



Federal Aviation Administration

Memorandum

Date: MAY 19 2011
To: Ali Bahrami, Manager, Transport Airplane Directorate, ANM-100
From: ~~For~~ David W. Hempe, Manager, Aircraft Engineering Division, AIR-100 *Sym Cabler*
CC: See Distribution List
Prepared by: Brennen Roberts, Aerospace Engineer, AIR-150
Subject: Deviations to MSAD Order 8110.107 Regarding Superseded ADs

This memorandum is the response to Transport Airplane Directorate (TAD) memorandum titled "Request for Deviation from Order 8110.107, Monitor Safety / Analyze Data (MSAD)", dated April 18, 2011 (attached).

The TAD memorandum describes 2 situations involving superseded airworthiness directives (ADs):

1. The first situation concerns AD applicability errors. TAD issues ADs to correct unsafe conditions in aircraft, engines, propellers or appliances (products), and have defined applicability at the time of issuance. On occasion, after AD issuance, TAD discovers that the applicability of the AD did not include all of the affected products, and they supersede the AD to increase the applicability. When TAD supersedes 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. TAD also views other steps in MSAD as unnecessary, such as:
 - paragraph 2-9, Step 5.0 - Record Risk Analysis Results;
 - paragraph 2-11, Step 7.0 - Perform Causal Analysis;
 - paragraph 2-12, Step 8.0 - Document the Cause(s);
 - paragraph 2-13, Identify Causes and Contributing Factors; and
 - paragraph 2-14, Step 9.0 - Evaluate and Select Corrective Action for a Fleet Issue.

TAD requested a permanent deviation from some of the requirements (including those mentioned above) of the MSAD order for this situation.

2. The second situation concerns ADs for which there is not an existing risk analysis. When the MSAD order became effective, additional work was required – most significantly, the performing of a risk analysis. Due to TAD difficulties transitioning to MSAD, some offices with high continued operational safety (COS) workloads now have a daunting backload of COS issues to work through. Some of this workload is the superseding of ADs mandating improved corrective actions. The original 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.

TAD requested a temporary, time-limited deviation of 24 months from some of the requirements (the same as mentioned for situation 1) of the MSAD order for this situation.

This memorandum approves your deviation request to the MSAD process requirements of the MSAD order, 8110.107, Chapter 2, for 2 situations:

1. The deviation for the 1st situation is permanent and applies to AD supersedures solely to increase the applicability of original ADs.
2. The deviation for the 2nd situation is time-limited to 24 months (from the date of this memorandum) and applies to AD supersedures (to ADs issued before September 15, 2010) to mandate a different corrective action for an AD for which no risk assessment has been performed.

For both of the above mentioned situations:

1. This deviation includes a waiver to the requirements of paragraph 2-15.a., requiring the presenting of risk analysis, causal analysis, and quantitative evaluation of the risk reduction of corrective actions to the Corrective Action Review Board (CARB). However, exceptions are that the following CARB requirements must continue to be accomplished:
 - The issue and recommended action (the superseding AD) must be presented to the CARB for concurrence, per paragraph 2-15.a.; and
 - The issue and recommended action (the superseding AD) must be documented in the CARB meeting minutes per paragraph 2-15.b.
2. If the unsafe condition that the superseding AD addresses in any way differs from the unsafe condition that the original AD addresses, then the MSAD order must be fully complied with.
3. The superseded AD will automatically become part of the MSAD AD database upon issuance, but will have no MSAD event or safety issue record associated with it.
4. These approved deviations may be utilized by any Directorate or Aircraft Certification Office that has MSAD responsibilities.

If you have any questions, please contact Brennen Roberts at (405) 954-6920 or Brian Skelly at (202) 267-8588.

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