



Federal Aviation Administration

Memorandum

Date: APR 18 2011

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

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

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

The Transport Airplane Directorate (TAD) requests a deviation from some of the requirements of Order 8110.107, dated 3/12/2010, for two situations. Although this request is being submitted by TAD, it is being made on behalf of all four Directorates.

The first situation concerns airworthiness directive (AD) applicability errors. ADs are issued to correct an unsafe condition in an aircraft, engine, propeller or appliance (products), and have a defined applicability at the time of issuance. On occasion, after AD issuance, we discover that the applicability did not include all the affected products, and we supersede the AD to increase the applicability. When we supersede an AD for this reason, a risk analysis is not an efficient use of resources, as the supersedure will be issued regardless of the risk result to meet International Civil Aviation Organization (ICAO) obligations or as general policy. However, Order 8110.107 paragraph 2-9 Step 5.0 – Record Risk Analysis Results 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 necessary for supersedures for applicability errors. 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; and paragraph 2-14, Step 9.0, Evaluate and Select Corrective Action for a Fleet Issue.

The second situation also concerns AD supersedures. When the MSAD order became effective, additional work was required – most significantly, performing a risk analysis. Due to the difficulties transitioning to MSAD, some offices with high continued operational safety (COS) workloads now have a daunting backlog of COS issues to work through. Some of this workload is processing supersedures mandating an improved corrective action. The ADs for most of these supersedures were issued before the effective date of the MSAD order, so the analyst does not have an existing risk analysis to aid in calculating risk of the supersedure. We request a

temporary deviation from the requirement to perform a risk analysis (and other MSAD steps as mentioned above) for supersedures mandating an improved corrective action to allow the affected offices to transition and catch up.

In both of these situations, the supersedure will automatically become part of the MSAD AD data base upon issuance, but will have no MSAD event or safety issue record associated with it.

In consideration of the above, we request a deviation from the requirements of Order 8110.107 (risk analysis, causal analysis, evaluate corrective action, etc.) for the following situations:

1. Supersedure of an AD solely to increase the applicability of the AD. The unsafe condition and compliance program is to remain unchanged. We request a permanent deviation for this situation.
2. Supersedure of an AD to mandate a different corrective action for ADs for which no risk assessment has been performed. The unsafe condition must be the same in the supersedure as in the original AD (i.e., no new safety issue). We request a time-limited deviation of 24 months for this situation.

Thank you for consideration of our request.