



Federal Aviation Administration

Memorandum

Date: DEC 21 2011

To: Mike Kaszycki, Manager, Transport Airplane Directorate, Transport Standards Staff, ANM-110

From: ^{FOR} David W. Hempe, Manager, Aircraft Engineering Division, AIR-100 *sym Cahler*

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Subject: Concurrence with Request for Deviation from Order 8110.112, *Standardized Procedures for Usage of Issue Papers and Development of Equivalent Levels of Safety Memorandums.*

Purpose

The Transport Airplane Directorate (TAD) requested a deviation from one of the requirements of Order 8110.112, *Standardized Procedures for Usage of Issue Papers and Development of Equivalent Levels of Safety Memorandums*, dated June 15, 2010. The TAD suggested that this deviation be applicable to all four directorates and that the order be revised to remove the language referenced in their deviation request. This memorandum approves the requested deviation to the requirement in FAA Order 8110.112 that the signature date and the header/title page date be the same (see Order 8110.112, appendix A, paragraph 1.b.19 (page A-6)).

Background

The TAD provided the following justification:

The FAA uses the date in the header/title page to reference the date of the last change to the document, as the document goes through the development process. Once the last change is implemented and the final reviews are conducted, the final approval typically is done several days later. This results in the issue paper having a different header/title page date than the signature date.

FAA Order 8110.112, appendix A, paragraph 1.b.19 (page A-6) states: "The date on the first page header must correspond to the date signed." The issue paper process, as previously found in Order 8110.4C, did not contain this requirement. Order 8110.112 introduced the practice of using the date to track the internal revision status.

Compliance to the requirement of the Order is not impossible. However, compliance does involve significant workload on the staff that develops and approves issue papers. In order to comply, the approving official would have to coordinate their approval date with the printing of the document. With large numbers of issue papers in circulation, this would take up valuable resources to perform an administrative task that may not provide a large benefit.

Discussion

FAA certification personnel find it valuable to be able to track the latest change by referencing the date on the header/title page. The date on the header/title page represents the last revision of the issue paper at that stage. In the conclusion stage this continues to be true, provided no changes occur between that last revision date and the signature date. If there are changes during this time, the header/title date would be changed in accordance with the normal process. Therefore, the date of the last revision and the signature date do not need to match for tracking purposes.

Conclusion

We concluded that it is beneficial for the FAA to deviate from the existing requirement found in FAA Order 8110.112, appendix A, paragraph 1. b. 19 (page A-6), where it states, “the date on the first page header must correspond to the date signed.” This will provide administrative relief without affecting the ability of certification personnel to track the latest change by date.

This deviation is approved and applicable to all aircraft certification offices, aircraft certification directorates, the Brussels certification staff, and FAA Academy Regulatory Support Division. This deviation will be incorporated into the next revision of Order 8110.112.