	There is a conflict between FAA Order 8100.15 and FAA Order 8100.14 with regard to ODA restrictions on requesting technical assistance. This is also in conflict with existing bilateral agreements between the US and other countries, where procedures for technical assistance are documented.	Revise the Order(s) to allow ODA holders to have the same allowances in requesting technical assistance of CAAs as other applicants can when certifying activities are being performed in foreign countries and when the certification project is under an FAA project number.	Non-concur: OMT must be involved if another CAA’s assistance is required. With respect to certification activities under FAA project numbers there is an element of oversight involved here which the FAA cannot and will not delegate.

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				<p>performing ODA activity within their country.</p> <p>However, both paragraphs reference FAA Order 8100.14 (<i>“Interim Procedures for Working with the European Community on Airworthiness Certification and Continued Airworthiness”</i>), which contains technical assistance guidance in its paragraph 6-1.b.(3)(a) that allows technical assistance to be directly requested from a supplier that holds an EASA DOA if the DOA is authorized for similar activities.</p>			
142.	HBC	78	8-9 a.	<p>Second sentence requires “Any multiple use repair data must be in the form of a repair specification and the data must address all possible damage conditions...”</p>	<p>This requirement is too open-ended.</p>	<p>Change text to read: “Any multiple use repair data must be in the form of a repair specification and the data must address all <u>appropriate</u> damage conditions...”</p>	<p>Non-concur. Repair specifications must address all possible damage conditions.</p>

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143.	Cessna	78	8-9 a.	Multiple use repair data must be in the form of a repair specification.	This will significantly impact Cessna's ability to respond to fleet wide issues with SRM type repairs. Having to issue a repair specification will require Cessna UMs to pursue another special authorization and change our ability to quickly respond to fleet conditions, reducing fleet safety, not increasing it.		Non-concur. Repair specifications are not required for design approval holders.
144.	HBC	79	8-9 c.	New requirement to submit an FAA Form 8100-11 for a major repair or major alteration when the data addresses all aspects of the repair or alteration is not of value and will be burdensome.	HBC prepares thousands of repair design data every year of which most are deemed major. Typically, all aspects of the repair are addressed. In addition to preparing the 8100.9 approval for the data it will be required to also have an 8100-11 prepared and signed by the ODA administrator. Would these then be submitted to the OMT or kept internally? Will the OMT like receiving thousands of 8100-11 forms on our repairs?	Please justify this additional task.	Non-concur. FAA form 8100-11 is required to document completion of a major repair or major alteration and will be retained by the ODA holder.
145.	Cessna	79	8-9 c.	An FAA Form 8100-11 must be completed	Currently this form (8100-11) is not required. When a repair is complete an 8100-9 is issued and the paperwork is provided to the customer and the ODA Administrator. Cessna's documentation currently addresses all aspects of what is specified to be covered by the		Non-concur. FAA form 8100-11 is required to document completion of a major repair or major alteration and will be retained by the ODA holder.

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					8100-11. Cessna does not see a value to this document.		
146.	Cessna	79	8-9 d.	ICA Review and Acceptance Procedures	This will greatly impact Cessna's ability to turn aircraft repairs and mods in a quick manner. Cessna currently averages 3 days or less for a repair from start to finish. Having to pursue AEG approval of ICA requirements is going to push this process to a month or more for a repair. This is an unacceptable delay and increased level of downtime for our customers to bear.		Non-concur. ICA review and acceptance may be delegated.
147.	Boeing	79	8-9.c.	Paragraph 8-9.c. (<i>"Statement of Completion"</i>) adds a requirement for completion of an FAA Form 8100-11 in instances when the repair data approvals address all aspects of a particular repair or alteration.	Boeing approves an immense amount of repair data. Operators are ultimately responsible for the repair, however. We consider this new additional paperwork requirement unnecessary.	Remove this requirement from the Order.	Non-concur. FAA form 8100-11 is required to document completion of a major repair or major alteration.
148.	Sikorsky Aircraft Corp.	79	8-9: Approval of Major Alterati	Per FAA input, an 8100-11 is required for type design projects only	Commenter contends that Statement of Completion is not required to formally close-out Major Repair & Major Alteration Approval activity.	Remove requirement for 8100-11 for repairs & alterations from Chapt 8.	Non-concur. FAA form 8100-11 is required to document completion of a major repair or major alteration.

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			on or Major Repair Data				
149.	Cessna	91	9-3.a.(10)	Function code 9160	Cessna is unclear of the intent of this code.		<p>Concur. Revised Function Code (FC) 9160M, issuing Standard or Special Airworthiness Certificates to 9170M and is unique to eligible aircraft and airworthiness approvals for engines, propellers, and project articles.</p> <p>Revised function code for issuing FAA Form 8130-31, Statement of Conformity – Military Aircraft to 9170M.</p>
150.	Learjet	91 & 92	9-3 (a) 10 & 9-3 (h)	<p>Function code 9160 includes a/w certificates and issuance of the FAA Form 8130-31.</p> <p>Note: 9-3 (h) is new and is not marked with a rev bar.</p>	<p>9-3 (a) 10 does say not it is for military projects.</p> <p>It is confusing to use the same function code for two different activities, especially when the Order addresses them on different pages.</p>	Combine the different aspects of 9160 into 9-3 (a) 10 or assign a separate function codes.	<p>Concur. Revised Function Code (FC) 9160M, issuing Standard or Special Airworthiness Certificates to 9170M.</p> <p>Revised function code for issuing FAA Form 8130-31, Statement of Conformity – Military Aircraft to 9170M.</p>

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151.	Boeing	91, 92	9-3.a.(10) 9-3.h.	<p>These proposed paragraphs state:</p> <p>“9-3.a. <i>FUNCTIONS. ... The PC ODA holder's procedures manual must identify the ODA holder's specific authorized functions and limitations. The available PC ODA functions are:</i> ... <i>(10) ISSUE STANDARD OR SPECIAL AIRWORTHINESS CERTIFICATES (FUNCTION CODE 9160) for eligible aircraft and airworthiness approvals for engines, propellers, and project articles at a approved facility, only when it has been determined that the product(s) conform to the approved design requirements are in a condition for safe operation.</i>”</p>	<p>1. The function codes called out in paragraphs a.(10) and h. – <i>Function Code 9160</i> -- are the same, but they are for entirely different functions. We believe the function code in paragraph (10) is incorrect; work accomplished for the provisions of that paragraph usually falls under Function Codes 9061, 9062, 9063, 9064, 9065, and 9066.</p> <p>2. The term “project articles” used in paragraph a.(10) is not clear as to what it encompasses. The term is not used anywhere else in the Order, nor is it defined.</p>	<p>To ensure correct compliance:</p> <p>1. Clarify or correct the function code that is shown in paragraph a.(10).</p> <p>2. Define the term “project articles” or replace it with an already-defined term.</p>	<p>Concur: Function code is incorrectly labeled. Change to 9170 in referenced paragraph (a.10) and also in Figure 2-2. Boeing is correct that the intended purpose of this function code is already covered in codes 9061 through 9066, so this separate code seems unnecessary?</p> <p>AIR-112: Deleted FC 9160 as it is unnecessary.</p> <p>Revised “project articles” to read just “articles”</p>

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				<p>“9-3.h. ISSUING FAA FORM 8130-31, STATEMENT OF CONFORMITY - MILITARY AIRCRAFT (FUNCTION CODE 9160) - an ODA unit member may prepare and sign FAA Form 8130-31 on behalf of the FAA.”</p>			
152.	Boeing	92	9-3.f.	<p>The proposed text states:</p> <p><i>“f. EVALUATE PLR, PC AND PROCESS CHANGES (FUNCTION CODE 9120). A PC ODA unit may perform an evaluation of the ODA holder's quality control system to address a new TC model, STC design, or process. The PLR may be amended by the FAA if the ODA unit finds the quality control system complies with 14 CFR §§ 21.139, 21.143, 21.150, and 21.153.”</i></p>	<p>We suggest the following changes to this paragraph:</p> <ol style="list-style-type: none"> 1. Add the term "amended [TC models]" in the 1st sentence to account for projects dealing with a derivative configurations of a previously approved Type Certificate that do not warrant an all new TC. For Boeing, this accounts for the majority of our large TC projects. 2. Add the term "Supplement" to the 2nd sentence to account for possible changes to the PC Supplement, which defines the approved facilities. 3. Add references to the applicable Part 21 sections that 	<p>Based on our suggestions, the text of the revised paragraph would state:</p> <p><i>f. EVALUATE PLR, PC AND PROCESS CHANGES (FUNCTION CODE 9120). A PC ODA unit may perform an evaluation of the ODA holder's quality control system to address a new TC <u>new or amended TC models</u>, STC design, or process <u>change</u>. The <u>PC PLR or Supplement</u> may be amended by the FAA if the ODA unit finds the quality control system complies <u>and associated</u></i></p>	<p>Partial Concur: <u>We do not agree with an ODA performing an evaluation of new associate facilities as suggested in bullet #1.</u></p> <p>However, a change as recommended is acceptable(Reference to the new part 21 is also made). Change as follows:</p> <p>“A PC ODA unit may perform an evaluation of the ODA holder's quality control system to address New or Amended type certificate models, STC designs, or process changes. The PC or PLR may be amended by the FAA if the ODA unit finds the quality control system and associated production</p>

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					will become effective after April 2011.	<u>production processes comply with: 14 CFR §§21.139, 21.143, 21.150 21.147 and 21.153 (current Part 21 sections); or 14 CFR §§21.137, 21.138, 21.139, 21.140, and 21.147 (future Part 21 sections effective after April 2011).</u>	processes comply with: 14 CFR §§ 21.137, 21.138, 21.139, 21.140, 21.147 and 21.150. (i.e., part 21 effective April 16, 2011).
153.	United Airlines ODA	A-11	Appendix A Figure 10	First line item ‘Establish Conformity Inspection Requirement’ should not apply to TC and STC ODA.	For the TC and STC ODA, the establishment of conformity is an engineering UM function for the TC ODA and the STC ODA and not in activity reporting under FAA Order 8100.8c.	Recommend grayed out the fields for TC ODA and STC ODA.	Non-concur. With respect to individual designees that may be true. However, for the purpose of recording the work, and training of ODA Unit Members (UM), this data is required.
154.	Boeing	A-20	Appendix A, Figure 15	The sample conformity inspection plan shown in Figure 15 is only suitable for an STC ODA or for a TC/PC ODA doing post-delivery airplane modifications. It is not suitable for a TC/PC ODA performing major design changes to production airplanes under the ODA holder’s Production	The sample conformity inspection plan was originally developed for a DAS operation when performing STC modifications to airplanes not for a TC/PC ODA operation certifying major changes to production airplanes.	Delete the sample conformity plan and just refer to FAA Order 8110.4 for conformity plan content requirements.	Non-concur. Necessary corrections to the sample conformity plan were stated in comment #5. Per comment #5 by Boeing, revised 8-6a.(2) to read: “A conformity plan showing relevant information such as that shown in...” While it is Order 8110.4 that provides general guidance for the development of TC/STCs, this sample form is necessary to promote standardization. However it

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				Certificate.			should be refined.
155.	Boeing	B-1 thru B-17	Appendix B	<p>The sample manual contains several “must” statements, which are deemed as requirements that the ODA holder would have to incorporate into its procedures manual. One example (from page B-15) is:</p> <p><i>“(THE FOLLOWING INFORMATION MUST BE IN THE CERTIFICATION PLAN:)”</i></p>	<p>The example text in parentheses is different from and more prescriptive than the text in the previous version of the Order. The instructive wording has changed from “<i>should</i>” to “<i>must.</i>” This is not in agreement with FAA Order 8110.4C, paragraph 2-3.d., which allows for a certification plan to be submitted with information that is available, and additional information submitted as it becomes available. It is not practical for ODAs that process large numbers of projects within a year to submit all of the elements outlined in Appendix B at the initiation of each project. Implementation of this new requirement could result in significant schedule delays for some ODA holders.</p>	<p>The appendices should not impose additional requirements beyond the other paragraphs or sections of the order. Additionally the requirements in the appendices should be less prescriptive. Revise the text back to the original, to state “should” rather than “must.” For the example:</p> <p><i>“(THE FOLLOWING INFORMATION <u>MUST SHOULD</u> BE IN THE CERTIFICATION PLAN:)”</i></p>	Non-concur. Certification plan requirements for ODA holders is prescribed in 8100.15A, Appendix B.
156.	Boeing	B-9	Appendix B para 7	<p>The selection process described in proposed paragraph 7 (ODA Unit Selection Procedures) differs in certain of its</p>	<p>Our current process has been accepted and approved by the FAA. We suggest either revising the text of paragraph 7 to conform to our approved process, or</p>	<p>To reflect our approved process, the text of the proposed Order should be revised as follows:</p>	Non-concur. This request is limited to this commenter and not widespread. We suggest the commenter apply for a

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				requirements from Boeing's current approval process.	adding words to specifically state that if an ODA's approved process differs from that described in paragraph 7, the approved process takes precedence. This will clarify the intent and ensure appropriate compliance.	<p><i>“7. ODA UNIT SELECTION PROCEDURES. ...</i></p> <p><i>a. INITIAL ADMINISTRATIVE PROCESSING OF APPLICATION. ... The procedures manual also needs to define exactly what information is documented, how coordination with the OMT will occur and the expected timeframe for FAA response. All forms used to document this process should be listed in Appendix E.</i></p> <p><i>b. EVALUATION BY FOCAL POINT (<u>REPRESENTATIVE/ADVISOR</u>). The <u>representative or</u> advisor conducts a preliminary review of the application for general qualifications. The <u>representative or</u> advisor is responsible to determine the appropriate authority and limitations, may interview the applicant</i></p>	deviation to the order.

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						<p><i>and check the applicant's references. An organization's process needs to identify who is responsible to act the role of the advisor and how interviews are accomplished.</i></p> <p><i>c. Optional Evaluation Panel Review. Consisting of at least two people, the evaluation panel may include the advisor. ...”</i></p>	
157.	Sikorsky Aircraft Corp.	B-8	Appendix B, Section 3: Organizational Structure & Responsibilities	Reporting paths up through management for other duties a unit member may have outside of ODA duties is not appropriate.	The ODA UMs other duties fall outside of his or her ODA duties and should not be detailed in the org. structure.	Remove “as well as other duties a unit member may have.”	Non-concur. This information is vital to ensuring the ODA UMs are not subject to undue pressure or conflict of interest while performing authorized functions on our behalf.
158.	Cessna	C-1 -C- 66	Appendix C	Cessna respectfully requests that the FAA provide references to the requirements that support the Inspection Criteria listed in Appendix C.	Clarification of requirements		Outside the scope of this revision. A team has been assembled to improve the ODA inspection program. This comment will be provided to that team.

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159.	Sikorsky Aircraft Corp.	B-15	Appendix F: Certification Plans	Change “must” to “should” in the introductory sentence	Not all items may be required for each project	Change “must” to “should” in the introductory sentence	Non-concur. All certification plan items from 8110.4 applicable to ODA holders, has been provided in the ODA order.
160.	Sikorsky Aircraft Corp.	B-15	Appendix F: Certification Plans	FAA Form 8110-12, if required.	FAA Form 8100-12 is not always required	Add “if required”	Non-concur. Per 8110.4, FAA form 8110-12 is required for all TC and STC projects.
161.	Sikorsky Aircraft Corp.	G-1	Appendix G. 702: Suggestions for Improvement	Form 1320-19 is in Appendix H, not E	Incorrect reference	Change to Appendix H	Concur. Directive feedback guidance is now listed in 704. and revised to read, “...is on the last page of this order.”
162.	Sikorsky Aircraft Corp.		Ch. 8 Ch. 11 B-15 App. F	Include (limited) acceptability of previously-approved (ODA or non-ODA) data	Previously-approved (8110-3 / 8100-9) data may (if applicable / valid) be utilized on an ODA project without requiring ODA re-approval via a new 8100-9.	Revise Order accordingly	Non-concur. Although previously approved data (8110-3/8100-9) can be used by an ODA without an 8100-9, follow 8110.4 and other FAA policy regarding the use of FAA approved data. No need or benefit to add this language to the ODA order.

#	Company /Group	Pg	Para.	Comment	Rationale for Comment	Recommendation	Disposition
163.	Sikorsky Aircraft Corp.	2	Deviations	Deviation section from original FAA Order 8100.15 appears to have been omitted in Rev. A but should be put back in	ODA holders should have the ability to make a request for deviation to the Order and there is no provision for it in this revised Order.	Reinsert the Deviation section (1-6, page 2) from the original Order 8100.15.	Concur. Deviation section has been added and located in 702., page G-1.
164.	Bell Helicopter	6, 7, 91, 92	Fig 2.1, Fig 2.2, Para 9-3 a. (10), Para 9-3 h.	Function Code 9160M is used for two different functions.	In one instance this function code is used for issuing FAA Form 8130-31, Statement of Conformity – Military Aircraft. (Ref Fig 2.1 and Para 9-3 h. In the next instance this same function code is used for issuing Standard or Special Airworthiness Certificates. (Ref Fig 2.2 and Para 9-3 a.(10)	Bell Helicopter requests a review and correction of inconsistencies and repetition with Function Code 9160M, issuing Standard or Special Airworthiness Certificates. Bell Helicopter feels that this function is already noted and in use as 9061M and 9062M. Bell Helicopter also requests a review and correction of inconsistencies of the function code for issuing FAA Form 8130-31, Statement of Conformity – Military Aircraft, to follow formatting in place for TC and STC Function Codes of the same type function.	Concur. Revised Function Code (FC) 9160M, issuing Standard or Special Airworthiness Certificates to 9170M is unique to eligible aircraft and airworthiness approvals for engines, propellers, and project articles. Unlike FC 9061M and 9062M which is for U.S. Registered aircraft and Experimental aircraft, respectively. Revised function code for issuing FAA Form 8130-31, Statement of Conformity – Military Aircraft to 9170M.

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165.	Wencor	A20-A23	Fig. 15	The sample Conformity Inspection Plan (CIP) is 4 pages long with numerous entries that are not applicable to PMA project development such as: Aircraft models to be modified, Installation Conformity, TIA/STIR, entries in Part III General, Part VII.f. (Post Conformity Mods/Replacements), Part VII.g. (Flight Testing), Part VIII Airworthiness and Return to Service.	Provide a simple one page Sample CIP for PMA usage to streamline the process and adapt to only PMA needs.		Non-concur. This may be a good idea regarding PMA.s but it is currently out of the scope of this revision. FAA Order 8110.42 is specific to the PMA process and currently depicts the process graphically, with appropriate references, in the PMA process flowchart in Appendix A. The ODA program (and Order 8100.15) does not change anything about that process. Authorizations granted by the FAA to ODAs will vary based on an organization's experience and expertise among other factors.
166.	Wencor	A-33	Fig. 22	Make and Model eligibility example is misleading as it shows a short-cut for listing incomplete model numbers. The short cut listing used in the past is now not acceptable to ACO or MIDO due to internal ISO audit issues. Also correct typo in existing note after ".End of Listing."; on	Add a clarifying note to the form as follows: "NOTE: Make and Model listings must be exactly as on the applicable TCDS. Notify the ACO of any conflicts encountered." This is a verbal policy needing to be documented for consistent understanding by PMA companies.		Partial concur. PMA policy governs the proposed note. Typo corrected.

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				the CFR callout.			
167.	Duncan Aviation	A-10	Figure 10	There is no form recommendation for submittal of MRA activity (reference paragraph 12-5 b.).		Suggest developing a form that will combine this form with the data that is required to be submitted for MRA activity.	Non-concur. ODA holders are free to create a form.
168.	Learjet	6	Figure 2-1	Should new function code 9160 M be 9170 M instead. Using 9160 M for this function code instead of 9170 M causes confusion elsewhere in the Order. Additional comments are included based on the draft Order using 9160 M.	The function codes have the same last three digits. 8170 M, 9160 M & 11170 M does not conform to that logic.	Change 9160 M in figure 2-1 (and other location) to 9170 M.	Concur. Revised accordingly.
169.	HEICO Aerospace	Page 6	Figure 2-1	The sample supplements in the Appendix A Figures 21 and 22 list the ODA administrator as the single approval signature. Functions 13031 and 13032 are listed as Mfg. codes.	The ODA administrator should be the single approving entity for the supplements and may be either an engineering or manufacturing unit member.	Create a new function type for the administrator and use that function type for Function codes 13031 and 13032.	Non-concur. No value added by specifying ODA administrator function codes.

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170.	HBC	6	Figure 2-1	Draft didn't remove unnecessary comma at ODA function code 8130 E.	Comma in function code is inconsistent with the formatting of other function codes.	Please remove comma.	Concur. Revised accordingly.
171.	HBC	6	Figure 2-1	Several function codes in the STC ODA column are underlined in this draft that were underlined in the previous revision.	Underlined text denotes new text. Several STC ODA codes were not added in this draft, yet they are underlined.	Please remove underline from codes that were not new to this draft.	Non-concur. Underlined function codes are available for consultant group organizations.
172.	Learjet	7	Figure 2-2	Function code 9160 M has already been used for a different function on page 6. See prior comment.	What does this new function allow that is now already covered in 9061 M & 9062 M?	Create unique function code is required.	Concur. Revised Function Code (FC) 9160M, issuing Standard or Special Airworthiness Certificates to 9170M is unique to eligible aircraft and airworthiness approvals for engines, propellers, and project articles. Unlike FC 9061M and 9062M which is for U.S. Registered aircraft and Experimental aircraft, respectively. Revised function code for issuing FAA Form 8130-31, Statement of

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							Conformity – Military Aircraft to 9170M.
173.	HBC	7	Figure 2-2	There are two function codes both of which are identified as “Issue Export Approvals.” Is it possible to delineate them from each other?	Possibly could eliminate some confusion.	Provide further delineation between the codes 9064M and 9065 M into Figure 2-2.	Non-concur. See FC definitions in Chapters 9 and 12.
174.	Boeing	73-74	Figure 8-1	The table shown in Figure 8-1 (“ <i>ODA Type Certification Process</i> ”) does not align with Order 8110.4.	The table as shown could be taken as a literal depiction of how a project should flow; it does not account for companies accomplishing tasks in a different sequence. Prescribing the project sequence may introduce constraints on ODA holders and inadvertently limit the benefits of the ODA.	Revise the table references to allow a flexible process that accomplishes the same end result.	Non-concur. Deleted Figure 8-1 as the certification process is referenced in FAA Order 8110.4.
175.	Boeing	74	Figure 8-1 (Page 2 Of 2)	The flow diagram shows that the Type Inspection Report (TIR) is submitted prior to the issuance of the original or amended type certificate. This conflicts with Order 8110.4C, which shows the submittal of TIR as a post-TC activity.	The texts of FAA Orders 8100.15 and 8110.4 are in conflict regarding issuance of original or amended type certificates.	Revise Figure 8-1 to eliminate the conflict.	Non-concur. Deleted Figure 8-1 as the certification process is referenced in FAA Order 8110.4.

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				Additionally, proposed paragraph 8-6.i (pp. 68-69) states that Issuance of the TC is in accordance with Order 8110.4.			
176.	AeroMech	B-15	Item 3 in list	This line item indicates that a copy of FAA 8110-12 Application for STC must be included in the certification plan.	This seems inappropriate and unnecessary since the plan is submitted to the OMT concurrently with the application.	Eliminate item 3.	Non-concur. FAA form 8110-12 is required per FAA order 8110.4.
177.	Learjet	A-10	N/A	In the "Issue Export Airworthiness Approvals" block the form number should be 8130-3 not 8130-4. The changes to the "Summary Activity Report" form are good and will make it easier to complete.		N/A	Concur.
178.	HEICO Aerospace	143	Para 13-6 a. (2) (j-n3);	Due to the formatting errors of the draft order, these paragraphs are confusing	We assume that sub paragraph (j) is for design approvals sought outside the ODA and (k) is for design approvals sought within the ODA.	Sub paragraph (l) – (n3) should be sub paragraphs of (k). Delete (a) –(c) because they will now be sub paragraphs of (k) and not required in (j)	Non-concur. Formatting and typographical errors. Deleted 13-6.a.(2)(j) and (k).

#	Company /Group	Pg	Para.	Comment	Rationale for Comment	Recommendation	Disposition
179.	HEICO Aerospace	Page 24 (and various other locations)	Para 3-18 d. (1); (and various other locations)	Changes to Part 21, have changed the “part and appliance” references to “article”	Harmonization with new part 21 terminology.	Replace “appliance” or “part” with “article” throughout the order.	Concur. Revised accordingly.
180.	Bell Helicopter Textron	81, 94, 117, 127	Para 8-112, Para 9-8, Para 11-14, Para 12-7	These sections (Para 8-112 - TC, Para 9-8 – PC, Para 11-14 - STC) place further requirements upon the ODA Unit for the issuance of operating limitations which differs from the requirements of Para 12-7 – MRA, as well as current Independent DARs, which follow the same rationale, regulations and Orders. Bell helicopter finds that this extra requirement for the TC, PC, and STC Functions places undue burden on the project schedules	FAA Order 8130-2G (which is the ref noted in this order) has very specific language when it comes to limitations, conditions and flight test areas when issuing airworthiness certificates. These added steps forces the ODA unit in some cases to go above and beyond in order to achieve the same results as an Independent DAR, who follows the same rationale and Order and is not limited to these requirements when issuing airworthiness certificates. The benefit of an ODA was to have less involvement from the FAA. These added requirements place more FAA involvement on the unit, which places undue burden on the project schedules.	Bell Helicopter requests that Order 8100.15A Para 8-112, Para 9-8, and Para 11-14 be changed to reflect the same wording as Para 12-7	Non-concur. Paragraph 12-7 cannot be used for all four of the ODAs mentioned. The actual function codes for issuance of airworthiness certificates, are specifically tied to the type ODA for which the code is authorized. Hence there are some differences. Also, ODA Unit members are not the same as DAR’s. The authority is issued to the ODA holder and not the individual. DARs are required to confer with their advisors before commencing projects, but much too often they do not.

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				and is unnecessary to insure safety.			
181.	Garmin	Appendix B	Sample manual	In the past, there was an expectation from FAA that the text in the sample manual that was not CAPs or italics appear as much as possible word-for-word in the ODA's Procedures Manual. With this revision some of the added text doesn't add anything substantive or in some cases doesn't make sense outside the context of the Order itself. Is the expectation that existing manuals still match word-for-word? If there is no notable change in what is required but just additional/different wording, is there an expectation that an existing manual be updated to match the	Seems that some of the added text added should be in italics to make it clear it is guidance for content rather than required specific wording that must included word-for-word.	Review added text and clearly indicate what criteria are for content and what actual wording is expected to incorporated into new and existing manuals.	Concur. Revised accordingly.

#	Company /Group	Pg	Para.	Comment	Rationale for Comment	Recommendation	Disposition
				sample manual?			
182.	Wencor	3 22 36 37 132 134 136	Var	<p>Various typos: P.3 2-3 Typo on 1st word Add to last sentence: “.. that apply to their type of delegation.” P.22 3-16.a Calls for Appendix A Figure 9 and s/b Figure 10 P.36 5-3.d.1 1st sentence, last word is misspelled. P.37 5-4 5th sentence has spelling error P.132 13-3.e.(2) 1st word typo P.134 13-4.e Several typo errors noted P.136 13-6.a Typos on sub (m) and (n)</p>			Non-concur with adding language to 2-3, last sentence. No benefit or need to add recommended language.