

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	---	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>ANE MIDO-45</b>	10b	The term Fabrication System was changed by Part 21 with Quality System.	Compliance with Part 21	Change Fabrication to Quality	<b>Adopted</b>
<b>ANE-100/110/140</b>	General	If the eligibility criteria are not well defined, so some applicants may think they do not need to coordinate with the ACO for all PMA proposals to streamline articles.	It would be best to use a procedure that results in an up-front agreement between the applicant and ACO regarding the nature of the characterization data and the part classification, rather than rely on criteria that could be contentious.	The Applicant should coordinate with the ACO/ECO and get concurrence that the PMA qualifies for streamlining.  <i>(comment for 6b below covers this line item)</i>	<b>Partially adopted</b>  Qualified applicants have sufficient expertise to characterize the nature of their articles and the impacts on safety. The initial memorandum of agreement for the process does not mandate nor preclude prior coordination and agreement on the articles classification. The MoU is the best

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					place for this up front coordination initiative.
<b>ANE-100/110/140 Combined</b>	1	Same as above	Same as above	Change “articles that have the least effect on safety” to “ <b>articles meeting the streamlining criteria in Section 8</b> ”	<b>Adopted.</b> Revised to the listed paragraphs to use the classification of articles from other FAA guidance and the risk-based resource targeting tool
<b>ANE-100/110/140 Combined</b>	1, 4a, 4c, 5a, 5a(1), 5a(2), 5b, 6b, 8, 8a, 9b	Refer to a common set of criteria to describe the articles that are eligible for the spma.	<ul style="list-style-type: none"> <li>The terms “no impact on safety”, “least effect on safety”, “low-risk”, “pose the least risk”, “no effect on continued safe operation...”, “non-critical”, are used interchangeably to mean the same thing.</li> <li>Also the term “non-critical” introduces new eligibility criteria for spma and could have</li> </ul>	Change all to “ <b>articles meeting the streamlining criteria in Section 8</b> ” (specific recommended changes shown below)	<b>Partially Adopted</b>  Revised the listed paragraphs to use the same non-safety significant classification of articles with the common criteria from other FAA

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	---	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			unintended consequences.		guidance and the risk-based resource-targeting tool.
<b>ANE-100/110/140 Combined</b>	4a, 4c	Same as above	Same as above	<ul style="list-style-type: none"> <li>• Change “A proposed article whose failure has no impact on safety” to “A proposed article <b>meeting the streamlining criteria in Section 8</b>”</li> <li>• Change “These are low-risk articles” to “<b>These are articles meeting the streamlining criteria in Section 8</b>”</li> </ul>	<b>Adopted</b>  Revised to the listed paragraphs to use the classification of articles from other FAA guidance and the risk-based resource targeting tool. The order and industry document describes these articles as non-safety significant.

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>ANE-100/110/140 Combined</b>	5a(3)	The eligibility criterion in Section 5a(3) searches service history for the original part for ADs, but the reason for the AD search is different for streamlined parts.	AD searches are also required for the standard PMA process, but the reason is to ensure the applicant doesn't copy a faulty design that can fail and cause unsafe flight and landing. However, a failure of a streamlined part should never result in an AD, so the AD search is to check the criticality of past failures to ensure none of the original part failures, if any, resulted in unsafe flight or landing.	Change 5a(3) to read: "evaluates the service history of the original article ... and Airworthiness Directives to (AD). <b>Failure of an original article that might result in the need for an AD is not eligible for streamlining.</b> "	<b>Adopted</b> by adding the following to the end of the referenced paragraph: An AD on the original article disqualifies the corresponding replacement article from the streamlined process.
<b>ANE-100/110/140 Combined</b>	5a, 5a(1), 5a(2)	Same as above	Same as above	<ul style="list-style-type: none"> <li>• Change 5a "expedite approval of non-critical articles" to "expedite approval of <b>articles meeting the streamlining criteria in Section 8</b>"</li> <li>• Remove 5a(1)</li> <li>• Change 5a(2) to "shows the article <b>meets the criteria in Section 8</b>"</li> </ul>	<b>Adopted.</b> Revised to the listed paragraphs to use the classification of articles and criteria from other FAA guidance and the risk-based resource targeting tool

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>ANE-100/110/140 Combined</b>	5b	<b>COMMENTS FOR MARPA MANUAL:</b> Do not establish new eligibility criteria in MARPA document.	One set of criteria should be established for streamlining using consistent unambiguous language.	Change “Non-Critical Articles Submitted” to articles <b>meeting the streamlining criteria in FAA Order 8110.spma Section 8</b> ”	<b>Adopted.</b> Document revised to use the same criteria as the implementing order.
<b>ANE-100/110/140 Combined</b>	5c	<b>Refer to the FAA Order for Eligibility Criteria and to the MARPA manual for the MoU.</b>	MoU is a process that does not need to be controlled by an FAA Order. It is more appropriate to refer to the MARPA manual for ACO/Industry agreements.		<b>Non-adopted.</b> The order does not control the MoU. It directs the use of one.
<b>ANE-100/110/140 Combined</b>	6b	Same as above. (Also adding a recommendation to change 6b to be consistent with 9a, see third bullet)	Same as above	<ul style="list-style-type: none"> <li>• Change “show the article is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller.” to “<b>show the article meets the streamlining criteria in Section 8.</b>”</li> <li>• If the ... article’s failure affects safety, “ to “If the ...article <b>does not meet the</b></li> </ul>	<b>Adopted.</b> Revised the listed paragraphs to use the classification of articles and associated criteria from other FAA guidance and the risk-based resource targeting tool

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<b>streamlining criteria in Section 8”</b> <ul style="list-style-type: none"> <li>• Change “use the standard PMA process to <b>“use the process in Order 8110.42”</b>”</li> </ul>	
<b>ANE-100/110/140 Combined</b>	6b	MoU is controlled by MARPA manual, so the Order should establish limitations to the MoU since it supersedes the MARPA manual.	Ensures that the MoUs do not allow applicants to streamline “like” parts without ACO oversight.	Change “Review the applicant’s characterization <b>data of every article proposed for streamlining and determine if meets the streamlining criteria in Section 8.</b> ”	<b>Adopted</b>  Review the applicant’s characterization of each article and the impact of its failure. The applicant’s safety assessment must show the article is non-safety significant and its failure has little or no effect on continued safe flight and landing

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	---	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>ANE-100/110/140 Combined</b>	6e	Refer to FAA Order	This change will preserve the focus on the FAA eligibility criteria in the Order	Change to “Check the data package for completeness and adherence to <b>this order and</b> the MARPA guide.”	<b>Adopted</b>
<b>ANE-100/110/140 Combined</b>	8	Title should not contain the qualifier “ <b>Non-Critical</b> ”	Same as above	Change title from “Non-Critical Articles Eligible for Streamlining” to “ <b>Articles Eligible for Streamlining</b> ”	<b>Partially adopted</b>  Changed the description of eligible articles to non-safety significant.
<b>ANE-100/110/140 Combined</b>	8a	Establish sound eligibility criteria. Need to refer to applicant’s qualifications in Section 6 as part of the streamlining eligibility criteria.	Make criteria consistent with AC 43.18 Category III. Added “Improper Reverse Engineering” because consequence of failure for a properly reverse engineered article could be different than the consequence of failure of continued operation with an improperly reverse engineered article.	Change “pose the least risk to their respective products...” to “ <b>whose failures or improper reverse engineering would have no effect on the continued safe flight or landing of the aircraft, manufactured by applicants meeting the criteria in Section 6 of this order.</b> ”	<b>Partially Adopted.</b>  Deleted any mention of Category 3.  No need to infer improper reverse engineering.

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	---	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>ANE-100/110/140 Combined</b>	8b	Same as Section 8	Same as Section 8	Change “process of non-critical articles” to “articles meeting the streamlining criteria in this section”	<b>Adopted.</b> <b>Non-Safety Significant Articles Eligible for Streamlining.</b> Streamlining applies to articles that pose the least risk to their respective products and their failures have little or no impact on safe flight or landing. These articles usually need a small number of discrete, well-known and easily demonstrated showings of compliance.

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>ANE-100/110/140 Combined</b>	9b	Same as above	Same as above	Change “eligible non-critical articles in...” to “ <b>articles meeting the streamlining criteria in Section 8</b> ”	<b>Non adopted.</b> The criteria for the eligible articles are repeated adequately throughout the order.
<b>ANE-MIDO-41 Ann Azevedo</b>	6a			Should be PRINCIPAL inspector	<b>Adopted</b>
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	6a	The draft Order reads” No reports of noncompliance’s in Principal inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years”. We believe most PMA manufacturers would not meet this criterion and recommend slightly less restrictive criteria.	Four years with NO noncompliances in either PI evaluations or ACSEPS is very restrictive criteria. We would suggest no systemic noncompliance’s resulting in the issuance of a Letter of Investigation within the last four years be used instead.	A noncompliance may be systemic or isolated restricting an applicant from using this process perhaps unfairly. By limiting this criteria to systemic noncompliance’s where a letter of investigation was documented in the last four years accomplishes the intent of the original	<b>Adopted.</b>  Revised in paragraph 7 as follows: No reports of <u>systematic</u> noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				statement, but doesn't unduly limit an applicant.	(LOI) within the last four years. The ACO may search the Aircraft Certification Systems Evaluation Program (ACSEP) reports in Certificate Management Information System (CMIS) database. Contact the responsible manufacturing inspection district office (MIDO) to search CMIS for non-compliances
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	6f	The draft Order reads in part "Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF),..."	PDF formats would need to be converted if a revision were needed. By using a "Word " format, the document can easily be modified if required prior to final signature. The signature process	Change sentence 6(f) to read in part "Send this supplement electronically to the responsible MIDO in a word document	<b>Not Adopted.</b>  The signed supplement in PDF is the ACO record that the articles

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		It would be simpler to send the document in a word format, so corrections can be made	would be the same by operating location as it currently works	Format,...”	met the streamlined criteria. A MIDO can easily convert, and then add the information on the respective articles to the existing supplements of the holder.
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	8b	The draft order reads “This process of non-critical articles does not allow the use of Designated Engineering Representatives (DER) to make findings of compliance”. It would appear this unduly limits the resources available to the FAA to make findings of compliance. By allowing the use of DER’s the process would further reduce the workload on the ACO.	Using DER’s to either find compliance, or make a recommendation of finding compliance would further reduce the workload on the ACO, and allow applicants to effectively use resources to assist them through this process furthering the intent of the Draft Order and maintain the high level of safety we currently sustain.	Change the draft Order to read “ Use of Designated Engineering Representatives (DER) to make or recommend findings of compliance is encouraged.”	<b>Not adopted.</b>  FAA exercise of its discretionary function also includes how we use designees. Then these designees can focus their efforts on more safety significant projects.  The process expects qualified

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	---	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					<p>applicants to have the expertise to select and show compliance with the appropriate airworthiness requirements. The nature of the articles constrains the number and scope of these showings. The streamlined process assumes substantially complete showings with each application. Otherwise, applicants use the standard process in Order 8110.42.</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	--	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	6a	The draft Order states “The applicant must hold PMA with four years minimum experience making similar articles...” While the MARPA 1100 draft indicates this may be reduced based on experience that demonstrates a thorough understanding of the FAA’s PMA application process. We recommend the MARPA 1100 indication be added to allow for reduced timeframe. We suggest that be no less than two years experience.	By stating four years in the Order it doesn’t allow for consideration of applicants that demonstrate extensive experience. But we concur there should be a minimum level of demonstrated experience prior to using this process.	Change 6(a) to read “The applicant should hold PMA with four years demonstrated experience making similar articles, but this may be reduced to two years for applicants demonstrating extensive experience with PMA applications of similar articles”.	<b>Not Adopted.</b>  MARPA proposed the 4-year minimum level of experience in an earlier version of their document. Prior internal review accepted this minimum as start. Later revisions may consider reducing or increasing the minimum based on the success of the process.
<b>Marc B. Goldstein Aviation Safety Inspector, Manufacturing</b>	6	This being the case, quality system integrity, if that's the intent of paragraph under draft 8110.XX, could come down to (1) one PI visit only within last 4 years as	Reason for this recommendation, IAW 8120.2G, page 3-21, on low risk facilities Order reads for ACSEP's " <b>an evaluation is not required</b> " and for PI audits, page 3-20,, <b>it's from 24 to 36 month period.</b>	Specifically, under the third bullet the standard is defined as no "non-compliances on PI and ACSEP evals, and no LOIs <b>within last 4 YEARS</b> ". I would	<b>Not Adopted</b>  The four-year period assures at least one PI or ACSEP evaluation.

**Clearance Record  
DOCUMENT COMMENT LOG**

<b>Originating Office:</b> AIR-110	<b>Document Description:</b> Order 8110.SPMA, Streamlined Process for Parts Manufacturer Approval (PMA)	<b>Project Lead:</b> John Milewski, AIR-111	<b>Reviewing Office:</b>	<b>Date of Review:</b>
---------------------------------------	---	--	--------------------------	------------------------

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Certification Specialist NE-MIDO-46</b>		currently proposed. Implementing a 6 year requirement would assure us of at least (2) two PI visits.		recommend amendment to say <b>at least 6 YEARS.</b>	