

Commenter	Page & Paragraph	Comment	Reason for Comment	Suggested Change	Comment Resolution	Status
GE	Pg 2 para 2-3	Since the TCH will typically have valuable fleet data and engineering domain expertise not available to the FAA, the TCH's contribution to the process should be made more prominent.	The TCH and FAA working together are more likely to produce an accurate and useful risk assessment than the FAA working in isolation.	Add the following statement to the end of the section: <i>TC holders often produce risk assessments and instigate corrective action as part of their Continued Operational Safety/ Continued Airworthiness programs. You should engage the TC holder repeatedly in the MSAD process, beginning with the preliminary risk assessment, so that their domain expertise and access to data can contribute to a timely and realistic assessment of the issue, and to promote common understanding and appreciation of safety concerns. If the TCH chooses not to participate in an assessment, or there are irreconcilable differences of interpretation between TCH and FAA, that should be noted for the record.</i>	Concur with comment. Certificate holder involvement is encouraged throughout this order. Specifically, section 2-2b and figure 1 speak to leveraging certificate holder safety performance data and analyses performed by the certificate holder. No change made.	Closed

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AIA	Pg 2 para 2-3	Since the TCH will typically have valuable fleet data and engineering domain expertise not available to the FAA, the TCH's contribution to the process should be made more prominent.	The TCH and FAA working together are more likely to produce an accurate and useful risk assessment than the FAA working in isolation.	Add the following statement to the end of the section: <i>TC holders often produce risk assessments and instigate corrective action as part of their Continued Operational Safety/Continued Airworthiness programs. You should engage the TC holder repeatedly in the MSAD process, beginning with the preliminary risk assessment, so that their domain expertise and access to data can contribute to a timely and realistic assessment of the issue, and to promote common understanding and appreciation of safety concerns. If the TCH chooses not to participate in an assessment, or there are irreconcilable differences of interpretation between TCH and FAA, that should be noted for the record.</i>	Concur with comment. Certificate holder involvement is encouraged throughout this order. Specifically, section 2-2b and figure 1 speak to leveraging certificate holder safety performance data and analyses performed by the certificate holder. No change made.	Closed

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Gulfstream	Page 2	Pages 2-3 note that the industry (certificate holders) will have their own processes and that the ASE/ACO will have oversight. Gulfstream feels that an explanation of the proposed oversight functions should be included.		The ORDER needs to include verbiage to note the level industry involvement expected to achieve industry compliance with this ORDER.	Do not concur. Only FAA employees must comply with FAA Orders, not industry.	Closed

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Gulfstream	Page 3, Figure 1	<p>Additionally, Figure 1 shows several other functions and tasks that will require OEM coordination and information to be provided. Figure 1 should make reference to OEM participation/involvement specifically for risk analysis, root cause identification, and identification of corrective action. The COS integration mentioned in the Section 2-2 'Range of the MSAD Process' Subsection b. should be detailed in each of the functional sections.</p>			<p>Concur with comment. Modified risk analysis block in figure 1 to read: "ASE evaluates certificate holder risk analysis or performs a quantitative risk analysis to identify safety issues for corrective action."</p>	Closed

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GE	Page 5, Figures 2, 3 & 6	As above.	As above.	Amend figures 2, 3 &6 to reflect TCH input.	Concur with comment. Certificate holder involvement is encouraged throughout this order. Specifically, section 2-2b and figure 1 speak to leveraging certificate holder safety performance data and analyses performed by the certificate holder. No change made.	Closed
AIA	Page 5, Figures 2, 3 & 6	Since the TCH will typically have valuable fleet data and engineering domain expertise not available to the FAA, the TCH's contribution to the process should be made more prominent.	The TCH and FAA working together are more likely to produce an accurate and useful risk assessment than the FAA working in isolation.	Amend figures 2, 3 &6 to reflect TCH input.	Concur with comment. Certificate holder involvement is encouraged throughout this order. Specifically, section 2-2b and figure 1 speak to leveraging certificate holder safety performance data and analyses performed by the certificate holder. No change made.	Closed

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Gulfstream	Page 7, 2-7	To ensure that correct assumptions and information are used to complete the risk assessments, the information provided in Section 2.7 'Perform Preliminary Risk Assessment (Step 3.0)' on Page 7, the ORDER should include wording that states: "The ASE will coordinate with the appropriate personnel at the OEM to obtain information and clarification on system operation, failure modes, etc. that are required to perform the appropriate preliminary risk assessment"			Concur with comment. Certificate holder involvement is encouraged throughout this order. Specifically, section 2-2b and figure 1 speak to leveraging certificate holder safety performance data and analyses performed by the certificate holder. No change made.	Closed

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Gulfstream	Page 14, Section 2-10	Section 2-11 ‘Perform Causal Analysis (Step 7.0)’, Subsection a. should state the following: “Focus on identifying all of the part of product cause(s) that should be considered.”			Partially concur. Reworded paragraph for clarification and added “(s)” after all instances of ‘cause’ to emphasize many issues have multiple causes.	Closed
Airbus	Page 15, §2-14.a.	For the identification of candidate corrective actions, would not it be better to refer to generic terms defined in existing regulation material such as maintenance, preventive maintenance, rebuild, alteration, airworthiness limitations, Instructions for Continued Airworthiness?	For sake of reference to terms already defined in the existing regulation material.	<p>“Candidate corrective actions can include, but are not limited to:</p> <ul style="list-style-type: none"> - Maintenance and preventive maintenance (as defined in FAR 1), - Minor/major alterations (as defined in FAR 1), - Operating limitations (e.g. as defined in FAR 25, subpart G), including airworthiness limitations. 	Do not concur. The list in this order is more comprehensive than the generic terms defined in existing regulations. No change.	Closed

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Gulfstream	Page 15, Section 2-11	The statement about addressing causes using a “fleet” corrective action should be reserved for explanation in Section 2-14 Subsection b. “Determine the Corrective Action Vehicle.”			Do not concur. Because multiple causes often contribute to an event, it is important to focus on the causes applicable to the particular issue under analysis.	Closed
GE	Pg 17 table 2	“Risk Value” column – “Control program fleet risk – mathematical basis”.....The cited mathematical basis does not offer any flexibility which may be more appropriate, for a specific issue.		Revise text in “Mathematical Basis” column as follows: <i>Usually</i> computed as the product of average severity and average per flight or per flight hour probability.....in some cases, other approaches may be more applicable	Do not concur. To ensure consistent analyses across the organization, it is better if the definitions are not too vague.	Closed

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AIA	Pg 17 table 2	“Risk Value” column – “Control program fleet risk – mathematical basis”.....The cited mathematical basis does not offer any flexibility which may be more appropriate, for a specific issue.		Revise text in “Mathematical Basis” column as follows: <i>Usually</i> computed as the product of average severity and average per flight or per flight hour probability.....in some cases, other approaches may be more applicable	Do not concur. To ensure consistent analyses across the organization, it is better if the definitions are not too vague.	Closed
Airbus	Page 22, §3-2.a.(3)	Can’t find link C on figure 6.	Self explanatory	Delete the reference or clearly identify the link on figure 6.	Concur. Added link C in figure and clarified that it directs reader to figure 2.	Closed
GE	Page 26 4-2 b.	Last two sentences seem to conflict with each other.		Revise text as follows: This also applies when you believe that an MCAI does not represent a safety issue and a corresponding AD need not be issued	Do not concur. The last sentence clarifies that a risk analysis is not required when writing NARs for administrative reasons. Otherwise, a NAR must be accompanied by a risk analysis.	Closed

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AIA	Page 26 4-2 b.	Last two sentences seem to conflict with each other.		Revise test as follows: This also applies when you believe that an MCAI does not represent a safety issue and a corresponding AD need not be issued. This does not apply when no AD required (non-technical NAR) decisions are made for administrative reasons.	Do not concur. The last sentence clarifies that a risk analysis is not required when writing NARs for administrative reasons. Otherwise, a NAR must be accompanied by a risk analysis.	Closed
GE	Page 27 Figure 7	“NO” arrow from “Unilateral action considered” diamond is confusing	Unilateral condition considered diamond is open to misinterpretation. It is not clear from the diagram whether the FAA or the state of design authority is the subject of the diamond. If the reader assumes it is the FAA, then the NO arrow gives conflicting information.	Diamond should say “Unilateral action considered by State of Design Authority?”	Partially concur. Reworked flowchart for clarification. However, this process is focused on an inbound MCAI, so only the FAA would be considering unilateral action.	Closed

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AIA	Page 27 Figure 7	It is not clear what is meant by the “Unilateral action considered?” step.	AIA does not understand with confidence the question “Unilateral action required”. It appears the FAA wants to consider what action might be taken by the State of Design; however, more explanation is needed.	Clarify.	Partially concur. Reworked flowchart for clarification. However, this process is focused on an inbound MCAI, so only the FAA would be considering unilateral action.	Closed

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Airbus	Page 33, §7-1.a.	The way the limited authorized cases of an overriding higher policy are listed gives the impression there is no equal treatment between cases or between kinds of maintenance requirements.	For sake of equal treatment between cases and between kinds of maintenance requirements.	<p>[...] The following are the limited authorized cases of an overriding higher-level policy. It includes the ADs to mandate the incorporation in the operator's aircraft maintenance or inspection program of:</p> <ol style="list-style-type: none"> (1) New or revised instructions and/or associated limitations entered in the Airworthiness Limitations Section (ALS) of the Instructions for Continued Airworthiness (ICA), or of the maintenance manual, of a design approval holder, (2) new or revised Certification Maintenance Requirements (CMR) entered in the ICA of a design approval holder, (3) Mandatory instructions and associated airworthiness limitations of the Supplemental Structural Inspection Program (SSIP) or of the Corrosion Prevention and Control Program (CPCP) required by the aging aircraft program (69 FR 45936, July 30, 2004 and 	Do not concur. To avoid inconsistent application of this order across the organization, it is important to specify which requirements are applicable in this section.	Closed

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GE	General comment	MSAD appears to be so prescriptive that if OEM and operators voluntarily comply with needed actions to reduce risk to within guidelines that AD will still be written and released.	Writing an AD when full compliance is voluntarily agreed seems an inefficient use of FAA and industry manpower. For the most part this would be used for issues on small affected populations where obtaining voluntary concurrence is easier.	Suggest MSAD process allowance for skipping AD if it is shown with confidence that voluntary compliance with actions can be obtained.	Partially concur. Agree that voluntary compliance may be considered in selecting the corrective action. However, per the MSAD process, the risk analysis informs the CARB about the risk but the CARB makes final determination of unsafe condition and what corrective actions are necessary.	Closed
AIA	General comment	MSAD appears to be so prescriptive that if OEM and operators voluntarily comply with needed actions to reduce risk to within guidelines that AD will still be written and released.	Writing an AD when full compliance is voluntarily agreed seems an inefficient use of FAA and industry manpower. For the most part this would be used for issues on small affected populations where obtaining voluntary concurrence is easier.	Suggest MSAD process allowance for skipping AD if it is shown with confidence that voluntary compliance with actions can be obtained.	Partially concur. Agree that voluntary compliance may be considered in selecting the corrective action. However, per the MSAD process, the risk analysis informs the CARB about the risk but the CARB makes final determination of unsafe condition and what corrective actions are necessary.	Closed

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Gulfstream	General	Gulfstream requests the FAA to define the safety related terms such as: “hazard”, “event”, etc, listed in the ORDER to avoid confusion or misinterpretation.			Concur. Both suggested terms are already defined in appendix A. No change required.	Closed