



Federal Aviation Administration

Memorandum

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Airworthiness Division, AIR-100 

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Subject: Deviation to Federal Aviation Administration (FAA) Orders 8100.15B,
Organization Designation Authorization (ODA) Procedures and FAA Order
8110.103, *Alternative Methods of Compliance (AMOC) Requirements Limiting
Organization Designation Authorization (ODA) Approval of AMOC Requests*

Memo No.: AIR100-15-140-DM55

This memorandum authorizes a deviation from the requirements in paragraph 3-3 of FAA Order 8110.103A and paragraph 8-9 of FAA Order 8100.15B, which prohibit delegation of AMOC approvals in any area other than structures. This deviation allows Organization Management Teams to authorize type certification ODA holders to approve AMOC requests for areas other than structures for those products for which they hold the type certificate if the requested deviations are not relevant to the unsafe condition addressed by the Airworthiness Directive (AD).

Orders 8110.103, paragraph 3-3, and 8100.15, paragraph 8-9, currently prohibit delegation of AMOC approvals in any area other than structures. At the time when AMOC delegation policy was established, and as subsequently reviewed by the Airworthiness Directive Implementation Aviation Rulemaking Committee, it was not anticipated that AMOC delegation in areas other than structures would provide any meaningful benefit in terms of FAA workload reduction. Since that time, the FAA has had to approve a large number of non-safety related AMOC deviations in areas other than structures. This deviation will reduce FAA workload associated with approval of those AMOC requests that do not warrant direct FAA involvement.

It is intended that this authority be limited to deviations that are not relevant to the unsafe condition in the AD. The deviation must not have an adverse impact on the prescribed corrective action intended to address the identified unsafe condition. For example, if the location of a bracket is a part of, or the cause of, the unsafe condition described in the AD, it is not appropriate for an AMOC to allow a deviation from the bracket relocation requirement specified in the AD.

The two AMOC activities that may be authorized are modifications not associated with the unsafe condition and alternate service instructions not affecting the unsafe condition.

1. Modifications not associated with the unsafe condition:
 - a) Trimming of non-airframe brackets or clamps for systems hardware;
 - b) Relocation of brackets, clamps, wire bundles for systems hardware;
 - c) Drilling or mounting location deviations for systems hardware brackets, clamps or panels;
 - d) Instructions for drilling holes required for installing systems parts;
 - e) Splicing wire (allowed on non-fuel quality indicating system (FQIS) electrical systems only);
 - f) Alternate wire caps, grommets, terminal blocks, ground blocks, lugs;
 - g) Alternate relay positions;
 - h) Alternate wire routing instructions (2" minimum wire separation required from FQIS wiring);
 - i) Movement of wires to alternate connector pins;
 - j) Movement of wires to alternate terminal blocks (2" separation required from FQIS wiring);
 - k) Movement of wires to alternate splices;
 - l) Approval to retain wire that is long enough to meet re-routing requirement where instructions says to discard;
 - m) Replacing existing wire with longer wire where instructions specify use of existing wire;
 - n) Retaining replaced wires as spares instead of discarding;
 - o) Wire bundle wrapping differences;
 - p) Alternate means to re-label electrical panels;
 - q) Deviations from cleaning instructions;
 - r) Errors in sealant part number/alternate sealant; and
 - s) Replace removed bolts/nuts/washers with new hardware instead of reinstalling old ones.
- 2) Alternate service instructions not affecting the unsafe condition:
 - a) Request to remove more or fewer parts/components than the instructions require to gain required access to service area;
 - b) Alternate method of removing components than instructions specify;
 - c) Allow flight controls to be deactivated in other positions than what instructions specify;
 - d) Allow for servicing over two maintenance periods instead of one within required compliance time;
 - e) Allow maintenance actions to be completed with aircraft electrical power removed;
 - f) Allow for modifications of components at bench level instead of on airplane; and
 - g) Allow for alternate inspection methods to verify manufacturer, if available.

This authority may be granted only to Title 14, Code of Federal Regulations, (14 CFR) part 25 Type Certificate (TC) ODA holders. The specific limitations for this authority are to be established by the OMT based on the ODA holder's qualifications and performance and the

FAA's need to delegate AMOC authority. ODA procedures manuals and unit member listings must clearly define the boundaries and limitations of AMOC approval authority of the organization and individual ODA unit members.

This deviation will be incorporated into a future revision of Orders 8100.15 and 8110.103. For more information, please contact Ralph Meyer, AIR-140, at ralph.meyer@faa.gov, or at (202) 267-1575, or Michael Hendricks, AFS-650, at michael.g.hendricks@faa.gov, or at (817) 741-6812.

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