

**Clearance Record
DOCUMENT COMMENT LOG**

Originating Office: AIR-113	Document Description: Change 1 to Order 8110.103, Alternative Methods of Compliance (AMOC), Revision A	Project Lead: Rob Romero, 817-222-5102	Reviewing Office:	Date of Review:
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Commenter	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
Larry Williams, United Airlines	Pg 8, Para 3-5	1 st paragraph states AMOC requests <u>must</u> include the following long list of data, whereas, it is generally understood that this list should be tailored to the specific request and may not contain all of the stated criteria.	As stated, a CMO may balk and delay an urgent request if not all stated criteria are provided. An air carrier should provide all pertinent supporting data to support a given request, but not necessarily all items stated here.	Propose changing last sentence to "The proposal may include."	Non-concur. As stated, for every AMOC, the requester must submit paragraphs a-e. Paragraphs a, b, and c identify the requester, aircraft, and AD to which the AMOC will apply. Paragraph d, contains a long list of data, but also includes the qualifier "where applicable." Paragraph e references substantiating data which should accompany every AMOC request to assist the responsible office in making an acceptable level of safety determination. Paragraphs f and g are only for specific

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					types of AMOCs.
Larry Williams, United Airlines	Pg 9, Para 3-6.a.	Did not see spell-out of "SoD"		Propose spelling out what "SoD" means with 1 st use in doc.	No change necessary. The term SoD is defined in paragraph 2-3a(1), page 4, which was not included as a part of this change notice.
Larry Williams, United Airlines	Pg 10, Para 3-10.a.	To make sure all requestors get a response, this para should state a response is due for each request.		Propose 1 st sentence to read "The responsible office manager, or person delegated AMOC approval/denial authority, approves or denies all AMOC proposals via:"	Concur. Revised accordingly.
Larry Williams, United Airlines	Pg 11, Para 3-11.b.	This para does not speak to transferability for cases when an AD has been terminated	Though an air carrier may have obtained AMOC(s) for adjusted method of compliance, including changes to compliance times, once the AD is terminated or completed all requirements, it should be transferable.	Propose revised language "Changes to compliance time are typically not transferable, unless the AD has been terminated.	The content of this paragraph is unchanged from Revision A of the order. Your comment will be evaluated when a full revision to the order is undertaken.
Continental Airlines	General Comment	The ACO should authorize company DERs and ODA holders to review and approve AMOCs for non-structural			Non-concur. In 2010, the FAA completed an internal review of the current

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		<p>modifications as this would benefit air carriers and reduce delays and cancellations.</p>			<p>limitations on delegated AMOCs. This review included whether or not there was benefit in expanding delegation beyond the structural discipline. The review concluded that the ACOs did not issue enough AMOCs of this nature to support the development of appropriate criteria and properly oversee the delegation. These findings were supported by the AD Compliance Review Team</p>
Continental Airlines	General Comment	<p>The 24/7 AMOC process may be beneficial for very few AMOC situations due to the number of people involved. A more beneficial and efficient process would be for the company DERs and ODA holders to approve urgent multi aircraft requests,</p>			<p>No change necessary. The recently released revisions to FAA Orders 8110.37E and 8100.15A, expand the scope of delegated AMOCs for DERs and UMs. They allow the</p>

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		<p>since there is already established procedures for urgent requests that operate in a 24/7 time frame.</p>			<p>designee to approve an AMOC for a single aircraft, multiple aircraft (on multiple approval forms), or, in certain circumstances, global AMOCs.</p> <p>The 24/7 process is intended only for the approval of urgent AMOCs that have not been delegated to a designee. When appropriate, AMOCs are delegated. We only set limitations on the types of AMOCs that they can approve, not the timeliness with which they complete those approvals.</p>
Continental Airlines	3-10a	<p>The responsible office manager, or person delegated AMOC approval/denial authority, must respond to all requests and approves or denies the AMOC proposal via:</p>	<p>The ACO has questioned if an AMOC needs a response, this is to clarify that all requests must be responded to</p>		<p>Concur. Revised to read: "...approves or denies all AMOC proposals via:..."</p>

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Continental Airlines	3-11b	“...Changes of compliance time are typically not transferable, <u>however after the AD has been complied with the AMOC is transferable.</u> You must be careful...”	When exiting aircraft compliance time AMOCs have been questioned.		The content of this paragraph is unchanged from Revision A of the order. Your comment will be evaluated when a full revision to the order is undertaken
Continental Airlines	A-1 100d	“...without getting an AMOC, unless the procedures in the AD <u>or service document</u> permit substitutions. If you...”	Add italicized text.		The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken
Continental Airlines	A-1 100f	“The AD requires that I accomplish specific instructions in a SB. Those instructions require actions from a manual, and the manual requires action from a <u>manufacture’s</u> standard practice manual. My operating procedure differs from the standard practice manual. Do I	Add italicized text. CAL agrees with using manuals required by an AD however these manuals Aircraft Maintenance Manual (AMM), Standard Wiring Practices Manual (SWPM), ETC are not FAA approved and do not require additional approvals for changes or later versions.		The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken

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		<p>need an AMOC to keep using my operating procedure?</p> <p>Answer: Yes. You must accomplish the specific instructions in the SB specified in the AD, including any second- or third-tier documents that are required to complete the action(s) <u>unless otherwise noted in the AD or service documents.</u>”</p>			
Continental Airlines	A-5 107	Answer...”...compliance with the AD. The maintenance records <u>may be annotated as follows...</u> ”			The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken
Continental Airlines	A-6 107	Add the following sentence at the end of the note: “An exception is that, for a global AMOC, you would not need to keep a copy of the approval letter.”			The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment

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Boeing Commercial Airplanes	Page 6 3-3a(1)	<p>The proposed text states:</p> <p><i>"(1) The AD will identify if AMOC approval authority is delegated. ..."</i></p> <p>That sentence addresses only newer ADs. Older ADs do not include a statement that provides delegation to Designees such as Company DERs, DOA ARs, or ODAs. This can cause the FAA inspectors to question whether AMOC approval by Company DERs, DOA ARs, or ODA is valid</p>	<p>We recommend changing the text to read as follows:</p> <p><i>"(1) The AD will identify if AMOC approval authority is delegated. In cases where an AD does not identify the AMOC approval authority, the ACO will provide delegation by letter. ..."</i></p>	<p>Not every AD for which the Boeing Company DERs, DOA ARs, or ODA has AMOC delegation has a specific statement that provides AMOC approval authority. This could cause significant confusion with the FAA inspectors when reviewing the approval form (8110-3 or 8100-9), this Order, and the AD. Our suggested change will prevent such confusion, especially when the inspector is dealing with older ADs</p>	<p>Partially concur. Revised paragraph (1) to read "The AD will identify if AMOC approval authority is delegated. For older ADs that do not include an AMOC delegation section, AMOCs may be delegated following the guidance in FAA orders 8110.37 and 8100.15, as appropriate, via a process established between the responsible office and the DAH."</p>
Boeing Commercial Airplanes	Page 7 3-3a(1)(c)	<p>The proposed text states:</p> <p><i>"(c) The approval of an alternate inspection method, threshold, or interval where a new repair or modification results in the inability to</i></p>	<p>We suggest changing the text to read as follows:</p> <p><i>"(c) The approval of an alternative inspection method and interval where the alternative inspection method and interval provide</i></p>	<p>It would be preferable to provide additional flexibility regarding alternative inspection methods and intervals that provide at least the same capability of detection of the condition as the AD-mandated inspection (to prevent unnecessary airplane grounding when the</p>	<p>Non-concur. The ACOs have repeatedly told us that they want to be involved in the determination of new inspection methods, in general.</p>

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		<p><i>accomplish the existing AD-mandated inspection or necessitates a change in the existing AD inspection threshold. ... “</i></p>	<p><i>equal or better detection of the condition than the AD-mandated inspection (for example, open hole eddy current inspection method as an alternative to a surface eddy current inspection without fastener removal mandated by an AD). The approval of an alternative inspection method, threshold, or interval where a new repair or modification results in the inability to accomplish the existing AD-mandated inspection or necessitates a change in the existing AD inspection threshold. ...”</i></p>	<p>specified inspection method cannot be properly conducted, but alternative inspection methods are available that provide equal or better detection capability.)</p> <p>Such additional flexibility regarding alternate inspection methods and intervals will provide additional AMOC approval authority while maintaining the same level of safety.</p>	<p>The exception is for different inspections necessary due to existing repairs or modifications to particular aircraft.</p> <p>The proposed language was vetted through the AD CRT.</p>
ATA	Page 10 Paragraph 3-10 (a)	<p>Should read: The responsible office manager, or person delegated AMOC approval/denial authority, must respond to all requests and approves or denies the AMOC proposal via:</p>	<p>By adding “must respond to all requests and approves or denies the AMOC” emphasizes that the responsible office manager is required to respond to all AMOC requests including those that are not approved, which has not always been done</p>	<p>Page 10 Paragraph 3-10 (a) be revised to include the recommended verbiage.</p>	<p>Partially concur. Revised to read, “...approves or denies all AMOC proposals via:...”</p>

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ATA	Page 11 Paragraph 3-11 (b)	<p>Should read: If you are considering recommending that the AMOC proposal be approved, determine if the AMOC should be transferable. A transferable AMOC is an AMOC that will continue to apply to a product after it has been transferred to a new owner/operator. The holder of a transferable AMOC can make the AMOC approval document available to someone else who receives a product covered by that document. Changes of compliance time are typically not transferable. An AD that has been complied with under the authority of an AMOC is considered to be in compliance with 39.7 and the AMOC is transferable on an aircraft-by-aircraft basis. You must be careful when determining transferability, and not</p>	<p>By adding “An AD that has been complied with under the authority of an AMOC is considered to be in compliance with 39.7 and the AMOC is transferable on an aircraft-by-aircraft basis. You must be careful when determining transferability, and not make an AMOC transferable if it depends on:” emphasizes that once an AD is physically accomplished under an AMCO transfer of that aircraft should not require an additional AMCO for the new air carrier.</p>	Page 11 Paragraph 3-11 (b) be revised to include the recommended verbiage.	The content of this paragraph is unchanged from Revision A of the order. Your comment will be evaluated when a full revision to the order is undertaken

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		make an AMOC transferable if it depends on:			
ATA	Page 14 Paragraph 3-14	To facilitate expanding the availability and use of global AMOCs, recommend specifying that AMOCs be further filed by AD number.	Identification and research can be made to be relatively simpler by adding the AD number to the AMOC filing system	Recommend that AD numbers be added to the filing system AMOCS.	AIR-113 is working with AES-200 to address this issue. We have submitted an SF-115 proposing a special filing code for ADs and AMOCs. Until implemented, the current language will continue to be used.
ATA	Appendix A, Page A-6 Question 109.	Add highlighted sentence to Answer: Answer: Maybe. Starting June 2011, some DAHs are adopting the “required for compliance” (RC) notation whereby those critical steps of a service bulletin are identified with a notation of RC. If the service bulletin incorporates this notation, and: • If the task is identified as RC, then you must request an AMOC to deviate from this task; or	Adding “and the task is in the mandated portion of the service bulletin”, will emphasize the point that an AMOC is needed only in this case.	Appendix A, Page A-6 Question 109 be revised to include the changes to the answer section describe.	Concur. Revised accordingly.

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		<ul style="list-style-type: none"> If the task is not identified as RC, then you may deviate from the specific task without an AMOC. <p>However:</p> <ul style="list-style-type: none"> If the service bulletin does not incorporate the RC notation, and the task is in the mandated portion of the service bulletin, then you must request an AMOC to deviate from this task. 			
ATA	Current Order 8110.103A, Appendix A, Page A-1 section 100 Question d	<p>Question: The instructions in the mandated service document incorporated by reference in the AD calls for a specific fastener on my aircraft. May I substitute another fastener?</p> <p>Answer: No. You cannot use a different fastener (or any part, material, or process) from what is specifically mandated in an AD without getting an</p>	Adding the highlighted sentences to the answer emphasizing that an AMOC is required for deviations on any part, material, or process unless contained in the AD or service instructions.	<p>Current Order 8110.103A, Appendix A, Page A-1 section 100 Question d, answer should be revised to the highlighted sentences in parentheses:</p> <p>Answer: No. You cannot use a different fastener (or any part, material, or process) from what is specifically mandated in an AD without getting an AMOC, unless the procedures in the AD (or service instructions) permit substitution. If you substitute another fastener without an AMOC, you violate 14 CFR § 39.7 each time you operate the</p>	The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken

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		<p>AMOC, unless the procedures in the AD (or service instructions) permit substitution. If you substitute another fastener without an AMOC, you violate 14 CFR § 39.7 each time you operate the aircraft.</p>		aircraft.	
ATA	Current Order 8110.103A, Appendix A, Page A-1section 100 Question f	<p>Question: The AD requires that I accomplish specific instructions in a SB. Those instructions require actions from a manual, and the manual requires actions from a (manufacture's) standard practice manual. My operating procedure differs from the standard practice manual. Do I need an AMOC to keep using my operating procedure?</p> <p>Answer: Yes. You must accomplish the specific instructions in the SB specified in the AD, including any second- or third-tier</p>	Adding the word manufacturers to standard practice manual will emphasize that this does not include an operator's standard practice manual.	Revise Current Order 8110.103A, Appendix A, Page A-1section 100 Question f, to include the word manufacturer's in the phrase standard practice manual	The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken

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		documents that are required to complete the action(s). unless otherwise noted in the AD or service documents.			
ATA	Current Order 8110.103A, Appendix A, Page A-5section 107	<p>Question: How do I return my aircraft to service after receiving an AMOC?</p> <p>Answer: You may approve your aircraft for return to service after accomplishing an AMOC only if you record the AMOC in your aircraft maintenance records as your method of compliance with the AD. Annotate(remove) The maintenance records (may be annotated) as follows:</p> <p>(1) AMOC approval from the [XXX] ACO (or Directorate) approval authority, dated [MM-DD-YYYY], or</p> <p>(2) AMOC approval, FAA Form 8110-3, "Statement</p>	The current answer does not take into account that part 121 air carriers have programs and procedures that are contained in their manuals that govern how they make aircraft maintenance log book entries of the accomplishment of ADs	<p>Revise the current Order 8110.103A Appendix A, Page A-5section 107 to include:</p> <p>Note: Part 121 air carriers have the maintenance record requirements built into their compliance documents such as Engineering Order which is contained the operators approved Continuous Airworthiness Maintenance Program. Add at the end of the answer.</p>	The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken

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		<p>of Compliance with the Federal Aviation Regulations,” dated [MM-DD-YYYY] from [company DER name and employer], or</p> <p>(3) AMOC approval, FAA Form 8100-9, “Statement of Compliance with Airworthiness Standards,” dated [MM-DD-YYYY] from [ODA holder’s name], or</p> <p>(4) Global AMOC approval from the [XXX] ACO (or Directorate) approval authority to [global AMOC requester’s name], dated [MM-DD-YYYY].</p> <p>Note: Part 121 air carriers have the maintenance record requirements built into their compliance documents such as Engineering Order which is contained the operators approved Continuous Airworthiness</p>			

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		Maintenance Program.			
ATA	Current Order 8110.103A, Appendix A, Page A-71section 107	<p>Appendix A page A-6 section 107 Note:</p> <p>Note: You are responsible for notifying your PI (or lacking a PI, the manager of the FSDO/CHDO) before you use an AMOC. You may have additional requirements for maintenance record keeping for methods of compliance to an AD (e.g., 14 CFR §§ 43.9, 91.417 (a)(2)(v), 121.380(a)(2)(vi), or 135.439(a)(2)(v)).</p> <p>The note should be revised to reflect the current process for Global AMOC which does not require a copy of the approval letter to be kept by the operators.</p>	Adding “PI (or lacking a PI, the manager of the FSDO/CHDO)” to the note gives clear guidance on who is to be notified of the intent to use an AMOC in the event there is not a PMI assigned as in the case of a part 91 operator.	Revise Current Order 8110.103A, Appendix A, Page A-71section 107 to include the phrase “(or lacking a PI, the manager of the FSDO/CHDO)” to the note	The content of this paragraph is unchanged from Revision A of the order. Your comment will be evaluated when a full revision to the order is undertaken

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ATA	Current Order 8110.103A, Appendix A, Page A-1 section 100 Question f	<p>Question: The AD requires that I accomplish specific instructions in a SB. Those instructions require actions from a manual, and the manual requires actions from a (manufacture's) standard practice manual. My operating procedure differs from the standard practice manual. Do I need an AMOC to keep using my operating procedure?</p> <p>Answer: Yes. You must accomplish the specific instructions in the SB specified in the AD, including any second- or third-tier documents that are required to complete the action(s) unless otherwise noted in the AD or service documents. If I understand this</p>	The rationale for ATA's comment is by clearly addressing the revision status of the second- or third-tier documents that are required to complete the action(s) of an AD would eliminate any confusion in the future that could cause interruptions and had have a negative impact on air carrier operations.	ATA recommends that the current Order 8110.103A, Appendix A, Page A-1 section 100 Question f be revised to include specific language that would clearly articulate the following: Service Bulletins that refer to any manufacture's manual such as the Aircraft Maintenance Manual (AMM) or Fault Isolation Manual (FIM) without including a revision number would mean simply following that manual as revised constitutes compliance with the AD no AMOC is required when that manual gets revised. If the service information were to reference manufacturer's manuals at specific revisions then an AMOC would be required.	The content of this paragraph is unchanged from Revision A of the order and was not included in Change 1. Your comment will be evaluated when a full revision to the order is undertaken

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		<p>correctly I think the answer is that the SB refers to the AMM without including a revision number which would mean simply following the AMM as revised constitutes compliance with the AD no AMOC required when the AMM gets revised. If the service information were to reference AMMs at a specific revision then an AMOC would be required.</p> <p>The current language contained in the answer “You must accomplish the specific instructions in the SB specified in the AD, including any second- or third-tier documents that are required to complete the action(s) unless otherwise noted in the AD or service documents” does not clearly address the revision status of that document and leaves the</p>			

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		<p>question open to a variety of interpretations by both Aviation Safety Inspectors and operators alike.</p> <p>ATA would like the language in the answer to clearly articulate the following: Service Bulletins that refer to any manufacture's manual such as the Aircraft Maintenance Manual (AMM) or Fault Isolation Manual (FIM) without including a revision number would mean simply following that manual as revised constitutes compliance with the AD no AMOC is required when that manual gets revised. If the service information were to reference manufacturer's manuals at specific revisions then an AMOC would be required.</p>			

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