

Streamlined Parts Manufacturer Approval (PMA)

An FAA/Industry Collaboration

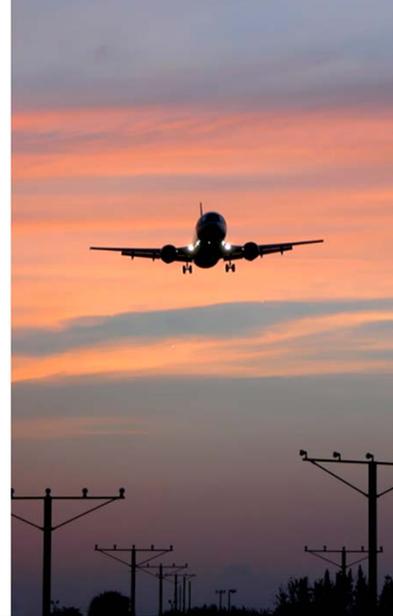
Presented to: Aircraft Certification Offices

By: John Milewski, AIR-111, 01-202-385-6322

Date: 20 December 2012



Federal Aviation
Administration



The streamlined process standardizes a discretionary practice at many ACOs. It is an expedited approval of replacement articles based on showings from qualified holders of PMA. The Modification & Replacement Parts Association (**MARPA**) collaborated with the FAA to set applicant qualifications, eligible articles, and the scope of the needed showings of compliance.

Introduction

- **Streamlined PMA overview**
- **The Role of the MoU**
- **Implementation & process flow**
- **Applicant qualifications**
- **Candidate articles**
- **Applicant responsibilities**
- **ACO actions**
- **Delegations**



This brief will introduce Streamlined PMA in the above manner. This brief will start with an overview of the streamlined process and then delve into each of its guiding principles as noted.

Streamline PMA Process

- **Expedited approval process**
 - Articles that impact safety the least
 - Trusted manufacturers
 - Proven experience
- **MARPA Document 1100**
 - Industry guide for data package
- **FAA Order 8110.119**



http://pmaparts.org/pdf/Streamlined_Application_Process_Rev_1_1.pdf

ACO Brief
3 January 2013



Federal Aviation
Administration

3 3

This process speeds the approval process for low risk parts that have little or no impact on safety. We limit this process to an existing holder with a successful history of PMA. An ACO usually has good relationship with this qualified applicant and an existing documented application process in the form of a Memorandum of Understanding (MoU). The streamlined process does not cancel this prior agreement. The streamlined process builds on the MoU practice and melds it with industry guidance to relieve the need of extensive reviews and findings by the ACO and its designees.

MARPA developed guidance for users of the streamlined process. This applicant guidance has practice guides on MoU requirements, applicant qualifications, needed safety assessments, showings of compliance and the content of data packages. The document advises users in best practices that often exceed that needed for the streamlined process.

The new FAA Order 8110.119 prescribes the ACO process for accepting the showings of compliance from qualified applicants on eligible articles. It relies on setting up an initial MoU to accept subsequent articles that meet the safety criteria from these applicants. The order also sets repeats the requirements for the streamlined process from the MARPA document as vetted through our comment process. **Note that the order takes precedence over differences with the MARPA document.**

Also, note that the order has a hot link to the MARPA document at the noted web address.

Memorandum of Understanding (MoU)

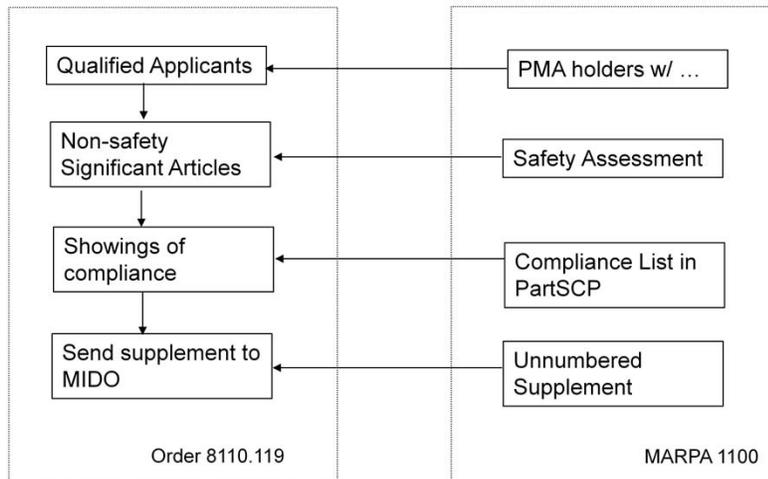
- **Sets framework for streamlined process**
 - Recognizes applicant qualifications
 - Affirms the category of candidate articles
 - Establish a recurring process
- **Refers to guidance in MARPA 1100**
 - Establishes scope of safety assessments
 - Use of Part Specific Certification Plan (PartSCP)
 - Content of data package



The MoU sets the framework for initial and follow-on use of the streamlined process. ACOs follow their local formats of their past MoU's. The MoU should address the noted elements of the streamlined process as described in MARPA 1100.

The practice guides in the MAPRA document gives applicants the necessary information to set up MoUs and provide the necessary showings of compliance in a consistent manner. The PartSCP prescribes the contents of the data package with the required statement of compliance.

Implementation & Process Flow



This slide shows the relationship between outputs of the industry guidance to the implementing order. The MARPA document guides the submittals of these elements for ACO review in a consistent manner as defined in the governing MoU. PMA holders declare their qualifications for the streamlined process. The safety assessment shows the candidate article meets the established criteria. The compliance list in the PartSCP provides the necessary showings. The draft supplement provides a ready mechanism to forward the newly approved article to the MIDO.

Applicant Qualifications

- **PMA holder with:**
 - No alert service bulletins,
 - No airworthiness directives, and
 - No reports of noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) **within the last four years.**



What are the qualifications of an applicant? The minimum applicant qualifications in the guidance and order are noted here. Qualifications less than these minimums requires a deviation from the order per our QMS process. The guidance in the MARPA Document 1100 notes this contingency. Applicants may well ask a deviation from one or more of these criteria via the ACO. An ACO's advocacy for a given deviation is key to its approval.

Candidate Articles

- **Articles whose failure have little or no effect on the continued safe flight and landing of the aircraft**
 - Examples include replacement parts for cabin interiors, fairings, etc.
 - Low number of well defined showings of compliance like flammability



Candidate articles are those that meet the above safety criteria. The streamline process is for the subset of articles that have the least impact on safety of its respective product. The governing criteria aligns with the lowest rating of failure consequences in the Risk Based Resource Targeting (RBRT) tool. Applicants will show articles meet this criteria through safety assessments that the ACOs review and concur. Again, deviations from this criteria requires the assent of the ACO and AIR-100 approval.

Applicant Responsibilities

- **Show article meets criteria for the process**
- **Show & state compliance with airworthiness requirements**
- **Establish eligibility**
- **Draft supplement**
- **Use MARPA 1100 format for data submittal**
 - Part Specific Certification Plan (PartSCP)



The streamlined process does not relieve applicants of any responsibilities for compliance with airworthiness requirements. 14 CFR 21 subpart K applies. Tests and computations is still the basis for the subsequent PMA. They establish eligibility in the same manner as in Order 8110.42. In addition, the data package includes a draft supplement.

The guidance in the MARPA document promotes use of the **PartSCP** for consistent presentation of submitted data.

ACO Actions

- **Establish initial MoU**
 - **Review applicant qualifications**
-
- **Review safety assessment of article**
 - **Review compliance list in PartSCP**
 - **Review product eligibility**
 - **Accept showings and statement of compliance**
 - **Send draft supplement to the responsible MIDO**



The initial MoU sets up the streamlined PMA process with each applicant for subsequent approvals. The ACO confirms the applicant and article meet their respective criteria. The first two bullets are usually one time events. The actions below the line occur with each article. The ACO confirms the showings of compliance are appropriate for the article and the eligible products. The ACO need not make specific findings, but approve the design on the basis of PartSCP. Retain pertinent data in project folder or use an existing data access agreement with the PMA holder in accordance with ACO practices and Order 8110.42.

No Delegated Findings

- **No designee or FAA findings needed other than the final approval**
- **Relies on applicant showings and statements of compliance**
- **Designees may act as consultants on the method and scope of showings**



The qualifications of applicant and the nature of the articles in the streamlined process does not rely on designee findings of compliance. However, designees may advise applicants on the scope and manner of their showings.

Questions????

- E-mail questions to john.milewski@faa.gov



This new process expedites approval of replacement articles and allows the ACO and its designees to dedicate resources to more safety significant efforts. The current limitations of the streamlined process restricts it to articles that have little impact on safety from qualified holders of PMA. These holders have demonstrated history of prior approvals. These applicants are still fully accountable for compliance with appropriate airworthiness requirements.