

**Clearance Record
DOCUMENT COMMENT LOG**

Originating Office: AIR-110	Document Description: Order 8110.xx, Streamlined Process for Parts Manufacturer Approval (PMA)	Project Lead: John Milewski, AIR-110	Reviewing Office: AIR-110	Date of Review: 10/20/10
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Commenter	Page & Paragraph	Comment	Reason for Comment	Suggested Change	Comment Resolution
A. Waters	1 Para 5. a	Paragraph 5 (a) states that we will accept a “uniform data package”. I am concerned as to how ‘uniform’ is determined. ‘Uniform’ with respect to what standard? An applicant compared to themselves? Uniformity defined by an applicant to each other applicant? Uniformity from an ACO to ACO comparison for applicant expectations.	As I have reviewed the streamlined process I see many opportunities and fully expect to realize through implementation a non-uniform approach. The lack of uniformity would be expected to be seen reviewing the criticality analysis, qualifying a part for this process, applicant qualifications, and data submittals.	More detail needs to be incorporated into this document in order to achieve uniformity and to maintain the equivalency of the proposed parts to the currently approved parts.	Do not concur. The process relies on the format and content in MARPA S4000C. We still preserve the two tenets of PMA: a part’s design meets the airworthiness standards of the applicable product and is produced in a manner for safe installation.
A. Waters	2 Para 5. b,c	Throughout this document the MARPA S4000C document is referenced. There are many details contained within the MARPA document that are not contained within the FAA document. Paragraph (c) states that the FAA document takes	How can the FAA document take precedence over the MARPA document when the FAA document is pointing to the MARPA document for the details? In the future MARPA could change their guidance without FAA acceptance.	The expectations for the streamlined process should be found clearly within the FAA Order and not reference the MARPA document.	Do not concur. The reliance on an industry guide is an initiative between the FAA and MARPA. The ACOLT supported this cooperative effort. Future alignment in the documents and easier access to the guide will occur when they are published after an extensive public comment period.

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		precedence.			
A. Waters	2 Para 5. b,c; 6b; 7a	The MARPA document does not present a clear understanding by MARPA of the FAA certification processes and purposes for these. An example is where the MARPA document defines destructive testing as a potential part of a first article inspection conformity requirement.	There are many instances within the MARPA document where they make statements that are not clear as to applicant requirements/expectations to meet FAA Order requirements. There is great risk in using an industry document as the means to identify the methods of PMA approval processes and applicant qualifications. An industry advocacy group (MARPA) document by it's very nature will be biased to the needs of the applicant. This document is no exception. The MARPA document does not present a clear understanding of certification in general nor to a means of certifying PMA parts.	Remove the MARPA S4000C document as a reference within the Streamlined Order. Develop the criteria within the Streamline Order explicitly.	Do not concur. This order specifies how the FAA will implement the streamline process with the inputs that follow the MARPA guide. The FAA, MARPA and the public will improve and align both documents that expedite approvals of parts that do not impact safety.

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A. Waters	2 Para 6	This is written with a subjective and non standardizable approach.	Example: What does it mean to have a complete package as noted in para. 6 (e)? Every applicant will have their own perspective of what a first article inspection looks like. The common understanding is that the first article inspection is post approval. The timing of the first article inspection is not universal. The quality of a first article inspection varies greatly applicant to applicant and ACO to ACO.	It would be best to have a much better definition of conformity. The content of a complete data package should be defined. Is 8110.42 chapter 3 expectations required to be met? If not then Why not?	Partially concur. Revised paragraphs 6e and 6g as follows: e. Check the data package for completeness and adherence to the MARPA guide. Perform spot checks of its data and declarations at your discretion. g. Rely on applicant's first article inspection report to confirm the part conforms to its approved design.
A. Waters	2 Para 6a	It appears that an applicant can have multiple very bad surveillance audits with one 'perfect' one in 4 years and qualify for this	Lack of clarity of expectations to qualify an applicant for this process.	Clarify expectations for applicants. Include criteria that will show the applicants overall understanding of the PMA process and the ability to accomplish all aspects of	Concur. Revised applicant qualifications as follows: a. Review the applicant's statement of qualifications for the

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		<p>process.</p> <p>There should be some clear criteria establishing the ability for the applicant to properly develop PMA's.</p>		Chapter 2 and 3 of the Order 8110.42.	<p>streamline process. The applicant must hold PMA with four years minimum experience making similar parts and having:</p> <ul style="list-style-type: none"> • No alert service bulletins, • No airworthiness directives and • No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years. The ACO may search the Aircraft Certification Systems Evaluation Program

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					(ACSEP) reports in Certificate Management Information System (CMIS) database. Contact the responsible MIDO to search CMIS for non-compliances.
A. Waters	2 Para 6a	There does not appear to be a solid engineering assessment of the capability of the applicant. No service bulletins or AD's does not evaluate that an applicant really knows what they are doing.	We have applicants who would put on a drawing "xyz material or equivalent" this applicant may very well qualify by the listed standard to do the stream lined process. Yet these applicants struggle with a comprehension of an appropriate certification of a PMA part.	There needs to be more rigor in the qualification of the applicants.	Do not concur. Applicants for this process have demonstrated capabilities as shown in their existing PMA for like parts. They are well known by their respective ACOs and MIDOs.
A. Waters	2 Para 7a	The use of an MOU with out clear Order defined expectations to define the streamlined process for every PMA applicant will remove any sense of standardization for the streamlined process.	The ACO's have a difficult time being standardized. An MOU that does not have a solid Order derived basis will result in an increased lack of standardization and potential ACO shopping.	Develop a clear expectation of what the MOU should include. Referencing the MARPA document will present a certain conflict of interest to the FAA needs.	Do not concur. Many ACOs already have MOUs with trusted holders of PMA. Paragraph 7 specifies the essential elements of the MOU. The ACOs have the expertise and flexibility to draft these MOU that align

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					with their products and resources.
A. Waters	3 Par 8	What does it mean to have “little” impact on the continued safe flight and landing of an aircraft? In my perspective ‘little’ means I do have impact on the safe flight and landing of the aircraft. Now the question is can I make it to an airport or not?	Not sure what is meant or how to interpret “little” impact on the safe flight and landing of an aircraft.		Concur. Removed ambiguity by deleting “little”. Also limited this process to the approval of parts whose failure has no affect on the safety of the product.
A. Waters	3 Para 7 b	Statements such as ‘the data is submitted based upon an agreement between the applicant and the ACO’ do not clearly define what a standardized data package will look like. This approach is also	The Order seems to be driven by an attempt to reduce effort by the applicant in submitting information to the ACO. It is unclear what the expectation is for submittals.	The type of data submitted and the quality of that data should be clearly defined especially in light of an apparent intent to decrease the oversight and effort to approve these parts.	Partially concur. The specific requirements for the data package reside in S4000C. The MOU recognizes this as showing compliance with the airworthiness standards. Paragraph 6 has the uniform steps to the streamline PMA

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		open to interpretation and may readily allow for packages that do not meet requirements of 8110.42 or potentially the rules.			<p>process for the ACO. Paragraph 7 explains the relationships the MoU, the MARPA guide, and the part PartSCP. Revised paragraph 7 as follows:</p> <p>7. The MoU and PartSCP.</p> <p style="padding-left: 40px;">a. The MoU between us and qualified applicants documents the streamline process. . The MoU accepts the content and format of the MARPA guide to show the needed compliances to airworthiness requirements.</p> <p style="padding-left: 40px;">b. The MARPA guide prescribes using a PartSCP to set the format and contents of the part’s design data. This PartSCP is a tailored application of the project certification plan used in type certification programs. Users of the streamline process will</p>

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					assess their articles using the criteria for category 3 articles as referenced in the MARPA S4000C guide.
A. Waters	3 Para 7 b	Another risk in this streamlined approach is that this order may very well be implemented in direct FAA sponsored opposition to FAA Order 8110.42.	The ACO's and the applicants will be looking to make this approach different from FAA Order 8110.42. That is the reason to generate a new Order right. So what is the minimum requirement? How and when does the minimum requirement apply?	Not sure	The process has applicant prequalification, ACO prior experience with applicants, pertains only to parts that do not affect safety and uses an industry guide to set the rigor of showing compliance with airworthiness standards.
A. Waters	3 Para 8	There are varying statements that contradict each other between the Streamlined Order, the MARPA document, The Propulsion document AC 33-8, and FAA Order 8120.2 regarding categorization of parts. Of specific concern is the position of "little to	The safety assessment methodology needs to be clear. The definitions for this assessment are not clear and reference documents like the CPL. Yet when visiting with the PMA process owner it seems the CPL is not really being used. A review of the MARPA document would show that the CPL is being used. The CPL itself has a statement of	There needs to be a clear consistent definition of the part criticality. This definition must go beyond what the part is and include the application of the part. The safety review should be inline with as a minimum the 8110.42 definitions as outlined in chap 2 5 (d). We as an agency run great risk	Do not concur. Defining critical parts is beyond the scope of this order. The streamline process only deals with approval of parts that do not affect safety. However, revised the order to deal only with this class of parts. Deleted figure 1 and any mention of criticality.

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		no impact on continued safe flight and landing”. Some documents are clear that there should be “NO” impact on continued safe flight and landing. Other documents say “little to no” yet all are claiming the same references as to part suitability for this process.	“not developed with any scientific basis” and “use at your own risk”. The CPL seems to have been developed by the MIO group with ‘little to no’ engineering input. So to try and classify parts by this methodology is concerning.	to pull back from the 8110.42 approach.	
A. Waters	4 Para 8 b	The MARPA guide is referenced in the context that it should be followed. It seems again inappropriate to reference an industry document as the means to certification when the MARPA document has an express purpose to decrease oversight and develop revenue for their members.	Many PMA applicants are not well founded in their understanding of the application of the parts they are developing. We as the FAA have extremely limited ability as it is even using designees to support the approvals to oversee the classification and development of these parts. To promote an approach where designees are not needed even for part classification continues to erode our ability to promote safety of the PMA parts.	The use of designees for all of these approvals regardless of the apparent ‘non-critical’ nature of the part.	Partially concur. The class of parts using this process need not use designees. However, left the scope of designee involvement to the discretion of applicants and ACO. Revised paragraph 8b as follows: b. This class of non-critical parts does not usually need Designated Engineering Representatives (DER) to make findings of compliance. However, designees may

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					advise applicants on certification requirements and safety analyses. They add value and quality to any PMA package. ACOs and applicants should consider the complexity of design and manufacture, scope of testing to demonstrate compliance, and service experiences of like parts to determine the level of designee involvement.
A. Waters	4 Para 9 a,b	An order is not a regulation that is true. I hope that what has been outlined in this document when implemented in accordance with the Order will meet the regulations.			Concur. The basic tenets of PMA are unchanged in the streamline process. The design of the parts must comply with the airworthiness requirements of their products and manufactured in a manner making them safe for installation.

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A. Waters	General	I am not clear what is to be done with much of the chapter 3 review and chapter 2 expectations for PMA parts as defined within FAA Order 8110.42C	Items that may be of concern include evidence that the applicant has developed a clear definition of eligibility, assessment of airworthiness limitations, part marking, effects on ICA, appropriate evaluation of equivalency and hence compliance to the airworthiness standards.	Need to be sure that the expectations when using this process will accomplish the order intent and requirements. Also, need to be sure that the implementation of this streamlined process meets the goals and requirements of the FAA Order 8110.42C and the regulation.	Concur. The rigor of showing compliance varies with the nature of a part. The class of parts eligible for the streamline process often needs the least rigor. They have the least impact on the safety of a product.
A. Waters ANM-100D	Page 1	General: This document approaches the PMA mostly from a manufacturing perspective and does not clearly address engineering concerns.	Most of the PMA Order 8110.42C deals with Engineering review of data from both a design and manufacturability perspective.	There needs to be clear criteria relative to adequacy of the applicant regarding design capability and application of the part on the product.	Do not concur. This process is for exiting holders of PMA with demonstrated design and manufacturing capabilities.
A. Waters	Page 1 Para. 4	Paragraph 4 states “The processes in FAA Order 8110.42, <i>Parts Manufacturer Approval Procedures</i> , to issue PMA for replacement parts, do not take into account the relative safety risk of the part.”	It is expected that the ACO by use of the applicant criticality analysis and direct knowledge account for the relative safety risk of the proposed part. If these risks are not being addressed then it is likely due to the negligence of the applicant or the ACO to not follow the Order.	If what has been stated in this paragraph is believed to be true then a streamlined process would degrade the safety assessment even further due to even less oversight. FAA Order 8110.42 should be changed to emphasize the need for adequate safety analysis of the PMA part.	Concur. Revised paragraph 4a as follows: The processes in FAA Order 8110.42, <i>Parts Manufacturer Approval Procedures</i> , to issue PMA require approval of each replacement part’s design by an aircraft certification office (ACO) regardless of its

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		This statement is incorrect.		This statement should be removed it seems to be irrelevant to the streamlined process.	nature. A proposed part whose failure has no impact on safety competes for limited resources at each ACO.
A. Waters	Page 1 Para. 4	Paragraph 4 states “These [ACO] reviews [of applicant PMA data] compete for scarce resources at every ACO with little impact on safety.”	If the statement is true that ACO review provides little impact to safety then why do we have rules and an Order with specific requirements for PMA approval that we are expected to follow. This statement implies there is no value added by the ACO to the safety of PMA parts. I can provide numerous examples where PMA applicants have no certain knowledge of the safety impact of their part or of the true application of that part. If ACO’s are not providing input to the applicant with safety impact I would suggest that the ACO is not following the Order requirements.	Remove this statement or revise the existing FAA Order 8110.42 to assure that the ACO engineering staff are following this Order and the Rules. This statement is irrelevant to the streamlined process.	Concur. Revised as follows: A proposed part whose failure has no impact on safety competes for limited resources at each ACO.

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ACE-118A	Figure 1	Five parts classifications are not consistent with our classifications	It should be three like in the CPL	Make it 1, 2 or 3 and limit the process to 3 only.	Concur. Deleted part classification table.
ACE-118A	Page 1, Paragraph 5a	Identifies the part as 'non-critical' – this needs to be more quantitative per the CPL	Consistency	Change 'non-critical' to something that matches CPL	Do not Concur. AIR-200 requested that the order not refer to the CPL. Non-critical are all parts that are not critical. The subset of these parts is those whose failure results in no impact on safety.
ACE-118A	Page 1, paragraph 5a	The part in Category 3 should have 'no' impact on safety	"little" is too subjective. Does a major event have a little impact on safety?	Remove the words "little or"	Concur. Deleted "little or no" throughout the order.
ACE-118A	Page 2, paragraph 5b	This paragraph states qualification for use of this order as defined in the S4000C document. Qualification should be spelled out in this Order, not in the Marpa document.	Us, not them	Remove the sentence that refers to Marpa document for qualification	Partial Concur. Revised as follows: Applicant guidance for this process, the nature of the parts, the kind of supporting data and the roles of designees is in the

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					Modification and Replacement Parts Association (MARPA) Document S4000C, Streamline Program for PMA Applications of Non-Critical Parts Submitted by Experienced Applicants with a Qualifying Performance Record, dated March 19, 2010. MARPA makes this guide readily available to the public on its website at www.pmamarpa.com .
ACE-118A	Page 2, paragraph 6a	“Findings” are not something that the FAA does during a surveillance evaluation.	We don’t have ‘findings’ anymore. Only ‘non-compliances’ We are a kinder, gentler FAA now. Geez.	Change ‘findings’ to something standardized with our current nomenclature.	Concur.
ACE-118A	Page 2, paragraph 6b	Class A or B system as classified in Figure 1 needs to be changed to directly reflect the CPL.	As discussed in Seattle.	Change to Category 3 only.	Partially concur. However, will use the criteria for CPL category 3 per AIR-200. A part whose failure has no effect on the continued safe flight and landing of the aircraft.

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ACE-118A	Page 2, paragraph 6g	Conformity requirements leads to FAA processes	We should rely on their first article inspection to satisfy any questions about manufacturing ability, not “conformity requirements”	Replace ‘conformity requirements’ with “Manufacturing Inspection Requirements”	Partially concur. Revise 6g as follows: g. Rely on applicant’s first article inspection report to confirm the part conforms to the approved design.
ACE-118A	Page 3, paragraph 7b	The ATL MIDO doesn’t amend supplements to add part numbers. They issue a new supplement every time.		Change the process to reflect what the MIDO does currently. Or convince the MIDO to change their evil ways.	Concur. Moved the requirement to paragraph 6f as follows: f. If the PMA application satisfies our streamlined criteria, the PACO records our approval by signing a draft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to

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					the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.
ACE-118A	Page 4, paragraph 8b	DERs add value and quality to any PMA package. They should be looking at every project.	This is the way we operate our MOU's currently in the ATL ACO.	It is meet and right so to do.	Partially concur. The process will involve designees at a level to ensure safety based on the nature of the part's design. Revised paragraph 8b as follows: This class of non-critical parts does not usually need Designated Engineering Representatives (DER) to make findings of compliance. However, designees may advise applicants on certification requirements. They add value and quality to any PMA package. ACOs and applicants should consider the complexity of design and

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					manufacture, scope of testing to demonstrate compliance, and service experiences of like parts to determine the level of designee involvement.
ACE-118A	Page 4, paragraph 9b	This is not the way the ATL MIDO does their supplements	They create a new supplement with each new PMA and with each new added eligibility.	Change the process to reflect MIDO current practice.	Concur. Revised the sentence as follows: The MIDO will take appropriate action to add these parts to the PMA of the manufacturer.
ACE-118A	Page 4, paragraph 9b	How can the MIDO make a change to a dual signed supplement?	ACO signs, then sends that document to MIDO for signature #2. This process doesn't reflect that reality.	Start reality show pitting the MIDO against the ACO in a paperwork shuffling competition. The winner gets er.. um..aaah....Nevermind, there is no <u>winner</u> .	Concur. We retained the ACO signature on the supplement and rely on the record of receipt and acceptance of the data package for our accomplishment of our discretionary review.
ACE-118Wa		There should be an appendix with an example MoU/template. There should also be a template for denial/acceptance letters.	There is no example MoU/template or denial/acceptance letters in the draft Order.	Provide an example MoU/template and denial/acceptance letters.	Do not concur. Each ACO has existing protocols and expertise to create MoUs and response letters.

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ACE-118Wa	General	What are the procedures for PMA applications that fall under the MoU in terms of establishing a project and the routing of a CPN?	Order 8110.42 has procedures for establishing PMA projects and routing the CPN which the draft Order does not have.	Include procedures for establishing the PMA project and routing of the CPN in this Order unless it is intended to not have a project or CPN for PMA applications that fall under a MoU for the streamlined process, then that should also be stated.	Do not concur. The projects that fall under the streamlined process will never require a CPN.
ACE-118Wa	Page 1, Par 2	The audience only lists FAA personnel, it should also include the applicants as well.	Applicants are not included as part of the audience.	Include the applicants in the audience.	Do not concur. Applicants are part of the audience through the MARPA S4000C guide. This Order implements the streamline process at the ACO.
ACE-118Wa	Page 1, Par 4.a	Par 4.a states that processes in 8110.42 “do not take into account the relative safety risk of the part”.	I disagree with that statement because it implies that there is something wrong or insufficient with 8110.42 which is then the justification for having this new Order for the streamlined process. A) Order 8110.42 does account for the safety risk in the “Safety Assessment” and also because the criticality of the part is discussed throughout the Order. B) If something is	Perhaps deleting the statement or reword to something like “does not provide for an approval process for “low-risk, non-critical parts””.	Concur. However revised paragraph 4a as follows: a. The processes in FAA Order 8110.42, <i>Parts Manufacturer Approval Procedures</i> , to issue PMA require approval of each replacement part’s design by an aircraft certification office (ACO) regardless of its nature. A proposed part

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			wrong or insufficient with the current 8110.42 then it should be revised instead of having a new Order. I think what's meant is that 8110.42 doesn't have a separate process for approving "low-risk, non-critical parts".		whose failure has no impact on safety competes for limited resources at each ACO. Under the test-and-computation method, an application for each new replacement part requires submittal of data, followed by aircraft certification office (ACO) review for compliance with appropriate airworthiness standards.
ACE-118Wa	Page 1, Par 5.a	What is mentioned in Par 5.a are requirements of and/or can already be done under 8110.42, however, some applicants are not following the requirements of the Order, are submitting incomplete, insufficient, sometimes regulatory non-compliant application package which then makes the FAA request additional	What is proposed in the new streamlined process is already covered in 8110.42, therefor the necessity and benefits for having a second PMA Order are questionable. There is no guarantee that this will solve/alleviate the burden on the FAA resources, which often arises from applicants' incomplete/insufficient application packages, failure to follow the current Order 8110.42 and at times failure to meet the regulations. The		Do Not concur. This order sets up criteria and methods for a streamlined process to approve non-critical parts from manufacturers with successful histories of producing like parts under parts manufacturer approval (PMA). The process applies to parts that have the least effect on safety and uses tests and computations to show compliance to airworthiness requirements. It relies on industry guidance from the

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		information/data during the review of the application package.	streamlined process is also suppose to benefit applicants, but I would contend that applicants who are already following 8110.42, are submitting complete and compliant applications would not need or benefit from the streamlined process, so the remaining applicants who would benefit from the streamlined process are applicants who have burdened the FAA under the current PMA process in 8110.42, and they are now potentially allowed to follow a process which has reduced much of the FAA oversight and review, so I would also contend that this could potentially lead to reduced safety and compliance.		Modification and Replacement Parts Association (MARPA) to set the rigor and format of these showings of compliance. The MARPA guidance is on their site for all to use. The streamlined process will expedite approval of eligible parts from qualified PMA holders. Aircraft certification offices will accept applicant showings in the manner of the industry guide as stipulated in a memorandum of agreement (MoU)

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ACE-118Wa	Page 2, Par 6.a	The criteria for applicants should also consider/require review of the applicant's design approval history/experience. Some applicants may do well with manufacturing but horrible on the design approval application, and also because an applicant has been manufacturing parts, their last design approval may have been many years ago or that they have never had a design approval because their previous PMAs has been through licensing agreement.	PMA is both design approval and manufacturing approval, but the criteria in the draft Order only considers/requires the applicant's manufacturing history/experience. Not including the applicant's design approval history/experience may lead to applicants not being able to follow the MoU or the MARPA S4000C which concentrates on design approval. The requirements (manufacturing history/experience) does not seem to match the process being agreed to in the MoU (design approval).	Include the applicant's design approval history/experience as part of the requirements for the streamlined process, perhaps a review of the last four years of design approvals or a certain number of design approvals since some companies may have more than others.	Do not concur. We limit this process to existing PMA holders. They successfully showed their designs met applicable airworthiness requirements in prior approvals. The quality and integrity of PMA designs are reflected in their service histories as documented by service alert bulletins and airworthiness directives. Some measure of design capabilities from prior approvals may reside in the respective project folders. The ACO is free to survey project folders for evidence that a holder's capabilities are commensurate with the nature of the part.

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ACE-118Wa	Page 2, Par 6.a	The requirement of having no findings from “at least one” audit in the last four years is not sufficient to indicate or provide confidence that the applicant will be able to maintain quality.	Requiring having no findings from “at least one” audit in the last four years can mean that the applicant could have had other audits that had multiple findings and/or some findings that were major/severe, safety related or regulatory non compliances.	Perhaps include guidance for MIDO to review the applicant’s audit history for the last four years and make an overall determination of acceptable/not acceptable on the applicant’s quality system and audit history. Or require no findings in any audit in the last four years, something other than “at least one”.	Concur. Revised requirement as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (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 MIDO to search CMIS for non-compliances.
ACE-118Wa	Page 2, Par 6.a and 6.b	There needs to be procedures for applicants applying for the streamlined process. The draft Order does not define who needs to review the applicant’s application for the streamlined process and also who needs to sign	Procedures for implementing the streamlined process are not clear. The procedures does not define how the applicant can apply for the streamlined process such as what they need to send, where to send the application, what they need to provide to show/prove their qualifications, etc. The	Provide procedures for applicants applying for the streamlined process. Provide detailed procedures for reviewing the applications for the streamlined process and signing of the MoU. Define the roles of the FAA offices, ACO, MIDO, AEG and the personnel in those offices,	Partially concur. This directive applies only to the ACO. The MIDO adds newly approved parts to the holders’ supplements per Order 8120.2F. Revised paragraph 6 as follows: 6. Steps to Implementing the Streamlined PMA

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		the MoU.	procedures does not define the roles and responsibilities of the FAA offices and personnel in the application, review, and MoU process.	ASEs, ASIs, managers.	<p>Process.</p> <p>a. Review the applicant's statement of qualifications for the streamlined process. The applicant must hold PMA with four years minimum experience making similar parts and having:</p> <ul style="list-style-type: none"> • No alert service bulletins, • No airworthiness directives, and • No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI)

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					<p>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 MIDO to search CMIS for non-compliances.</p> <p>b. Review the applicant's characterization of the part and the impact of its failure. The applicant's safety analysis must show the part is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller. Use safety standards</p>

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					<p>appropriate to your product. If you concur with the applicant's analysis, accept the part into the streamlined process. If the safety analysis is inadequate or the part's failure affects safety, direct the applicant use the standard PMA process.</p> <p>c. Establish a memorandum of understanding (MoU) with the applicant that prescribes the content of the compliance data described in the MARPA Guide S4000C. Use the guide's part specific certification plan (PartSCP) as necessary.</p> <p>d. Accept subsequent data packages that abide by the MoU with their statements of compliance per 14 CFR §</p>

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					<p>21.303(a)(5).</p> <p style="margin-left: 40px;">e. Check the data package for completeness and adherence to the MARPA guide. Perform spot checks of its data and declarations at your discretion.</p> <p style="margin-left: 40px;">f. If the PMA application satisfies our streamlined criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.</p>

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					<p>g. Rely on applicant's first article inspection report to confirm the part conforms to its approved design.</p> <p>h. The goal for approval by an ACO is 30 days from receipt of a data package that follows the content and format of the industry guide.</p>
ACE-118Wa	Page 2, Par 6.h and Page 4, Par 10.b	Stating that the goal for approval is 30 days from the receipt of the data package without stating that the completeness and compliance of the applicant's application package is a major factor in meeting that goal implies that the FAA is solely responsible for when that goal is not met.	It should be clear that the applicant is also responsible for meeting the 30 day approval goal with the quality of their application package and that compliance to the regulations is required regardless of any goal. I would contend that the 30 day approval goal is already achievable under Order 8110.42 for the types of "low-risk, non-critical parts" that this streamlined process covers if the applicants would follow the Order and submit a complete and compliant application	Include wording to also emphasize the applicant's role in meeting the 30 day approval goal and to state that compliance to the regulations is required.	Do not concur. MARPA S4000C guides the applicant's on the content and format of the data package. Experienced applicants will provide the necessary showings of compliance for the eligible parts per MARPA S4000C. These factors facilitate meeting our 30 day goal.

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			package.		
ACE-118Wa	Page 3, Par 7.b	The phrase “does a discretionary spot check” is unclear on what exactly is required.	What is required to be checked, which spot(s)? How is the check performed, are we looking for technical, regulatory compliance, grammatical, format, etc?	Define what is needed or perhaps delete the procedures in this paragraph and provide the procedures in Paragraph 6.	Partially Concur. Revised paragraph 7b as follows: b. The MARPA guide prescribes using a PartSCP to set the format and contents of the part’s design data. This PartSCP is a tailored application of the project certification plan used in type certification programs. Users of the streamlined process will assess their articles using the criteria for category 3 articles as referenced in the MARPA S4000C guide.

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ACE-118Wa	Page 4, Par 10.a	§ 21.303(a) through (k) should be changed because there is only 21.303 (a) and (b).	Part 21 has been revised/amended.	Change § 21.303(a) through (k) to § 21.303(a) and (b)	Partially concur. Revised paragraph 10a as follows: Title 14 of the Code of Federal Regulations (14 CFR) 21 Subpart K sets the regulatory requirements for approval of replacement and modification parts in civil aviation.
ACE-118Wa	S4000C	The MAPRA S4000C draft has the ICA as part of the PartSCP. The ICA should be a separate document so that it can be reviewed by AEG and provided to the customers, and meet the requirements of 21.50 and xx.1529.	The ICA is a section in the PartSCP and not a separate document. Order 8110.42 also allows applicants to propose that there is no change to the manufacturer's ICA and therefore no new ICA is necessary.	The Order should require the ICA be a separate document and meets the regulatory requirements and be reviewed/accepted by AEG, or also allow for the applicant to propose that no new ICA is necessary, similar to what is in 8110.42.	We require ICA when the design of the replacement part results in changes to the original ICA. This supplemental ICA may require AEG review at the discretion of the ACO. The class of parts approved under this process will not generate supplemental ICA. However, will forward this comment to MARPA for their consideration.

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ACE-118Wpm	Page 2, Para 6	We should not use a streamlined process for any part that requires a new special process that the applicant has not used before.	MIDO needs to evaluate the applicants' ability to implement special processes.	Somewhere, probably in paragraph 6, we need a restriction that parts requiring a new special process will not be eligible for the streamlined process.	Do not concur. The prospective applicants already hold PMA and have demonstrated capability in the manufacture of similar parts.
ACE-118Wpm	Page 2, para 6.a.	The limitation of "No Service Bulletins" is too harsh. The MARPA document says "No Alert Service Bulletins" which would make sense.	Some SB's are just optional product improvements and do not indicate a safety issue. We do not want to prevent an applicant from issuing these types of SB's.	Change wording to "No Alert Service Bulletins" or something similar.	Concur.
AIR-220	Global	The streamlined process requires the use of the CPL. The CPL is an FAA document used for resource allocation purposes. It was never meant to be used by industry for determining part criticality.	Endorsing the use of the CPL by industry may not be in the FAA's best interest. Is AIR-100 confident enough in the CPL for industry to use it in determining part criticality?	Develop an alternative method of determining part criticality that doesn't rely on the CPL.	Concur. Removed mention of CPL and category 3 from the order. However, the order will specify the common criteria for Category 3 and Class A. Engineers will evaluate parts against this criterion.

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AIR-220	Page 1 Par. 5b, and Par. 6	The streamlined process implies that it is only applicable when the PMA basis is test and computation and identity without a licensing agreement.	When the PMA basis is identity by licensing agreement or STC, the process in 8120.2 must be followed.	Revise the document to state that the streamlined process is only applicable when the PMA basis is test and computation and identity without a licensing agreement.	Concur. Added the following to the end of paragraph 1: The process applies to this class of parts using tests and computations.
AIR-220	Page 2 Par. 6a 3 rd bullet	Be more specific describing the type of surveillance audit required.	A surveillance audit includes PI evaluation, product audit, supplier control audit, and ACSEP.	Specify the type of surveillance audit that qualifies.	Concur. Revised sentence as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) during those last four years.
AIR-220	Page 2 Par. 6a 3 rd bullet	The requirement may allow an applicant to have several findings within 4 years and still be eligible.	The way the requirement is written, an applicant could have 2 or more surveillance audits within 4 years with many findings and they would still qualify for the process if only 1 audit was finding free.	Change to read: "No findings from surveillance audits conducted within the last four years."	Concur. Replaced "during those" with "within the" as recommended.

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AIR-220	Page 2 Par. 6b	MARPA Guide number is incorrect. Reference is to SC4000C.	Typographical error.	Change MARPA Guide number to S4000C	Concur.
AIR-220	Page 2 Par. 6f	This paragraph conflicts with Order 8120.2F, paragraph 2-45.	The MIDO has the option of conducting a MIDO audit at the applicant's facility.	Change to read: "...advise the responsible MIDO to add the associated part to the holders PMA supplement after conducting a MIDO audit, if applicable."	Do not concur. The paragraph does not limit MIDO responsibilities. MIDO still has the discretion to conduct an audit. However, a facility had previous successful MIDO audits and successfully manufactured similar parts under its PMA.
AIR-220	Page 4 Par. 8b	There is a definition of "critical parts" in 8110.42C that is different than in the MARPA guide. An FAA order should not be endorsing MARPA's definition.	The definition in 8110.42 should be the definition referenced in FAA orders.	Revise to reference only the FAA definition found in 8110.42.	Partially concur. This process is for non-critical parts. Will advise MARPA to remove its term for critical from the industry guide.

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AIR-220	Page 4 Par. 9b	This paragraph conflicts with Order 8120.2F, paragraph 2-45.	The MIDO has the option of conducting a MIDO audit at the applicant's facility.	Change to read" The MIDO will change the existing supplement by adding the newly-approved parts, after conducting a MIDO audit, if applicable."	Do not concur. The order does not constrain MIDO discretion. Also the applicants for this process have proven facilities with a history for making similar parts under PMA. The need for a specific audit to reassess an existing PMA holder's capabilities seems unlikely.
AIR-500	Global Change paragraph 6a, Page 2	Improper punctuation.		Add the letter "d" to the word "streamline".	Concur
AIR-500	Global Change, Header	Delete XXX. XX as the order number.		Replace with Order 8110.XX	Concur.

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AIR-500	Header Section, Page	Delete the term "effective" in the date place holder.	Non-compliance with Order 1320.1 E.	The only time you place time "effective date" at the top is if the effective date is different from the date you have a document signed.	Concur.
AIR-500	Missing Required Text			Need to include the following administrative paragraphs Deviation, Suggestions for Improvement, and Records Management.	Concur.
AIR-500	Page 5	Missing Directive Feedback Form.	Non-compliance to Order 1320.1 E	Need to include a Directive Feedback Form in document.	Concur. Added Feedback form.
AIR-500	Paragraph 10b, 1 st sentence, Page 4.	It is already understood that the orders beginning reference are owned by FAA.		Delete the acronym "FAA" at the beginning of the sentence.	Concur.

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AIR-500	Paragraph 10b, last sentence, Page 4.	Missing comma.		Place a comma after the term "designs".	Concur.
AIR-500	Paragraph 3, Page 1	Missing period		Place a period at the end of the sentence after the website address.	Concur.
AIR-500	Paragraph 5b, Page 2	Clarity.		Do you mean Non-Critical "Articles" Submitted by Experienced Applicants with a Qualifying Performance Record, dated March 19, 2010.	Concur
AIR-500	Paragraph 6a, 2 nd bullet, Page 2	Missing comma.		Place a comma after the term "directives".	Concur.

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AIR-500	Paragraph 6a, Page 2	Refrain from using bullets.	Bullets can be difficult to reference.	Use a number or letter.	Do not concur. The referenced bullets highlight specific applicant qualifications. Our directive on directives permits such.
AIR-500	Paragraph 6d, page 2	Improper punctuation.		Delete the word "Figure" and replace with the word "Table".	N/A. Deleted figure/table from order.
AIR-500	Paragraph 6d, Page 2	Improper capitalization		Remove the capitalization from the term "figure".	N/A. Figure deleted.
AIR-500	Paragraph 6f, Page 2	Improper punctuation.		Remove the letter "d" from the word satisfied and replace with "s".	Concur.

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AIR-500	Paragraph 7a, 2 nd sentence, Page 2	Missing comma.		Place a comma after the term "format".	N/A. Eliminated need for comma with deletion of "delegations".
AIR-500	Paragraph 7b, 4 th sentence, Page 3	Clarity		Do you mean "MIDO" or amends the appropriate supplement to add the new part?	Concur. Instructions moved to paragraph 6f as follows: i. If the PMA application satisfies our streamlined criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.

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AIR-500	Paragraph 8a(5), 2 nd sentence, Page 4.	Missing space.		Place an extra space before the term "resulting".	N/A. Deleted Figure 1 and associated text.
AIR-500	Paragraph 8a(5), 4 th sentence, Page 4	Missing complete reference to Order 8110.42.		Rewrite to read Order 8 110.42 Production Approval and Certificate Management.	Partially concur. Revised sentence as follows: <i>Orders 8110.42 Parts Manufacturer Approval Procedures and 8120.2 Production Approval and Certificate Management Procedures specify the process for these approvals.</i>
AIR-500	Paragraph 8a, 7 th sentence, Page 3.	Improper usage of period.		Remove period after the acronym "CPL".	N/A. Removed all referrals to CPL.

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AIR-500	Paragraph 8a, last sentence, Page 3.	Incorrect spacing.		Remove the extra space before the term "assess".	N/A. Edited paragraph and deleted word.
ANE-110/111	4b	The use of the term “Low-Risk” is a relative term with no baseline reference. Low-Risk is not tied to any of the classifications in Table 1 of 8110.XX	Risk involves both likelihood and severity. The “low risk” eligibility criteria in Order 8110.XX does not account for noncritical parts that have low failure rates, but failure can still indirectly result in one of the hazardous engine effects in §33.75. Order 8110.XX does not consider all the aspects of an original part that make it low risk and account for them in the eligibility criteria. Low failure rates might be due to a particular application of “like parts”, or unpublished OEM engineering, manufacturing or special inspections that might not be duplicated during the	Remove the concept of Low Risk from the streamlining eligibility criteria.	Concur. Replaced “low risk” with “that affect safety the least.”

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			reverse engineering process.		
ANE-110/111	5a	Parts eligible for streamlining should be consistent with Class A in Table 1 of 8110.XX, Category 3 parts per AC 33-8 and Class A per S4000.	The order refers to several documents, each with its own classification/categorization criteria. Eligibility criteria in 8110.XX for streamlining should be consistent among the documents.	Replace/Modify 5a: Parts eligible for streamlining must meet the criteria established for Class A in Table 1 of 8110.XX, Category 3 in AC 33-8 and Class A in S4000C.	Concur. However, placed the safety criteria for eligible parts in paragraph 6b as follows: b. Review the applicant's characterization of the part and the impact of its failure. The applicant's safety analysis must show the part is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller. Use safety standards appropriate to your product. If you concur with the applicant's analysis, accept the part into the streamline process. If the safety analysis is inadequate or the part's failure affects

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					safety, direct the applicant use the standard PMA process.
ANE-110/111	6	If not already addressed by the changes above, Deviations to Class A parts should be managed in a way that does not invalidate the criticality assessments.	Order 8110.42 Section 11 requires FAA engineering and manufacturing personnel to follow the procedures in 8110.42 order and Order 8120.2 to ensure a standard process is used.	Add 6i: Deviations to Class A parts must follow the procedures in 8110.42 order and Order 8120.2.	Do not concur. The streamline process approves designs of eligible parts for manufacture under existing PMA. These quality systems remain unchanged and follow applicable regulations. New applicants use the standard process in the referenced orders.
ANE-110/111	6	Order 8110.42C still applies with regard to data requirements, as well as applicant data retention requirements under part 21.143.	There is no requirement for the PMA applicant to generate and retain the compliance data so that it may be reviewed by the FAA.	Add 6j: The data requirements, as well as applicant data retention requirements under part 21.143 apply to the streamlined process.	Do not concur. Prospective users of the streamline process are existing PMA holders. They are already bound by design, quality control and data retention requirements.

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ANE-110/111	6a	There is little benefit to applicant's qualification requirements in 6a.	Applicants do not write service bulletins for engine parts. Applicants normally do not submit 21.3 reports because they are not enforced. There is no SDR information to make an applicant assessment.		<p>Do not concur. The ACOLT worked with MARPA to establish these applicant qualifications. However, added more definition to these qualifying elements.</p> <p>Review the applicant's statement of qualifications for the streamline process. The applicant must hold PMA with four years minimum experience making similar parts and having:</p> <ul style="list-style-type: none"> • No alert service bulletins, • No airworthiness directives and • No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and

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					Letters of Investigation (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 MIDO to search CMIS for non-compliances.
ANE-110/111	6d	The ACO or CMACO should be required to validate applicant's safety assessment and conclusions about classification and not rely on applicant's independent evaluation.	Improper classification of parts will result in streamlining of parts that do not meet the intent of 8110.XX. Applicant's do not have engine level knowledge to properly assess the criticality of engine parts. Criticality of "like" parts can vary with the application. CMACO's can offer valuable insight not available to	Replace/Modify 6d: As a minimum, ACO or CMACO will confirm applicant's safety assessment, service history and part categorization.	Do not concur. The principles of the streamline process entails allowing eligible parts have the rigor of their review relative their nature. This order specifies the ACO actions to approve parts that have the least effect on safety. Any reviewing ACO has sufficient expertise to ascertain a part's minimal

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			applicants to properly categorize parts.		impact on safety. If CMACO involvement is required, then the normal process applies. See paragraph 6b for ACO review of a part's safety.
ANE-110/111	6h	The project cycle time shown in Order 8110.XX is not needed.	The goal for a 30 day turnaround is already established for ACOs.		Do not concur. The ACOLT and MARPA agreed to this timeframe. The public perception is that the regular PMA process usually takes more than 30 days.
ANE-110/111	8a	There are no Category 3 parts in the CPL.	Category 1 parts in the CPL fall under Classification D in Figure 1 and are not eligible for streamlining. Category 2 parts in the CPL fall under Classification C in Figure 1 and are not eligible for streamlining.	8e) Parts in the CPL do not qualify for streamlining. We present the two categories (1 thru 2) of parts in a category parts list (CPL). (http://www.faa.gov/aircraft/air_cert/production_approvals/mfg_best_practice/media/Category_Parts_List.pdf).	Partially concur. The classification is in AC 43-18. Category 3 parts are those that are not category 1 or 2. We will evaluate against the criteria for a category 3 parts: their failures do not affect safe flight and landing. AIR-200 prefers we not use their list.

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ANE-110/111	8a(1)	Additional description is needed for what constitutes failure in Category A to capture airplane level safety considerations.	At the engine level, the consequence is based on the failure of a physical part. At the airplane level, it is more pertinent to consider failure of the PMA design, not just one part in a single engine.	Replace/Modify 8a(1): Classification A - The part's failure has little to no impact on continued safe flight and landing of the aircraft. For the purposes of this Order, the failure of a part includes failure of the PMA design to meet the certified capability of the original product. <i>[removed CPL because there are no Category 3 parts in the updated CPL.]</i>	Partially concur. The revised order only addresses parts that have the least impact on safety. The part classes and their defining criteria are deleted. The order uses the same criteria for category 3 parts from AC 43-18.
ANE-110/111	8a, 8b	Only Category A parts in Table 1 should be eligible for streamlining. There is little distinction between class B and class C parts.	The only difference between B and C is probability. If Class C parts are not eligible, then Class B should not be eligible either because failure of Class B parts can result in the same safety threat identified in C. Failure of Class B parts can also result in 14 CFR 21.3 reportable events.	<i>(see next suggested change)</i>	Concur. Deleted Figure 1 and associated classes of parts. Will evaluate against the criteria for parts that have the least effect on safe flight and landing.

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ANE-110/111	8b	FAA orders should not incorporate non-FAA documents created by and for applicants. Also, we are not aware MARPA has version control procedures that are acceptable to the FAA.	The Order, as written in section 6.b, references MARPA Guide S4000C to prescribe the role of designees, the nature of parts and the content of the compliance data, which is already covered by FAA regulations, policy and guidance.	Replace/Modify 8b: If there are conflicts between the MARPA guide S4000C and any other FAA orders, regulations, policy or guidance, the FAA documentation takes precedence.	Concur. However, placed the order precedence in paragraph 5c. as follows: c. If any conflicts arise between this order and the industry guide, this order takes precedence. We make a finding of compliance by accepting the showings from qualified applicants in the manner set forth in the MOU with its reliance on the MARPA industry guide.
ANE-110/111	8b	If not already addressed by the changes above, projects considered Significant per Order 8110.4C, Appendix 1 Paragraph 1b, Figure 3 should not be eligible for streamlining.	The Certification Project Notification form has unique criteria to determine if a project is significant. The significance of the project determines the level of coordination required within the FAA.	Add: 8d) Projects considered Significant in Certification Project Notifications are not eligible for streamlining.	Do not concur. We restrict this process to parts that have the least impact on safety. Their very nature prevents them from becoming a major change or a significant project.

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ANE-110/111	8b	If not already addressed by the changes above, Order 8110.XX should exclude engine parts that are managed with TLD (time limited dispatch).	Some engine parts (or their output) are managed with Time Limited Dispatch (TLD) allowances. This allowance is based on safety assessments, extensive fleet data and experience specific to the application. TLD is carefully monitored by the FAA and engine manufacturers over the life of the product.	Add: 8c) Parts managed by time limited dispatch are not eligible for streamlining.	Do not concur. The revised order applies to parts that have the least impact on safety. These parts by their nature probably do not require management with TDL. Also we do not address TDL allowances in Order 8110.42C. Specific guidance for TDL parts lies with the responsible directorate.
ANE-140	1: 1	New Classification system is to be established.	The creation of a new classification system is not stated in the purpose.	Include a statement of the new classification system in the purpose.	Do not concur. The process relies on an existing class of parts from AC 43-18. Deleted Figure 1 as beyond the scope of this order.
ANE-140	1: 4.b	What are “rudimentary low risk” parts?	The word “rudimentary” does not seem appropriate. The third definition of Webster would call it “very imperfectly developed” which doesn’t give the right impression.	Replace the words “rudimentary low risk” with “certain”.	Concur. Revised the sentence as follows: While organization designation authorizations (ODA) reduce some demand on ACO resources, many manufacturers of certain parts lack the staff to qualify for this designation.

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ANE-140	1: 4a	Using safety risk as a factor in approval of aviation parts.	Is this consistent with type certification of products and their parts.		Partially concur. We use safety risk by limiting this process to parts that have the least impact on safety from manufacturers who have the best experience making them.
ANE-140	2: 5.b	Marpa document S4000C is dated Mar 19, 2010	S4000C on Marpa web site is dated June 2, 2010	FAA needs to control content of S4000C or define the requirements in the order.	Partially concur. Reconciled versions of the industry guide. MARPA will allow access to this guide in a more prominent location on their website. The guide follows the requirements of Order 8110.42C.
ANE-140	2: 6.a	What does the requirement of “no service bulletins” do?	S4000C states that the ”FAA should have listed zero Alert Service Bulletins” The FAA doesn’t issue service bulletins.	This need clarification as to the purpose of having no (alert) service bulletins.	Concur. Changed bullet to: No alert service bulletins,
ANE-140	2: 6.d	What is low risk?	No definition is provided for low risk.	Additional clarification required.	Partially concur. However, removed the risk classification from this order. Replaced it with: the part is non-critical and its failure has no effect on continued safe operation of the aircraft,

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					engine or propeller.
ANE-140	3: 8.a(3)	Classification C is stated as being the current definition of Category 2 parts in the CPL.	The CPL uses the word “may” as in ‘Resulting consequences <u>may</u> reduce the’ whereas the Order uses the word “would”	Replace the word “would with ‘may”.	N/A. Deleted Figure 1 and associated classifications.
ANE-140	3; 8.a	The Order introduces part Classification.	The description of the classes B, C, D conflict with categories in existing Order 8120-2, 8110-42 and guidance AC 33-8, 33-9.	Resolve these differences.	Concur. Deleted classifications as beyond the scope of this order.
ANE-140	4: 9.b	What is the purpose of the last sentence, especially with regard to “enough detail”.	Order 8110-42 identifies the data that the applicant is required to furnish to the ACO/ECO in a draft supplement. The ACO/ECO confirms that data.	Remove the sentence.	Concur.

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ANE-140	General	The commenter is not aware of any acceptable justification, technical or otherwise, for allowing PMA applicants to bypass requirements that the OEM must meet in order to do business.	The Type Certification process is the means by which we ensure a minimum level of safety for the flying public, however, PMA applicants are not required to meet the same requirements with the same level of certainty or fidelity in substantiating data.	Have the same data requirements established by original certification standards apply to both PMA and OEM applicants.	Concur. The principles of PMA remain intact. The designs of parts still must meet the airworthiness requirements of their eligible products. However, the nature of the group of parts eligible for the streamline process need less rigor in our review of their showings of compliance.
ANE-140	General	The ability for PMA applicants to identify low-risk or non-critical parts for streamlining is disputable.	The comment is base on my experience reviewing erroneous and incorrect safety assessments submitted by PMA applicants as well as disagreements about OEM safety assessments used to categorize major and minor design changes.	Fully develop and implement a PMA process before attempting to add streamlining allowances.	Do not concur. We restrict this process to qualified applicants and a group of parts that have the least impact on safety. Each ACO is familiar with their respective applicants and their capabilities. Also the ACO still reviews the assessments of their candidate parts.
ANE-140	General	The streamlining criteria requiring no service bulletins and no airworthiness directives for eligibility is not valid.	There is no system in place to reliably determine or evaluate whether or not PMA parts are responsible for field service problems.	Require PMA applicants and operators to monitor the performance of their products and enforce reporting requirements.	Concur. COS is an inherent responsibility of all PMA holders. MARPA promotes COS principles to their membership and sponsors a workshop.

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ANE-150	Page 2, Section 6(a)	Within the MARPA document, there should be no discussion of FAA issuing Alert Service Bulletins (ASB).	The product manufacturer is the one issuing ASBs, not the FAA. If there is an ASB, then FAA might issue a corresponding AD, but that is already covered in the next section.	Clarify that section in the MARPA document or in this Order. Also clarify what is the expectation of the Service Bulletin review in this Order.	<p>Concur. Revised paragraph 6(a) as follows:</p> <p>a. Review the applicant's statement of qualifications for the streamline process. The applicant must hold PMA with four years minimum experience making similar parts and having:</p> <ul style="list-style-type: none"> • No alert service bulletins, • No airworthiness directives and • No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the

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					<p>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 MIDO to search CMIS for non-compliances.</p>
ANE-150	Page 2, Section 6(h)	The goal for approval should be 30 days from receipt of <u>complete</u> data package.	This matches the AIR metrics requirements for 30 days after receipt of a complete data package.	Revise wording to include the word "complete."	<p>Concur. Revised paragraph as follows:</p> <p>The goal for approval by an ACO is 30 days from receipt of a data package that follows the content and format of the</p>

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					industry guide.
ANE-150	Page 3, Section 8(a)	There is no need to have part classification A-E, the figure or section 8(a)(1-5).	PMA Order 8110.42C already indicates that the applicant perform a safety assessment that will be evaluated using AC 2x.1309 or its equivalence. The classification that a Class C would be outside the scope of this Order matches the definition of a major failure condition in the referenced ACs.	This Order should just indicate that if the required safety assessment results in any condition leading to a major or higher failure condition, then it would not fall into this streamlined process.	Concur. Deleted the classification table and associated part classes as confusing.
ANE-150	Page 4, Section 9(b)	Email notification to MIDO is not allowed regardless of streamlined process.	This Order does not override 8110.42C requirements and thus PMA supplement approval needs to follow those steps outlined in 8110.42C, which does not allow email notification to MIDO. This Order would streamline data package review for those eligible, but does not supersede	Delete 9(b).	Partially concur. Aligned record of design approval with Order 8110.42C. Moved the requirement to paragraph 6f as follows: If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a daft

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			any other PMA activity actions as defined in 8110.42C.		supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.
ANM-120S	Page 1, paragraph 4	Statement that the current order 8110.42 does not take into account the relative safety risk of the part.	To evaluation if the part is critical, the relative safety risk of the part should be considered. However the current order could be expanded.	Clarify the statement in the proposed order 8110.xx, and expand the definition for criticality to expand on the relative safety risk in order 8110.42.	Partially concur. Revised paragraph 4a as follows: The processes in FAA Order 8110.42, <i>Parts Manufacturer Approval Procedures</i> , to issue PMA require approval of each replacement part's design by an aircraft certification office (ACO) regardless of its nature. A proposed part whose failure has no impact on safety competes for limited resources at each ACO. Under the test-and-

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					computation method, an application for each new replacement part requires submittal of data, followed by aircraft certification office (ACO) review for compliance with appropriate airworthiness standards.
ANM-120S	Page 2, paragraph 5b	Title of MARPA document is misquoted.	While it's a minor difference and probably no one will be lead to the wrong report, having the error is a disservice to MARPA.	Change title with "Non-Critical Articles"	Concur. The title changed during its last revision.
ANM-120S	Page 2, paragraph 5b	Date of MARPA document does not match the date of the document provided on their website.	If MARPA is trusted not to revise without FAA approval, revision date should not be called out. If they are likely to revise without FAA approval, the date should be called out so we know which rev level to be most accurate (most recent is no longer relevant).	Revision date of referenced MARPA document should either be deleted or should match the approved/ accepted/ concurred revision of the document.	Concur. The Order will reference the published date of the industry guide.

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ANM-120S	Page 2, Paragraph 6a	Third bullet says the company must have at least one audit where no findings were reported.	Is this the real intent of the sentence? Only one successful audit in four years? Does this include minor findings? Or only safety-related findings?	Please clarify requirement, and consider changing “at least one” to “any”	Concur. Revised first sentence of the bullet as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years.
ANM-120S	Page 2, Paragraph 6b	MARPA does not use our same classification system for whether parts are low-enough risk to use this process.	We use “Classification A or B”. They use “Category 2 or 3”. If these had the same definition, that’d be fine, but they don’t.	Please continue to work with MARPA to consolidate definitions (their document should match ours).	Concur. Deleted table.
ANM-120S	Page 2, Paragraph 6h	Is the 30 day approval just for the ACO or both ACO and MIDO?	Since we’re working on this order with industry input, we should look at what they think it means, and provide guidance. Their report clearly indicates that 30 days is from submittal to MIDO approval.	Again, please work more closely with MARPA to make the documents match. Otherwise, clarify here that it’s 30 days for just ACO. Please also add “complete” before “data package”	Concur. Revised paragraph as follows: The goal for approval by an ACO is 30 days from receipt of a data package that follows the content and format of the industry guide.

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ANM-120S	Page 2, Paragraph 5a	The applicants safety assessment does not include service history to the safety risk assessment, and this is a key item.	As part of the requirements for a PMA under 8110.42, the service history must be also looked at. The applicant should include this as part of the data package.	Add to the last sentence “, and 3) evaluates the service history of the part including any know service issues, service bulletins/letters/notices, and Airworthiness Directives (AD).”	Concur. Added the following to the end of the sentence: and 3) evaluates the service history of the original part including any known service issues, service bulletins/letters/notices, and Airworthiness Directives (AD).
ANM-120S	Page 2, paragraph 5b	Document implies that membership with MARPA is required.	This document should be for everyone, both MARPA members and non-members. Addition of a clarifying statement in this section will reduce future misunderstandings.	Add a statement such as “Membership in MARPA is NOT required to use this process as long as the guidelines and intent are followed.”	Concur. Added the following to the end of paragraph 5b: MARPA membership is not a requirement to use this guide or process.
ANM-120S	Page 3, Paragraph 7a	“The MoU between us and the qualified applicants documents ...” is awkward and cumbersome.	Redefining who the MoU is between is unnecessary and makes the sentence flow awkwardly.	Delete “between us and the qualified applicants” Consider combining the remaining sentences or using “it” instead of repeating “The MoU”	Concur. Revised paragraph 8a as follows: A MoU with qualified applicants documents the streamline process. It stipulates the content, format and delegations in the

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					MARPA guide to streamlined PMA.
ANM-120S	Page 3, Paragraph 7b	MARPA does not advise users to “evaluate the consequence of part failure on the next higher assembly”.	It only categorizes parts by what would happen if the part fails. Nothing is mentioned about the next assembly.	Again, please work more closely with MARPA to make the documents match. Either their document needs to have them assess the next higher assembly, or we can’t say it’s expected they do that.	<p>Concur. Revised text to align with the MARPA industry guide. However, we will initially limit this process to category three parts or articles. Revised paragraph 7b as follows:</p> <p style="padding-left: 40px;">b. The MARPA guide prescribes using a PartSCP to set the format and contents of the part’s design data. This PartSCP is a tailored application of the project certification plan used in type certification programs. Users of the streamline process will assess their articles using the criteria for category 3 articles as referenced in the</p>

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					<p>MARPA S4000C guide. Failures of these articles have no effect on the continued safe flight and landing of the aircraft. An applicant submits the specified data for these articles as detailed in the industry guide and MoU with their Project Aircraft Certification Office (PACO). The PACO accepts the package and does a discretionary spot check. Then the ACO forwards the supplement information for the new part to the responsible MIDO for appropriate action. The manufacturer then performs routine first article inspection of this newly-approved part to confirm it conforms to the approved design</p>

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ANM-120S	Page 3, Paragraph 7b	ACOs do not amend supplements. MIDO does that.	ACOs only do design approval and do not issue or amend the supplement.	Change second-to-last sentence to end with “discretionary spot check and sends the new supplement to MIDO for approval.”	Concur. Revised as follows: Then the ACO forwards the supplement information for the new part to the responsible MIDO for appropriate action.
ANM-120S	Page 3, Paragraph 8a	MARPA never uses the definition of “little or no impact on the safety of the aircraft, engine, or propeller.”	We need these documents to match. Please actually coordinate with MARPA so that we’re sending out one consistent message to the public and to our engineers. Disparities will only lead to confusion.	Either change the order’s wording to match MARPA’s or change MARPA’s wording to match ours.	Concur. Deleted “little or no” from the entire order.

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ANM-120S	Page 3, Paragraph 8a	MARPA's document applies to much more than just Class A and B parts.	By comparing our definitions with theirs, we say Class A and B can use this process. They say Class A, B, C, and D can use this process.	Please make the documents agree.	Concur. Removed The part classes and used the common criteria of category 3.
ANM-120S	Page 3, Figure 1	Maybe we can give this chart to MARPA, along with the five following definitions, and ask them to use it.	If we do that, we'll all agree the definitions of the categories. We'll all use the process the same. It's clear-cut when to use the process, when to use a DER, etc.	No change needed. MARPA should use this table.	Do not concur. We will limit this process to category 3 articles. The extra classifications introduce unintended implications that went beyond the scope of this order. Deleted Figure 1.
ANM-120S	Page 4, Paragraph 10a	Reference to 21.303 will soon be outdated.	Should we consider waiting to release this order until April 2011 so that the proper reference can be in there? It'd be a shame to release it, and only a handful of months later, have it be wrong.	Option 1) Hold release till April 2011 and use updated reference. Option 2) Include both references with a "before April 2011" and a "after April 2011" Option 3) Leave it and plan a minor revision after April 2011.	Partially concur. Changed reference to 14CFR 21 Subpart K.

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ANM-120S	Page 4, Paragraph 8b	Encourage more use of DERs by the applicants.	The applicant use of DERs is always encouraged for any project.	Add a statement that the use of DERs in the process is always encouraged.	Concur. Revised paragraph 8b as follows: This class of non-critical parts does not usually need Designated Engineering Representatives (DER) to make findings of compliance. However, designees may advise applicants on certification requirements. They add value and quality to any PMA package. ACOs and applicants should consider the complexity of design and manufacture, scope of testing to demonstrate compliance, and service experiences of

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					like parts to determine the level of designee involvement.
ANM-130L N. Phan-Tran	<u>Note:</u> <u>Comments to draft MARPA S4000C (rev. 6/2/10)</u>	1. Sect V par. Compliance and Conformity states that “For parts eligible for S4000C treatment, first article inspection is considered to be beyond the regulatory requirements <u>because the FAA generally would not issue a request for conformity (RFC) for articles of the sort addressed under S4000C, due to the non-critical nature of the articles involved and the recognized history of the applicant’s certification and production</u>	1. This statement from MARPA appears misleading applicants and conflicting with FAA current certification guidelines. FAA Order 8110.42, ch 2, par 5b for Inspection and Test Procedures states “ An applicant proposes sufficient inspection and test procedures to affirm the airworthiness of the part design during its manufacture. The complexity and nature of the part sets the scope of these inspections and tests.” 2. MARPA statement conflicts with FAA draft AC21-data, chapter 4, par. 6 states: “A DER		<ol style="list-style-type: none"> 1. N/A. Forwarded to MARPA for action. 2. N/A. The latest version of the draft AC does not contain the noted limitation.

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		processes.” 2. Sect V Streamlined “ Because articles eligible for this program are non- critical, there may be a few, if any, additional tests other than the first article inspection	or an ODA cannot approve descriptive data by inspection only”		
ANM-130L N. Phan-Tran	Pg 3, par. 8(2) “Classification B-The part’s failure would not prevent continued safe flight and landing. Resulting consequences could reduce the capability of the aircraft...” Par. 8(3) “Classification C- The part’s	Class B is determined lower risk than Class C part. But class b consequences of part failure are considered higher than class C (could vs would). Review classifications and failure consequences			N/A Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.

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	failure would not prevent continued safe flight and landing. Resulting consequences <u>would</u> reduce the capability of the aircraft..."				
ANM-130L N. Phan-Tran	Pg 2, par 6 a. "No service bulletin"	Inconsistent with referenced Draft MARPA doc S4000C dated June 2, 2010 which states "No Alert Service bulletin"	The requirement must be consistent if the FAA recognizes MARPA document as a standard guide line for this streamlined PMA process		Concur. Revised bullet as recommended.
ANM-130L N. Phan-Tran	Pg 3, par 7(b) "The MARPA guide advocates using PartSCP to set the format and contents of the part's design data"	MARPA draft document S4000C rev. June 2, 2010 does not provide format or content of PartSCP. FAA should review MARPA document S4000C for acceptance and Order 8100.42 and Draft AC 21 for consistency.	S4000C only describes key differences between PSCP in FAA Order 8110.42 and PartSCP. Does it mean the streamlined PMA applicants require following Order 8110.42 and drafting AC 21-data for data submittal?		Do not concur. Section IX of S4000C is the PartSCP outline that details its scope and contents.

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ANM-140L J King	Para. 6. f. Para. 7. b. Para. 9. b.	This order states in all 3 of these paragraphs that new parts are either added to the holders PMA supplement, or the supplement is amended, or the existing supplement is changed to add parts.	Each time an applicant submits a new part/or parts application, after the PACO reviews and grants Engineering approval, a NEW SUPPLEMENT is approved by the PACO and the MIDO.	Some high volume PMA holders have over 50 supplements that are numbered in sequence	Concur. Consolidated the PACO instructions on the supplement in paragraph 6f as follows: 6f. If PMA application satisfied our streamline criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.

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ANM-140L SK	MARPA S4000C Draft Document Starting with Page 8	Using a 4 year standard for Experience, no ACSEP findings, Zero ADs is very Arbitrary. Also, the FAA does not issue ASBs, the PMA holder does.	This 4 year or less standard is overly simplified. This Draft MARPA document needs to be reviewed and FAA approved, if it is to be accepted by the FAA for a streamlined PMA process	Either the MARPA document needs to be reviewed and Approved by the FAA, or the contents should be included in this Order.	Partially concur. The prerequisites for using the streamline process are in the proposed order. The ACOLT and MARPA agreed on these applicant qualifications. We will reconcile difference in the two documents through the public comment process.
ANM-140L ID	Para 5. (b)	The MARPA document is no that easy to find in their website, the document is still in draft form and the date for the document is wrong.			Concur. Will advise MARPA to make it more prominent.
ANM-140L ID	Para 5. (b)	Who approves this MARPA document and any revision to it?			MARPA publishes and maintains their industry guide.
ANM-140L ID	Para 5.(a)	What are the criteria for the safety assessment?			The safety assessment focuses on showing that failure of a part does not affect safe flight and landing. It is usually qualitative in nature, but some may perform quantitative

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					analysis at their discretion. We review this assessment as a requirement for the streamline process.
ANM-140L PGC/SK	Para 5.b.	The order refers to a non-FAA controlled document.	MARPA document S4000C could be substantially revised or withdrawn without FAA knowledge.	List the salient features of S4000C within the order independently of any formal reference to the MARPA document.	Do not concur. This is an initiative from our ACOLT. An AC is always a later alternative.
ANM-140L ID	Para 6. (e)	No real link of data package requirements outlined in Order 8110.42	There needs to be a link to the data package criteria in Order 8110.42.		Concur. Revised paragraph 6e as follows: Check the data package for completeness and adherence to the MARPA guide.
ANM-140L ID	Para 8 (2) and (4)	The use of “could” makes these criteria very subjective.			N/A. Removed the criteria as the result of another comment. The table introduced confusion and went beyond the scope of this order.

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ANM-140L ID	Para 8 (a)	The whole paragraph is confusing. Also there is no category (3) in the CPL.			Concur. Deleted reference to CPL. Category 3 comes from AC 43-18. The MARPA guide uses this category.
ANM-140L DA	Para 9.(b)	The Order proposes that the PACO emails the approved supplement but currently the supplement is signed by the Branch Manager before it is sent to the MIDO.	It is unclear what will be emailed: the unsigned copy of the Supplement, a .pdf copy of the signed Supplement. Please clarify.		Concur. Revised the second sentence to read as follows: We record these approvals by e-mailing the signed PACO approved supplement in Portable Document Format (PDF) to the cognizant MIDO.
ANM-140L RP	Para. 5a	Applicant's Safety Assessment	Agree that the applicant's safety assessment is key. My experience is that the ACO is always leading the applicant along on safety assessments.	Suggest considering adding criteria so that the applicant's ability to perform accurate safety assessments becomes a criteria to use the streamlined process?	Do not concur. The safety assessment focuses on showing that failure of a part does not affect safe flight and landing. It is usually qualitative in nature, but some may perform quantitative analysis at their discretion.

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ANM-140L RP	Para. 6b.	Bring MARPA MOU and Part Specific Certification Plan into streamlined order.	The Order should not rely on a non FAA document that is subject to change without FAA concurrence.	Same as comment.	Do not concur. ACOLT and industry advocated this approach. This is a cooperative effort for approval of parts that do not impact safety.
ANM-140L RP	Para. 6g.	Reliance on Applicant's First Article Inspection system.	Applicant's first article inspection system may not have any legal standing as a conformity record.	Suggest MIDO comment on this aspect.	Do not concur. Conformity is at the discretion of the MIDO or ACO. The first article inspection report is evidence that the part conforms to the approved design.
ANM-140L PGC	Para. 8.a.	Figure 1. Part Criticality Table is confusing.	Part Classification lettering and numbering I think unnecessarily complexes the way parts are classified.	Use existing criteria in Order 8120-2F App D.	Partially Concur. Deleted table as it was beyond the scope of this order.
ANM-140L RP	All	21.311 Requires that the FAA make a finding of compliance for a PMA part.	It is not clear if the compliance finding can be made by delegation as proposed	Define in the Order if applicant is making finding of compliance.	Concur. Added the following to the end of paragraph 1c: We make a finding of compliance by accepting the showings from qualified applicants in the manner set

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					forth in the MOU with its reliance on the MARPA industry guide.
ANM-140L RP	Para 8 figure 1	Category B & C parts	Does this Order preserve the requirement for the PMA part to have equivalent performance to the OEM part? Although failure of a category B or C part may allow continued flight failure can be a link in an accident chain.		N/A - Deleted Figure 1 as it went beyond the scope of this order.
ANM-140L RP	Para 8a.	Remove web address.	Web addresses can change over time	Provide permanent guidance in Order	Do not concur. Web addresses do change, but they are the standard of the future and we reference them in RGL. Also we review and update the web address for the FAA sites.
ANM-150L M. Kuck	All	This document appears to be more liberal than the ODA order which has the bounds of a procedures manual and an administrator.	Need to note that the MOU does not negate Order 8110.42 requirements. Test and computation does mean test and computation whereas S40000C states they only need to do a		Do not concur. See paragraph 1 of the order. Also S4000C includes a PartSCP that lists the certification basis of the part.

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			first article inspection (part V) which is not in line with 8110.42		
ANM-150L M. Kuck	All	Put this in Order 8110.42 in lieu of creating new Order	This Order appears to conflict with 8110.42 on requirements	Add to Order 8110.42	Do not concur. A future revision may consider combining the two orders, but this initiative stands alone as an expedited process with reliance on an industry guide.
ANM-150L M. Kuck	All	This Order appears to not follow or reference the requirements of Order 8110.42	Put in Order 8110.42 or point to Order 8110.42 to ensure all requirements are met		Do not concur. S4000C has the details of showing compliance to applicable airworthiness requirements that follow the tenets of Order 8110.42.
ANM-150L M. Kuck	Page 2, Para 5. b	Reference to S4000C with no revision?	This S4000C is only in draft form and not released, there is nothing that holds this to a specific level that we have reviewed. All TSO's point to a revision level – we don't go with draft documents because they could change	Put a revision level here and have us review final S4000C	Concur. Will introduce revision levels when both this order and the S4000C are published.

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ANM-150L M. Kuck	Page 2, Para 6	No reference in here to FAA ACO reviewing documentation only send to MIDO	This could be misinterpreted that the applicant sends the data package to MIDO for approval versus the ACO		Do not concur. The order is for the ACO to implement the process via MoU. Applicant guidance is in S4000C.
ANM-150L M. Kuck	Page 2, Para 6. d	Confirm part is Class A or B	We reference Class A & B of parts, however S40000C references CPL 1 & 2 which are not the same, these documents do not align and can be misinterpreted		Concur. Deleted table as it introduced confusion and exceeded the scope of this order.
ANM-150L M. Kuck	S40000C	Many concerns start with this document not being released yet.	Document not released. Wrong cross references noted. Does not follow 8110.42 requirements. Article includes material & processes which are not PMA'd. This document states we are giving out "allowances" which do not follow 8110.42. States we don't have to test only do first article inspection.	I suggest we get a released document and review it. This document does not follow the requirements of 8110.42 and provides "allowances" which implies they do not follow the order.	Concur. Both this order and S4000C will undergo public review. This review will point out and reconcile any remaining inconsistencies.

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ANM-150S	Page 2, paragraph 6. a.	Third bullet need to be changed.	It could be clean in the first audit and horrible in the next more recent audit.	Change it to no finding in the last 4 years	Partially concur. Change last bullet as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years.
ANM-150S	Page 2, paragraph 6l b.	Add that an MOU will only be added if the ACO feels there will be add benefit	MOU are not easy and take a lot of time.	See comment	Do not concur. The MOU is one of the governing documents for this process. Some ACOs use the MOU routinely.
ANM-150S	Page 2, Paragraph 7a	Consider changing delegation word	The PMA applicant isn't actually being delegated.	Try showing	Concur. Revised the sentence as follows: The MoU accepts the content and format of the MARPA guide to show the needed compliances to airworthiness requirements.

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ANM-150S	Page 3, Paragraph 8a	It would be nice if all the times the FAA used Criticality they matched	Consistence is nice	SUP order definition	Partially concur. Deleted references to critical as those type of parts are beyond the scope of this order.
ANM-150S	Page 3, Paragraph 8A	What about systems that are not flight system but are important, like escape slides	Standard criticality assessment misses cabin systems.	More detail	Do not concur. This process applies to parts that pose no impact on safety.
ASW-180	Page 2, Para 6a	Draft says no "findings". The common term is "noncompliances."	The term "findings" has not been used when documenting noncompliances for several years.	Change "findings" to noncompliances	Concur. Revised sentence as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years.
ASW-180	Page 3, Para7b	The MARPA guide advocates using a Part SCP to set format and contents....	There is no definition of a Part SCP. What does the acronym stand for?	Include the definition of PartSCP.	Concur. Revised paragraph 7 as follows: 7. The MoU and Part Specific Certification Plan (PartSCP).

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ASW-180, FTW-MIDO	Page 1-2 Paragraph 5.a, Paragraph 6.f. (Also - Page 2- 4, Para 7.a, Para 8.a, Para 9a/9b)	Proposed Draft states "We teamed" Proposed Draft states "our streamlined process"	The paragraph does not identify who "we" is. This is all through the document. Using terms like "our", " us ," and "we" is not standard in other orders.	The order does not identify who "we" is. Replace " ours ", " us " and " we " with the "FAA" - Or - Insert the (ACO, PACO, MIDO, etc.) to assign proper responsibility.	Partially concur. The use of pronouns in our directives is a recognized part of our plain language initiative. However, the order will identify the organization associated with their first use. Revised the beginning of paragraph 2 as follows: We, the FAA, teamed ...
ASW-MIO	Page 2, Para 5b	The qualifications of applicants who can use this process are located in MARPA Document S4000C.	The MARP A website does not list Document S4000C; therefore could not review the qualifications for applicants to use this process.	Provide a copy of the S4000C so the ASI's can review the qualifications.	Do not concur. Applicants show their qualifications to enter the streamline process. The order repeated these qualifications in paragraph 6. The link to the MARPA document was updated.
Azzi ACE-118A	Page 2 Para. 6	This section does not address the ACO's Need for the implementation of this process and the ACO's Ability to manage such implementation	It should be at the discretion of the ACO to determine whether or not such implementation would be beneficial in alleviating the workload. Having such agreements in place and maintaining them could also increase our	Include a requirement for the ACO to review its Need for such an implementation and its Ability to manage it.	Do not concur. The ACO has the discretion on when and where to use this process. The ACOLT wants this process to reduce the demands on their resources.

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			workload when the reduction in engineering review is not significant.		
Azzi ACE-118A	Page 2 Para. 6. b. & 7.a And Page 3, Para. 7.b	MARPA Guide could be one mean but not the only mean.	MARPA should not be the only guidance used to establish an MOU, other guidance materials, policies, industry standard or practices could be used at the discretion of the ACO	Add “other means” besides MARPA guidance	Do not concur. The proposed contingency is not needed for the eligible class of parts from holders of PMA. The alternative remains the standard PMA process.
Azzi ACE-118A	Page 2 Para. 7.a.	The MOU should not be referred to as a “delegation”	The MOU establishes an agreement for a working arrangements. A “delegation” is not being issued to a company or organization here.	In lieu of “ The MOU accepts the content, format and <u>delegations</u> in the MARPA guide...”. Use: “The MOU established and agreement between the FAA and the applicant on the means of streamlining the PMA process”.	Partially concur. Revised paragraph 7a as follows: a. The MoU between us and qualified applicants documents the streamlined process. The MoU accepts the content and format of the MARPA guide to show the needed compliances to airworthiness requirements.

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Buczynski, ANM-108	Page 4 Paragraph 10a	Paragraph 10 a states; Title 14 of the Code of Federal Regulations (14 CFR) § 21.303(a) through (k) sets the regulatory requirements for approval of replacement and modification parts in civil aviation.	With the release of the new 14 CFR part 21 this reference will not be current in a short period of time.	Remove the reference to 21.303 (a) through (k) and replace it with “ Subpart K ” Example: Title 14 of the Code of Federal Regulations (14 CFR) Subpart K sets the regulatory requirements for approval of parts in civil aviation.	Concur.
FTW MIDO		The statement "No findings from at least one surveillance audit during the last four years" RBRT Low Risk facilities receive a PI evaluation once every four years.	The statement is ambiguous and needs clarification. Does this mean that 3 out of 4 years had audit findings, but because 1 year had no findings it is okay? Over the last 4 years, a low risk facility will have received 1 audit If no	Revise statement to clarify. Two PI Evaluations in a row with no FAA documented non compliances in a 8 year audit cycle for a RBRT low Risk facility.	Partially concur. Revise the noted bullet as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (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

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			<p>noncompliances were noted against only those processes last audited, is it now assumed here that the entire quality system is compliant therefore the FAA is to base its decision to implement the streamline process is acceptable?</p> <p>One PI Eval with no noncompliances is too low of an average to use for this</p>		responsible MIDO to search CMIS for non-compliances.
FTW MIDO	Page 2, Para 6f	This paragraph implies that the ACO will advise the MIDO to add the associated part to the holders PMA supplement.	Statement is confusing and ambiguous and does not provide enough specific information for the process.	Revise the Order to define "WHO" will prepare the supplement and "HOW" the ACO will advise the MIDO. Explain the process in more detail for both the ACO and MIDO responsibilities.	<p>Concur. Revised paragraph 6f as follows:</p> <p>f. If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a draft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use</p>

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					this document to create new or change the existing supplements of the PMA holder.
FTW MIDO	Page 4, Para 9a	First sentence states, "The process explained in this order is not a new regulation."	It is common knowledge that Orders are not regulatory, and therefore, the statement is unnecessary.	Delete the first sentence in paragraph 9a.	Do not concur. Some have contended that the streamline process is a new regulation. The paragraph dispels that.
FTWMIDO	Page 1, Para 2	The "Audience" for this Order is for FAA personnel responsible for evaluating applications for PMA.	MIDO's also have personnel with responsibilities for evaluating PMA applications for which this Order fails to address or provide any guidance.	Revise Order to either exclude MIDO personnel or provide a definitive process for MIDOs to follow when evaluating PMA applications.	Concur. Applicants for this process are existing holders of PMA who manufacture similar parts. They have approved fabrication and inspections systems. MIDOs know their capabilities. Their responsibilities are unchanged. MIDOs will review the same elements associated with adding new parts to these FIS. Revised paragraph as follows:

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					This order is for Federal Aviation Administration (FAA) personnel at Aircraft Certification Offices (ACO) responsible for evaluating applications for PMA. Manufacturing Inspection District Office (MIDO) personnel will follow their existing processes in FAA Order 8120.2.
FTWMIDO	Page 2, Para 5.b	The Order states to use MARP A Doc. S4000C to determine applicant qualifications.	Who is responsible for validating the accuracy of the MARPA Doc? The field should review this document and comment on it. If MARPA revises the document will the FAA review	Accuracy of the MARPA Doc. should be validated by the FAA prior to using it as a basis for applicant qualifications. Submit the document for field review before issuing this new order. Any changes to the document should be submitted to the	Concur. We will reconcile the Order and the MARPA document through the public comment process. Concur. We referred the field to the MARPA document as during this iteration. Many commented on the document. These comments will go to MARPA for resolution. Concur. This is a cooperative effort with

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			and approve on the revision. Will the Field be notified of the approved changes?	field for review once it's approved by the FAA.	industry. If changes become uncontrollable, we will convert the document to an AC.
FTWMIDO	Page 2, Para 5c	This paragraph only addresses conflicts between the industry guide and the Order, but does not address the accuracy of the data contained within the industry guide.	I agree the Order should take precedence with conflicts, but the Order does not address conflicts between the industry guide and FAA project records or other data sources such as CMIS.	Revise Order to address conflicts between the industry guide and FAA data sources.	Concur. Added paragraph 6b as follows: b. Review the applicant's characterization of the part and the impact of its failure. The applicant's safety analysis must show the part is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller. Use safety standards appropriate to your product. If you concur with the applicant's analysis, accept the part into the streamline process. If the safety analysis is inadequate or the part's failure affects safety, direct the applicant use the standard PMA process.

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FTWMIDO	Page 2, Para 6a	This paragraph does not provide the responsible office for evaluating applicant's qualifications and whether ADs, SBs, or audit findings within the last for years are applicable,	Not only does the Order not state who is responsible, it does not define the process for making such determinations.	Revise Order to designate responsibilities and define the processes to be used for making determinations.	Concur. The ACO determines whether or not to use the streamline process. Applicants apply to their ACO to use this process. The ACO reviews applicant statements of qualifications and their assessments of eligible parts. Revised paragraph 6 to delineate steps and responsibilities.
FTWMIDO	Page 2, Para 6b & 6c	These paragraphs do not provide the office responsible for establishing a MoU nor do they explain "how" parts are confirmed as low risk for accepting subsequent data packages that abide by the MoU.	The Order does not provide enough definitive information regarding a process that explains specifically "HOW" parts are confirmed as low risk and the criteria used to accept subsequent data packages using a MoU.	Revise Order to provide the process details for confirming that parts are low risk and who has responsibility for establishing a MoU.	Concur. The responsible ACO reviews an applicant's qualifications and the characterization of a part. Revised paragraph 6b as follows: b. Review the applicant's characterization of the part and the impact of its failure. The applicant's safety analysis must show the part is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller. Use

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					safety standards appropriate to your product. If you concur with the applicant's analysis, accept the part into the streamline process. If the safety analysis is inadequate or the part's failure affects safety, direct the applicant use the standard PMA process.
FTWMIDO	Page 2, Para 6e	This paragraph states to review the rest of data package for completeness.	Not enough information is provided in the Order that specifies the criteria for a data package in order to determine if it is complete.	Revise Order to define what is required in the applicant's data package as well as a checklist that can be used to determine completeness.	Concur. Revised the paragraph as follows: e. Check the data package for completeness and adherence to the MARPA guide. Perform spot checks of its data and declarations at your discretion.
Garry D. Sills ASW-150	General Comment	To set a goal for PMA approval of 30 days misses the understanding that the applicant's package may be unacceptable and might need to be returned for correction. So, the ACO/MIDO may not be			Concur. Applicants for this process are well versed in PMA and quite familiar with Order 8110.42. Also the MARPA guide refers to our PMA order and sets data requirements for part approvals that align with 8110.42C.

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		<p>motivated to help the applicant. If this policy were accepted it will require the FAA to be expected to make corrections for the applicant. So the applicant might be motivated to send in a less than perfect submittal because they would know the FAA will correct it for them. This is not progress. The applicants should be expected to know what the 8110.42c requires and then provide it exactly as expected.</p>			
Garry D. Sills ASW-150	Page 3 Para. 7 .b.	<p>It states “the PACO accepts the package, does a discretionary spot check and amends the appropriate supplement to add the new part”. FAA Order 8110.42C</p>			<p>Partially concur. The proposed guidance is for applicants and more suited to the MARPA guide. However, revised paragraph 6b as follows:</p> <p>b. Review the applicant’s</p>

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		states that PMAs are only amended to correct typo errors and contact information. Adding a new part to a PMA requires a new supplement be created just listing the new part or parts. All supplements must conform to whatever the order requires as stated above.			characterization of the part and the impact of its failure. The applicant's safety analysis must show the part is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller. Use criteria appropriate to your product. If you concur with the applicant's analysis, accept the part into the streamline process.
Garry D. Sills ASW-150	Page 4 Para. 9	This information has already been stated earlier in the text of this order.	Eliminate duplication.	Delete para. 9	Partially concur. Eliminated duplicated material.

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Garry D. Sills ASW-150	Page 4 Para. 10. c.	What is the point of this statement? If this order exists why is this order being created? Organizations could just be delegated under Order 8100.15			Concur. However, added the intent of the suggested change to the end of paragraph 4b as follows: The streamline process allows these small manufactures to quickly add non-critical parts to their approvals. Manufacturers with ODA may not use this process as they already approve these parts under their existing authorizations.

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Gregg Behonick ANE-MIDO-46 16316948420	MARPA S4000C Draft Rev June 2, 2010	During the review of this requirement MARPA had moved the location of this document on the MARPA site and I had to go back to the originator John Milewski to find where the document was located.	I am afraid that this will happen in the future or that MARPA will change the	Define the procedure that is required for this process in this ORDER.	Do not concur. The challenges of managing websites are common in every organization including the FAA. If industry does not perform its duty to make S4000C easily available to all, we will convert the document to an advisory circular.
Gregg Behonick ANE-MIDO-46 16316948420	MARPA S4000C Draft Rev June 2, 2010 II. Introduction	Sixth para, forth bullet indicates that the applicant intends on obtaining an 8130-3 tag for each article.	Many of the facilities that are in this non-critical status supply parts domestically and DO NOT presently do not supply tags with their parts, nor do they have a designee to perform this task. This will create a burden on these facilities to perform this task.	What happens if they do not wish to supply these tags? Does that mean they can not participate in this program, or does the ACO have the ability to say "OK it is OK not to supply the 8130-3 tag with each article shipped? Is this then a mandate that the MIDO must enforce? This is not a regulatory requirement that the MIDO could enforce, so what happens if the applicant stops supplying these tags?	Concur. The expedited design approval and use of an existing production system suited for the eligible part does not change our policies for 8103-3 tags. Will forward comment to MARPA for their disposition.

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Gregg Behonick ANE-MIDO-46 16316948420	MARPA S4000C Draft Rev June 2, 2010 Page 8 ...0 ACSEP Findings During the Past Four Years Experience	The second paragraph talks to having zero ACSEP Findings of “safety non-compliance over the past four years.	I think if you look at the history of ACSEP you will find only a negligible percent of any noncompliance at these type facilities to be “safety non-compliances”. The mere nature of being a producer of non critical parts, really says that any non-conformance found during an ACSEP WILL NOT be a safety critical non conformance.	Re think this whole philosophy!	Concur. The revised order has more stringent criteria: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years. The public comment process will address and reconcile differences.
Gregg Behonick ANE-MIDO-46 16316948420	MARPA S4000C Draft Rev June 2, 2010 Page 8 ...4 Years Experience	The second paragraph indicates using 4 years experience as a benchmark.	I do not believe this is sufficient as an applicant may have only dealt with the FAA on one project in the four years and really does not have a handle on the regulation.	I recommend including a time frame AND a specific number of projects dealing with the FAA as more credence to entering into this program.	Do not concur. This process is only open to applicants with sufficient experience that demonstrates their capabilities to design and manufacture eligible parts. Their respective ACOs already have sufficient knowledge of their capabilities to condone use of the streamline process.

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Gregg Behonick ANE-MIDO-46 16316948420	Page 2 Para 5. b.	I do not believe it is in the best interest of referencing an industry document in our Orders. The outside organization can change these documents much faster than we can change our orders and the industry document may change drastically before the FAA even gets a chance to comment or act on these changes.	Industry has different needs than the FAA and if we leave the control of these documents to industry, we will lose control or our inherently governmental right. The MARPA document was revised even during this review process, and OUR review process had to change mid stream.	You may use the organizations thoughts and comments, but establish them in OUR document.	Do not concur. The MARPA document is applicant guidance material and not regulatory. It sets the framework and scope for showing compliance of parts that have the least impact on safety. Our ACOLT agreed to this approach. The order takes precedence over the industry guide.
Gregg Behonick ANE-MIDO-46 16316948420	Page 2 Para 6. a. Third bullet	The term "FINDING" is no longer a term utilized in AIR.	AIR now used "Systemic noncompliance" and "Isolated noncompliance"	Please correct the document to define which type of noncompliance that is desired.	Concur. Changed sentence as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years.

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Gregg Behonick ANE-MIDO-46 16316948420	Page 2 Para 6. a. Third bullet	There is a conflict with this bullet and the MARPA document which states “ACSEP Audit findings after the past four years.”	Many of the facilities that will be effected by this document no longer get ACSEP evaluations based on the chart in ORDER 8120.2 Section 2 Para 3-5 that will be rated in the LOW Risk Category.	Review and reorganize your thoughts.	Concur. We will reconcile the MARPA guide and the order through the public comment process.
Gregg Behonick ANE-MIDO-46 16316948420	Page 2 Para 6.d.	Why are we letting industry now add additional Classifications A-E	Our CPL is developed with 1,2,3. Let’s not confuse the system with additional classifications.	The FAAs system is confusing at best and very difficult to STANDARDIZE. Don’t include additional decision points in the process.	Concur. Deleted table as it introduced confusion and exceeded the scope of this order.
Gregg Behonick ANE-MIDO-46 16316948420	Page 2 Para 6.f.	The FAA does not have any process called out for in this paragraph. The MIDO office “does not just add” items to the supplement.	There must be a process defined on how to do this or “standardization” will just be thrown out the window.	No defined procedure. The QMS police would have afield day with this one.	Concur. Revised paragraph as follows: f. If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO

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					in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.
Gregg Behonick ANE-MIDO-46 16316948420	Page 3 Para 8. a.	Are we going to include or exclude engine parts form this requirement. We now have PMA holders of engine parts	Only a concern	Think this through.	Yes. This process will include parts from every product. However, we will limit this process to parts that have the least impact on safety. The ACO will decide what these parts are.
Gregg Behonick ANE-MIDO-46 16316948420	Page 4 Para 9 b.	The MIDO does not "CHANGE" and existing supplements by adding the newly-approved parts.	MIDO only agrees or disagrees with the supplement supplied by the applicant and approved by the ACO. The MIDO does not change documents. Additionally, the ACO typically signs the bottom left of the PMA supplement that comes through the ACO, so the MIDO has no means to "change" anything.	Define the procedure that is required for this process in this ORDER.	Concur. Changed paragraph 6f as follows: b. If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement

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					electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.
James Sutherland ANM-120S	Throughout	Page numbers are insufficient.	Orders should tell the reader how many pages are in the order in some way. Either with a table of contents that lets you know what the last page is, or just by saying "Page x of y"	Format page numbers in the footer to also tell you how many pages total.	Do not concur. There are less than five pages to this order. Also Order 1320.1E does not mandate such.
John Hill ANM-130S	Pg 3 Para 8, Figure 1 Part Criticality Table	The Part Classification uses "A" (no impact) through "E" (direct hazardous effects – critical) which can be confusing.	Definition is inconsistent with existing FAA guidance. Similar letter labeling (A-E) is used in other FAA guidance for failure categorization but "A" being Catastrophic and "E" no effect. (Reference ARP 4754, DO-178B, DO-254, etc).	Follow the failure category and probabilities identified in published FAA guidance. (IE: ARP4754, DO-254, DO-178B, AC 25.1309, etc). Determine the failure effect and assign the appropriate failure category per existing FAA guidance.	Partially concur. Figure 1 is unnecessary and went beyond the scope of this order. Deleted Figure 1.

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Khailaa Hosny ACE118-C	Pg 3, par 8.) a)	The 5-classes definition of part criticality doesn't exist today and is not technically feasible.	Different functions in the aircraft can use the same part, and have different impact on flight safety.	It is practically impossible for even the most brilliant engineer to accurately evaluate the impact without using the type-design proprietary data from the original OEM manufacturer.	Concur. Removed the classification table and restricted the streamline process to parts whose failure does not affect safe flight and landing.
Khailaa Hosny ACE-118C	Pg 3, par 8.) a)	The intent to limit PMA to non-critical parts in itself is understandable. But, how you do it is not technically feasible.	The current type-design certifications do not require the applicant to identify safety impact of each part on a product and if they do, they keep it to themselves. It is not realistic to expect an engineer can make his/her assessment without data, unless it is obvious and simple. Although the ACO engineer can request any data from the applicant and use it to make the assessment, it is not ethical to do so,	Consider Limiting applicability of a PMA to: 1. A part that is identical and manufactured under the same process of the OEM type-design approved part. (i. e. only the name in the nameplate is different, independent of PMA criticality) 2. Simple parts that are obvious to an experienced MIDO that they don't have any impact on product performance, weight, form, and function, 3. Specific parts List for special cases, to be collected from ACO	Partially concur. The order will apply to parts that do not affect safe flight and landing. The safety assessment form the PMA holder must show this to the satisfaction of the ACO.

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				engineers based on actual projects worked (the goal is to start a list of special parts that can be worked by MIDO without ACO involvement.).	
Khailaa Hosny ACE118-C	Pg 3, par 8.)a)	Can't use the CPL for criticality definitions; it has no scientific basis and technically not valid, especially when dealing with highly integrated parts on the aircraft, or the engine, or the propeller)	The note on the header of the CPL states : "Note: The Production and Airworthiness Division and the Manufacturing Inspection District Offices use the Category Parts List as one consideration to determine resource allocation. The CPL is a notional tool that has no scientific basis. It was developed for internal use only leading to the frequency of FAA surveillance of new products and parts manufacturing facilities. The CPL was not coordinated with the industry. The industry may or may not agree with the CPL content. The CPL posted on the internet is for information only	Applicant has to identify the impact of part failure for the specific installations.	Concur. The order does not use the CPL. The safety of the part is evaluated against the criteria that the failure of the part has no effect on safe flight and landing.

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			and if used for other purposes than what is stated above it is solely at the user's risk."		
Khailaa Hosny ACE-118C	Pg 4, par 9.)b)	ACO involvement with the MIDO is not clear.	How will the MIDO and the ACO will work together to achieve the 30 days response limit?	Find a solution to close the accountability gap between ACO and MIDO. (Consider limiting the 30 day limit to those PMAs issued by MIDO, without ACO involvement, as suggested above)	Concur. The relationship with the MIDO is unchanged. The 30 day goal is for finding the part's design meets applicable airworthiness standards. Upon finding such, the ACO send the appropriate documentation to the MIDO to add the part to the holders PMA. Addressed the ACO to MIDO relationship in paragraph 6f as follows: f. If the PMA application satisfies our streamlined criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this

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					supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.
MBradley, ACE-118C	(1)Classification A	Revise the definition of Classification A parts	In order to optimize the standardization of this process, and because this is a critical aspect of this order, the definition should be as clear and detailed as possible.	“(1)Classification A – Any failure mode or malfunction of the part The part’s failure has little to no impact on continued safe flight and landing of the aircraft. Resulting consequences <i>could not</i> reduce the capability of the aircraft or the ability of the crew to cope with adverse operating conditions or subsequent failure. This is the current intent of the definition of Category 3 parts in the CPL.”	N/A Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.

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MBradley, ACE-118C	(2)Classification B	Given the current wording, applying this definition to parts without additional guidance will be difficult.	This definition relies on a probability, as in the statement “Resulting consequences <i>could</i> reduce the capability...”, without defining that probability further.	Include more clear definition of the acceptable probability (and would it be in terms of relative frequency of occurrence or degree of belief?).	N/A Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.
MBradley, ACE-118C	(3) Classification C	At what probability would this definition be applied?	For example, if a Failure Mode and Effects Analysis (FMEA) showed that a remote condition could exist that “would reduce the capability”, will we still apply this definition, or could an applicant argue that the failure or malfunction is so remote that the resulting consequences <i>could</i> reduce the capability?	Clarify. Suggest including examples of the FMEAs, or other analyses, that result in proper classifications.	N/A Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.
MBradley, ACE-118C	(5) Classification E	It’s not clear if the “reduction in safety margins” is from the current/approved OEM levels OR if it can rely on the certification levels. , degrade performance, or cause loss of			N/A Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.

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		capability to conduct certain flight operations. Failures of these parts result in direct hazardous effects. This is the current definition of Category 1 parts in the CPL and “critical” in Order 8110.42			
MBradley, ACE-118C	10. Current Regulatory Material	This section is unnecessary.		Remove this section. Make these procedures part of 8110.42, the PMA Order.	Do not concur. The paragraph is the tie to regulations and polices concerning PMA.
MBradley, ACE-118C	10c	It’s not clear how this process applies to ODA’s.	The order mentions ODA but doesn’t say how, or if, this process can be or should be utilized in the ODA procedures manuals.	Clarify.	Concur. Added the following to the end of paragraph 4b: Manufacturers with ODA may not use this process as they already approve these parts under their existing authorization.

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MBradley, ACE-118C	11	Is this a notice or an order?	Para 11 says “Distribute this notice to the...”	Clarify or correct.	Concur. Corrected to order.
MBradley, ACE-118C	11	Does this kind of information usually get distributed to so many people/offices?	The current text says to distribute this to Flight Standards Services, directorate offices, regional Flight Standards divisions, Academy, Regulatory Support Division air carrier; general aviation, and FSDOs, international field offices, and international area offices.	Would this only be distributed to AIR offices?	Concur. Will narrow distribution following during public comment period.
MBradley, ACE-118C	4.a.	It should state that some of the PMA approvals we issue are for parts that have little impact on safety, not that the approvals themselves are useless when it comes to safety.	This statement sounds like PMA approvals are not necessary at all.	“These reviews compete for scarce resources at every ACO, with some parts having with little impact on safety.”	Partially concur. Revised paragraph as follows: a. The processes in FAA Order 8110.42, <i>Parts Manufacturer Approval Procedures</i> , to issue PMA require approval of each replacement part’s design by an aircraft certification office (ACO) regardless of its

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					nature. A proposed part whose failure has no impact on safety competes for limited resources at each ACO. Under the test-and-computation method, an application for each new replacement part requires submittal of data, followed by aircraft certification office (ACO) review for compliance with appropriate airworthiness standards.
MBradley, ACE-118C	4.b.	This paragraph seems inappropriate for an order, and it's not entirely accurate.	<p>This paragraph 4 sounds like justification for this process, something I didn't think Orders necessitated within the primary text.</p> <p>The second paragraph speaks only to ODA, what about DERs, etc? Not sure what the purpose of this is, however, if it needs to stay, then it should be more accurate. For example, it's not just that the companies</p>	<p>If this process is incorporated into the existing PMA order, this entire section (4. a-b) can be removed.</p> <p>IF this kind of text is wanted/needed, then suggest including a section on "Background" like other orders have.</p>	<p>Concur. Revised paragraph 4b as follows:</p> <p>b. While organization designation authorizations (ODA) reduce some demand on ACO resources, many manufacturers of certain parts lack the staff to qualify for this designation. The streamlined process allows these small manufactures to quickly add non-critical parts</p>

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			don't have the staff to qualify, but it's possible they don't have the experience, workload, organizational structures, etc. to qualify for an ODA.		to their approvals. Manufacturers with ODA may not use this process as they already approve these parts under their existing authorization.
MBradley, ACE-118C	5 a-c	<p>It's not clear who is "qualifying" the applicants that can use this process, or if anyone must officially qualify them. <i>(Although it becomes clear later, this paragraph is confusing as written)</i></p> <p>From the third sentence, it sounds like the FAA will unofficially qualify applicants: "This is followed by a shortened ACO review based on our successful experience with the manufacturer",</p> <p>However, in the next</p>	<p>It's not clear at this point in the order/process if applicants have to be qualified prior to applying for PMA using this process.</p> <p>It's not clear who is establishing several requirements for this process. It sounds like MARPA is performing a regulatory role for this process by controlling qualification requirements, defining data requirements, etc, and that seems unacceptable. Even if the FAA "approves" the referenced MARPA document, it should be controlled by the FAA if we reference it an FAA order as required criteria.</p>	<p>Clarify requirements and ensure roles and responsibilities of FAA and MARPA are appropriate.</p> <p>If the MARPA guide is not mandatory, and or the FAA will not "qualify" applicants, make that clear and remove the reference to the MARPA guide from the FAA order, OR reword 5.b to clarify that it's a suggested method (like an AC – a way, not the only way?)</p>	Partially concur. Revised paragraph 5 and expanded paragraph 6 to clarify responsibilities, applicant qualifications and use of the MARPA guide.

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		paragraph 5.b, it sounds like MARPA is setting the FAA requirements for applicant qualifications, the nature of the parts eligible, requirements for supporting data, and the roles of designees.			
MBradley, ACE-118C	5a	Don't see the relevance of the first sentence. "a. We teamed with a leading PMA industry group to expedite approval of low-risk, non-critical parts by PMA. "	This sounds like it belongs in "Background".	Remove this sentence entirely.	Do not concur. However, deleted reference to low risk from other comments.
MBradley, ACE-118C	5a			"The streamlined process entails our the ACO receiving accepting a uniform data package that relies on manufacturer statements and designee findings of compliance. "	Partially concur. Revised sentence as follows: The streamlined process entails our receiving a uniform data package that relies on manufacturer statements and designee findings of compliance.

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MBradley, ACE-118C	5b	I couldn't find the "Modification and Replacement Parts Association (MARPA) Document S4000C, Streamline Program for PMA Applications of Non-Critical Parts Submitted by Experienced Applicants with a Qualifying Performance Record, dated March 19, 2010, the MARPA webpage.	The order states MARPA makes this guide readily available to the public on its website at www.pmamarpa.com , however I couldn't find it to review it.	Make this document available for FAA review prior to issuing the order.	Concur. MARPA moved S4000C during the review process. Updated the link in the streamlined order accordingly.
MBradley, ACE-118C	6	This section sounds more like it belongs in a flow chart. It has portions of the process described later in the order.			Partially concur. The paragraph as revised details the sequence of the streamlined process.
MBradley, ACE-118C	6.	Change the title of this section.	Current title doesn't fully reflect content of subparagraphs.	Consider changing the title to "6. Qualifying the Applicant to Use Streamlined PMA Process."	Do not concur. Extensive revisions resulting from other comments detailed the steps in the streamlined process.

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MBradley, ACE-118C	6a	It's not clear WHO reviews the applicant's statement of qualifications.		Revise to state that the ACO is responsible to review/verify the applicant's statement of qualifications.	Do not concur. This order applies only to the ACO. The implied "you" in the imperative is the ACO.
MBradley, ACE-118C	6a, third bullet	List the types of "surveillance" audits applicable.		Clarify that the "surveillance audits" referred to here are "ACSEP", "PI audits", etc.	Concur. Revised as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (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 MIDO to search CMIS for non-compliances.

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MBradley, ACE-118C	6a, third bullet	Do you really mean ZERO findings?	Depending on the audits that apply here, would any kind of findings be acceptable to still find the applicant qualified.	Clarify this by calling out the unacceptable finding types by their official name (per the audit guidance).	Concur. Revised bullet accordingly.
MBradley, ACE-118C	7	Why is the MOU that the FAA will agree to found in an industry guide?	The boilerplate MOU might be more appropriate for an Appendix to the Order.	Move the material from the MARPA guide to the FAA order (applicant qualifications, MOU, data requirements, delegation guidance, etc).	Do not concur. Our ACOLT agreed to this new approach with industry. Placing applicant guidance in an AC is a later possible alternative.
MBradley, ACE-118C	7a	This paragraph sounds like the FAA will simply accept what's in the MARPA guide. If that's the case, why not put the content of the MARPA guide in the order or an AC to make it official guidance for the FAA. The MoU accepts the content, format and delegations in the MARPA guide to	This statement makes it sound like the FAA office signing the MOU must use the procedures and guidance outlined in the MARPA guide.	Clarify what are requirements and what are suggestions.	Do not concur. The MoU documents the streamlined approach and recognizes the showings of compliance to airworthiness requirements in the manner set in the MARPA guidance. An ACO has the discretion to utilize this process in the manner set forth by the ACOLT.

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		streamlined PMA.			
MBradley, ACE-118C	7b	This information is more appropriate for background information.		Move this to another section that discusses background or additional/optional guidance. Since the Order calls out the “PartSCP” then it should say if a “PartSCP” is required, and if so what is the minimum content/format, and if not required then clearly state that.	Concur. The PartSCP is integral component of the MARPA guide for showing compliance. Revised sentence as follows: The MARPA guide prescribes using a PartSCP to set the format and contents of the part’s design data.
MBradley, ACE-118C	7b and 8a	The description of the safety analysis differs between these paragraphs.	7a says: “Users of the streamline process will evaluate the consequence of part failure on the next higher assembly, and the product itself.” 8a says: “We gauge safety impact by assessing the consequences of part failure on the product.”		Concur. Revised both sentences to delete these descriptions. The streamlined process is for a small class of parts: those whose failure does not affect safe flight or landing.

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MBradley, ACE-118C	8.a.	Include malfunctions in the assessment, not just failures.	Malfunctions should be considered for their impact on safety, not just outright failures.	“We gauge safety impact by assessing the consequences of part failure or malfunction on the product.”	N/A. Deleted sentence.
MBradley, ACE-118C	8.a.	The instructions for interpreting the CPL are not clear. It appears that the current CPL parts and categorizations could/should be revised to account for it being relied upon in an FAA order that is mandatory for ACOs, designees, applicants, etc.		Revise CPL instructions and send to engineers for review and comment since users of the proposed Streamlined Process will be required to use it (since this will be an Order, not an AC).	N/A. Deleted references to CPL.
MBradley, ACE-118C	8.a. category parts list (CPL) reference.	Reference to the CPL should be agreed to by the owner of the document. The current introduction to the CPL should be changed.	The introduction to the CPL on the web states, in part, “The CPL is a notional tool that has no scientific basis. It was developed for internal use only leading to the frequency of FAA surveillance of new products and parts	Revise the introduction to the CPL and include a reference to this Order 8110.XX, Streamlined PMA Process.	N/A. The order no longer refers to the CPL. We assess the part against the criteria for category 3 replicated from AC 43.18 and RBRT.

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			manufacturing facilities. The CPL was not coordinated with the industry. The industry may or may not agree with the CPL content. The CPL posted on the internet is for information only and if used for other purposes than what is stated above it is solely at the user's risk."		
MBradley, ACE-118C	8.a. Second sentence	Remove the sentence "The majority of PMA are for non-critical parts."	This is an unnecessary/irrelevant statement, and possibly won't remain true.	Remove	Concur.
MBradley, ACE-118C	8a	It's not clear how to apply this definition.	Each of the statements might lead to difference conclusions. Should they be connected with "and" or "or". For example, many failures or malfunctions 'could directly result in degraded performance' and yet it might not result in a hazardous effect.	Clarify. Do all conditions of the definitions need to be met, or just one condition?	N/A. Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.

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MBradley, ACE-118C	9. Effect of the Streamlined PMA Process.	. Move this section.	This explanation would have been helpful from the beginning of the order.	Move this section to the beginning of the order, in a Background-type section	Partially concur. However, will leave the paragraph in the current location pending public comment. Relocation of it is feasible afterward.
MBradley, ACE-118C	9b	This para deviated from the requirements in 8110.42.	The ACOs co-sign the amended/new supplements with the MIDO. This paragraph sounds like the ACO should just send an electronic revised version with no signature.		Concur. Moved requirement to paragraph 6f and aligned it to the PMA order.
MBradley, ACE-118C	Classification definitions	Since the Classification D definition includes the qualifier "...if other conditions existed...", it makes it sound like the other prior definitions for Classifications A-C are only applied when the failure or malfunction directly results in the consequences described in the applicable definitions.	If the definitions for Classifications A-C should be considered only for events that are directly related, then it needs to be described.	Revise definitions as appropriate (remove "if other conditions exists" or add qualifiers to Classification definitions for A-C)	N/A Deleted Figure 1 from the order as it added confusion and went beyond the scope of this order.

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MBradley, ACE-118C	Figure 1.	Make it clear <u>in the table</u> that this order applies to ONLY Classes A and B.	It could be confused that this process could apply to Classes A, B, C, and D because they're shown as "Non-critical" in the table, and only class E parts are critical.	Shade the "non-applicable to this process" class parts or make some other similar change to (such as using asterisks) to make clear that this process is only for Class A and B parts.	Do not concur. We will limit this process to category 3 articles. The extra classifications introduce unintended implications that went beyond the scope of this order. Deleted Figure 1.
MBradley, ACE-118C	General	It's not clear why this is proposed to be a completely new order.	It seems that this process should be part of the existing PMA Order 8110.42.	Suggest incorporating this process into the existing PMA order so we don't have two different PMA orders.	Do not concur. The streamlined PMA process has applicant qualifications and part restrictions that limit its application. However, a later merger of the two orders at a much later date is possible.
Ozzie Lopez ACE-102A	Page 2 Para. 6. Steps to Implementing the Streamlined PMA Process	This section spells out a procedure by which a PMA Company meeting certain criteria (6a) may obtain a streamlined MOU. Nothing is said as to the need and ability for the FAA PACO to have such an agreement.	There are many PMA companies which meet the criteria of 6a and do not increase workload on the PACO whom they work with. However, there are companies which have a heavy demand on the PACO. Therefore it would be prudent for the PACO to first establish a "need and ability" to commit to the development of an MOU with a PMA company.	Change this section to describe the need for the FAA PACO to establish a "need and ability" to proceed with the streamline program once a PMA company has requested PMA a streamline MOU.	Do not concur. The ACOLT accepted the proposed applicant qualifications for the streamlined process. This national process must avoid any appearance of being arbitrary and capricious. An ACO must exercise due diligence in denying this process to eligible parts from proven holders of PMA.

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Ozzie Lopez ACE-102A	Page 2 Para. 7. The MoU and PartSCP. c. The MoU between us and qualified applicants documents the streamline process. The MoU accepts the content, format and delegations in the MARPA guide to streamlined PMA.	This section overemphasizes the use of the MARPA S4000 document to develop an MOU with the FAA. The contents in the S4000 are very general. More is needed in the development of an MOU than just following this document. This paragraph needs to be revised.	The MARPA S4000 Document is good guidance material for the industry that is solely controlled by MARPA. There are other document such as, the FAA CPI guide, PMA Order, and other FAA material that a PMA company my use to develop a draft MOU. The MARPA document is one document that may be used by a PMA company in the development of an MOU. However the details and format of the MOU are worked and developed between the PMA company and the PACO. In addition, the S4000 document is developed and controlled by MARPA and may be revised over time. Since the FAA has no control of this document, and if accepted as a sole source by the FAA, may mean a change in the order as this document is revised by MARPA. Each PMA company	Revise this section to state that the PMA company may use FAA guidance, the MARPA S4000 document, and other guidance material as appropriate for developing a draft MOU. The final format and content of the MOU is agreed to by the PACO and the PMA company.	Do not concur. The S4000C guide was a cooperative initiative between MARPA and the FAA. The guide and our proposed order standardize the means of showing compliance for parts that affect safety the least. An ACO may use other means for parts outside the scope of this order.

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			is different and the MOU will have to reflect this. Atlanta ACO experience in this area has been that this process takes time and details do change from company to company. As a result of this work the ATL ACO has developed a generic streamline MOA as a guide that may be used by PMA companies.		
Ozzie Lopez ACE-102A	Page 3 Para 8. Non-Critical Parts Eligible for Streamlining. Streamlining applies to parts whose failures have little or no impact on the safety of the aircraft, engine or propeller.	In the MOU development, the PMA company should have a certifiable parts list of the types of parts which they have the experience an competency to design and manufacture.	PMA companies often produce many parts of a particular design such as washers, seals, bearing, bushing...etc. These companies often submit PMA packages for different type bushings, seals, and many type of parts but of similar design. The PMA companies therefore will develop a certifiable parts list which indicates the type of parts they may work on. As they gain experience with other parts the PMA company will revise this certifiable parts list.	Revise this section to include the development of a certifiable parts list by the applicant to indicate the type or family of parts they can work on based on their experience and competency to design and manufacture.	Do not concur. The knowledge of a holder's capabilities to manufacture different classes of parts resides at the approving ACO. This ACO can readily discern whether a PMA holder designed similar parts from past project folders and records.

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Ozzie Lopez ACE-102A	<p>Page 3 Para 8. Non-Critical Parts Eligible for Streamlining.</p> <p>We present the three categories (1 thru 3) of parts in a category parts list (CPL). Refer to our website for further information on the CPL.</p>	Remove the CPL from the order only confuses the issue of part criticality.	<p>Please note the top note of the CPL:</p> <p>Note: The Production and Airworthiness Division and the Manufacturing Inspection District Offices use the Category Parts List as one consideration to determine resource allocation. The CPL is a notional tool that has no scientific basis. It was developed for internal use only leading to the frequency of FAA surveillance of new products and parts manufacturing facilities. The CPL was not coordinated with the industry. The industry may or may not agree with the CPL content. The CPL posted on the internet is for information only and if used for other purposes than what is stated above it is solely at the user's risk.</p>	Remove CPL	<p>Concur. Revised paragraph 8a as follows:</p> <p style="padding-left: 40px;">a. Streamlining applies to parts whose failures have no impact on safe flight or landing</p>

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Ozzie Lopez ACE-102A	Page 3, Para 6c The MARPA guide advocates using a PartSCP to set the format and contents of the part's design data.....etc	The contents of the part design data is an item that should be described in the MOU and addition to other item as safety assessment, ICA, installation eligibility, and other items identified in the PMA order under applicant responsibility. The MOU should also describe what will be at a minimum the contents of the PartsSCP.	The MOU developed in the Atlanta ACO capture the FAA and applicant responsibilities as found in FAA Order 8110.42C chapters two and three.	Expand, or rewrite, this section to address what are the essential elements that must be in the MOU.	Do not concur. Applicants for this process already hold PMA and are diligent in their responsibilities based on passed performance. Also the class of parts eligible for this process has the least impact on safety. Please note that the PartSCP follows the tailored PSCP in Order 8110.42C.
Ozzie Lopez ACE-102A	page 4 Para. 8. Non-Critical Parts Eligible for Streamlining. a(1)-(5), Page 3, (b)	DER should be employed to classify part criticality A-E. not just B. If classification C, D, E are not to be considered than in the MOU than state so.	Capable DERs are essential at this point in the process	Revise par a and b as appropriate to reflect use of the DER in determining part criticality	N/A. Removed part classes from order as beyond its scope. This order only applies to parts that affect safety the least.

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Patrick Gillespie ANM-150S	Page 2, Paragraph 6. a.	Delete or change the first bullet	Not all service bulletins are because of design or manufacturing errors	Just delete it, or be specific about design error service bulletins	Do not concur. Service bulletins for replacement parts are rare, but usually address design and manufacturing errors.
Peplowski, ANM-108	Page 3 and 4, Paragraph 8	The CPL is an FAA Internal Document. It clearly states in the CPL Note: “The Production and Airworthiness Division and the Manufacturing Inspection District Offices use the Category Parts List as one consideration to determine resource allocation. The CPL is a notional tool that has no scientific basis. It was developed for internal use only leading to the frequency of FAA surveillance of new products and parts manufacturing	The use of the CPL by PMA Applicants as described in this draft Order is an “Official “ function. The notional nature of the CPL is clearly over extended. Comments/requests from industry to add their parts to use the “Streamlined Process for PMA” will be addressed to the Production and Airworthiness Division and the Manufacturing Inspection District Offices with responsibility for their area.	Make the CPL an “official” document maintained by the Aircraft Engineering Division to validate the proper classification and scientific basis of items on the CPL. Perhaps an AC would be a proper venue for it. The Manufacturing Offices will continue to use the CPL, but not make changes to it or maintain it.	N/A. The order no longer refers to the CPL. We assess the part against the criteria for category 3 replicated from AC 43.18 and RBRT.

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		facilities.” The CPL is maintained by the Manufacturing Inspection Office, ANM-108, as an aid to determine Risk-Based Resource Targeting.			
R Thomas ANM-100D	7.b. (pg. 3)	Users of the streamlined process must be required to obtain DER approval or recommend approval of their Safety Assessment prior to submitting their streamlined PMA package to the FAA.	Many PMA applicants have limited system knowledge and are not qualified to assess the criticality of a part. The desire to use the streamlined process to the greatest extent possible will result in many inappropriate findings of non-critical.	“Users of the streamline process will evaluate the consequence of part failure on the next higher assembly, and the product itself. This safety analysis must be reviewed by a DER and submitted to the ACO as recommend approve or approved (per the DER’s authorization) on an 8110-3 with the users package. If part failure....”	Partially concur. The proposed guidance is for applicants and more suited to the MARPA guide. However, revised paragraph 6b as follows: <ul style="list-style-type: none"> b. Review the applicant’s characterization of the part and the impact of its failure. The applicant’s safety analysis must show the part is non-critical and its failure has no effect on continued safe operation of the aircraft, engine or propeller. Use criteria appropriate to your

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					product. If you concur with the applicant's analysis, accept the part into the streamline process.
R Thomas ANM-100D	8 (pg.3)	The assessment of criticality for design approval must remain consistent with Order 8110.42C, Chapter 2, paragraph 5.d.	Other sources, 8120.2F and AC 43-18 and their classes/categories are not intended for design approval.	Paragraph 8 should be deleted or refer to Order 8110.42C.	Do not concur. This order applies to a class of parts that do not affect overall safety. It is the applicant's responsibility to show such. If an ACO engineer finds the applicant's safety analysis inadequate, the part's approval may not use streamline process.
RBoffo ACE-117C	Page 2, Para 5.b.	The link given doesn't lead you to the S4000C document.	Same	Use the following: http://www.pmaparts.org/gvt/S4000C_draft.pdf This link goes to a draft version dated June 2, 2010. The final Order should refer to a released version of the document.	Concur. MARPA moved S4000C during the review process. Updated the link in the streamlined order accordingly.

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RBoffo ACE-117C	Page 2, Para 6.a	The third bullet doesn't make sense.	If the company only gets rated at the lowest rating from resource targeting, they may not get an ACSEP within 4 years.	No non-compliances from the latest ACSEP if performed	Partially concur. Revised 3 rd bullet as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (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 MIDO to search CMIS for non-compliances
RBoffo ACE-117C	Page 2. Para 5.c.	The paragraph refers to the MARPA document as an Industry Guide.	The document says, "Under no circumstances should this program be interpreted as a mandate, nor as an industry standard practice."	Change the paragraph to: If any conflicts arise between this order and MARPA Document S4000C, this order takes precedence.	Concur. Revised sentence as follows: If any conflicts arise between this order and the industry guide, this order takes precedence.

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RBoffo ACE-117C	Page 2., Para 6.a	Issuance of Service Bulletins shouldn't be a limiting factor toward development of streamline processes.	Unnecessarily restrictive. Service Bulletins aren't always indicative of service difficulties.	Remove the bullet, "No service bulletins"	Partially concur. Revised 3 rd bullet as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (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 MIDO to search CMIS for non-compliances.
RBoffo ACE-117C	Page 2., Para 6.b	If the paragraph isn't changed, several signed agreements would need revised.	Some offices use the term Partnership for Safety Plan from the Certification Process Improvement (CPI) Guide instead of MoU.	Change to: "Establish a memorandum of understanding (MoU) or Partnership for Safety Plan (PSP)."	Do not concur. We restricted this process to parts that affect safety the least from proven holders of PMA. Also this process does not negate prior agreements in their respective forms. These prior agreements may exceed the bounds of the streamline process.

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RBoffo ACE-117C	Page 3., Para 8.	There are too many ways to classify parts (Category vs. Class).	Parts classification has already been established by Order 8120.2 and AC 43-18 and now by MARPA and this Order. Instead of creating new Part Classes that we don't use for anything (Class C -D). Use the current categories and restrict them.	Change Paragraph 8. to: Streamlining applies to parts whose failures have little or no impact on the safety of the aircraft, engine or propeller. The majority of PMA are for non-critical parts. The streamline process applies only to parts in which failure would not prevent continued safe flight and landing and the resulting consequences <i>are not likely to</i> reduce the capability of the aircraft or the ability of the crew to cope with adverse operating conditions or subsequent failures.	Partially concur. Restricted this process to parts that impact safety the least. Revised paragraph 8a as follows: a. Streamlining applies to parts whose failures have no impact on safe flight or landing.
RBoffo ACE-117C	Page 4, Para 9.b.	The first sentence could be expanded to allow the DER to submit the PMA supplement directly to the MIDO/MISO. This would drastically reduce ACO workload.	Provided preapproval of the Part SCP is made, if the part is non-critical(Category 3/Class A), ACO involvement should NOT be required.	Change the paragraph to allow this if incorporated into the agreed MoU or PSP.	Do not concur. DER direct to the MIDO goes beyond the bounds set by the ACOLT. However, it is a natural expansion of the process. Will consider it for the future upon gaining experience and confidence in the streamlined process for PMA.

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RBoffo ACE-117C	Page 4, Para 9.b.	Typically, the applicant provides the PMA supplement in electronic format to the PACO. The ACO sends the signed unnumbered supplement to the MIDO to complete the dual signature process.	If the DER is allowed to transmit the electronic version of the PMA supplement to the MIDO/MISO, the PMA supplement could be signed only by the MIDO and they can file a copy of the 8110-3 form approving the design data.	Change the paragraph to reflect the allowance of DER approval and MIDO/MISO only signature on the PMA Supplement.	Do not concur. We retained the ACO signature on the supplement and rely on the record of receipt and acceptance of the data package for our accomplishment of our discretionary review.
S. Gesele ANE-117	Page 1 Par 4.a	There is only a reference to PMA by test and comp. What about identity without licensing agreement?		This Order should be clear as to which PMA processes are covered by it.	Concur. Paragraph 4a does mention test and computation, but does not explicitly exclude identity without a license agreement. Added the following to the end of paragraph 1 : The process applies to this class of parts using tests and computations.
S. Gesele ANE-117	Page 2 Par 5.b	Unable to locate the referenced guide on the pmamarpa.com website.	The ACO engineer should be able to obtain required work instructions/ guidance from RGL and not have to rely on a website maintained by a non-governmental organization.		Concur. MARPA moved their guide to different location on their website after release of the draft order for field review. They will place it in amore prominent place

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					for the public comment period.
S. Gesele ANE-117	Page 2 Par. 6.a, third bullet	How would the ACO engineer know if the PMA applicant had findings from prior surveillance audits?	The ACO does not audit PMA facilities and does not have these records.		Concur. Add the following text to paragraph 6: The ACO may search the Aircraft Certification Systems Evaluation Program (ACSEP) reports in Certificate Management Information System (CMIS) database. Contact the responsible MIDO to search CMIS for non-compliances.
S. Gesele ANE-117	Page 2 Par. 6.a, third bullet	I interpret the way the third bullet is worded to mean that the applicant only needs one clean audit over the past four years to be eligible for the streamlined process. If there was a clean audit 3.5 years ago, followed			Concur. Changed “No findings from at least one surveillance audit during the last four years.” To “No findings from any surveillance audits during those last four years.”

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		<p>by 2 or 3 audits with several significant findings, then it would appear that the applicant is still eligible for the streamlined process.</p> <p>If an applicant had 1 minor, administrative finding on each audit over the past four years, then they would be ineligible for this process.</p> <p>Is that the intent?</p>			
S. Gesele ANE-117	Page 2 Par. 6.a	<p>There is no timeframe for the first and second bulleted items. If the applicant issued a service bulletin 35 years ago, then it would appear they are ineligible for this streamlined process.</p>	<p>It would not be reasonable to expect an ACO engineer to be aware of any AD or SB that has ever been associated with an applicant.</p> <p>It would not be reasonable to exclude an applicant who had a SB 35 years ago from this process.</p>	Place an appropriate timeframe for the first two items.	Do not concur. The same four year timeframe applies to all the criteria in paragraph 6.

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S. Gesele ANE-117	Page 4 Par 9.b	What is meant by, "We record these approvals by e-mailing an electronic version of the PACO approved supplement to the cognizant MIDO. The MIDO will change the existing supplement by adding the newly-approved parts."	Our current process is for the ACO to have an original signature on the PMA supplement. Does this Order change that?		Concur. Yes for the group of parts that pose no impact on safety. The process treats these parts much like those covered by license agreements.
SAT MIDO	Page 2, para 6. f. And page 4, Para 9.b.	The referenced paragraph simply states that the MIDO will add parts to the PMA supplement. No mention is made as to what auditing and/or verification actions MIDO is expected to take in connection with adding the parts.	This draft order does an excellent job of addressing the ACO portion of the process, but is virtually silent concerning the MIDO portion. PMA is a two step "apples and oranges" process. Step 1 is the design approval (ACO). Step 2 is the production approval (MIDO). Regardless of what level of discretionary authority or streamlining of the process is used by the ACO to find compliance, the MIDO is still responsible for verifying that	Modify the referenced paragraph to the effect that while the streamlined process applies to the ACO portion, applicants must demonstrate to MIDO that they have established a system capable of producing conforming parts, and that MIDO will evaluate that system to include in most cases an on site evaluation and conformity inspection.	Do not concur. Only existing PMA holders with established FIS for making like parts may use this process. New applicants must use the processes in Orders 8110.42C and 8120.2F. MIDO will perform its duties per Order 8120.2F. They apply the same process that adds new parts to the supplements of existing PMA holders.

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			<p>the applicant has established a system capable of producing parts that are safe for installation on type certificated aircraft. The verification includes an evaluation of the facilities, equipment, personnel, processes, work instructions, and records, as well as a conformity inspection of a produced part to substantiate that the system works. Even if the ACO determines that conformity is not necessary to find compliance to design that does not mean that one is not necessary to verify production capability. Nor does it mean that an on site evaluation of the system is not necessary. In instances where an existing PMA holder is simply adding another variation of a part they already produce, an on site verification and conformity should not be necessary. But in all other cases an on site</p>		

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			verification and conformity would be prudent.		
SAT MIDO	Page 2, Para 6a, 3 rd bullet	Proposed draft says, MARP A SC4000C says the company must have " ... zero ACSEP findings of safety non-compliances ... "	There is a vast difference between the FAA order and the industry guide. The stating "No Findings" would indicate a completely clean ACSEP, whereas MARP A stating "No Safety Related" noncompliances would indicate only safety related noncompliances found during an ACSEP, which are very rare.	Define what we intend to use as the standard. In my personal experience, I have not been part of an ACSEP where a safety related noncompliance was found.	Concur. We will reconcile differences between the order and the industry guide through the public comment process. Revised the 3 rd bullet as follows: No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (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 MIDO to search CMIS for non-compliances.

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SAT MIDO	Page 2, Para 6g	This paragraph states to rely on applicant's first article inspection to satisfy any conformity requirements.	Not enough information provided to explain who is responsible for reviewing the FAI records and the minimum requirements the FAIs must contain to be acceptable.	Revise Order to expand and clarify who is responsible and how the process will be performed.	Partially concur. Revised paragraph 6g as follows: g. Rely on applicant's first article inspection report to confirm the part conforms to its approved design.
SAT MIDO	Page 2, Para 6g	Paragraph 6.g. allows conformity inspections to be eliminated and substitutes industry inspections.	The recent review of the LSA market (<i>FAA 'I' "Light- Sport Aircraft Manufacturers Assessment" Final Report issued May 17, 2010</i>) has shown that industry does not/will not adhere to the required consensus standards on its own.	Require FAA involvement in conformity inspections as a good "product audit" is the best form of auditing to see if a quality system can produce parts that meet type design.	Do not concur. Applicants for this process are existing PMA holders with known capabilities and histories of making like parts. The MIDO still follows Order 8120.2F in its surveillance of the FIS and conformity of the parts produced. Please note that these parts have the least impact on aviation safety. The standard process does not usually demand a conformity inspection.

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SAT MIDO	Page 3, Para 8a and Figure 1 (table)	Paragraph a. states that the streamlined process applies to only "Class A & B" parts. MARPA SC4000C allows category 2 parts (Class C & D) to be included in the streamlined process.	The table is too vague as to whether Class B parts are actually Category 3 parts (per the CPL).	Define which category Class B parts fall within. Ensure industry does not the streamlined approval process.	Partially concur. The revised order only addresses parts that have the least impact on safety. The part classes and their defining criteria are deleted. The order uses the same criteria for category 3 parts from AC 43-18.
SAT MIDO	Page 4, Para 8b	Paragraph 8b allows the industry to use "Non-FAA approved data" to obtain an approval to produce parts.	The recent review of the LSA market (<i>FAA's "Light-Sport Aircraft Manufacturers Assessment Final Report issued May 17, 2010)</i> has show that industry does not/will not adhere to the required consensus standards on its own.	Require FAA approval (ACO or DER) of all design data as required by regulation.	Partially concur. We still approve the designs of the parts by accepting applicant showings of compliance in the manner described in the MARPA document. We limit the level of our review due to the benign nature of the part. The parts eligible for this process have the least impact on the safety of the product. Revised paragraph 8b as follows: b. This class of non-critical parts does not usually need Designated Engineering Representatives (DER) to

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					make findings of compliance. However, designees may advise applicants on certification requirements and safety analyses. They add value and quality to any PMA package. ACOs and applicants should consider the complexity of design and manufacture, scope of testing to demonstrate compliance, and service experiences of like parts to determine the level of designee involvement.
SAT-MIDO	NOTE: CONCERN REGARDING MARPA: Page 10, 3 rd paragraph	- implies that first article conformity inspections information that are not required because the FAA will not issue under the streamlined PMA process.	We consider that to be bad will end up confusing MARPA's dues paying members. The fact is, regulations require all PMA applicants to make all inspections necessary to determine conformity. Whether or not FAA conformity will be done is not relevant. Applicants still must do their own conformity inspections. These	Recommend MARPA be informed.	Concur. Will forward to MARPA as part of the public comment process.

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			conformities are understood to be 100% as described in orders 8110.4 and 8110.42.		
Tom Thorson ANM-140S	Page 1; Paragraph 4	Last sentence of 4a and all of paragraph 4b are not related to current PMA approval process (title of Section 4.).	Unclear why these sentences are included; appear editorial rather than applicable to the final Order.	Delete	Do not concur. Paragraph 4 is necessary background and supporting rationale for the streamline order.
Tom Thorson ANM-140S	Page 2; Paragraph 6.a	Second sentence: "...similar parts and had:" not grammatically correct	Grammatical	"...similar parts and have had:"	Concur. Changed "had" to "having"
Tom Thorson ANM-140S	Paragraph 8	Recommend adding a section for the PACO to coordinate with the product CMACO on the determination of criticality.	Determination of part classification is critical to allowing this streamlined process. Part criticality may not be evident to the PACO (if different than the CMACO).	Add sentence to paragraph 8.a making a recommendation or requirement to coordinate concurrence with part classification with the CMACO for the product.	Do not concur. This process does not apply to critical parts. Deleted figure 1 and remove all references to critical parts.

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Webster, ANM-108	Paragraph 5.b., 6.b., 7.a., 7.b., and 8.b.	Remove all references to Modification and Replacement Parts Association (MARPA) Document S4000C	Modification and Replacement Parts Association (MARPA) Document S4000C, Streamline Program for PMA Applications of Non-Critical Parts Submitted by Experienced Applicants with a Qualifying Performance Record, dated March 19, 2010 is actually, per the MARPA website, a draft document S4000C DRAFT Rev., dated June 2, 2010. http://www.pmamarpa.com/gvt/S4000C_draft.pdf	Do not create and submit documents for in-put and/or review to FAA Field Offices until all supporting referenced websites, documents, processes, and/or procedures are actually released and accessible for the end user. A complete review and in-put cannot be value added with referenced documentation and information that is incomplete – unless that is the goal. If that is the intent, then the reviewing Field Offices need to be advised. Is it the intended for the FAA Field Offices to make comment on the draft MARPA S4000C document also? Is this proposed Order and the reliance on MARPA intended to “streamline” all PMA applicants – i.e. test & computation, STC, and licensing agreements?	Do not concur. The reliance on an industry guide is an initiative between the FAA and MARPA. The ACOLT supported this cooperative effort. Alignment and easier access will occur when the order and guide are published after an extensive public comment period.

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Webster, ANM-108	Paragraph 6	How is the FAA going to control and be informed to ensure that the requirements in paragraph 6 are met when PAH facilities performance information is not routinely shared among all FAA Offices.	The FAA ACOs, MIDOs and/or FAA Directorates do not routinely share information about facilities when an LOI, LOA, or some other form of corrective action is required. Is this information going to be available on a National FAA Database? After reviewing the MARPA Program (paragraph 5.c. of this proposed Order), it does not have this information either. This website is a fee for service group and the FAA does not have access to their data and/or all their published guidance.	Provide guidance, process, procedure, and/or an FAA National Database to ensure that the requirements in paragraph 6 are met when PAH facilities move their FAA certification projects and/or manufacturing to a different ACO, MIDO and/or FAA Directorate of responsibility	Do not concur. The applicant attests to the noted qualifications for the streamline process. The ACO may verify based on its experience with the applying PMA holder. Communication with the issuing MIDO is essential to obtain the needed information.
Webster, ANM-108	Paragraph 6.a.	How is the FAA going to control and be informed to ensure that the requirements in paragraph 6 are met when a PMA facilities moves their certification programs and/or manufacturing to the different ACO, MIDO and/or FAA Directorate	This document does not take into consideration of a PAH that physically relocates their manufacturing facility and/or if the PAH submits an FAA project application to an ACO outside the PAHs Geographic ACO (another ACO more suitable for the FAA project like transport (ANM), propulsion (ANE),	<p>a. Review the applicant's statement of qualifications for the streamline process. The applicant must hold PMA with four years minimum experience making similar parts and had: (Add Bullet)</p> <ul style="list-style-type: none"> The PAH facility has not changed, moved, relocated 	Do not concur. A prohibition of changes in the manufacturing system is excessive. Changes in the recommended characteristics of a manufacturer are allowed under PMA for more safety significant parts when given the proper notification. However, moves to another

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		responsibility?	rotorcraft (ASW), etc.)	and/or expanded their manufacturing, inspection, approved Quality System, PAH certification organization and/or the FAA certification projects in the past 4 years.	region can make showing demonstrated experience in manufacturing difficult.
Webster, ANM-108	Paragraph 10.a.	The implementation of New Part 21 will change the reference in this paragraph.	Title 14 of the Code of Federal Regulations (14 CFR) § 21.303(a) through (k) sets the regulatory requirements for approval of replacement and modification parts and will be invalid once the New Part 21 is fully implemented in April 2011.	Change the reference to reflect the New Part 21 requirements and then hold this FAA Order document back from release until the New Part 21 is fully implemented in April 2011 (only an 8 month hold).	Partially concur. Changed the reference to subpart K which does not change in April 2011
Webster, ANM-108	Paragraph 10.b.	This is conflicting information between the current Part 21 and the Newly released Part 21 with a complete implementation by April 2011	This paragraph states “The process entails FAA review and approval of the parts’ design and fabrication systems.” When in actuality, for PMA PAH facilities, there is no requirement to have an “approved fabrication system”. The PMA PAH facilities are required to have an “accepted fabrication system”	Change the requirements to reflect the New Part 21 requirements and then hold this FAA Order document back from release until the New Part 21 is fully implemented in April 2011 (only an 8 month hold).	Do not concur. All fabrication and inspection systems will convert to approved quality systems without affecting this order.

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			until the New Part 21 is fully implemented in April 2011, then the PMA PAH facilities are required to have an “approved quality system”.		
Webster, ANM-108	Paragraph 10.b. and (Paragraph 9.b.)	This paragraph is in conflict with paragraph 9.b. of this same proposed FAA Order. And this paragraph has conflicting information between the current Part 21 and the Newly released Part 21 with a complete implementation by April 2011.	As this paragraph 10.b. states, FAA Order 8100.42 and FAA Order 8120.2 is the process which requires the ACO to send copies of the unnumbered and signed PMA supplement and the applicant’s letter to the responsible MIDO for the final processing of issuing a new PMA Supplement - but it is conflict with paragraph 9.b. of this proposed Order which states “The MIDO will change the existing supplement by adding the newly-approved parts.”	Change the issuance of the PMA Supplement to mirror the requirements by referencing the requirements in FAA Order 8120.2 and FAA Order 8100.42.	Concur. Consolidated and placed the instructions for the supplement in paragraph 6f as follows: If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a daft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing

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					supplements of the PMA holder.
Webster, ANM-108	Paragraph 10.c.	Paragraph is unclear as to if an ODA is qualified to ask for this option applicable to the streamline PMA Process	There is no function code in FAA Order 8100.15 which allows an ODA to use a “streamline” PMA process for the design approval and/or the issuance of a “streamline” PMA Supplement. The allowance for this will be at the sole discretion of the OMT and the ODA will be required to implement a process in the FAA approved ODA Manual. Or this Order will prohibit an ODA from this “streamline” PMA guidance.	(Add to last sentence) The guidance in this order will not be used by these FAA Order 8100.15 delegated organizations.	Concur. However, added the intent of the suggested change to the end of paragraph 4b as follows: The streamline process allows these small manufactures to quickly add non-critical parts to their approvals. Manufacturers with ODA may not use this process as they already approve these parts under their existing authorizations.
Webster, ANM-108	Paragraph 9.b.	The MIDO is required to ensure that the PAH has an adequate and “acceptable” fabrication inspection (FIS) system and manufacturing	“The MIDO will change the existing supplement by adding the newly-approved parts” is not acceptable per the FAA Order 8100.42, Chapter 4, paragraph 1, which states “PMA Activities.	Change the issuance of the PMA Supplement to mirror the requirements by referencing the requirements in FAA Order 8120.2 and FAA Order 8100.42.	Partially Concur. These applications for streamline PMA come from existing holders with proven capabilities for manufacturing

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		processes and/or procedures. The New Part 21, which is to be implemented by April 2011, will change this requirement to an “approved Quality System”.	Refer to FAA Order 8120.2, Section 5 for MIDO responsibilities in PMA.”; and this is not in alignment with FAA Order 8120.2, Section 5, paragraph 2-45 requirements of issuing an FAA PMA Supplement, which states in part “The MIDO confirms that the applicant has the capability to produce the proposed part in accordance with the approved design. The MIDO will conduct the production approval process upon receipt of the PMA supplement evidencing approval of the design by the ACO, or upon receipt of an application based on identity by licensing agreement or STC.” Also, this is not acceptable per the MIDO responsibilities in FAA Order 8100.42, Chapter 1, paragraph 9 which states in part “When appropriate, the MIDO verifies the applicant’s manufacturing processes achieve the approved		like parts. The responsible MIDO is very familiar with the applicant’s existing FIS or approved quality system. Consolidated and placed the instructions for the supplement in paragraph 6f as follows: c. If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a draft supplement. Ensure that the supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA

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			<p>design characteristics. Approval of a PMA application requires the ACO to approve the design, and the MIDO to approve the production system.</p> <p>See appendix A, PMA Process Flowchart.” Furthermore, this is not acceptable per the ACO responsibilities in FAA Order 8100.42, Chapter 2, paragraph 11.d. (1) which states “When the holder uses an already accepted production system, the ACO still approves the design of the additional part and the MIDO conducts an optional review of the holder’s FIS. The MIDO reviews the holder’s FIS if production of new parts significantly increases the holder’s scope of operations or demands greater manufacturing abilities.”; and (2) which states “After design approval and FIS review, the ACO will sign and the MIDO will issue a PMA supplement that adds the new</p>		holder.

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			parts or installations to the original approval.” And/or, this proposed FAA Order is not in alignment with the ACO responsibilities in FAA Order 8100.42, Chapter 3, paragraph 12.d., which states “Send copies of the unnumbered and signed PMA supplement and the applicant’s letter to the responsible MIDO. If the responsible MIDO is remotely located, send advanced electronic copies of these documents to expedite processing of the PMA.”		
Wu, ANM-108	Page 4, par 9(b)	Par 9(b) proposes a slightly different way of issuing the PMA supplement. Not very clear. Should use what is already in Order 8110.42.	The different instructions for issuing the PMA supplement will create confusion.	Order 8110.42, Ch 3, par 12 “d. Send copies of the unnumbered and signed PMA supplement and the applicant’s letter to the responsible MIDO. If the responsible MIDO is remotely located, send advanced electronic copies of these documents to expedite processing of the	Concur. Consolidated and placed the instructions for the supplement in paragraph 6f as follows: If the PMA application satisfied our streamline criteria, the PACO records our approval by signing a daft supplement. Ensure that the

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				PMA.“	supplement data has enough detail to populate its six columns. Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.