



Federal Aviation Administration

Memorandum

Date: June 24, 2016
To: See Distribution List
From: Susan J. M. Cabler, Acting Manager, Design, Manufacturing & Airworthiness
Division, AIR-100 
Prepared by: Production Certification Section, AIR-112
Subject: PAH Issuance of Authorized Release Documents
Memo No.: AIR100-16-110-GM16

This memorandum clarifies guidance in FAA Order 8120.22, *Production Approval Procedures* on the use of FAA Form 8130-3, Airworthiness Approval Tag as an Authorized Release Document (ARD). This memo takes precedence over other conflicting guidance. Title 14 of the Code of Federal Regulations (14 CFR) § 21.137(o) allows for the following:

1. Production Approval Holders (PAH) may implement § 21.137(o) provided they have developed and implemented procedures in their quality systems addressing the selection, appointment, training, management, and removal of individuals authorized to issue ARDs.
 - a. The PAH may select any individual to sign an ARD on its behalf. These individuals may be inspectors, persons who issue or cause certificates of conformity (C of C) to be issued or other person designated by the PAH to issue the form for PAH compliance with 14 CFR §§ 21.146(c), 21.316(c) and 21.616(c).
 - b. Some or all of these procedures may already be in place for persons performing inspections, issuing or causing C of Cs to be issued, or performing other functions relating to the PAH's compliance with 14 CFR §§ 21.146(c), 21.316(c) and 21.616(c).
 - c. It is the PAH's regulatory responsibility to only release airworthy parts from its quality system and the FAA views the issuance of FAA Form 8130-3 under § 21.137(o) as an administrative function.
 - d. A PAH may, but is not required to, use designee qualifications and training as a guide for authorizing individuals to sign ARDs. A PAH has the flexibility to choose how it intends to train the selected individual.
2. The § 21.137(o) privilege is available to all PAHs, even if they currently use individual or organizational designees to issue FAA Form 8130-3 as domestic or export airworthiness approvals.

- a. A PAH implementing § 21.137(o) may retain its existing designees with functions related to § 21.137(o) until April 1, 2018.
 - b. A PAH that exercises § 21.137(o) may not add designees except when needed to support function codes unrelated to § 21.137(o).
3. If ARDs are used for export, those authorized to sign FAA Form 8130-3 on the PAH's behalf must receive training on:
- a. 14 CFR part 21, subpart L,
 - b. Applicable bilateral agreements,
 - c. Advisory Circular 21-2, *Special Requirements of Importing Countries*, Appendix 2, and
 - d. Chapters 1, 2, and 4 of FAA Order 8130.21, *Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag*.
 - e. The training must include potential differences in how the forms are issued for domestic vs. export use.
4. The PAH may implement § 21.137(o) procedures without prior approval from the Manufacturing Inspection District Office. The changes are, however, subject to FAA review in the same manner as any other change to a PAH's quality system.
5. Persons signing ARDs under § 21.137(o) may be employed at a PAH's distribution center provided it is part of its FAA approved quality system. The distribution center may be an associate facility; however, that is not required.
6. Suppliers authorized by the PAH to direct ship articles on the PAH's behalf may issue ARDs under § 21.137(o) provided the PAH includes procedures in its quality system describing how supplier personnel will comply with this section. Some or all of the procedures required by § 21.137(o) may already exist if the PAH currently uses direct ship authority to release articles from supplier locations.

If you have any questions, please contact the Production Certification Section, AIR-112, at (202) 267-1575.

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