



# Federal Aviation Administration

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## Memorandum

Date: July 28, 2014

To: All Manufacturing Inspection Offices  
All Manufacturing Inspection District Offices  
THRU: Dorenda D. Baker, Director, Aircraft Certification Service, AIR-1

From: Margaret Gilligan, Associate Administrator for Aviation Safety, AVS-1 *Ken Filippelli*

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Subject: Deviation to Federal Aviation Administration (FAA) Order 8100.8D and Order 8000.95 for existing Manufacturing Designated Airworthiness Representatives (DAR-F) to issue Special Airworthiness Certificates to Unmanned Aircraft Systems (UAS) at specific test sites.

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The FAA recently established a number of UAS test sites to allow increased testing and evaluation of UAS. To facilitate operations at these test sites, we are allowing certain FAA DARs to issue Special Airworthiness Certificates for UAS at affiliated test sites. This effort will be accomplished in two phases. The first phase is addressed by this policy deviation memo, which documents the process for granting authority to existing DAR-Fs. Phase two will address the unique qualifications, training, and appointment of new UAS DARs to support the test sites. This policy will be addressed in a separate order.

This memorandum constitutes a deviation to Order 8100.8D, Designee Management Handbook, and Order 8000.95, Designee Management System (DMS), to authorize the expansion of authority for existing DAR-Fs to issue Special Airworthiness Certificates to UAS at specific test sites. Special Airworthiness Certificates under this expanded authority will be issued in the experimental category, and will be valid for the purposes of research and development, and crew training only.

Before this authorization may be granted to an existing DAR-F, the following requirements must be met:

1. The DAR-F must be active and authorized Function Code (FC) 11: Issue original/recurrent special airworthiness certificates, in the experimental category, for the purposes of performing market survey, research and development, and crew training on U.S.-registered aircraft.

2. The DAR-F must apply by letter to their managing office for this expansion of authority.
3. The DAR-F must include a letter of affiliation from the management of each UAS test site where they wish to conduct certification activities. The letter must be on test site letterhead and acknowledge that the test site desires to work with the specific DAR-F on UAS certifications. A DAR-F applying to issue certificates at more than one test site must have a letter of affiliation from each proposed test sites. Test site operators designated for UAS research and development are:
  - North Dakota Department of Commerce
  - Griffiss International Airport
  - State of Nevada
  - Virginia Tech
  - University of Alaska
  - Texas A&M University–Corpus Christi
4. The DAR-F must complete the Introduction to Unmanned Aircraft Systems course and the Unmanned Aircraft Systems Initial Training course. These courses are available online from Flight Standard Service’s Designee Standardization Branch, (AFS-640) through the Designee Registration System, and a certificate of completion is available upon successful completion of the training.
5. The DAR-F must attend and successfully complete the UAS Aircraft Certification Seminar presented by AIR-113. This seminar provides instruction on specific requirements in FAA Order 8130.34, Airworthiness Certification of Unmanned Aircraft Systems and Optionally Piloted Aircraft.
6. The DAR-F must be accompanied and supervised by their Managing Specialist (MS) on at least one UAS certification for each test site where the DAR-F is affiliated.

Before an Aviation Safety Inspector (ASI) may act as a Managing Specialist (or Advisor) for a DAR-F authorized for UAS activities, the ASI must complete the online training and seminar required for DAR-Fs specified in paragraphs 4 and 5 above, or be scheduled to complete it within 90 days of assignment. If the ASI has participated as a team member on a UAS certification project, seminar attendance is not required.

Implementation of the new Designee Management System (DMS) is underway. Depending on the DAR’s managing office DMS transition date, the expansion of authority will need to be recorded either in the Designee Information Network (DIN), or in DMS. The procedure for recording this authority in either location is as follows:

- **For existing DAR-Fs who have not transitioned into DMS, the Advisor will document this authority in DIN** -- The DAR-F will attach a PDF of the Certificate of Completion for the AFS-640 training DIN record using the DIN portal. The Managing Office (MO) will document completion of the UAS Aircraft Certification Seminar and the FAA supervised certification of a UAS at the test site, under general management actions and issue a new electronic Certificate of Authority (eCOA). The authorization

will be granted under FC 11 with the following limitation: “A specific limitation to this function code is required for any DAR to be authorized to support UAS certifications. This limitation authorizes you to issue Special Airworthiness Certificates, in the experimental category, for the purpose of research and development, and crew training, for a UAS at the following test site(s): \_\_\_\_\_.”

- **For existing DAR-Fs who have already transitioned into DMS, the MS will document this authority in DMS** -- The DAR-F will initiate a request for expansion of authority and scan and attach a PDF of the Certificate of Completion for the AFS-640 training. The appointing office (AO) will document completion of the UAS Aircraft Certification Seminar and the FAA supervised certification of a UAS at the test site in DMS and generate a new Certificate Letter of Authority (CLOA). The authorization will be granted under FC 11 with the following limitation: “A specific limitation to this function code is required for any DAR to be authorized to support UAS certifications. This limitation authorizes you to issue Special Airworthiness Certificates, in the experimental category, for the purpose of research and development, and crew training, for a UAS at the following test site(s): \_\_\_\_\_.”

Concurrent with this memo, a deviation will also be released to Order 8130.34C, Airworthiness Certification of Unmanned Aircraft Systems and Optionally Piloted Aircraft. Currently, this order prohibits FAA DARs from issuing Special Airworthiness Certificates for experimental purposes for UAS.

The pertinent information in this memorandum will be incorporated with the next change or revision to Order 8100.8 or 8000.95 as appropriate. If you have any questions, please contact the Delegation and Organizational Procedures Section, AIR-142, at (202) 267-1575.