

Clearance Record
DOCUMENT COMMENT LOG (PUBLIC)

Originating Office: AIR-110	Document Description: Commercial Parts Order	Project Lead/Reviewer: Victor Powell	Reviewing Office: Various Field Offices	Date of Review: 06/14/2012	
Commenter	Page & Paragraph or Topic	Comment	Reason for Comment	Suggested Change	Comment Resolution
AIR-500	Global Change	Incorrect formatting.		All the text/paragraphs on page 3 alignment need to be left justified.	Adopted.
AIR-500	Header Area, Page 1	Missing order number.		Place the order number in the black box indicated as "Order Number".	Adopted.
AIR-500	Paragraph 2, Note Section, Page 1	Add comma and correct acronym.		Rewrite to read: Per Title 14, Code Federal Regulations (14 CFR) 21.1(b)(4), a technical standard...	Adopted.
AIR-500	Paragraph 5a, 2 nd & 4 th sentence, Page 1	Incorrect spacing.		There should be only two spaces before the start of these sentences.	Adopted.
AIR-500	Footer area, Page 1	Incorrect format.		Remove the page number from the footer. The page number should not be indicated or labeled until second page.	Adopted.
AIR-500	Header Area, Pages 2 & 4	Incorrect format.		The date should be placed in the top left-hand corner and order number in the top right-hand corner within the header.	Adopted.

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AIR-500	Paragraph 5c, Page 2	Incorrect spacing.		Check entire paragraph. It should be left justified. Remove extra spaces. There should only be two spaces between sentences and one space between each term.	Adopted.
AIR-500	Paragraph 6b(1), Page 2	Incorrect spacing.		Remove the extra from between the terms "of and the".	Adopted.
AIR-500	Paragraph 7, Page 3	Missing acronym.		Place the acronym "ICA" after the paragraph title.	Adopted.
AIR-500	Paragraph 7a, 3 rd sentence, Page 3	Improper capitalization.		Remove the capitalization from the term "order".	Adopted.
AIR-500	Paragraph 13a, b, & c, Page 4	Incorrect format.	Delete the colon after the subparagraph titles ("Article, Commercial Part and Approved, Unapproved, Acceptable Article".	Replace with a period.	Adopted.
AIR-500	Paragraph 15, Page 4	Missing several Administrative Paragraphs.		Include "Deviation, Suggestions for Improvement, and Records Management" paragraphs within the document.	Adopted.
AIR-500	Signature Block, Page 5	Incorrect format.		The signature block cannot be place on a separate page by itself. The signature block should be placed on the page with last paragraph of the document.	Adopted.

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AIR-500	Page 5	Missing "Directive Feedback" form.	Non-compliance to Order 1320.1E.	Include the 1320-19 "Directive Feedback" form in this order as Appendix A.	Adopted.
Douglas Wilson AFS-350	Page 1, Section 1. Purpose of this Order., line 2	"This order describes what aircraft certification office (ACO) personnel do to approve a commercial parts list (CPL), changes to a CPL, and replacement alternative parts." - Reference to: "replacement alternative parts"	When looking for a definition of "replacement alternative parts", CFR part 21.1(b)(3) does not define the above term. Should this term be defined for future clarification to FAA responsible personnel?	Suggest defining "replacement alternative parts" in more detail other than as defined as an alteration to the product in section 9 of this order.	Partially adopted. The term "replacement alternative parts" has been changed to reflect the section 9 term of "commercial part replacement alternative."
Douglas Wilson AFS-350	Page 1, Section 5. Background, paragraph a., line 6.	"These articles are often produced by major manufacturers (such as consumer electronics) where aviation represents a very small share of their overall business." Reference to: an entity - "consumer electronics"	The identified entity in the paragraph may go out of business or sold and possibly listed by another name.	Suggest changing the sentence to read: "These articles are often produced by major manufacturers where aviation represents a very small share of their overall business."	Partially adopted. The term "consumer electronics" in this context is not referring to a specific business entity but rather a manufacturing sector. The term has been expanded to "such as those producing consumer electronics."

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Douglas Wilson AFS-350	Page 2, Section 5. Background, paragraph c., line 2	"c. Specifically, 14 CFR 21.9(a)(4), introduces commercial parts under replacement and modification articles. It explicitly deals with articles installed on aircraft that were not produced solely for aviation purposes." CFR 21.9(a)(4) A commercial part as defined in 21.1 of this part;	21.9(a)(4) refers back to 21.1. The CPL may be a part of the manufacturer's design approval for listed parts applicable. CFR 21.50(b) states, the holder of a design approval must include ICA's with a list of commercial parts listed. Could situations permit a manufacturer to produce commercial parts solely for aviation purposes that would change the meaning of paragraph c?	Suggest rewording or deleting the sentence: "It explicitly deals with articles installed on aircraft that were not produced solely for aviation purposes." 14 CFR 21.9(a)(4) which point back to 21.1 by rule does not support the language of the sentence.	Non-Concur. The rule language pertaining to commercial parts in 14 CFR 21.9(a)(4), 21.1, and 21.50(b) are consistent with regards to not being produced specifically for aviation use and therefore not under a Production approval holder system. As commercial parts they are allowed by the TC applicant to be listed as part of the type design under CPL. A manufacturer is not permitted to produce commercial parts solely for aviation purposes.
ANE-150	Page 2, Paragraph 6, Section b	Recommend including a Failure Modes and Effects Analysis (FMEA) as part of supporting data.	An FMEA lists clearly different failure modes and how it would affect the airworthiness of the aircraft for which it's being used.	Add an additional requirement for the applicant to establish an FMEA when proposing a CPL.	Non-Concur. Paragraph 6b.(2) lists the need for a System Safety Assessment from the applicant. Paragraph 6c. further states the applicant provide the failure modes and effects as part of the system safety assessment, and provides further discussion of the evaluation of failure modes. FMEA is a subset of the system safety assessment.

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ANM109/JP	General	Many of the requirements in the Order are worded to apply to the applicant, although the Orders apply to FAA personnel.	Requirements help ensure that we meet process/safety objectives. In addition, when establishing the requirements, if we ensure the ability to verify them in order to provide course correction as needed we can do internal oversight.	Suggest clarity, as in other AIR Orders of "must," "will," and "shall" vs. use of "should" and in addition, include a statement to clarify that requirements against applicants are written for reviewer to ensure that said requirements are met.	Non-Concur. The document has been reviewed for FAA personnel as the audience. We can find no specific instances of wording directed directly at applicants, but will correct if found.
T. Webster, ANM-104B, 425-917-6557	Throughout Document	Several paragraphs have a margin justification on both left and right of the paragraph instead of the typical left only justification.	Format throughout document is not consistent.	Paragraphs noted for change are, but not all inclusive to, paragraph 3, paragraph 5. a. and c., paragraph 7 through 12, and paragraph 15. Scrub entire Order and reformat all paragraphs with a left only margin.	Adopted.
Chris R. Parker, (425) 917-6496	Page 1, Paragraph 2	Also include the applicability of this order to those responsible for evaluating an amended supplemental type certificate.	FAA Form 8110-12, Application for Type Certificate, Production Certificate or Supplemental Type Certificate includes amended supplemental type certificate as an option.	Change paragraph 2 to read: "All Federal Aviation Administration (FAA) personnel responsible for evaluating applications for a type certificate (TC), amended type certificate (ATC), supplemental type certificate (STC), amended supplemental type certificate (ASTC), and parts manufacturer approval (PMA) involving commercial parts."	Adopted.

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Chris R. Parker, (425) 917-6496	Page 2, Paragraph 6	Add ASTC to the types of certification projects.	FAA Form 8110-12, Application for Type Certificate, Production Certificate, or Supplemental Type Certificate includes amended supplemental type certificate as an option.	Change paragraph 6 to read: "As part of the TC, ATC, STC, ASTC, or PMA certification project, have the applicant identify whether or not they plan to develop a CPL as part of their ICA."	Adopted.
ANNM109/JP	Page 2, Para 6(a)	Why restate the regulatory requirement in the Order?	The regulatory requirement is the standard. Restating, with minor changes, may lead to misapplication and interpretation. In addition, the Order is for FAA personnel and should be written for personnel reviewing to ensure or review against the regulatory requirement.	State.. "The FAA ensures that the applicants submits a CPL in accordance with 21.50(b)"	Non-Concur. The suggestion that is provided is not altogether accurate and can be confusing. How does the FAA ensure the applicant submits anything? The language in the procedures is further guidance to FAA employees and is written to provide implementing details of the regulation as an aid to understanding and standardization.

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Susan Letcher, ANM-104B, 425-917-6474	Page 2. 6.a.(3)	Paragraph 6.a. states "The data must substantiate the following in order for the article to be acceptable as a commercial part" and lists three items (1), (2), and (3). Item (3) is not a requirement.	Item 3 states "(3) Any other data necessary for the FAA to approve the CPL." This is not something that can be substantiated. The statement about providing other data as needed should be in 6.a itself.	Revise 6.a. from "The data must substantiate the following in order for the article to be acceptable as a commercial part" to read "The applicant must provide data supporting the following to substantiate that the article can be considered a commercial part, along with any other data that the FAA may need to approve the article for inclusion on the CPL."	Partially adopted. Item 3 has been moved to paragraph 6.b. on supporting data.
Susan Letcher, ANM-104B, 425-917-6474	Page 2. 6.c	The second to last sentence states "An email or other written notification must be sent to an applicant for a CPL that is rejected (with explanation), or whether more data is needed for an incomplete package." It should be re-written to be clearer.	Grammatically incorrect.	Revise 6.c to read: "An email or other written notification must be sent to an applicant to reject a CPL (with an explanation), or to identify that additional information is needed in the case of an incomplete package."	Adopted.
Chris R. Parker, (425) 917-6496	Page 3, Paragraph 7.a	Remove requirement which limits the FAA approval of a CPL to applicants who only meet the criteria established in AC 21-45.	Disagrees with sentence in paragraph 6.c which states "Your office may allow the applicant to use means other than that specified in AC 21-45, Commercial Parts, without notifying AIR-100."	Change paragraph 7.a to read: "The FAA must approve the CPL if the applicant has met the criteria as established in this Order."	Adopted. The AC is non-binding on the applicant.

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Susan Letcher, ANM-104B, 425-917-6474	Page 3. 12	Paragraph 12 states "The ODA may not approve a CPL." It appears that the CPL requires two endorsements from the FAA - one from the ACCO (which this order applies to - and generally applies to review of the safety aspect) and one from the AEG (for ICA aspects). FAA should consider allowing ODAs to make this finding for the ACCO aspect. It would still have to get the ICA sign off.	Some ODAs, like Boeing, have some fully delegated projects for which the FAA OMT does not actually review the certification plan - it is automatically delegated to the ODA based on the kind of change. In those cases, requiring the CPL to be approved by the FAA adds an FAA-involved step that would not be otherwise there. Some ODAs, like Boeing, are well qualified to make the safety determination related to CPL.	Revise paragraph 12 to state "The ODA may approve safety assessments supporting CPLs, provided the ODA's FAA-approved procedures manual includes processes and limitations and clearly identifies the parallel requirement for FAA acceptance of the ICA."	Non-Concur. The CPL relates to the overall type design configuration for the DAH and should be approved by the FAA.
G. Jose ACE-119A	Page 3, Paragraph 11	The paragraph does not explicitly address whether or not a commercial part listed in a CPL is subject to the PMA process (test and computation) or in other words can an PMA applicant PMA a commercial part that is part of the approved CPL?	To clarify intent.	Provide explicit guidelines with regards to commercial parts on approved CPLs and the PMA process	Non-Concur. The type design holder, including PMA applicant, are eligible to create a CPL and use commercial parts in their design. A commercial part is not eligible to obtain PMA on its own as it is produced outside of an approved PAH Quality system. A part of ther CPL does not require a PMA to produce a replacement, nor should we issue one. This is similar to standard parts - we don't issue PMA for standard parts either.

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AIR-510 DMO Review	Header Area, Page 1	Incorrect format.		Delete the term "Effective" under the black box. The effective date is the day the document is signed by management.	Adopted.
AIR-510 DMO Review	Paragraph 3, Page 1	Add wording.	Missing FAA external website.	Rewrite to read: You can find this order on https://employees.faa.gov/tools_resources/orders_notices/ or public website; http://www.faa.gov/regulations_policies/orders_notices/ , or the Regulatory and Guidance Library (RGL) website at http://rgl.faa.gov .	Adopted.
AIR-510 DMO Review	Paragraph 17, 1 st sentence, Page 5	Delete "Aircraft Certification Service, Planning and Financial Resources Management Branch, AIR-530".		Replace with "Aircraft Certification Service, Administrative Services Branch, AIR-510".	Adopted.
AIR-510 DMO Review	Paragraph 17, 2 nd sentence, Page 5	Typo.		Remove the extra period and extra spaces. There should be only two spaces between sentences.	Adopted.
AIR-510 DMO Review	Paragraph 17, 3 rd sentence, Page 5	Missing telephone number.		Place the complete contact telephone.	Adopted.