



Federal Aviation Administration

Memorandum

Date: APR 15 2011

To: Dave Hempe, Manager, Aircraft Engineering Division, AIR-100

From: Ali Bahrami, Manager, Transport Airplane Directorate, ANM-100

Prepared by: John Craycraft, Safety Management Branch, ANM-117

Subject: Request for Deviation from Order 8110.107, Monitor Safety / Analyze Data



The Transport Airplane Directorate requests a deviation from some of the requirements of Order 8110.107, dated 3/12/2010, for certain types of issues affecting transport category airplanes.

The Transport Airplane Risk Assessment Methodology (TARAM) contains the analysis methodology and risk guidelines to be used within Monitor Safety / Analyze Data (MSAD) for the risk analysis of Transport Category airplane safety issues. Paragraph 1.1 of the draft TARAM handbook states in part:

“When a higher-level policy, such as a regulation, requires that an Airworthiness Directive (AD) be written, do not use TARAM results in making the decision to write an AD. The policy decision to write ADs in those cases was made during the course of rulemaking or other policy decisions, and overrides the TARAM risk guidelines. Examples of this include:

- the widespread-fatigue-damage rule requirement for mandatory modifications to justify a limit of validity
- changes to Airworthiness Limitation Inspections
- maintenance and inspection instructions developed under Special Federal Aviation Regulation (SFAR) number 88”

The above TARAM handbook excerpt directly recognizes some situations when an MSAD risk analysis to support the issuance of an AD is not value-added and could even be contrary to overriding requirements of a higher-level policy. However, not performing this risk analysis is in conflict with Order 8110-107 paragraph 2-9 Step 5.0 – Record Risk Analysis Results which states in part "... you must record the total uncorrected fleet risk and the uncorrected individual risk (per flight or per flight-hour) and compare them to the Directorate-defined risk guidelines, as applicable, for issuing ADs..."

Other MSAD steps are also not applicable for cases where the analysis and decisions have already been made during the development of a higher level policy. A few examples are paragraph 2-11, Step 7.0, Perform Causal Analysis; paragraph 2-12, Step 8.0, Document the Causes; paragraph 2-13, Identify Cause and Contributing Factors; paragraph 2-14 Step 9.0 Evaluate and Select Corrective Action for a Fleet Issue, etc.

In consideration of the above, we request a deviation from the requirements of Order 8110.107 (risk analysis, causal analysis, evaluate corrective action, etc.), except for the requirement to bring the issue to the Corrective Action Review Board (CARB) and to record the issue in the MSAD database, which should both remain in effect. This deviation request is only for the following transport category airplane issues, where a higher-level policy decision has already been made that dictates the course of action to be taken:

1. ADs for mandatory modifications required by the widespread-fatigue-damage rule (75 FR 69746, November 15, 2010).
2. ADs to mandate the incorporation in the airworthiness limitations section of the maintenance manual new or revised damage tolerance inspections or safe-life limits required for § 25.571 compliance.
3. ADs that are needed for SFAR 88 compliance.
4. ADs required by the aging aircraft program (69 FR 45936, July 30, 2004 and 70 FR 5518, February 2, 2005) for changes to supplemental structural inspection programs and corrosion prevention and control programs (CPCP).

Thank you for consideration of our request.