

Clearance Record
DOCUMENT COMMENT LOG

Originating Office: AIR-140	Document Description: Order 8110.103, Revision B	Project Lead: Rob Romero	Reviewing Office:	Date of Review:
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Commenter	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
Boeing	Page 4 2-3.c	Some ACOs have authorized certain company DERs and ODA holders to review and approve AMOC proposals.”	Increased clarity; 2-3 a. (1) does not include OMTs as part of the “ACO” definition. Regarding delegated AMOCs; OMT grants the authority for AMOCs (reference FAA Order 8100.15 B Change 1 Section 8-9), and FAA Policy Memo AIR100-15-140-DM55 refers to the OMT for authorizing the ODA holders.	Some have authorized certain company DERs and ODA holders to review and approve AMOC proposals. Some ACOs and OMTs have authorized certain ODA holders to review and approve AMOC proposals	Partially concur. Revised to read, “The FAA has authorized certain company DERs and ODA holders...”
Boeing	Page 6 3-2.b	b. AMOC proposals should be sent to the ACO through the PI, unless the requester does not have a PI, as in the case of a DAH.”	To align this paragraph with what is stated in AC 39-7, Paragraph 12.b.	b. AMOC proposals should be sent to the ACO through the PI, unless the requester does not have a PI, as in the case of a DAH. For this situation, the requestor (DAH) should send the proposal directly to the manager of the FAA office identified in the AD.”	Partially concur. Added a new sentence that reads, “When the requester does not have a PI, the AMOC proposal is sent directly to the manager of the FAA office identified in the AD.”

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Boeing	Page 6 3-3.a	Some ACOs authorize certain company DERs or type certification ODA holder unit members to review and approve AMOC proposals. For information on what the ODA holder and DER can do within this delegated authority, refer to FAA Order 8100.15, Organization Designation Authorization Procedures, and FAA Order 8110.37, Designated Engineering Representative (DER) Handbook.”	Sentence clarification. Combining DERs and ODA holder unit members in the same sentence could create confusion as to which FAA order applies to the DER or which order applies to the ODA.	Some ACOs have authorized certain company DERs or type certification ODA holder unit members to review and approve AMOC proposals. For information on what the ODA holder and the DER can do within this delegated authority, refer to Order 8100.15, Organization Designation Authorization Procedures, and FAA Order 8110.37, Designated Engineering Representative (DER) Handbook. Some ACOs and OMTs have authorized certain ODA holders to review and approve AMOC proposals. For information on what the ODA holder is authorized to do within this delegated authority, refer to FAA Order 8100.15, Organization Designation Authorization Procedures.”	Partially concur. Revised to read, “The FAA authorizes certain company DERs or type certification ODA holder unit members...”
Boeing	Page 6 3-3.a.(1)	The AD will identify if AMOC approval authority is delegated. For older ADs that do not include an AMOC delegation section, AMOC approval authority may be delegated following the	Sentence clarification. Combining DERs and ODA holder unit members in the same sentence could create confusion as to which FAA order applies to the DER or which order applies to the ODA	The AD will identify if AMOC approval authority is delegated. For older ADs that do not include an AMOC delegation section, AMOC approval authority may be delegated to company DERs following the guidance in FAA	Partially concur. The word “older” has been deleted. Other change not incorporated.

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		guidance in FAA Orders 8110.37 and 8100.15, as appropriate, via a process established between the responsible office and the DAH.”		Order 8110.37 and 8100.15, as appropriate, via a process established between the DAH and the responsible ACO. For ADs that do not include an AMOC delegation section, AMOC approval authority may be delegated to ODAs following the guidance in FAA Order 8100.15, via a process established between the DAH and the responsible OMT	
Boeing	Page 6 3-3.a.(1)	AMOC approval authority that has been delegated by the ACO and approved by the designee require no further FAA approval.”	Clarification. The sentence implies that the AMOC approval authority gets approved by the designee and does not require further FAA approval.	“ AMOC approval authority that has been delegated by the ACO and approved by the designee The AMOC approved by the DER that has been delegated AMOC approval authority by the ACO requires no further approval. The AMOC approved by the ODA that has been delegated AMOC approval authority by the OMT requires no further approval.”	Partially concur. Original sentence has been retained except that “ACO” has been replaced by “FAA”.
Boeing	Page 6 3-3.a.(1)	The responsible office can delegate AMOC approval authority only for ADs where the requester intends to restore a product to its type certification basis or other known, defined, and published standards	We suggest altering the focus to an AMOC that is associated with the correction of the unsafe condition. The intent of the responsible office may be in question when the responsible office grants the AMOC approval	The responsible office can delegate AMOC approval authority only for ADs where the requester intends to restore a product to its type certification basis or other known, defined, and published standards. “The DER or ODA can only approve an AMOC associated with	Non-concur. Current wording acceptable as is.

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			<p>authority. We suggest a change to reflect when the DER or ODA can approve the AMOC.</p> <p>The term “published standard” may not be clear, we suggest adding the term “airworthiness.”</p>	<p>correcting an unsafe condition when the requested AMOC’s airworthiness standard (for the mitigation of the safety issue) is its type certification basis or other known, defined, and published airworthiness standards.”</p>	
Boeing	Page 6 3-3.a.(1)	“This includes the following:”	Sentence clarification	This The AMOC safety mitigating actions includes the following	Non-concur. Current wording acceptable as is.
Boeing	Page 6 3-3.a.(1)(a)	“(a) Certain AD-mandated structural modifications, alterations, or repairs, including those where no previous FAA-approved action exists.”	<p>The term “FAA-approved action” could mean approval by a designee, therefore we suggest deleting “including those where...”</p> <p>For clarification purposes, we suggest separating deviations to alterations and new alterations.</p>	<p>“(a) Certain AD-mandated structural modifications, alterations, or repairs, including those where no previous FAA-approved action exists. Deviations to AD-mandated or AD AMOC structural alterations, or repairs.</p> <p>(b) New structural alterations or repairs not previously approved by the FAA for compliance with the AD.”</p>	Non-concur. Current wording acceptable as is.
Boeing	Page 6 3-3.a.(1)(c)	(c) 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	We suggest to separate the modifications and new repairs into separate paragraphs for clarification.	(c) The approval of an alternative inspection method, threshold, or interval where a new repair or modification or alteration results in the inability to accomplish the existing AD-mandated or AD AMOC approved inspection or necessitates a change in the	Non-concur. Current wording acceptable as is.

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		<p>or necessitates a change in the existing AD inspection threshold. The standard for these approvals is the appropriate damage tolerance regulation (for example, 14 CFR 25.571, amendment 25-45 or later).</p>		<p>existing AD inspection threshold. The standard for these approvals is the appropriate damage tolerance regulation (for example, 14 CFR 25.571, amendment 25-45 or later).</p> <p>(d) The approval of an alternative inspection method, threshold, or interval where a deviation to a repair or alteration results in the inability to accomplish the existing AD-mandated or AD AMOC inspection or necessitates a change in the existing AD inspection threshold. The standard for these approvals is the appropriate damage tolerance regulation (for example, 14 CFR 25.571, amendment 25-45 or later).</p>	
Boeing	Page 6-7 3-3.a.(1)(d)	Add a new sub-paragraph under 3-3.a.(1)(d).	To add additional clarity.	3-3.a.(1)(d)1. The DER or ODA can approve an AMOC that addresses non-structural minor deviations not associated with the unsafe condition.	Non-concur. Paragraph 3-3 is regarding what the FAA may delegate. Added sentence is about what DER/ODA can approve and does not add clarity to what FAA may delegate.

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Boeing	Page 6-7 3-3.a.(1)(d)	Other non-structural minor deviations not associated with correcting the unsafe condition as documented and agreed to between the FAA and designee. The deviation must not have an adverse impact on the prescribed corrective action intended to address the identified unsafe condition. For example, if the location of a bracket is a part of, or the cause of, the unsafe condition described in the AD, it is not appropriate for an AMOC to allow a deviation from the bracket relocation requirement specified in the AD.	We suggest to separate DER and ODA for clarification	Other non-structural minor deviations not associated with correcting the unsafe condition as documented and agreed to between the ACO and the DER. FAA and designee . Non-structural minor deviations not associated with correcting the unsafe condition are documented and agreed to between the OMT and the ODA. The deviation must not have an adverse impact on the prescribed corrective action intended to address the identified unsafe condition. For example, if the location of a bracket is a part of, or the cause of, the unsafe condition described in the AD, it is not appropriate for an AMOC to allow a deviation from the bracket relocation requirement specified in the AD.	Partially concur. The word “other” has been deleted. Other recommended change not incorporated.
Boeing	Page 7 3-3.b	The responsible office may delegate to an ODA holder the authority to approve global AMOCs for administrative (non-technical) corrections to a service bulletin referenced in an AD provided there is a procedure in place for such approvals. Refer to	For added clarification, state that it is the responsibility of the OMT that authorizes the ODA holder; this information is included in the ODA procedures manual.	The responsible office OMT may delegate to an ODA holder the authority to approve global AMOCs for administrative (non-technical) corrections to a service bulletin referenced in an AD provided there is a procedure in place for such approvals. Refer to FAA Order 8100.15 for specifics regarding this procedure.”	Partially concur. Revised to read, “The FAA may delegate to an ODA holder....”

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		FAA Order 8100.15 for specifics regarding this procedure.			
Boeing	Page 9 3-10	How to Approve an AMOC. If the responsible office has delegated AMOC approval authority to a DER or ODA holder, follow the AMOC process as shown in FAA Order 8110.37 or FAA Order 8100.15, as applicable (refer to paragraph 3-3).”	We suggest addressing DER and ODA separately.	How to Approve an AMOC. If the responsible office has delegated AMOC approval authority to a DER or ODA holder , then follow the AMOC process as shown in FAA Order 8110.37. If the responsible office has delegated AMOC approval authority to an ODA holder then follow the AMOC process in FAA Order 8100.15. (refer to paragraph 3-3).”	Partially concur. Revised to read, “If the FAA has delegated AMOC authority...”