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Order 8110.55A

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1.	Garmin	Pg. 1, ¶ 5.d.	“Appendix 1 provides sample audit...”	Editorial	Add the word “a”: “Appendix 1 provides a sample...”	Accepted. Change made. Reference to appendix has been removed and content found in training materials.
2.	Garmin	Pg. 2, ¶ 7.b.	“...competencies acquired though previous experience...”	Editorial	Change “though” to “through.”	Accepted. Change made and 7.a and 7.b consolidated.
3.	Garmin	Page 2, ¶ 7.b. bullet 4	Tool qualification skills should first emphasize RTCA/DO-200A experience, per RTCA/DO-200A, Section 2.4.5.	Desired experience is really for RTCA/DO-200A tool qualification, not RTCA/DO-178B or RTCA/DO-254.	“RTCA/DO-200A tool qualification concepts and review methods. (Experience in RTCA/DO-178B or RTCA/DO-254 tool qualification concepts also may be considered.)”	Accepted. Paragraph 7.a and 7.b have been consolidated and updated to list both DO-178 and DO-254 as acceptable areas of technical knowledge.
4.	Garmin	Page 3, ¶ 9.b.	Tool qualification skills should first emphasize RTCA/DO-200A experience, per RTCA/DO-200A, Section 2.4.5.	Desired experience is really for RTCA/DO-200A tool qualification experience, not RTCA/DO-178B.	“...and one additional member familiar with RTCA/DO-200A tool qualification and review methods.”	Accepted.
5.	Garmin	Pg. 3, ¶ 10.a.	“Evaluate and audit the applicant’s facility before issuing a LOA.” This sentence reads as if an on-site audit is	An ACO may determine that an off-site documentation review is sufficient, assuming they	“Evaluate the LOA application before issuing a LOA. If necessary, this	Accepted. Initial audit should be on-site for demonstration and

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			mandatory prior to issuing any LOA.	are familiar with the applicant's processes.	could include an audit of any of the applicant's facilities...."	records review. Subsequent audits can be off-site or desk reviews.
6.	Garmin	Pg. 3, ¶ 10.a.	<p>"...this audit could include any of the applicant's facilities (that do not hold a Type 1 LOA),...."</p> <p>Not sure what the parenthetical clause is trying to clarify.</p>	Why would an audit be restricted to only sites not already holding a Type 1 LOA when there are also Type 2 LOAs? Why just mention a Type 1 LOA?	Remove the parenthetical, or reword / expand for better clarity.	<p>Accepted.</p> <p>Changed to read: "Evaluate and audit the applicant's facility before issuing a LOA. This audit should be conducted at the applicant's facilities where database processing takes place to ensure the applicant meets the criteria of AC 20-153A. "</p>

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7.	Garmin	Page 3, ¶ 10.a.	<p>“... this audit could include any of the applicant’s facilities...”</p> <p>The applicant should specify which facilities are required to be audited based on what facilities encompass DO-200A processing steps. The FAA should only request additional facility visits so long as they involve DO-200A processing steps.</p>	Prevent burdensome preparation and promote reasonable expectations on behalf of applicant and auditors.	“...could include any of the applicant’s facilities where RTCA/DO-200A processing tasks are executed...”	Accepted. See previous comment.
8.	Garmin	Pg. 5, ¶ 10.f.	“The FAA auditor and facility leader...”	There may be multiple FAA auditors.	“The lead FAA auditor and facility leader...”	Accepted.
9.	Garmin	Pg. 5, ¶ 11.a.	Garmin currently has two Type 2 LOAs that do not follow the stated numbering scheme.	It is not clear what numbering scheme should be used for revisions to existing LOAs that do not follow the stated numbering scheme. It is also unclear whether additional LOAs given to an existing LOA holder should use the numbering scheme documented in this paragraph, or continue in a “grandfathered” manner with the LOA holder’s current	FAA should add guidance regarding revision of existing LOAs that do not follow the stated numbering scheme, whether the stated numbering scheme is mandatory, and clarify the intent of this paragraph.	Acknowledged. This numbering scheme is a recommendation versus a requirement. Unique numbering schemes previously developed between an applicant and ACO meeting the intent of this paragraph are certainly

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				numbering scheme.		acceptable.
10.	Garmin	Pg. 5, ¶ 12.b.	“A LOA is not transferable to another person, company, or location.”	Authority to distribute databases covered under an LOA can be granted to another organization, such as Garmin’s relationship with Jeppesen.	Suggest adding this statement: “(Note: Authority to distribute databases covered under a LOA may be given to another organization, provided such agreements are documented and quality procedures are followed.”	Partially Accepted. Added new 2 nd sentence to read: “While actual production and distribution of databases may be done by a third party under license, the responsibility for the terms and conditions of a particular LOA remain with the holder of the LOA.”
11.	Garmin	Page 5, ¶ 12.c.	“... and include the supplier’s facilities...” Why would a Type 1 supplier’s facility be subject to a visit during a Type 2 audit? A Type 2 applicant should be required to verify the current status of a Type 1 supplier, but nothing beyond that.	Limit the scope of the audit only to what the applicant can control. Prevent Type 1 LOA holders from incurring redundant audits. Type 1 LOA holders should already be subject to periodic independent audits from the FAA.	“...should inspect the LOA holder’s facilities periodically to ensure the holder continues....”	Accepted.
12.	Garmin	Pg. 5, ¶ 12.d.	“You can revoke the LOA if the applicant does not comply with the specified conditions.”	Seems overly harsh without much room for discretion or flexibility.	“FAA auditors have the option to revoke a LOA if the	Partially Accepted. Changed to read:

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			<p>“specified conditions” is vague. Are these the specified conditions on the LOA letter itself, or audit findings?</p>		<p>applicant does not remedy audit non-compliance issues within an agreed timeframe.</p>	<p>“The ACO can revoke the LOA if the LOA holder does not resolve outstanding deficiencies from an audit report, comply with the specified terms and conditions of their LOA, or satisfactorily remedy non-compliance issues within an agreed timeframe.”</p>
13.	Garmin	Pg. 5, ¶ 13.b.	<p>This paragraph describes the use of DERs in LOA projects.</p>	<p>The FAA recently updated FAA Order 8110.37E, DER Handbook. This update mentions nothing about the use of DERs in LOA projects. While this paragraph limits the use of DERs to TC or STC projects, consistent with the most recent 8110.37E update that removes TSO DER authority, it is likely that most LOAs are not associated with TC or STC projects. For</p>	<p>Remove ¶ 13.b.</p>	<p>Accepted.</p>

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				<p>example:</p> <ul style="list-style-type: none"> • Type 1 LOA holders do not develop aircraft type design data • Garmin's Type 2 LOAs are associated with the TSO equipment, not a specific aircraft type design in a STC or TC <p>In both of these situations, neither the LOA holder nor the FAA will gain any advantage.</p> <p>Given that this guidance is:</p> <ul style="list-style-type: none"> • Not supported by 8110.37E • There is little evidence of advantage to the FAA, and • A high likelihood of confusion both within the FAA and within 		

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				<p>the DER community about how a DER can become “appropriately appointed”</p> <p>It seems more appropriate to not include this guidance.</p>		
14.	Garmin	Pg. 2-1, Appendix 2, Introductory paragraph	“The following items are common findings collected from numerous database supplier audit reports.”	The term “database supplier” can be interpreted to mean either a Type 1 or Type 2 LOA holder. From a Type 2 LOA holder’s perspective, the “database supplier” is its Type 1 LOA data supplier. From a user’s perspective, a Type 2 LOA holder is its data supplier.	“The following items are common findings collected from numerous RTCA/DO-200A audit reports involving LOA applicants.”	Partially Accepted. The appendix 2 language was updated and moved to training materials as follows: “The following items are common findings collected from numerous audit reports involving LOA applicants.”
15.	Garmin	Pg. 2-1, Appendix 2, 2nd, 3rd, and 4th items in table on page	Including overly-specific reference on the LOA and/or process documents as is indicated by the following Reasoning/Expectation column text could render the LOA and/or process documents out-of-date if FAA personnel	<p>Prevent unnecessary LOA and/or process document modification.</p> <p>The FAA has not required this level of specificity before, and it is not called out in either</p>	Suggest limiting contact information to the level of the ACO office, but not specific personnel, mailing addresses, phone numbers, etc. At most specify	Partially Accepted. The appendix 2 language was updated and moved to training materials. Changed to read:

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			<p>change:</p> <p>[Supplier XYZ] needs to embed specific contact information in their processes to ensure proper notification of the FAA contact (i.e., NY ACO LOA project engineer, mailing address, phone number, etc.).</p>	<p>RTCA/DO-200A, or AC 20-153A.</p>	<p>ACO office and ACO personnel title (e.g., ACO Manager).</p>	<p>“[Supplier XYZ] needs to embed contact information in their processes to ensure proper notification of the FAA contact (i.e., recommend using at least ACO office and generic reference to ACO LOA project engineer title, etc.). Updates to dedicated FAA personnel contact names, phone numbers, email addresses, and mailing addresses should not require a change to the LOA.”</p>
16.	Garmin	<p>Pg. 2-1, Appendix 2, 3rd item in table on page</p> <p>Comment also applies to all</p>	<p>“Any [Supplier XYZ] alert pertaining to a discrepancy in the delivered data should be sent to the FAA.”</p> <p>The term “Supplier” can be interpreted to mean either a</p>	<p>This can be (wrongly) interpreted such that a Type 2 LOA holder would be obligated to re-send all data alerts it receives from its Type 1 LOA data supplier to the</p>	<p>“Any [Type X LOA holder] alert pertaining to a discrepancy in the delivered data caused by [Type X LOA holder]</p>	<p>Partially Accepted. The appendix 2 language was updated and moved to training materials.</p>

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		uses of [Supplier XYZ] throughout the document.	Type 1 LOA holder or a Type 2 LOA holder.	<p>FAA. Since the FAA should already have data alerts from a Type 1 LOA holder, it does not make sense for a Type 2 LOA holder to also pass them on to the FAA.</p> <p>Per AC 20-153A, Section 10.a.(1), the holder of a LOA must report to the FAA all defects produced and distributed under the LOA that may have a safety effect. This implies Type 1 LOA holders should report their alerts to the FAA, and Type 2 LOA holders should report their alerts to the FAA. But Type 2 LOA holders should not be required to forward to the FAA the data alerts they receive from their Type 1 LOA data supplier.</p>	<p>should be sent to the FAA.”</p> <p>Throughout document, “[Type X LOA holder]” should replace “[Supplier XYZ]”.</p>	<p>Changed to read: “Notification of any major non-conformity needs to be provided to FAA. Any discrepancy in the delivered data should be sent to the FAA by the supplier that caused the error or was notified of the error by a customer.”</p> <p>Supplier XYZ could just as well be Type X LOA Applicant. This is just a placeholder and reflects typical usage.</p>
17.	Garmin	Pg. 2-2, Appendix 2, 4th item in table on page	“...To acknowledge upstream and downstream agreement with supplier’s/user’s DQRs...”	Garmin has tens of thousands of “downstream” users. It is logistically impossible to obtain written	“To acknowledge upstream and/or downstream agreement...” to avoid implying that	Accepted. An acceptable alternative is to assume that the user accepts the

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				<p>agreement of DQRs with each one.</p> <p>Garmin has written acknowledgement of DQR agreement with its Type 1 LOA data supplier. The FAA has previously agreed with Garmin that obtaining written agreement with individual customers is not feasible. The act of a user purchasing a unit implies acceptance of the DQRs for that unit.</p>	all data suppliers need DQR written agreements both up and down the chain.	DQRs specified by the Type 2 supplier unless the user provides additional requirements. Material has been updated and moved to training materials.
18.	Garmin	Pg. 2-2 & 2-3, Appendix 2, last item in table on page 2-2, carried over to first item in table on page 2-3	“A 5 p.m. Friday scenario should be considered to show the process doesn’t wait until Monday morning.”	The Friday / Monday scenario is an expansion of AC 20-153A guidance.	The reference to the Friday/Monday scenario should be removed.	Not Accepted. The Friday / Monday scenario is a common audit technique. Appendix 2 has been moved to training materials.
19.	Garmin	Pg. 2-3, Appendix 2, 3 rd (last) item in table on page	“The process must included root cause...”	Editorial	Change “included” to “include”.	Accepted. The appendix 2 moved to training materials. Change made.
20.	Garmin	Pg. 2-5, Appendix 2, 3 rd item in	“Need procedures to rebuild the files that are stored in archive for recovery.”	Common Finding and Reasoning/Expectation seem inconsistent.	”Need procedures to rebuild/recover files that are stored	Partially Accepted. The appendix 2

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		table on page	“Data suppliers must have a means to archive and recover data and tool qualification files.”	Per RTCA/DO-200A, Section 2.4.5.5, the tools need to be archived, not the “tool qualification files.”	in archive.” “Data suppliers must have a means to archive and recover data and tools.”	moved to training materials. DO-200A states in Item 5 of Section 2.4.5.5 that “configured items” be archived, not just tools. One of those “configured items” is specified in Item 4 as a “change control process.” Also, DO-200A Section 2.4.5.6 specifies tool qual document requirements and states: “...documents and reports shall be maintained...” Changed to read: “Need procedures to rebuild/recover files that are stored in archive.” “Data suppliers must have a means to archive and recover tools, tool

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						records, qualification documents, and reports.”