



# Federal Aviation Administration

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## Memorandum

Date: February 3, 2015

To: See Distribution List

From: David W. Hempe, Manager, Design, Manufacturing, & Airworthiness Division,  
AIR-100 

Prepared by: Madeleine Miguel, Certification Procedures Branch, AIR-110

Subject: Deviation to FAA Order 8110.112A, *Standardized Procedures for Usage of Issue Papers and Development of Equivalent Levels of Safety Memorandums*, Appendix E

Memo No.: AIR100-15-110-DM29

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This memorandum approves the Transport Airplane Directorate's (TAD) request, dated December 23, 2014, to deviate from certain issue paper requirements in appendix E of Order 8110.112A. This deviation approval grants the same applicant for certification (i.e., an applicant who is likely to apply for similar installations on future certification projects) with the option to re-use previously approved issue papers by including a reuse statement in the conclusion section of that previously approved issue paper. This deviation applies to all Aircraft Certification Offices, Aircraft Certification Directorates, Manufacturing Inspection District Offices, the Flight Standards Service (including Aircraft Evaluation Groups), the International Policy Office, and the FAA Academy Regulatory Support Division.

### Background

Appendix E of FAA Order 8110.112A allows the applicant to use an Administrative Collector Issue Paper (ACIP) but does not provide the applicant with the option to include a reuse statement, for previously approved issue papers, in the conclusion section of that issue paper. TAD has developed an option for the applicant to reuse previously approved issue papers. In TADs current work instruction, AIR-ANM-050-W1, Revision 6, the applicant is instructed to include a reuse statement in the conclusion section of the previously approved issue paper. The Design, Manufacturing and Airworthiness Division concurs that reusing previously approved issue papers saves agency resources and promotes consistency.

### Policy

If an applicant is likely to apply for similar installations on future certification projects, and the FAA position is unlikely to change in the near future, the applicant is approved to include a reuse

statement in the conclusion section of the previously approved issue paper, provided all the conditions listed below are met:

**Reusing an Issue Paper (Optional):**

1. The project Aircraft Certification Office (PACO) or the Organization Management Team (OMT) may add a statement in the “CONCLUSION” section that allows for the same applicant to use this issue paper position again on a future project. This reuse statement may be used if all of the following apply:
  - a. The accountable directorate determines the issue is typical for other, similar certification projects,
  - b. The PACO or OMT determines it is appropriate to make the agreement contained in the reuse statement with the applicant, and
  - c. The applicant agrees to the terms in the reuse statement below.

The reuse statement must include the following (the PACO or the OMT may need to include additional information to describe when re-use of the issue paper is appropriate):

“The FAA concurs with <applicant’s> proposed method of compliance. <Applicant> may follow this same methodology, until further notice, for future installations on <product (e.g., transport category airplanes)>\* with the understanding that additional compliance documentation will be required for each installation. The magnitude and scope of the additional compliance documentation will depend on the differences between the various installations.

Reference to the use of this issue paper as the method of compliance must be included in the certification plan and compliance documentation for any future installations. The <Applicant> must contact the FAA to ensure that the FAA Position on this issue has not changed. Any subsequent modifications to these installations must be reviewed for continued adherence to this issue paper.”

\* **Note:** The PACO or the OMT must verify that the amendment level for the requirements referenced in this issue paper are the same as the certification basis for a subsequent installation.

If you have any questions, or require any additional information, contact Maddie Miguel, AIR-110, at [maddie.miguel@faa.gov](mailto:maddie.miguel@faa.gov) or at (202) 267-1575.

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