

DOCUMENT REVIEW LOG

1. Document No.: FAA Order 8110.100B		2. Project Lead:		3. Reviewing Office (Name and Phone Number):		4. Date of Review: April 29, 2013		5. Date of AIR-100 Disposition: May 16, 2013	
Item No:	Page and ¶:	Commenter:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:			
1.	p1, Section 7	Bombardier	The purpose of SAIBs is clearly defined, however the context is not really well defined.	The SAIB is only one of many tools used in the overall context of continuing airworthiness and safety management of in-service aircraft.	Consider offering the definition of an AD/MCAI at the end of this section, to offer a comparison and to show the difference in purpose between both in an effort to clarify the context.	Partially concur. Added text to provide a brief, general comparison to that of an AD (discussed in greater detail in ¶ 8).			
2.	p2, Section 9d.	Bombardier	The Order states that <i>"a SAIB cannot be used to: [...]d. Provide guidance, instructions, or training to FAA aviation safety engineers (ASE) or aviation safety inspectors (ASI) regarding certification or field approval activities. Use directives, policy memos, or other methods (e.g., issue papers) to convey the necessary information."</i> This criterion is too broad in that it could unduly restrict the need for an otherwise perfectly acceptable and useful SAIB.	In the past there have been safety issues identified on a specific type of aircraft caused by numerous reported instances of "unapproved modifications that do not follow the DAH's ICAs or recommendations". For example, certain aircraft types have had unapproved modifications performed on the seat belts and such mods have been inappropriately or erroneously approved via field approvals. An SAIB may be the best tool to use in such cases to sensitize operators, maintenance organizations, and FAA safety engineers and or inspectors, of widespread practices that might create safety issues; an AD might not be warranted because the DAH's recommendations might not have been followed, and should they have been followed there would be no unsafe condition.	Consider removing this paragraph and allowing the issuance of an SAIB as an awareness tool for ASEs & ASIs.	Non-concur. There are other means of communication within the FAA to communicate awareness of safety concerns which are listed in ¶ 9 d. The audience for SAIBs is primarily to external stakeholders: flying public, DAHs, operators, pilots, etc.			

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3.	pp2-3, Section 10	Bombardier	The DAH's responsibilities are not clear. Although there is cursory mention of DAHs in section 11a.(1), the R&R are not explicit enough.	There is no subsection on DAH responsibilities.	Consider adding a subsection on "DAH" responsibilities, and specify that <i>"At the discretion of the responsible Directorate of ACO, DAHs can be asked to help draft or review the content for SAIBs that relate to their products"</i> .	Non-concur. While it is accurate to imply that DAH's have responsibility for continued operational safety oversight of their products, your suggested statement is more appropriate for an Advisory Circular. We encourage any office drafting an SAIB to work with the DAH as part of the development process, as is stated in ¶ 11.a.(1).
4.	General	Bombardier	EASA has similar guidelines for the acceptable use of their Safety Information Bulletins (SIBs), which might not be obviously similar to FAA's SAIBs. In other words, the acronyms, purpose statements, and list of acceptable and unacceptable uses, although similar, are not exactly the same and create confusion.	Harmonization might be useful to broaden industry understanding and ultimately increase visibility of SAIBs.	Consider harmonizing with the EASA SIB acronym, or with respect to using similar wording to explain the purpose and acceptable or unacceptable uses of and SAIB.	Partially concur. SIBs have the same function as our SAIBs, Safety Alerts For Operators, and Unapproved Parts Notifications. However, EASA's internal working procedures for SIBs do not provide detail as to acceptable and unacceptable uses. We agree in principle with your recommendation: we are reviewing how other CAAs issue non-mandatory safety information for opportunities for future harmonization beyond this current revision. No change to the order is needed at present.