

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>GE Aviation</b>	1	<p>This section states that the criteria and methods contained in this order are designed for “manufacturers with successful histories of producing like articles under parts manufacturer approval (PMA)” and applies to “articles that have the least effect on safety”.</p> <p>Past history of manufacturing parts under a PMA approval does not guarantee future success and should not be a criterion for invoking maximum use of the FAA’s discretionary authority with respect to PMA approvals.</p>	<p>Newer products may have dramatically different margins of safety and increased system interactions versus historical products. “Prior history” does not guarantee successful experience going forward on “like articles” in different products given the potential for significant system design changes that could change the functional requirements for the “like articles”.</p> <p>For example ... A cushioned P-clamp used to secure a fuel manifold on the outside of a turbine engine can also serve as a vibration damping mechanism for the fuel manifold system. “Prior history” with PMA of P-clamps does not ensure that the applicant understands the design criteria and performance constraints for a P-clamp integral to vibration damping for the manifold system. Introduction of design differences</p>	Delete “successful histories of producing like articles” as a qualifying criteria for a manufacturer to qualify for a streamlined PMA approval process.	<p><b>Adopted</b></p> <p>Revised the first sentence as follows:</p> <p>This order sets up criteria and methods for a streamlined process to approve articles from current holders of PMA that meet our qualifying criteria</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			to this “simple” part could have significant impact on the overall fuel delivery system compliance with the certification basis which would not be addressed by the proposed streamlined approval process.		
<b>Lycoming</b>	1	The subject proposed order states that the guidance is intended to streamline the article approval process and be particularly advantageous to manufacturers as well as the Aircraft Certification Offices (ACO). Lycoming strongly believes the order as drafted ignores significant defects in the definition of "non-critical articles" for piston aviation engines and provides unfair competitive advantage to the PMA holder community.			<b>Partially adopted</b>  Replaced “non-critical” with “non-safety significant” and refined the criteria for candidate article as follows:  Streamlining applies to articles that pose the least risk to their respective products and their failures have little or no impact on safe flight or

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					landing. These articles usually need a small number of discrete, well-known and easily demonstrated showings of compliance.
<b>Lycoming</b>	1	<p>Additionally, the FAA only makes mention to "like" articles. It is suggested that the order be revised to emphasize additional article approval will require the guidance set forth in order 8120.2G:</p> <p><b>"2-43. Advising the Applicant. The applicant should be advised that:</b></p> <p><b>d. PMA Holder's Responsibility</b></p> <p>(6) Additional Article</p>			<p><b>Partially adopted</b></p> <p>Replaced "from manufacturers with successful histories of making like articles under parts manufacturer approval (PMA)" with "from current holders of PMA that meet our qualifying criteria."</p> <p>The streamlined process relies on</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		Approvals. If a PMA holder wishes to produce additional articles under the existing approved quality system, an application must be made and the holder must show compliance with § 21.307. The MIDO will then issue a PMA supplement that adds the new articles to the original approval. If the new articles' production constitutes a significant change in the operation or capabilities of the PMA holder, the MIDO will conduct a review of the holder's production and quality systems."			Order 8120.2G requirements for adding articles to the supplements of existing holders of PMA. Note these holders already have approved quality systems per Title 14 CFR 21.307.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>N. J.Provenzano Protec Consulting, Inc</b>	1	Failure or modification of a non-critical part may result in the failure of a critical part normally referred to as the “determining the effect of influencing parts”. Draft does not address this issue as required by other FAA guidance/orders.			<b>Not adopted</b>  The criteria for the class of articles eligible for the streamlined process preclude articles that affect critical parts.
<b>N. J.Provenzano Protec Consulting, Inc.</b>	1	Section 1, Purpose states: “sets up criteria and methods for a streamlined process to approve articles from Manufactures with successful histories of producing like articles under...”. This implies that a specific list of parts can be developed which will always be classified as non-critical. This is not correct because a part maybe non-critical in one application or location but critical in another.			<b>Partially adopted.</b>  Replaced :non-critical” with “non-safety significant articles that have little or no effect on safe flight or landing”. The significance of an article to the safety its product is the basis for entry into this process.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>N. J.Provenzano Protec Consulting, Inc.</b>	1	The term “successful histories” is not defined and is arbitrary. Further a successful history does not automatically ensure the a similar part will be successful in the future. OEM’s occasionally misfire on parts which have been successfully executed many times in the past.			<b>Adopted</b>  Deleted “successful histories” and revised the first sentence as follows:  This order sets up criteria and methods for a streamlined process to approve articles from current holders of PMA that meet our qualifying criteria.
<b>N. J.Provenzano Protec Consulting, Inc.</b>	1	The ability of the PMA applicant to conduct a safety analysis needs oversight and certification. There should be a set of standards which must be met before the applicant is qualified to make the			<b>Partially adopted</b>  A safety assessment from experienced applicants and their qualitative failure mode and

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		determination if a part is critical or non-critical. For many PMA applicants this is an unfamiliar process and or lack the design knowledge to determine how and why a part failures and is unable to determine the consequences of failure.			effects analysis are key to the characterization of an article. The responsible ACO reviews the assessment that allows entry into the process.
<b>Snecma</b>	1	<i>This paragraph sets up "successful histories" as a criterion to go through a streamlined process to approve articles</i>	Every new part potentially introduces specific features which may affect the overall operations of the system it is a part of. Successful history claimed by a manufacturer cannot be a guarantee of success for the future designs	Do not consider successful history as a criterion to shorten ACO review.	<b>Partially adopted</b>  Revised for as follows:  This order sets up criteria and methods for a streamlined process to approve articles from current holders of PMA that meet our qualifying criteria.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Snecma</b>	1	<i>Streamlined process applies to articles that have the least effect on safety</i>	The "least effect on safety" is not defined in this document. Part categorization is defined in other official FAA document such as AC-33-8 but these documents are not referenced in FAA 8110.spm order.	Include FAA document such as AC-33-8 to have part categorized in accordance with their criticality.	<b>Partially adopted</b>  Revised the subject criteria to align with AC 33-8 and our risk based resource tool (RBRT) as follows:  The process applies to non-safety significant articles that have little or no effect on safe flight and landing. These articles from qualified applicants represent the lowest risk to safety.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>GE Aviation</b>	1, 4a, 8a	<p>These sections reference “articles that have the least effect on safety”, “no impact on safety” and “articles that pose the least risk to their respective products” as the definition for parts that will qualify for the streamlined PMA approval process.</p> <p>Definitions for “least effect on safety”, “no impact on safety” and “least risk” are not contained in this document. References to part criticality and parts that are eligible for the streamlined PMA approval process should be consistent with part criticality references contained in other FAA documents ... for example ACs 33-8, 33-9 and 43-18.</p>	<p>In the absence of definitions of “least effect on safety”, “no impact on safety” and “least risk”, FAA personnel responsible for evaluating applications for PMA will have to make their own determinations of what types of parts meet these broad descriptors. Failure to have clear definitions for parts that qualify for a streamlined PMA approval can result in application of the streamlined process to parts that were never intended to be covered by this process.</p>	<p>Delete references to “articles that have the least effect on safety”, “no impact on safety” and “least risk” (and other similar references throughout this document).</p> <p>Align references for part types that qualify for the proposed streamlined PMA approval process with part criticality references in other FAA documents ... for example ACs 33-8, 33-9 and 43-18.</p>	<p><b>Partially adopted</b></p> <p>Realigned the descriptions of the candidate articles and associated criteria with that used in the aforementioned advisory circulars and the FAA risk-based resource targeting (RBRT) tool.</p> <p>Revised the description and criteria for the potential articles as follows:</p> <p>The process applies to non-safety significant articles that have little or no effect</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					on safe flight or landing. These articles from qualified applicants represent the lowest risk to safety.
<b>Rolls-Royce</b>	1, 9	Rolls-Royce believes that a safe and successful implementation of the streamlined process delineated in Order 8110.SPMA and MARPA Document 1100 is fully contingent on the thoroughness and accuracy of the applicant's safety analysis and determination that the article is "non-critical and its failure has no effect on continued safe operation". In view of that, an applicant's intellectual		In order to minimize the occurrence of careless or inaccurate safety analysis and subsequent article classification, it is recommended that additional detail or safeguards be implemented within the characterization of the article process.	<b>Adopted</b>  Replaced "non-critical" with "non-safety significant" to focus this process on the class of articles that have the least impact on the safety of its product. In addition, we refined the criteria for candidate articles based on the consequences

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>understanding of the system in which the article is expected to function then becomes an essential ingredient of a meaningful safety analysis.</p> <p>For example, it may be concluded that a proposed article is ‘non-critical’ based on a casual determination that the part failure would only result in a power-loss or in-flight shutdown event, and that according to 14 CFR 33.75 (g)(1) the failure effect is regarded as a minor engine effect. However, to the Operator of a single engine aircraft, a power-loss or in-flight shutdown event is not a minor event. If the failure of a particular engine part occurs during a single</p>			<p>of their failures.</p> <p>Revised criteria to align with AC 33-8 and our risk based resource tool (RBRT) as follows:</p> <p>Streamlining applies to articles that pose the least risk to their respective products and their failures have little or no impact on safe flight or landing. These articles usually need a small number of discrete, well-known and easily demonstrated showing s of</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		engine phase of flight where a forced landing is likely un-survivable, then that part is critical (at least to the occupants of the aircraft).			compliance.
<b>MARPA</b>	1c	The Order should more clearly state that the reason that ODA is not useful to the process is because there is no need to approve data. Further, the Order should more clearly explain that an ODA-holder may elect to process these Non-Safety Significant Articles through the ODA at the holder's option (foregoing the benefit of this Order). Finally, in order to avoid confusion, this paragraph should make it clear that the compliance with the standard (in addition to the showing of compliance) is necessary to be eligible for	Clarification	Add the following to the end of end of the second sentence: and conformity to the industry standard for applications (no specific data approval is required).	<b>Adopted</b> as follows:  The revised has a new dedicated paragraph 6 that addresses delegation. The revised paragraph follows:  <b>6. Designees and the Streamlined Process.</b> This process relies on showings of compliance and conformity from qualified applicants without

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		streamlined approval under this process. We recommend that paragraph 4(c) be revised as follows to meet these recommendations.			the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then the holder may do so under the normal ODA process.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.
<b>GE Aviation</b>	4a	<p>The language in this section - “a proposed article whose failure has no impact on safety” - indicates that a part can qualify for the proposed streamlined PMA approval process if its failure is not deemed to have an impact on safety.</p> <p>The establishment of acceptance criteria for the streamlined approval</p>	<p>The highly interactive nature of parts in today’s turbine engines requires that both the applicant and the FAA look beyond the part itself and consider potential system interactions that involve the part in question. A part with system interactions does not have to fail to have an impact on safety.</p> <p>For example ... The airflow holes in packing associated with a roller bearing allow flow of pressurization and bore cooling air</p>	Expand the requirement for a part to qualify for the streamlined PMA approval process to include a rigorous system effects assessment in addition to a component level failure impact assessment.	<p><b>Partially adopted</b></p> <p>The revised criteria take into account any detrimental system effects from failure of an article performing its intended function.</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		process based solely on the relationship of a part's failure to impact on safety is insufficient.	from the booster flowpath. The bore cooling air establishes a boundary condition for multiple life-limited parts. Such a "simple" part would not have to fail to have a potential impact on safety. Introduction of design differences versus the type design would be enough to lead to potential safety issues.		
<b>GE Aviation</b>	4a, 6h, 9b	<p>Section 4.a. states that "A proposed article whose failure has no impact on safety competes for limited resources at each ACO."</p> <p>Section 6.h. establishes an FAA goal of approving PMA applications submitted under the streamlined approval process within 30 days from receipt of the package.</p> <p>Section 9.b. states that "the</p>	<p>Establishing the expectation of approvals within 30 days of receipt of data packages for "articles that have the least effect on safety" or "whose failure has no impact on safety" contradicts the stated goal of freeing up ACO resources to work on more safety critical issues. To meet the established 30 day processing time, ACO's will necessarily have to commit resources to processing PMA applications for "articles that have the least effect on safety." As currently written this order instructs FAA employees to use maximum</p>	<p>Modify the target approval time frame in Section 6.h. and Section 9.b. to be more consistent the FAA's stated goal of minimizing competition for limited ACO resources.</p>	<p><b>Not adopted</b></p> <p>The goal is not mandatory, but a reflection of the use of discretionary authority. Applicant qualifications and article eligibility criteria are conducive to expedited approval with the timeframe goal.</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>goal of the streamlined process is to help us approve eligible non-critical articles in about 30 days with minimal use of ACO resources.”</p> <p>Establishing a 30 day goal for approving non-critical articles under the streamlined PMA process seems to contradict the stated goal of minimizing competition for the limited resources of each ACO.</p>	<p>discretionary authority with respect to approving certain data packages with minimal review but does not appear to give these same employees the discretion to allocate their time to address more safety critical activities before processing applications for “articles that have the least effect on safety.”</p>		
<b>GE Aviation</b>	4b	<p>This paragraph states that “This streamlined process will be particularly advantageous to manufacturers lacking the staff to qualify for an organizational designation authority (ODA).”</p>	<p>The FAA’s Organization Designation Authorization (ODA) program delegates certain types of authority to qualifying organizations. A PMA ODA would only be granted to organizations that have demonstrated a thorough working knowledge of FAA regulations, methods of</p>	<p>Revise the content and scope of this order to ensure that the streamlined PMA process is not used to circumvent the FAA ODA process resulting in the effective delegation of FAA</p>	<p><b>Partially adopted.</b></p> <p>Consolidated the rationale for he lack if delegation in a new paragraph 6 as follows:</p> <p><b>6. Designees and</b></p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		Entities lacking the staff to qualify for an ODA would presumably be the least equipped to understand the potential safety impacts of a given part.	compliance, policy, processes and procedures applicable to the PMA process.	authority without the commensurate approvals required to achieve ODA.	<b>the Streamlined Process.</b> This process relies on showings of compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					If an ODA holder wants to make findings of compliance, then the holder may do so under the normal ODA process. Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.
<b>Snecma</b>	4b	<i>This streamlined process will be particularly advantageous to manufacturers lacking the staff to qualify for an organization designation</i>	ODA requires experience and thorough working knowledge of FAA regulations... to have delegations granted.	Ensure that this order can not be used to get round necessary application for an ODA	Adopted.  Deleted referenced sentence.  Consolidated the

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<i>authorization (ODA).</i>			<p>rationale for the lack of delegation in a new paragraph 6 as follows:</p> <p>6. Designees and the Streamlined Process. This process relies on showings of compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then the holder may do so under the normal ODA process. Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>DaCosta</b>	4b, 6a	<p>My comment here is "Manufacturing lacking the staff " to qualify for an ODA designation [8100.15a]</p> <p>Perhaps quantification of what the minimum qualification would be needed in order to be considered amply qualified to utilize "Spma" process.</p> <p>Reason: Using the four (4) year and no objectionable post-PMA service issues shown in this draft, does not take into account that many of these PMA PAH holders have no employed engineering staff, but contract the design and review [DERT] activities outside their respective company.</p>			<p><b>Partially adopted</b></p> <p>Deleted paragraph 4b.</p> <p>The minimum applicant qualifications in paragraph 7a1 are as follows:</p> <p>The applicant must hold PMA with four years minimum experience making similar articles and having:</p> <p>No unresolved alert service bulletins, No airworthiness directives, and No reports of systematic</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		Therefore, clarification may be needed to differentiate how, and whom these manufactures should have these Spma's prepared and reviewed by before submission to FAA ACO.			noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) <b>within the last four years.</b>
<b>Lycoming</b>	4b, 8b	The order directs that compliance statements must be provided by applicant; however, it also specifically states that ODA holders cannot use their ODA units and that the process does not allow the use of Designated Engineering Representatives (DERs). If neither the ODA units nor DERs can be used, what will the criteria be for the individuals who are making conformity and			<b>Partially adopted</b>  The nature of the non-safety significant articles eligible for the streamlined process relies on applicant only showing of compliance because these articles represent the lowest risk to the safety of the aircraft, engine or

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		compliance findings?			<p>propeller. Applicants still comply with 14 CFR 21.303(a)(3) by submitting their articles' designs. This data is the bases for conformity inspections.</p> <p>Clarified the ODA and designee exclusion from the streamlined process in a new paragraph 6 as follows:</p> <p><b>6. Designees and the Streamlined Process.</b> This process relies on showings of compliance and conformity from</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then the holder may do so under the

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					normal ODA process. Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations..
<b>DaCosta</b>	4c	I believe this same prelude argument can be made to the use of qualified FAA DER's ... meaning use of FAA DER's in many certification programs also reduces "some" demands on ACO resources!  Comment: FAA needs to			Partially adopted  A new paragraph 6 clarifies the lack of an ODA component and designees in the streamlined process.  6. Designees and the Streamlined

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		clarify how this statement relates to item statement of 8b.  8b.			Process. This process relies on showings of compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					wants to make findings of compliance, then the holder may do so under the normal ODA process. Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.
<b>HEICO Aerospace</b>	4c	Paragraph 4.c. is discussing the relation of the ODA holder to the Streamlined Process. We would strengthen the last sentence to recommend against this Streamlined	The ODAs and streamlined process are both trying to reduce the demand on ACO. By using the ODA, the ODA holder will use less ACO resources. Note: We would not prohibit the use of the Streamlined Process, just	Change the last sentence to read. “An ODA Holder should not use this Streamlined Process, but should use their normal ODA procedures.”	<b>Adopted</b>  <b>6. Designees and the Streamlined Process.</b> This process relies on showings of

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		Process if you have an ODA	recommend against it.		compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					the holder may do so under the normal ODA process. Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.
<b>DaCosta</b>	5	1. Element "Experience" with the PAH. This as it is will be difficult for the following reasons:  a. ACO engineers assignments, rotate, therefore the ACO engineer will be tasked with developing a			<b>Not adopted</b>  1a. The streamlined process is not reliant on the expertise and familiarity of any one ACO engineer with a qualified

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>"experience" [knowledge and understanding of the PAH and his operations. ACO as it is has budget constraints that may not avail the ACO engineer to apply their resource to this "Key" element [task].</p> <p>b. ACO engineer may not be current on the PAH technology use, or special processes, though the part may not be critical in itself, the processes maybe.</p> <p>2. Key element #1 "Categorizations" by the applicant to relevant to criticality of the part, would require showing of "Where used" Impact on the next higher assembly, and Is the showing really the most critical location</p>			<p>applicant. The referenced element addresses the FAA organizational experience with this applicant as evidenced by past approvals.</p> <p>1b. The specific engineer need not have intimate knowledge of an applicant's capabilities, but access to the record of past approvals that attest to the qualifications for the streamlined process.</p> <p>2. The applicant assesses the impact of an article's</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>application the article can be installed into? This would require the ACO engineer to extensively know, or the applicant show ALL applicable locations for installation and that implication.</p> <p>3. Key element #2 Key element #1 "Safety Analysis" by the applicant to relevant 14 CFR xx.1309 maybe beyond the applicants ability even when properly addressed using FAA guidance AC 23.1309-1D, would require the ACO engineer to read the FMEA and concur with that assessment.</p> <p>4. Key element # 3 "Service History" The ACO would need to verify</p>			<p>failure on the product. Only articles whose failures have little or no affect on the respective products qualify for the streamlined process. The application for this PMA still needs showings of compliance to a product's airworthiness requirements. The application includes evidence of eligibility.</p> <p>3. The safety assessment follows that in the standard PMA process. It does not rely on the rigor of a</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		the search results put forward by the applicant, this would take some resource time by the ACO engineer.			product's fault tree analysis. A failure modes and effects analysis is sufficient for the class of articles eligible for the streamlined process.  4. The applicant provides information of the service history of the original article as a part to the safety assessment. The ACO engineer has discretion to check applicant's showings.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>GE Aviation</b>	5	<p>This section highlights the FAA’s reliance on “a leading PMA industry group” to develop the streamlined approval process defined in this Order and the referenced industry document (MARPA 1100) defining the key requirements of the streamlined process.</p> <p>Development of the process and reference material covered by this order should involve a broader cross-section of industry.</p>	<p>Broader industry input is required to ensure that the “criteria and methods for a streamlined process” embodied and referenced in this Order truly mitigate the risk of approval of parts whose failure or system interactions could impact safety given the intent of the Order to maximize use of the FAA’s discretionary authority and issue “approvals based solely on the applicant’s showing of compliance.”</p>	<p>Engage the Aerospace Industries Association to expand industry participation in development of the industry guidance to be referenced in this Order.</p>	<p><b>Not adopted.</b></p> <p>The FAA ACO leadership team and a PMA trade group developed this initiative to alleviate FAA resources and expedite approvals. Applications for this group of articles occur routinely at every ACO and across product lines. This process standardizes a practice at various ACOs. The process does not relieve applicants from showing and stating compliance with regulations.</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Snecma</b>	5a	<i>This is followed by a shortened ACO review based on our successful experience with the manufacturer</i>	Successful history claimed by a manufacturer cannot be a guarantee of success for the future designs (see above)	Successful should not be considered as a criterion to shorten ACO review	<b>Adopted</b>  Deleted “successful”
<b>Snecma</b>	5a	<i>A key component of this package is applicant’s safety assessment...</i>	Because of various interactions between parts, an exhaustive safety assessment cannot be performed at part level and must be extended to the whole system. A PMA part manufacturer may not be in a position to perform an accurate safety assessment. A letter from FAA (P.A. White) to AIA (T. Sigler) has expressed concerns about PMA applicant’s ability to account for system effect in safety analysis and needs for industry guidance to perform analysis	Launch an industry working group to come up with an industry guidance to be included in this FAA order.	<b>Not adopted</b>  The FAA restricts this process to the group of articles that pose the least risk to safety. It represents a fundamental use of discretionary function. Acceptance of applicant only showings of compliance allows the FAA to focus resources to more safety significant efforts.

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>GE Aviation</b>	5a.	<p>This document states that “A key component of this package is the applicant’s safety assessment that 1) categorizes the article as non-critical, 2) shows that the article’s failure has no impact on safety, and 3) evaluates the service history of the original article including any know service issues, alert service bulletins/letters/notices, and Airworthiness Directives (AD).”</p> <p>A recent letter from the FAA ECO to the Aerospace Industries Association highlighted concerns with PMA (and other DAH) applicant’s ability to perform safety assessments of turbine engine components. Reliance solely on “a</p>	<p>The June 6, 2011 letter from Mr. Peter White of the FAA ECO to Mr. Todd Sigler of the Aerospace Industries Association highlighted concerns with PMA applicant’s abilities to properly understand potential system interactions for turbine engine parts:</p> <p>“However, the assessments used for validating reverse engineered designs are only as good as the supplier’s ability to understand the functional design of the original part and the influence the part has on the engine system, and the influence the engine system has on the part.”</p> <p>And,</p> <p>“Guidance is needed to help replacement and modification parts suppliers understand the engine system effects that need to be assessed for parts that can</p>	<p>(1) Engage the Aerospace Industries Association to expand industry participation in development of the industry guidance to be referenced in this Order.</p> <p>(2) Incorporate the industry guide developed by AIA to support this Order into FAA guidance material (e.g. Advisory Circulars 33-8 and 33-9) rather than referencing an uncontrolled industry document.</p>	<p><b>Not adopted</b></p> <p>The document sets the format and content for showing compliance with the applicable airworthiness requirements. Any potential articles will have a small number of discrete, well-known and easily demonstrated showings of compliance. Expanded industry involvement is unnecessary at this point as the process involves an exercise of FAA discretionary function at a</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		leading PMA industry group” for part criticality determinations for turbine engine parts seems contradictory to the FAA ECO effort to enlist broader industry support to address concerns with this same issue.	influence, or are influenced by critical engine parts and systems, and then set the expectations for what they need to do include in their reverse engineering validation procedures to avoid unintended consequences to the engine system. This guidance will also help ensure all turbine engines parts suppliers are working to comparable requirements for part integrity and continued operational safety, and it will serve those operators who legally configure their engines with replacement and modification parts.”		fundamental level while preserving safety of the product.  The process does not circumvent prior guidance for showing compliances. The very nature of the anticipated class of articles will limit scope of any system effects.
<b>ANE-100/110/140 Combined</b>	5b	<b>COMMENTS FOR MARPA MANUAL:</b> Do not establish new eligibility criteria in MARPA document.	One set of criteria should be established for streamlining using consistent unambiguous language.	Change “Non-Critical Articles Submitted” to articles <b>meeting the streamlining criteria in FAA Order 8110.spma Section 8</b> ”	<b>Adopted.</b> Document revised to use the same criteria as the implementing order.

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Lycoming</b>	5b	<p><i>"A key component of this package is the applicant's safety assessment that 1) categorizes the article as non-critical, 2) shows that the article's failure has no impact on safety and 3) evaluates the service history of the original article including any known service issues, alert service bulletins/letters/notices, and Airworthiness Directives (AD)."</i></p> <p>This safety assessment is done by each applicant and there is no standard requirement specified for this evaluation.</p>			<p><b>Partially adopted</b></p> <p>The standard for the safety assessment is in the industry document and includes consideration of the noted elements. In addition, non-safety significant replaced non-critical. The former term better describes the governing attribute of candidate articles.</p> <p>Revised and moved the paragraph 7b1 as follows:</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					Review the applicant's characterization of each article and the impact of its failure. The applicant's safety assessment must show the article is non-safety significant and its failure has little or no effect on continued safe flight and landing. Use safety standards appropriate to your product. If you concur with the applicant's assessment, accept the article into the streamlined process. If the safety assessment

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					is inadequate or the article's failure affects safety, direct the applicant use the PMA process in Order 8110.42.
<b>MARPA</b>	5b	Draft Order 8110.SPMA paragraph 5.b. refers to the MARPA 1100 document as "Streamlined Program for PMA Applications of Non-Critical Articles Submitted by Experienced Applicants with a Qualifying Performance Record." The correct title is "Streamlined Program for PMA Applications of <i>Non-Safely-Significant</i> Articles Submitted by Experienced Applicants with a Qualifying Performance Record."		Please therefore update the title of the MARPA standard in this paragraph.	<b>Adopted.</b> Aligned this common terminology throughout the order.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		As discussed earlier, the MARPA program was purposefully named using an undefined term in order to avoid confusion with the existing conflicting definitions of the <b>term "critical."</b>			
<b>MARPA</b>	5b	Draft Order 8110.SPMA paragraph 5.b. makes reference to the location of the MARPA standard as being at .. www.pmamarpa.com ... MARPA changed its primary website location about five years ago to "www.pmaparts.org." Although the older URL location remains active as a pointer to the new URL location, it will be phased out when the current domain registration for "marpapma.com" expires.		Please therefore update the location of the MARPA standard in this paragraph.	<b>Adopted</b>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>N. J.Provenzano Protec Consulting, Inc</b>	5b	The draft document directs readers to a PMA trade association website for guidance relative to executing the streamlined approval process. This includes “the nature of the articles”. Control of the guidance lacks FAA oversight and changes can be made without FAA approval.			<b>Not Adopted</b>  The streamlined process is a cooperative initiative with industry. The public comment process will reconcile differences and align terminology and criteria for a consistent approach. Note that the content of this order has precedence over the industry document.
<b>Snecma</b>	5b	Applicant guidance for this process, the nature of the articles, and the kind of supporting data is in the <i>Modification and Replacement Parts</i>	MARPA Document 1100 is labeled as a draft document on MARPA website. The revision process is not clearly defined	This document might be used as a guidance by applicants but should not be used as a reference in a FAA document. It should be	<b>Not adopted</b>  The MARPA document is applicant guidance that the order

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<i>Association (MARPA) document 1100...</i>		replaced by an official FAA document (Advisory Circular). This FAA document might be based on recommendations issued by an industry working group	processes for PMA. It prescribes the scope and means of needed showings compliance. The public comment process aligns the document and order. The industry document cannot set requirements on the FAA in its approvals.
<b>GE Aviation</b>	5b and c	Section 2.5.b. states that “Applicant guidance for this process, the nature of the articles, and the kind of supporting data is in the Modification and Replacement Parts Association (MARPA) Document 1100.”	Multiple references in the MARPA Document 1100 do not align with the content of the FAA Order. Three examples are highlighted below.  <u>EXAMPLE 1 – Eligible Parts</u> • MARPA Document 1100 states that the streamlined program	The FAA should eliminate conflicts (now and in the future) by deleting all references to MARPA Document 1100 and issuing an Advisory Circular that clearly defines the requirements for	<b>Partially adopted</b>  This hybrid approach uses a publically available document and an implementing FAA order.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>Section 2.5.c. states that “If any conflicts arise between this order and the industry guide, this order takes precedence” but also states that “We make a finding of compliance by accepting the showings from qualified applicants in the manner set forth in the memorandum of understanding (MoU) with its reliance on the MARPA industry guide.</p> <p>Pointing applicants and FAA employees to the MARPA Document 1100 as currently written will create significant confusion and require both applicants and FAA employees to make judgment calls due to the multiple disconnects between wording in the</p>	<p>applies for a “Non-Safety Significant article” and defines such an article as one “whose failure would have no appreciable effect on the continued safe flight and landing of the aircraft.” MARPA does not define what the phrase “no appreciable effect” means.</p> <ul style="list-style-type: none"> <li>• This order states that the streamlined program applies to an “article whose failure has no impact on safety”.</li> <li>• Both applicants and FAA employees are required to decide whether or not a part that qualifies under the MARPA definition qualifies under the FAA Order.</li> </ul> <p><u>EXAMPLE 2 – Eligible Applicants</u></p> <ul style="list-style-type: none"> <li>• MARPA Document 1100 states that “This program applies ... when that application is submitted by an experience production approval holder with a documented record of safety accomplishment.” and “The</li> </ul>	<p>application for PMA under the streamlined approval process.</p> <p>The FAA should also eliminate Section 5.c. on Page 2 since conflicts will not arise between an FAA issued order and an FAA issued advisory circular.</p>	<p>Internal coordination and public comment process will align both the order and the MARPA document. The final versions of both will use common terms and criteria as espoused during this process. The document and order had known differences to allow others to comment on their best resolution.</p> <p><u>Example 1:</u> The document and order will have the same criteria for candidate articles eligible for the</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		Order and wording in MARPA Document 1100.	<p>applicant has past experience with the PMA process.”</p> <ul style="list-style-type: none"> <li>• This order states that “The applicant must hold PMA with four years minimum experience making similar articles . . . “</li> <li>• Both applicants and FAA employees are required to decide whether or not an application that qualifies under the MARPA definition qualifies under the FAA Order.</li> </ul> <p><u>EXAMPLE 3 – Qualifying Criteria</u></p> <ul style="list-style-type: none"> <li>• This order clearly states that the streamlined PMA process is intended for “articles whose failure has no impact on safety”</li> <li>• MARPA Document 1100 Section VII highlights the fact that parts “whose failure would have NO appreciable effect on continued safe flight BUT whose failure in combination with other factors might reasonably affect continued safe flight” could still qualify for</li> </ul>		<p>streamlined process. The applicant makes the initial assessment and supports such. The project ACO reviews and arbitrates this assessment.</p> <p><u>Example 2.</u> The special conditions and caveats for applicant qualifications in the industry document are ambiguous. The order will set the applicant qualifications with an allowance for deviations on a case-by-case basis.</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			<p>the streamlined approval process.</p> <ul style="list-style-type: none"> <li>This same section also suggests that applicants may choose to include DER-approved data supporting the showing of compliance while this order states “this process of non-critical articles does not allow the use of Designated Engineering Representatives (DER) to make findings of compliance.”</li> </ul>		<p><u>Example 3:</u> The document and order will use the following criteria for candidate articles:</p> <p>Non-safety significant articles are those whose failures have little or no effect on safe flight or landing.</p>
<b>GE Aviation</b>	5b, 6c and 7b	This section references “the Modification and Replacement Parts Association (MARPA) Document 1100, Streamlined Program for PMA Applications of Non-Critical Articles Submitted by Experienced Applicants with a Qualifying Performance Record, dated September 19, 2011.” The document referenced here	The fact that the September 19, 2011 version of MARPA Document 1100 is marked as “draft” and includes a “Revision History” section indicates that MARPA intends for this document to be a living document that changes over time. Referencing the September 19, 2011 (draft) version of the MARPA Document 1100 in this order creates the potential for significant confusion going forward as applicants following the	The FAA should eliminate conflicts (now and in the future) by deleting all references to MARPA Document 1100 in this order and issuing an Advisory Circular that clearly defines the requirements for application for PMA under the streamlined approval process.	<p><b>Not adopted</b></p> <p>The implementing order for the streamlined process stipulates its precedence over the industry document in the event of conflicts. The document sets the format and scopes the required</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>and accessed directly by a link contained in this order is marked as a draft document and contains a revision history index indicating that this document will be subject to continual revision over time.</p> <p>FAA Orders instruct FAA employees on how to follow FAA rules, policy and guidance material. Directing FAA employees to follow MARPA Document 1100 rather than FAA mandated internal process seems inappropriate. Additionally, referencing an uncontrolled industry document can create significant confusion moving forward when the specific referenced</p>	<p>MARPA Document 1100 will likely use the most recent version while FAA employees will be required to use the September 19, 2011 draft version of the document.</p> <p>This potential conflict is compounded by the FAA intent to maximize use of the FAA's discretionary authority and issue "approvals based solely on the applicant's showing of compliance."</p>	<p>Issuing an Advisory Circular will allow the FAA to maintain control of revisions to the guidance material referenced in the order. Additionally, referencing an FAA AC rather than an industry document addresses concerns with instructing FAA employees to take direction from non-FAA issued guidance material.</p>	<p>showings of compliance. The final versions of the order and document will have the same applicant qualifications and the article criteria.</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		document (“dated September 19, 2011”) may not be available for FAA employee review due to subsequent revisions introduced outside of the FAA’s control.			
<b>Lycoming</b>	5c	With respect to the consistent and equitable application of the FARs, the new order relies on and references a Memorandum of Understanding (MoU) between the FAA ACO offices and the applicants. The MoU would specify the content of the compliance data required per the MARPA Document 1100. There is an attempt to apply a set of eligibility requirements for past performance to the applicants: "The applicant must hold PMA with four years	However, basing a MoU with reliance on the MARPA industry guide and providing for waivers and special circumstances at the discretion of the FAA once again allows individual interpretation of the order and overall variation in compliance from applicant to applicant and ACO to ACO.  More importantly, the exceptions stated above must be addressed in the interest of safety. The same allowances regarding MoUs and the discretion of the FAA to apply special circumstances or waive ACSEP findings provide for the potential that PMA parts can be introduced to the field without the		<b>Partially adopted</b>  This hybrid approach uses a publically available document and an implementing FAA order. Internal coordination and public comment process will align both the order and the MARPA document. The final versions of both will use common terms and

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>minimum experience making similar articles and having:</p> <ul style="list-style-type: none"> <li>o No alert service bulletins,</li> <li>o No airworthiness directives, and</li> <li>o 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 manufacturing inspection district office (MIDO) to search CMIS for non-compliances. " <p>While this appears to make</p> </li></ul>	<p>same rigorous evaluation, and history as the parts of the Design Approval Holder (DAH). From the Order</p>		<p>criteria as espoused during this process. The document and order had known differences to allow others to comment on their best resolution.</p> <p>The applicant qualifications in the order are the governing requirements for entry into this process. Revision of the industry document will remove the noted caveats and match the qualifications in the order.</p> <p>Revised the effected paragraph</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>the requirements clear and consistent for all the potential applicants, the order allows an applicant to circumnavigate the order by using the guidance set forth in MARPA Document 1100 Rev. Sept 19, 2011:</p> <p><b>"v. DEMONSTRATING YOUR BUSINESS' QUAUFICATIONS</b></p> <p><b>PRODUCTION QUALITY INFRASTRUCTURE</b></p> <p><b>PRACTICE GUIDE</b>  <b>V(8)(2)(c):</b> An applicant with one or more ACSEP Finding of safety non-compliance in the past four years is free to structure their PMA applications according to the MARPA</p>			<p>as follows:</p> <p>c. We make a finding of compliance by accepting the showings from qualified applicants in the manner set forth in the MARPA document. The document contains best practices from other working agreements with the FAA. Some of these practice guides and associated contingencies go beyond the scope of this order. If any conflicts arise between this order and the industry</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>1100 program. <b>Any special circumstance may be used to reduce the time period associated with this element, or to waive a prior ACSEP Finding of safety noncompliance at the discretion of the FAA.</b> The decision to permit an applicant with ACSEP Findings of safety non-compliance in the past four years to enjoy allowances like expedited treatment would be entirely at the discretion of the FAA, and would likely be addressed in the MOU between the applicant and the FAA.</p> <p><b>QUALITY RECORD</b></p> <p><b>PRACTICE GUIDE</b> V(C)(I)(c): An applicant</p>			document, this order takes precedence.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>with one or more Airworthiness Directives in the past four years is free to structure their PMA applications according to the MARPA 1100 program. <b>Any special circumstance may be used to reduce the time period associated with this element, or to waive a prior Airworthiness Directive at the discretion of the FAA.</b> The decision to permit an applicant with Airworthiness Directives in the past four years to enjoy allowances like expedited treatment would be entirely at the discretion of the FAA, and would likely be addressed in the MOU between the applicant and the FAA.”</p> <p>The FAA attempts to cover</p>			

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>any discrepancies between the above MARPA guidance and the order with the following:</p> <p><b>"5. Streamlined FAA and Industry Process.</b></p> <p>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 memorandum of understanding (MoU) with its reliance on the MARPA industry guide."</p>			

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Rolls-Royce</b>	5c	We believe that there is a discrepancy between the expectations in Order 8110.SPMA and the MARPA 1100 document. The FAA Order requires zero reports of noncompliance in ACSEP audits within the last four years. The MARPA 1100 document (Requirement V(B)(2)) limits the requirement to only “findings of safety noncompliance”. It is recommended that the FAA’s intended expectation with regards to ACSEP findings be clarified if needed.			<b>Adopted</b>  This hybrid approach uses a publically available document and an implementing FAA order. Internal coordination and public comment process will align both the order and the MARPA document. The final versions of both will use common terms and criteria as espoused during this process. The document and order had known differences to allow others to

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					comment on their best resolution.  The applicant qualifications in the order are the governing requirements for entry into this process. Revision of the industry document will remove the noted caveats and match the qualifications in the order.
<b>MARPA</b>	6	Paragraph six of the draft Order describes the streamlined process. As currently drafted, it fails to distinguish the non-recurring features of process implementation from the recurring features of process use. In order to		We have added suggested text to the proposal that would permit changes to the MOU.  We have added suggested text to the proposal that would	<b>Adopted</b>  Revised paragraph 6 and renumbered as follows:  <b>7. The Streamlined PMA Process.</b>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>improve the draft Order, we recommend splitting this paragraph into two paragraphs (or leaving it as two separate sections within the same paragraph). The first ha~ should describe non-recurring features, such as assessing the applicant's eligibility for participation in the program and developing the MOU. The second ha~ should describe the recurring features that will occur for every PMA application eligible for participation in this program.</p> <p>This will make it clear that the MOU process does not have to be repeated for each separate PMA Article.</p>		<p>permit the ACO to suspend the MOU or permit it to continue in the event of a potentially disqualifying event. The deciding factor in such an event would be the ACO's assessment of whether the event undermines trust in the applicant.</p> <p>We recommend the following suggestion, which re-orders the elements that are part of the process and implements the above-mentioned changes. Note that the FAA may wish to split "Implementing the Process" and "Using the Process" into two completely separate paragraphs.</p>	<p><b>a. Application and Setup</b></p> <p>1. Review the applicant's statement of qualifications for the streamlined process. The applicant must hold PMA with four years minimum experience making similar articles and having:</p> <p>No alert service bulletins, No airworthiness directives, and No reports of systemic noncompliance in Principle Inspector</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>6. Steps to Implementing the Streamlined PMA Process.</p> <p>6a. Implementing the 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 articles and having:</p> <ul style="list-style-type: none"> <li>• No alert service bulletins.</li> <li>• No airworthiness directives against the applicant's parts, and</li> <li>• No reports of noncompliance in Principle Inspector (PI) evaluations, ACSEP audits and</li> </ul>	<p>(PI) evaluations, ACSEP audits and Letters of Investigation (LOI) <b>within the last four years.</b></p> <p>2.The ACO may search the Aircraft Certification Systems Evaluation Program (ACSEP) reports in Certificate Management Information System (CMIS) database. Contact the responsible manufacturing inspection district office (MIDO) to search CMIS for non-compliances. If an applicant has</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>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 manufacturing inspection district office (MIDO) to search CMIS for non-compliances.</p> <p>In cases where an otherwise qualified applicant has an occurrence described in this subparagraph within the last four years before the application,</p>	<p>a disqualifying occurrence of any one of the above, the project ACO must request a deviation for continued use of the streamlined process.</p> <p>3. Establish a MoU with the first time applicant that prescribes the format and content of the compliance data as described in the MARPA Document 1100. This MoU forms the framework for subsequent approvals of other articles from the qualified applicant. Use the document's article</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>you may shorten the eligibility compliance period only if the event does not undermine the FAA's trust in the applicant's ability to make findings of compliance for their own articles.</p> <p>b. Establish a MoU with the applicant that prescribes the content of the compliance data described in the MARPA Document 1100. Use the document's article specific certification plan (PartSCP) as necessary.</p> <p>c. Upon application for revision by the applicant, you may revise the MOU.</p> <p>d. After approval of the MOU, if the applicant</p>	<p>specific certification plan (PartSCP) as necessary. Accept subsequent data packages for other articles from the applicant that abide by the MoU.</p> <p><b>b. Implementation</b></p> <p>1. Review the applicant's characterization of each article and the impact of its failure. The applicant's safety assessment must show the article is non-safety significant and its failure has little or no effect on continued safe flight and landing.</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				has an occurrence described in sub-paragraph 'a' of this paragraph, then the ACO must assess whether the event undermines trust in the applicant's processes. If the ACO decides that the event undermines trust in the applicant's processes such that the applicant should no longer be permitted to operate under an MOU, then the ACO shall suspend the MOU (in writing) pending satisfaction that the applicant can participate in the MOU to the FAA's satisfaction. If the ACO decides that the event does not undermine trust in the applicant's processes,	Use safety standards appropriate to your product. If you concur with the applicant's analysis, accept the article into the streamlined process. If the safety analysis is inadequate or the article's failure affects safety, direct the applicant use the PMA process in Order 8110.42. 2. Check the data package for completeness and adherence to this order and the MARPA document. Note that MARPA 1100

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>then the ACO shall acknowledge the event and the applicant's corrective actions in a writing that permits the MOU to continue unabated.</p> <p>6b. Using the Process</p> <p>e. Accept subsequent data packages that abide by the MoU with their state compliance per 14 CFR § 21.303(a)(5).</p> <p>f. Review the applicant's characterization of the article and the impact of its failure. The applicant's safety analysis must show the article is Non-Safety Significant and its failure has no effect on continued safe operation</p>	<p>guides applicants in the content of acceptable data packages, but it also has some contingencies that are not in this order. Exercise of these contingencies will require approval of a deviation from this order.</p> <p>3. Review the associated statements of compliance per 14 CFR § 21.303(a)(5).</p> <p>4. If the PMA application satisfies the streamlined criteria, the ACO records an approval by</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>of the aircraft, engine or propeller. Use safety standards appropriate to your product. If you concur with the applicant's analysis, accept the article into the streamlined process. If the safety analysis is inadequate or the article's failure has an effect on continued safe operation of the aircraft., engine or propeller, direct the applicant to use the standard PMA process.</p> <p>g. 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>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) or Word document (DOC) format. The MIDO will use this document to create new or change the existing supplements of the PMA holder.</p> <p>5. The non-safety significant nature of an eligible article diminishes the need for an</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>h. If the PMA application satisfies our streamlined criteria, the ACO 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 of Document Format (PDF). The MIDO will use this document to create new or change the existing supplements of the PMA holder.</p> <p>i. The MIDO shall rely on the applicant's first article inspection report to confirm the article</p>	<p>initial conformity inspection. An applicant's first article inspection report documents the required conformity to its approved design. 6. 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 document.</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>conforms to its approved design.</p> <p>j. The goal for approval by the FAA is 30 days from receipt of a data package that follows the content and format of the industry guide.</p>	
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	6a	The draft Order reads” No reports of noncompliance’s in Principal inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years”. We believe most PMA manufacturers would not meet this criterion and recommend slightly less restrictive criteria.	Four years with NO noncompliances in either PI evaluations or ACSEPS is very restrictive criteria. We would suggest no systemic noncompliance’s resulting in the issuance of a Letter of Investigation within the last four years be used instead.	A noncompliance may be systemic or isolated restricting an applicant from using this process perhaps unfairly. By limiting this criteria to systemic noncompliance’s where a letter of investigation was documented in the last four years accomplishes the intent of the original statement, but doesn’t unduly limit an applicant.	<b>Adopted.</b>  Revised in paragraph 7 as follows: No reports of <u>systematic</u> noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years. The ACO may search the Aircraft

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					Certification Systems Evaluation Program (ACSEP) reports in Certificate Management Information System (CMIS) database. Contact the responsible manufacturing inspection district office (MIDO) to search CMIS for non-compliances
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	6a	The draft Order states “The applicant must hold PMA with fours years minimum experience making similar articles...” While the MARPA 1100 draft indicates this may be reduced based on experience that demonstrates a thorough	By stating four years in the Order it doesn’t allow for consideration of applicants that demonstrate extensive experience. But we concur there should be a minimum level of demonstrated experience prior to using this process.	Change 6(a) to read “The applicant should hold PMA with four years demonstrated experience making similar articles, but this may be reduces to two years for applicants demonstrating extensive experience with PMA	<b>Not Adopted.</b>  MARPA proposed the 4-year minimum level of experience in an earlier version of their document. Prior internal review accepted

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		understanding of the FAA’s PMA application process. We recommend the MARPA 1100 indication be added to allow for reduced timeframe. We suggest that be no less than two years experience.		applications of similar articles”.	this minimum as start. Later revisions may consider reducing or increasing the minimum based on the success of the process.
<b>Boeing Commercial Airplanes</b>	6a	The first bullet reads:  <i>“No alert service bulletins...”</i>  We consider this language too restrictive	We recommend revising the text to state:  <i>“No <u>unresolved</u> alert service bulletins ...”</i>	Consider the scenario where the service bulletin is years old, but still in effect. For example, Cessna has a service bulletin on the 172 models to check seat tracks annually for the life of the airplane	<b>Adopted</b>
<b>Boeing Commercial Airplanes</b>	6a	Second bullet reads:  <i>“No airworthiness directives ...”</i>  We consider this language too restrictive.	We recommend revising the text to state:  <i>“No airworthiness directives initiated within <u>[time frame]</u>”</i>	Consider the same scenario as described in our Comment #1. “No” means never. We suggest that a time frame needs to be taken into account.	<b>Adopted</b>  The time frame for each bullet is the same 4 year interval noted at the end of the sentence

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Boeing Commercial Airplanes</b>	6a	<p>The third bullet reads:</p> <p><i>“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 manufacturing inspection district office (MIDO) to search CMIS for non-compliances”</i></p> <p>We consider this language too restrictive.</p>	<p>We recommend revising the text as follows:</p> <p><i>No reports of noncompliance in <b>Principle Principal</b> Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years <u>affecting inspection, conformance, or airworthiness</u>. The ACO may search the Aircraft Certification Systems Evaluation Program (ACSEP) reports in Certificate Management Information System (CMIS) database. Contact the responsible manufacturing inspection district office (MIDO) to search CMIS for non-compliances.”</i></p>	<p>The nature of any PI finding, ACSEP finding, and LOI should be taken into account. For example, an LOI written for something that did not have any adverse affect on the quality and conformance of the product should not eliminate the PMA from using this process.</p>	<p><b>Partially adopted</b></p> <p>The revised bullet further defines the type of non-compliances now in paragraph 7 as follows:</p> <p>No reports of <u>systemic</u> noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) within the last four years.</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>DaCosta</b>	6a	<p>This four-year minimum is fine, but clarification to added define additional parts not found to be materially similar to the prior PMA activities.</p> <p>Should new part types restart clock [minimum].</p>			<p><b>Not adopted</b> The four year minimum experience level is unaffected by the types of future articles from an applicant. The responsible MIDO still assesses the capability to manufacture each additional article added to a PMA supplement per FAA Order 8120.2</p>
<b>GE Aviation</b>	6a	<p>This section states that applicants who qualify for the streamlined process “must hold PMA with four years minimum experience making similar articles”.</p> <p>As discussed above, past history of manufacturing “similar articles” under a</p>	<p>As discussed above, newer products may have dramatically different margins of safety and increased system interactions versus historical products. “Experience making similar articles” does not guarantee successful experience going forward on different products given the potential for significant system design changes that could change</p>	<p>Establish clear criteria for applicants and parts to qualify for the streamlined PMA approval process – especially for turbine engine parts – including:</p> <ul style="list-style-type: none"> <li>• Proper classification of part type using part</li> </ul>	<p><b>Not adopted</b></p> <ul style="list-style-type: none"> <li>• Defining the range and groups of articles is beyond the scope and intent of this order. The streamlined process focuses on articles from one</li> </ul>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>PMA approval does not guarantee future success and should not be a criterion for invoking maximum use of the FAA’s discretionary authority with respect to PMA approvals.</p> <p>Furthermore, the current criteria “four years minimum experience” is too vague to be used as a qualification criteria for determining acceptability for the streamlined process.</p>	<p>the functional requirements for the “similar articles”.</p> <p>The qualification criteria of “four years minimum experience” as currently presented does not differentiate between an applicant that produced a high volume of parts under a prior approval and one who produced only a handful of parts under a prior approval. A four year time period without significant accumulation of service history for parts produced in that time frame – and corresponding field data on the performance of such parts over the time frame – is a meaningless qualifier for the streamlined process.</p> <p>Presumably the intent of the “four years minimum experience” reference is to ensure that applicants wishing to use the streamlined PMA approval process have accumulated significant field</p>	<p>criticality definitions defined in other FAA documents ... for example ACs 33-8, 33-9 and 43-18.</p> <ul style="list-style-type: none"> <li>• Minimum experience threshold for number of parts introduced into service</li> <li>• Minimum experience threshold in terms of accumulated hours and cycles of in service experience (for turbine engine parts)</li> <li>• Limitation that parts identified as influencing parts for Life-Limited Parts are not eligible for the streamlined PMA approval process (for turbine engine parts)</li> </ul>	<p>group that has little or no effect on safe flight and landing. The aforementioned criteria are common to the referenced advisory circulars and our risk-based resource targeting (RBRT) tool. The final version of order will reframe from the arbitrary category numbers cited in the advisory circulars</p> <ul style="list-style-type: none"> <li>• Minimum performance and experience threshold for this one group of article is embedded in the</li> </ul>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			experience to meet a minimum qualification standard. Given the planned “maximum use of FAA discretionary authority” for approval of PMA applications under the streamlined approval process, the FAA should establish clear quantitative qualification requirements rather than the current qualitative “four years minimum experience” requirement.		applicant’s existing PMA.  • Influencing articles as described will not meet the criteria for the articles eligible for the streamlined process.
<b>Powell of Paoli</b>	6a			Permit variation from "no reports of non-compliance if the variation is defined as to cause, correction, and with the conclusion the PAH's continuing service record and production capabilities are not affected.	<b>Adopted</b>  Revised the referenced criteria and moved to paragraph 7 as follows:  No reports of <b>systemic</b> noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					Investigation (LOI) <b>within the last four years.</b>
<b>Precision FliteParts Inc.</b>	6a	The simple use of “noncompliance” seems overly general and broad. MARPA 1100 DRAFT qualifies the requirement as “safety non-compliance,” which implicitly bestows a distinction with non-safety noncompliances, e.g., procedural, isolated, non-systemic, administrative, etc. My eighteen years of experience in the PMA industry has demonstrated that if one wants to find a noncompliance, one will find a noncompliance on some level - no matter how insignificant. As an	We strongly feel the current wording would unnecessarily restrict applicability of the order to the point that the number of eligible participants would render the existence of the order unnecessary and create an avenue of potential abuse against PMA holders. While zero non-compliances should be the ultimate goal of every organization, in all but the most simple of circumstances, it is not realistic given the complexity of the systems and supporting procedures. This order addresses a process for non-critical parts by experienced PMA holders – already weeding out complex parts and inexperienced PMA holders. The zero non-compliance requirement is overly		<b>Adopted</b>  Revised the referenced criteria and moved to paragraph 7 as follows:  No reports of <b>systemic</b> noncompliance in Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) <b>within the last four years.</b>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		example, should a PMA holder submit minor changes on the 181st day of the required 180 day submission requirement be excluded from this process? Based on my interpretation of the requirements, said PMA holder would not be eligible for participation.	restrictive. Simply allowing the ACO the authority to evaluate an applicant's record to determine qualifications would suffice and give the streamlined process some true meaning and utility.		
<b>Snecma</b>	6a	<i>The applicant must hold PMA with four years minimum experience making similar articles and having ...</i>	The validity of a calendar limit (4 years) depends on the quantity of articles produced in that period	FAA should establish quantitative criteria such as : Number of parts produced and fit on engines Number of Engine Flight Hours / Engine Flight Cycles accumulated by PMA parts	<b>Not adopted</b>  The nature of articles eligible for the streamlined process does not require the quantitative rigor suggested. These articles will not rise to the level that affects engine performance or safety.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>DaCosta</b>	6b	Only comment is to extent of this ACO engineer's evaluation depth to discern these two "Key" elements? and its impact on the ACO resources.			<p><b>Not adopted</b></p> <p>The ACO accepts the applicant's statement of qualifications unless contradicted by other evidence.</p> <p>The safety assessment is of sufficient rigor to show the impact of article's failure on its product.</p>
<b>GE Aviation</b>	6b	<p>This order instructs the FAA employee to "review the applicant's characterization of the article and the impact of its failure" and to "use safety standards appropriate to your product".</p> <p>The establishment of acceptance criteria based</p>	<p>The June 6, 2011 letter from Mr. Peter White of the FAA ECO to Mr. Todd Sigler of the Aerospace Industries Association highlighted concerns with PMA applicant's abilities to properly understand potential system interactions for turbine engine parts:</p> <p>"Guidance is needed to help replacement and modification</p>	<p>Delay the release of this order until the guidance material being developed by the FAA ECO is available to help both applicants and FAA employees understand if the applicant has properly characterized the potential impact of an</p>	<p><b>Not adopted</b></p> <p>Articles that influence critical parts are not eligible for the streamlined process. The ECO provides the necessary guidance for these</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		solely on the relationship of a part's failure to impact on safety is insufficient. The highly interactive nature of parts in today's turbine engines requires that both the applicant and the FAA look beyond the part itself and consider potential system interactions that involve the part in question. A part with system interactions does not have to fail to have an impact on safety.	parts suppliers understand the engine system effects that need to be assessed for parts that can influence, or are influenced by critical engine parts and systems, and then set the expectations for what they need to do include in their reverse engineering validation procedures to avoid unintended consequences to the engine system. This guidance will also help ensure all turbine engines parts suppliers are working to comparable requirements for part integrity and continued operational safety, and it will serve those operators who legally configure their engines with replacement and modification parts.”	article's failure as well as potential impacts on the engine system.	articles.
<b>Snecma</b>	6b	<i>Review the applicant's characterization of the article and the impact of the failure</i>	Because of various interactions between parts, an exhaustive safety assessment cannot be performed at part level and must be extended to the whole system. A PMA part manufacturer may not	Launch an industry working group to come up with an industry guidance to be included in this FAA order.	<b>Not adopted</b>  A qualitative failure modes and effects analysis is sufficient ascertain

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			be in a position to perform an accurate safety assessment.		the impact on the next higher assembly and then the product.
<b>Powell of Paoli</b>	6c			Include in the MoU the PAH Number, date assigned, and how many approved part numbers have been in production during the last four (4) years	<b>Not adopted</b>  The specific contents and format of the MoU are left to the discretion and procedures of the responsible ACO.
<b>ANE-100/110/140 Combined</b>	6e	Refer to FAA Order	This change will preserve the focus on the FAA eligibility criteria in the Order	Change to “Check the data package for completeness and adherence to <b>this order and</b> the MARPA guide.”	<b>Adopted</b>
<b>DaCosta</b>	6e	It should be part of the 6c. to incorporate a check list, which incorporates minimum elements embodied within each			<b>Not adopted</b>  The checklist resides in the PartSCP. The

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		SPMA package			applicant addresses each item in this plan.  Please note that the revised order divided the reviews into initial and recurring tasks.
<b>GE Aviation</b>	6e	This section instructs FAA employees to “Perform spot checks of its data and declarations at your discretion.”  The discretionary authority of the FAA is described elsewhere and more completely in existing FAA rules, policy and guidance material.	FAA Orders instruct FAA employees on how to follow FAA rules, policy and guidance material. The statement “perform spot checks of its data and declarations at your discretion” without more context on the discretionary authority of the FAA may not be consistently interpreted by applicants and/or FAA employees.	Delete this sentence from the order.	<b>Adopted.</b>  Deleted sentence.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Snecma</b>	6e	<i>Perform spot checks at your discretion</i>	Performing spot checks at FAA employee's discretion may induce inconsistencies in the process of different data packages.	Remove this sentence.	<b>Partially adopted</b>  Deleted discretionary spot checks.
<b>Atlanta MIDO CE-42 Jim Stutson SASI</b>	6f	The draft Order reads in part "Send this supplement electronically to the responsible MIDO in Portable Document Format (PDF),..." It would be simpler to send the document in a word format, so corrections can be made	PDF formats would need to be converted if a revision were needed. By using a "Word" format, the document can easily be modified if required prior to final signature. The signature process would be the same by operating location as it currently works	Change sentence 6(f) to read in part "Send this supplement electronically to the responsible MIDO in a word document Format,..."	<b>Not Adopted.</b>  The signed supplement in PDF is the ACO record that the articles met the streamlined criteria. A MIDO can easily convert, and then add the information on the respective articles to the existing supplements of the holder.

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>DaCosta</b>	6f	No apparent DNL as defined in 8110.42 which stipulates a finding by FAA to the design aspects of the PMA [Test & Computation]			<b>Not adopted</b>  The design notification letter (DNL) is an optional courtesy to an applicant. It has no regulatory standing outside of PMA. The speed of the streamlined process eliminates this optional administrative task.
<b>GE Aviation</b>	6f	This section states that “If the PMA application satisfies our streamlined criteria, the ACO records our approval by signing a draft supplement.”  As written, this statement eliminates the FAA’s discretionary authority to review and reject a PMA	The FAA should retain the discretionary authority to reject a PMA application even when the application is consistent with the streamlined process defined in this order and the referenced industry guide.	Modify the wording in this section to make it clear that the FAA retains the right to review and reject applications that comply with the intent of this order and the referenced industry guide if FAA review of the content indicates that approval is	<b>Not adopted</b>  The FAA has the inherent authority to accept and reject applications for the streamlined process. This order establishes a consistent basis for this decision on a

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		application. Additionally this statement appears to contradict the statement in the preceding paragraph that allows FAA employees to review data and declarations in applications submitted under the streamlined approval process.		not warranted.	specific class of articles.
<b>Snecma</b>	6f	<i>If the PMA application satisfies our streamlined criteria, the ACO records our approval by signing a draft supplement.</i>	ACO approval seems to be automatic when PMA application satisfies streamlined criteria. FAA should retain its discretionary authority to approve or not any part design.	Modify the wording to emphasize FAA discretionary authority to approve new designs.	<b>Not adopted</b>  This process approves the designs of eligible articles from qualified applicants based only on their showings of compliance. The nature of the articles from existing holders of PMA represents the lowest risk to

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					safety.
<b>DaCosta</b>	6g	FAA needs to clarify that this means NACIP is NOT required for SPMA applications and approvals.			<p><b>Partially adopted</b></p> <p>Clarified the requirements for conformity inspections as follows:</p> <p>The non-safety significant nature of an eligible article diminishes the need for an initial conformity inspection. An applicant's first article inspection report documents the required conformity to its</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					approved design.
<b>GE Aviation</b>	7a	This section states that “The MoU accepts the content and format of the MARPA guide to show the needed compliances to airworthiness requirements.” Section 5.b. of this order references the September 19, 2011 version of MARPA Document 1100. The MARPA website shows the September 19, 2011 version of Document 1100 to be a draft version. The MARPA document also contains a revision history index indicating that this document will be subject to continual revision over	The FAA should eliminate conflicts (now and in the future) by deleting all references to MARPA Document 1100 in this order and issuing an Advisory Circular that clearly defines the requirements for application for PMA under the streamlined approval process. Issuing an Advisory Circular will allow the FAA to maintain control of revisions to the guidance material referenced in the order.	Delete all references to MARPA Document 1100 in this order and issue an Advisory Circular that clearly defines the requirements for application for PMA under the streamlined approval process.  Incorporate references to the new advisory circular in this order.	<b>Not adopted.</b>  The guidance is appropriate for qualified applicants with eligible articles.

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		time.  Referencing an uncontrolled third party industry document in an MoU between the FAA and an applicant can create significant confusion moving forward due to subsequent revisions to the 3 <sup>rd</sup> party document introduced outside of the control of either the FAA or the applicant.			
<b>Snecma</b>	7a	<i>The MoU accepts the content and format of the MARPA guide to show the needed compliances to airworthiness requirements</i>	MARPA Document 1100 is labeled as a draft document on MARPA website. The revision process is not clearly defined.	Remove all references to MARPA Document 1100 in this order.	<b>Not adopted</b>  Both drafts of the document and this order were subject to nation-wide internal and external review. The purpose of these reviews was to surface concerns, reconcile

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					conflicts and align applicant qualifications and article criteria. The document and order work together to approve airworthy designs.
<b>MARPA</b>	7b	Avoid Using "Category 3" At the FAA's prior recommendation, MARPA removed references to categories of parts (particularity category three). Therefore, the reference to category three in paragraph 7(b) should be changed to "Non-Safety Significant Articles."			<b>Adopted</b> Deleted reference to Category 3 parts in paragraph 7.  <b>9. Non-Safety Significant Articles Eligible for Streamlining.</b> Streamlining applies to articles that pose the least risk to their respective products and their failures have little

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					or no impact on safe flight or landing. These articles usually need a small number of discrete, well-known and easily demonstrated showings of compliance.
<b>Snecma</b>	7b	<i>Users of the streamlined process will assess the articles using the criteria for category 3 articles as referenced in the MARPA 1100 guide.</i>	MARPA Document 1100 is labeled as a draft document on MARPA website. The revision process is not clearly defined.	FAA order should refer to FAA official documents such as AC 43-18, AC 33-8...	<b>Partially adopted</b>  The revised order and document uses the same article criteria excerpted for prior FAA guidance.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
MARPA	8	Paragraph eight of the draft Order describes the parts that are eligible for streamlining. It would be nice to have greater specificity in this section, in order to provide field offices with better guidance about what parts they ought to be willing to streamline, and what parts are clearly not eligible for streamlining. If we do not include greater specificity, then there is a danger of inconsistent implementation through the FAA field offices.		<p><b>8. Non-Safety Significant Articles Eligible for Streamlining.</b></p> <p>a. Streamlining applies to non-safety significant articles. These are the articles that pose the least risk to their respective products and whose failures would have no appreciable impact on continued safe flight or landing.</p> <p>b. A <b>Non-Safety Significant Article</b> is defined as an article whose failure during flight would have no appreciable effect on the continued safe flight and landing of the aircraft. This Order only applies to Non-Safety</p>	<p><b>Partially adopted</b></p> <p>Expanded the description of non-safety significant articles as follows:</p> <p><b>9. Non-Safety Significant Articles Eligible for Streamlining.</b> Streamlining applies to articles that pose the least risk to their respective products and their failures have little or no impact on safe flight or landing. These articles usually need a small number of discrete, well-known and easily</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p>Significant Articles.</p> <p>c. The definition of Non-Safety Significant Articles is meant to be at least co-extensive with the class of parts that have already been found to NOT need FAA-approved data when fabricated in a maintenance environment. FAA Headquarters reserves the right to expand or contract this definition</p> <p>d. This process for Non-Safety Significant Articles does not require the use of Designated Engineering Representatives (DER) to make findings of compliance. and <u>FAA approval of data using a</u></p>	<p>demonstrated showing s of compliance.</p> <p><b>Not adopted</b></p> <p>This risk of non-compliance from the qualified applicants and the low risk nature of the articles allows the FAA to forego designee finds altogether.</p> <p>Consolidated the rationale for the lack of delegation in the streamlined process as follows:</p> <p><b>6. Designees and the Streamlined Process.</b> This process relies on</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
				<p><u>DER is not necessary for a non-safety significant part. so the FAA advises against the use of DERs for non-safety significant parts. However, seeking DER data approval is permitted at the applicant's discretion where such approval does not violate specific FAA policies.</u></p>	<p>showings of compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					compliance, then the holder may do so under the normal ODA process. Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.
<b>Rolls-Royce</b>	8a	How does the 'target' of 30 days compare with other applications for approval made to the FAA? Does the FAA intend to publish targets for other forms of FAA approvals? If not, a level playing field suggests that			<b>Not adopted</b>  Thirty days is a goal, but not a mandate for the streamlined process in PMA. It is an estimate given the

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		they should not be published for this activity.			<p>qualifications of the applicants and the nature of the candidate articles. Other approvals take much longer due to the project sequencing protocols at the ACOs.</p> <p>The goal is an indicator of an efficient streamlined process. The FAA will not publish timeframes for other processes.</p>
<b>Snecma</b>	8a	<i>Streamlining applies to articles that pose the least risk to their respective products and their failures have no impact on safe flight or landing.</i>	<p>Because of various interactions between parts, an exhaustive safety assessment cannot be performed at part level and must be extended to the whole system.</p> <p>A PMA part manufacturer may not be in a position to perform an</p>	Launch an industry working group to come up with an industry guidance to be included in this FAA order.	<p><b>Not adopted</b></p> <p>The responsible ACO reviews the applicant's safety assessment against applicable</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			accurate safety assessment.		standards during this process. In addition, the applicants still show compliance to applicable airworthiness standards.
<b>DaCosta</b>	8b	<p>This process of non-critical articles does not allow the use of Designated Engineering Representatives (DER) to make findings of compliance.</p> <p>This prohibition would seem to be contrary to the stated goal for this streamline process, being: To reduce impact on the ACO resources!</p>			<p><b>Partially adopted</b></p> <p>This process relies on showings of compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					<p>(ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then the holder may do so under the normal ODA process.</p> <p>Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					as a function of their respective delegations.
<b>DaCosta</b>	8b	<p>This seems to be contrary to the stated goal of Streamline PMA process.</p> <p>a. Resource impact is lessened to ACO by use of well qualified DER.</p> <p>a1. The DER can become very "Familiar" with the applicants, and their expertise, and the ACO can task this to the DER and the DER can rely this in their summary report [Check List]. to the ACO.</p> <p>a2. The DER can filter out "Non-Spma compliant applicants or packages" so</p>			<p><b>Not adopted</b></p> <p>Consolidated and clarified the rationale for not using designees to make findings of compliance as follows:</p> <p><b>6. Designees and the Streamlined Process.</b> This process relies on showings of compliance and conformity from qualified applicants without the specific</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>as to remove this burden from the ACO.</p> <p>a3. The DER if authorized [change 8b] prohibition] could issue an 8110-3 for the Safety and Criticality Findings per 14 CFR xx. 1309, and the relative design rules for the components being Spma.</p> <p>This would reduce spot checking to only the FAA DER supplied report summary [check list].</p>			<p>findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then the holder may do so under the normal ODA process. Individuals that are</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.
<b>MARPA</b>	8b	Draft Order 8110.SPMA states that the process does not allow the use of DERs to make findings of compliance. While we can understand the FAA's desire to reserve DER resources to safety-significant projects, projects do not always fit neatly into specific regulatory pigeon holes and there are many	Even where a part is non-safely significant, there will still be findings of compliance to make under the regulations. For example, the failure of a curtain ring will not affect safe flight or landing so a curtain ring is non-safely significant; nonetheless, a curtain ring must meet all of the regulatory requirements for interior parts (like flammability testing) so a showing of compliance must still be made (even if the showing is subject to	We therefore recommend amending Draft Order SI10.SPMA paragraph 8b. to read as follows (additions are underlined, subtractions are struck-through):  <b>b.</b> This process <u>for</u> <del>of</del> <u>non-safety significant</u> <del>critical</del> articles does not <del>allow</del> <u>require</u> the use of Designated Engineering	<b>Not adopted.</b>  FAA exercise of its discretionary function also includes how we use designees. Then these designees can focus their efforts on more safety significant projects.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>situations where DER data may be appropriate to these less-safely-significant projects.</p> <p>As a project moves forward, additional testing and inspection may change the characterization of the project. Thus, testing of a part that was thought to be safely significant may yield unexpected results that cause the applicant to re-characterize the part as non-safely significant. In such a case, the applicant may have already utilized the services of a DER with respect to the part (in fact it may be the DER's analysis that resulted in the re-characterization of the part as non-safely significant). In other cases, previously approved data may be used</p>	<p>less scrutiny).</p> <p>The applicant remains responsible for having a complete set of data to demonstrate compliance to the applicable regulations. Failure to develop such a data set to support the application can result in enforcement action if the applicant's statement of compliance is false or misleading.</p> <p>One source of information to help in assessing compliance is designee approvals of data. DERs, ODA ARs and other FAA designees may be empowered to assess compliance with the regulations.</p>	<p>Representatives (DER) to make findings of compliance, <u>and FAA approval of data using a DER is not necessary for a non-safety significant part, so the FAA advises against the use of DERs for non-safety significant parts. However, seeking DER data approval is permitted at the applicant's discretion where such approval does not violate specific FAA policies.</u></p>	<p>The process expects qualified applicants to have the expertise to select and show compliance with the appropriate airworthiness requirements. The nature of the articles constrains the number and scope of these showings. The streamlined process assumes substantially complete showings with each application. Otherwise, use the standard process in Order 8110.42.</p> <p>Consolidated the</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		to support a subsequent application for PMA for a non-safely significant part. The fact that a DER has approved data for the project should not be a bar to processing the application under the streamlined process.			<p>rationale for the lack of delegation in this process as follows:</p> <p>This process relies on showings of compliance and conformity from qualified applicants without the specific findings from organizational or individual designees. A holder of an Organization Designation Authorization (ODA) may use the streamlined process, but without its ODA unit. The holder may apply as any</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					<p>other qualified applicant to the responsible ACO. If an ODA holder wants to make findings of compliance, then the holder may do so under the normal ODA process.</p> <p>Individuals that are Designated Engineering Representatives (DER) may advise applicants on the method and scope of applicant showings, but not as a function of their respective delegations.</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Cessna</b>	General	Cessna Aircraft Company has no comment on this issue at this time.			
<b>Lycoming</b>	General	To our point of unfair competitive advantage, it is stated that the FAA has "teamed with a leading PMA industry group to expedite approval of non-critical articles by PMA." The referred to leading PMA group was the Modification and Replacement Parts Association (MARPA). To reduce and eliminate any potential bias, Lycoming recommends that a joint working group comprised of both a leading GA industry group and OEM and PMA manufacturers be formed to provide			<b>Not adopted</b>  The streamlined process represents the exercise of the FAA's discretionary function at a fundamental level. In addition, the process standardizes the MoU practice implemented a various ACOs. The process is restricted to articles that have the least affect on safety. The

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		objective guidance, especially with respect to the definition of "non-critical" parts.			process does not convey any competitive advantage, but allows the FAA to focus on more safety significant efforts.
<b>Lycoming</b>	General	<p>In addition, the FAA cites "non-critical" articles. The FAA makes no reference to a definition of non-critical articles other than what is referenced in the MARP Document 1100 as guidance via Advisory Circular (CAC) 43-18.</p> <p><b>"Fabrication of Aircraft Parts by Maintenance Personnel; Appendix 2. Category Parts List (CPL):</b></p> <p>The information contained in this appendix should be</p>	Lycoming is strongly concerned that the CPL has not been updated since July 1, 2004 and that the suggested articles listed under "Propulsion System Components" are not all-inclusive from a critical nature in relation to reciprocating engines. It is recommended that FAA state a definition of critical and non-critical articles along with compliance guidance to include approach and concurrence from the DHA's ACO.		<p><b>Partially adopted</b></p> <p>The revised order and document uses Non-safety significant instead of non-critical. In addition, deleted all references to the Category Parts List.</p> <p>Defining critical and non-critical in the context of this order and the industry document is beyond the</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		<p>used as a guideline in determining a parts criticality. It is not all inclusive and specific questions concerning parts not addressed can be evaluated by contacting the certificate holding ACO.</p> <p>The CPL has not been reviewed for update since July 1, 2004 and is not scheduled for any future update. Current FAA Safety Management System initiatives could render the CPL obsolete, at which time it will be eliminated. 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>			scope and intent of the streamlined process.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>Lycoming</b>	General	In conclusion, Lycoming supports the FAA's endeavor to limit bureaucracy in the article approval process; however, the proposed FAA Order 8110.SPMA as drafted contains severe flaws with respect to SPMA candidate business qualifications generally and critical parts definition with respect to piston aviation engines. Both of these flaws must be addressed in any final Order. It is well understood that FAA budget challenges will likely affect the entire aerospace Industry and that streamlined processes and Increased delegation will be required to find the correct balance, but Orders that provide unfair competitive advantage to			<b>Partially adopted</b>  One of the purposes of the public comment process is to uncover flaws and rectify them. The Lycoming comments provided vital insights and concerns about the streamlined PMA process. The process is limited to articles that affect safety the least. Qualified holders of PMA will produce these articles with quality systems that comply with 14 CFR 21.307. Any attempt to

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		PMA applicants and create an environment for potential adverse impacts to operational safety are not a step in the correct direction.			define critical for piston aviation engines is beyond the scope and intent of this order and industry document.
<b>MARPA</b>	General	Draft Order 8110.SPMA uses the term "Non-Critical" to describe an article whose failure would have no impact on safety. MARPA 1100 uses the term "Non-Safety-Significant" in place of the term "Non-Critical". The purpose of this change is to create a standard definition unique to the streamline process.	This is done by avoiding the potential confusion caused by use of the word "critical." This word has been used in various ways in FAA's guidance and thus has a variety of meanings. We feel that is important to avoid casting one more denotation on an already balkanized word. By using a novel term, the FAA can ensure that the SPMA process is limited only to those parts that the FAA feels are appropriate, while at the same time maintaining the freedom to add or subtract categories of parts from this SPMA process without adversely affecting other unrelated portions of the FAA regulations and policies.	MARPA 1100 defines "Non-safety-significant" as: "an article whose failure would have no appreciable effect on the continued safe flight and landing of the aircraft. This definition is meant to be analogous to the class of parts that are considered to NOT need FAA-approved data when fabricated in a maintenance environment (known as Category III parts in the FAA's AC 43-18 guidance)."	<b>Partially adopted as follows:</b> The process applies to non-safety significant articles that have little or no effect on safe flight or landing.  Use of "little or no effect" instead of no "appreciable effect" better aligns with the characterizations in other FAA guidance and the FAA Risk-based

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			<p>The term critical is used in the regulations to denote aircraft parts "for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section of a manufacturer's maintenance manual or Instructions for Continued Airworthiness." 14 C.F.R. § 45.15(c). The parts must be "permanently and legibly mark[ed]...with a serial number (or equivalent) unique to that part." Id.. It is clear that some parts that are non-critical under the regulatory connotation of section 45.15 will nonetheless be safety-significant parts that the FAA may consider to be ineligible for treatment under 8110.SPMA.</p> <p>The word "critical" is also defined in AC 43-18 as "A term of significance applied to a part or to a function performed by a part. A</p>	<p>We therefore recommend that Draft Order 8110.SPMA adopt the use of the MARPA 1100 term "Non-Safely-Significant" in place of the term "Non-Critical." The marked-up draft found as an appendix to these comments shows where these changes should be made.</p>	<p>Resource Tool (RBRT).</p>

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
			<p>critical part performs a function of such significance (critical function) to the aircraft on which it is installed that, if it failed, the airworthiness of the aircraft would be degraded to an extent that would preclude continued safe flight or landing." This connotation of the term is similar to, and consistent with, other FAA guidance. This advisory definition of the term clearly differs from the regulatory usage; this sort of discrepancy creates the potential for confusion among applicants and within the FAA as individuals attempt to ascertain what precisely is meant by "non-critical."</p> <p>By applying the term "non-safety-significant" the confusion of differing usage of the terms "critical" and "non-critical" is eliminated. The term "non-safety-significant" carries a particular definition applicable only to the streamline PMA program.</p>		

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>N. J.Provenzano Protec Consulting, Inc</b>	General	FAA guidance for approval of PMA parts is in the process of being developed and is not complete. For most part it has introduced techniques which were opposed by the PMA industry because they lack the skills to execute. (see public comments associated with AC33.83-1). The ability of the PMA industry to execute this draft order is in its infancy as many lack the required design knowledge. For example: lack to the ability to determine a parts operating temperature and stresses.			<b>Not adopted</b>  Articles whose failures have a significant impact on safety are not eligible for the streamlined process.
<b>N. J.Provenzano Protec Consulting, Inc</b>	General	Prior to moving forward with this order further study of the PMA industry should be conducted to determine the capability to classify parts as critical or			<b>Not adopted</b>  Current holders of PMA are well able to determine the nature of the

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		non-critical. Suggest a formal documented evaluation by of the PMA industries capabilities by an impartial panel. This should include a search of AD's and other public information.			articles eligible for the streamlined process. Applicants still show compliance to applicable regulations. The process does include a search for applicable ADs.
<b>N. J.Provenzano Protec Consulting, Inc</b>	General	The document focuses on procedural issues covering the documents and the administrative steps required to obtain approval of a PMA application. Absent is the documents technical content, supporting data required, recommended methods and tools to ensure the PMA part will operate safely. Example: What skills, tools and information are needed to determine if a part is			<b>Not Adopted</b>  The industry document sets the scope and format of the required showings of compliance. The document relies on a Part Specific Certification Plan (Part SCP) to list these showings. The order implements the

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		critical or non-critical?			acceptance of these showings in the document's manner.
<b>N. J.Provenzano Protec Consulting, Inc</b>	General	The document considers experience with the submittal of PMA applications and knowing how to develop a PMA application package important "key elements". Absent is background and experience with the parts form, fit and function to ensure the PMA part is safe. What attributes are important to ensure the part will operate safely?			<b>Partially adopted</b>  Qualified applicants are holders of PMA that meet the required expertise and performance criteria. They have demonstrated abilities to show compliance with applicable airworthiness requirements and produce articles safe for installation. .

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
<b>N. J.Provenzano Protec Consulting, Inc</b>	General	4 years is considered a reasonable time period between a findings of safety non-compliances. What is important is the steps and changes made to determine root cause and implement improvements, not a time interval. The aviation industry has obtained it current level of safety by ensuring the safety issues which surface are fully investigated and remedied. That includes making basic changes to the way the part is designed, manufactured, inspected and in some cases, new oversight regulations. In some cases it has meant changes to the FAA/ company/industry culture.			<p><b>Partially adopted</b></p> <p>The four-year period of past PMA holder performance is sufficient to demonstrate the required expertise in showing compliance with airworthiness requirements and capabilities of producing articles that are safe for installation. Further refined the applicant qualifications in paragraph 7 as follows:</p> <p>No reports of systemic noncompliance in</p>

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					Principal Inspector (PI) evaluations, ACSEP audits and Letters of Investigation (LOI) <b>within the last four years</b>
<b>Rolls-Royce</b>	General	How does this process align with the improvements to the PMA process announced by the FAA at the EU/US safety conference in Vienna last year?		It is recommended that the processes be consistent and coherent	<b>Adopted</b>  The streamlined process addresses qualified applicants and candidate articles that are suitable to the exercise of FAA discretion. The consequences of non-compliance are minimal. This process will eventually fold into the implementation of safety management in

**Clearance Record**  
**DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
					PMA.
<b>Rolls-Royce</b>	General	How does the streamlined PMA process compare with the FAA activity regarding prioritisation of the applications it currently receives (reference SOP #: AIR-100-001)? Is it exempt, as it is presumed to be a simple task? If so, then the FAA should ensure that there are processes in place to apportion the application of FAA resources in an equitable manner. For example, a continual influx of low effort tasks should not overwhelm the existing resources to an extent that			The streamlined process reduces the level of effort at the ACO to below the sequencing threshold. However, each office still has the discretion to realign and prioritize the streamlined projects depending on the quantity it receives.

**Clearance Record  
DOCUMENT COMMENT LOG**

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

<b>Company &amp; Group</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Rationale for Comment</b>	<b>Recommendation</b>	<b>Disposition</b>
		there are then inadequate resources allocated to the certification of new products.			
<b>Universal Avionics Corporation</b>	General	UASC does not have any comments.			