

DISPOSITION OF FAA COMMENTS

Policy Statement PS-ANM-25-18, *Post-Maintenance Checks and Tests*

Prepared by [Robert C. Jones](#), ANM-112

No.	Comment	Requested Change	Disposition
Commenter: Jason Brys, ACE-MCO-100M			
1.	<p>States that the SAA or FHA data to help determine where checks need to be performed.</p> <p>There may be other reasons to perform post-maintenance checks. Some of them might be replacing leading edges.</p>	<p>Consider expanding the language to be more inclusive of more reasons to complete maintenance checks.</p>	<p>We do not concur and did not revise the policy. The purpose of this policy is to ensure applicants include callouts for appropriate post-maintenance checks or tests. The policy does not define any specific maintenance. Only that there be specific checks to ensure safety once the maintenance is completed.</p>
2.	<p>Would it be appropriate to reference § 91.407(b) and (c) in the regulatory reference section?</p>	<p>Consider adding the references.</p>	<p>We do not concur with referencing § 91.407(b) and (c). We did not revise the policy. While § 91.407 is an important rule, it does not relate to this policy, which simply ensures that the manufacturers have a process to select post-maintenance functional tests or checks that will detect incorrect maintenance or maintenance errors that could have a safety impact of hazardous or catastrophic as defined in AC 25.1309-1A. If such a maintenance issue is detected the operator should correct the error.</p>
3.	<p>Some line pilots do not have the knowledge or skill to perform the required tests.</p>	<p>Consider adding a requirement for who should do the testing. Consider putting a specification of who should be allowed to perform the tests.</p>	<p>We do not concur with specifying who should perform post-maintenance checks/tests. We did not revise the policy. This policy provides no direction to flight or maintenance operations personnel. It only requires that applicants (for a type certificate (TC), amended type certificate, or supplemental type certificate (STC)) create a process to ensure appropriate tests or checks are called out and used after completion of maintenance tasks.</p>

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Commenter: ACE			
1.		Rather than have a separate policy document, incorporate this policy into the existing ICA order and advisory circular documents.	We do not concur and did not revise the policy. After considering several mechanisms to address this concern, we determined a policy was the best instrument. It provides both direction to manufacturers and adequate information for ACOs to make findings. Orders provide direction only to the FAA personnel. Also, we know of no appropriate AC where this information would fit and have the visibility needed to address the concern.

No.	Comment	Requested Change	Disposition
Commenter: ANE			
1.	The second paragraph on page 3 states that, “the FAA has concluded that, to meet the intent of these part 25 regulations, applicants should....” This same “should” is carried over in two other places in paragraph 1 under “Policy.”	Please have “should” changed to “must.” If it is decided against my recommendation to make this change, then the policy would be in conflict with the NTSB safety recommendation (SR) (see first paragraph on page 4).	We do not concur and did not revise the policy. Policy does not have the force of a rule. The applicant may suggest a different methodology. Guidelines for writing policy define the appropriate ways to use the words should and must. This policy has been coordinated with the NTSB.

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2.	The most important sentence in the summary section states that, “This policy describes the use of”	Please have this changed to simple English. “This policy tells you how to use....”	We partially concur. We disagree with using “you” because policy can apply to both FAA personnel and applicants. However, we agree it can be rewritten in plain language. We revised that sentence to state: “This policy specifies that applicants should use system safety assessment (SSA)....”
3.	Page 2, first paragraph, second sentence uses the following string of nouns “design approval applicant.” What is this? Do you mean “applicants for design approval?”		Yes, “design approval applicant” is synonymous with “applicant for design approval.” We changed the referenced sentence to avoid any misunderstanding.
4.	The “Note” on page 3 uses “e.g.,” in parenthesis at the end of the first sentence and then uses, “Another example....”	Please use the same structure by placing a period after “serviced” and by changing “e.g.” to “example” and either making that thought its own sentence or including it into the other	We concur. We made the first example a new sentence so it is structurally similar to the second sentence.

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5.	<p>The second paragraph of page 4 states that, “The only oversight action for ACOs is to ensure that the (applicant’s) processes meet high-level safety criteria.”</p> <p>Paragraph 3 under Policy reinforces this by stating that “During airplane certification, each applicant”</p> <p>This is loaded. Is this policy retroactive? Does it only apply to TC airplane certification? Does it apply to TC, STC, PMA, TSO, etc.? How do we go about getting applicants to develop a process? Whether retroactive or not, does this become a new requirement for each new part 25 airplane project that comes into the office—that is, do we make our applicants send their processes with their certification plan? This IS extra work—is it an unfunded mandate? Who will do all of this extra work?</p>		<p>The commenter is not requesting a change to the policy, only asking questions about its effect on the applicant and certification office. As stated in the “Implementation” paragraph, the policy discusses compliance methods that should be applied to TC, amended TC, STC, and amended STC programs. It applies to those programs with an application date on or after the effective date of the policy.</p> <p>Its purpose is to ensure that the airplane manufacturer includes in the airplane maintenance manual (AMM) post-maintenance functional tests and checks that will detect maintenance issues and errors. The policy is not intended to be applied retroactively.</p> <p>Further, we do not agree that applying the policy will result in significantly more work, or that it is an unfunded mandate. Applicants today include post-maintenance tests and checks. This policy helps them develop a process to select tests and checks using the safety assessment process.</p>

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6.		Further to immediately above bullet, I RECOMMEND AND SUGGEST that this activity be associated with COS and that the COS team should be expanded to include not only the initial review of the process, but also the oversight of the application of this task by applicants. However, those that see the big picture and all of the data may recognize entire effort to be small and insignificant in the scheme of safety management and may opt out of my suggestion.	We do not concur and did not revise the policy. This policy applies to future airplane certification programs. Retroactive application is not addressed by it since it is out of scope for this policy.
7.	Will there be specific training material to help us to adequately perform the noted oversight/process review?		Yes, the FAA intends to provide background and training to support this process. For example, the FAA is completing DER training modules on this subject. We intend to make these available to appropriate oversight offices. Additionally, we will address this subject to the FAA in the yearly ANM-113 Standardization Briefing.

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No.	Comment	Requested Change	Disposition
Commenter: Jeff Morfitt, ANM-100S			
1.	Summary, page 1. Please state explicitly that this policy applies only to transport category airplanes. Reason: Clarity.	Change the first sentence to read: “...that may prevent a transport category airplane from being returned to service...”	We concur and made the change as requested.

No.	Comment	Requested Change	Disposition
Commenter: Tom Groves, ANM-110			
1.	Page 2, Relevant Past Practice paragraph. For clarity, reference to Maintenance Steering Group should be explained.	Provide appropriate reference(s) for MSG-3 (e.g., AC 121-22 or ATA document).	We concur and made the change as requested.
2.	Page 3, paragraph 1, reference to necessary tests and checks, “...tests and include...” Incomplete sentence.	Add “them in the ICA” after word include.	We concur and made the change as requested.
3.	Page 3, paragraph 1, reference to FHA. Only reference SSA. FHA is part of SSA.	Remove FHA.	We concur and made the change as requested.
4.	Page 3, Background, paragraph 1, “the accident.”	Reference particular accident. Change to “that.”	We concur and made the change as requested.
5.	Page 3, Background, paragraph 1. Reference to center of gravity.	Remove the word “incorrect.” Add “...loading to a center of gravity outside of the approved envelope.”	We concur and made the change as requested.

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6.	Page 3, Background. Clarify the 1 st sentence in the 2 nd paragraph of the Background.	<ul style="list-style-type: none"> • Add "...as part of its investigation" before "the NTSB." • Remove "several problems with." • Add "errors" after "maintenance." • Remove "on a critical system." • Remove "prevented." • Add "detected and corrected." 	We concur and made the change as requested.
7.	Page 3, Background, 1 st bullet. For clarify, reword.	Remove "the" after during and remove "check."	We disagree because we removed the phrase based on other comments.
8.	Page 4, 2 nd paragraph. Undefined term "safety management" not needed.	Remove "in the interest of safety management." Start with "This proposed policy."	We concur and made the change as requested.

No.	Comment	Requested Change	Disposition
Commenter: Tom Groves, ANM-110 and Dionne Palermo, ANM-106			
1.	Page 2, Relevant Past Practice paragraph. "However, the FAA has no direct input on the selection of checks intended to prevent potential hazards." For clarity, statement "direct input" should be changed.	Use "explicit guidance." If this change is not made, consider explaining further why the FAA has no direct input (e.g., may just be an explanation of the FAA role in MSG-3 or what information the DAH presents to ISC, etc.)	We concur and revised that sentence as follows: "The FAA has no direct input <u>explicit</u> guidance on the selection of <u>post-maintenance checks and tests</u> intended to prevent potential hazards resulting from maintenance activity."

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Commenter: Tom Groves, ANM-110 and Dionne Palermo, ANM-106			
2.	<p>Page 5, 1st paragraph, “and include them in AMMs.”</p> <p>(see other similar statements such as 1st sentence of 2nd paragraph of Relevant Past Practice)</p> <p>The AMM, which is one possible component of the ICA.</p>	<p>Remove “and include them in AMMs.”</p> <p>Use ICA instead—more generic and broad. Statement should read “for incorporation into the ICA.”</p>	<p>We partially concur. Instead, we replaced that text with “for incorporation of these checks and tests in the ICA.” The requested language could be misinterpreted to mean that the process, and not the checks/tests, should be incorporated into the ICA.</p>

No.	Comment	Requested Change	Disposition
Commenter: Dionne Palermo, ANM-106			
1.	<p>Page 1, Summary, paragraph 1.</p> <p>Align wording with any changes made in response to Tom Grove’s comment #3.</p>	<p>If Tom Grove’s comment #3 is incorporated, revise the 4th sentence of the 1st paragraph accordingly.</p>	<p>We concur and deleted the reference to functional hazard assessment (FHA) from the Summary as requested.</p>
2.	<p>Page 2, Relevant Past Practice, paragraph 1.</p> <p>Is it accurate to say the FAA uses AC 25-19 and the MSG-3 process? Should it be the FAA and industry?</p>	<p>Add reference to industry in 1st sentence of Relevant Past Practice section.</p>	<p>We concur and made the change as requested.</p>

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3.	<p>Page 3, Relevant Past Practices, 2nd paragraph.</p> <p>Clarify “it” in the last sentence in 1st partial paragraph (last sentence of 2nd paragraph of Relevant Past Practices section).</p>	Suggest, “However, iSpec 2200...”	We concur and made the change as requested.
4.	<p>Page 3, Relevant Past Practices, 3rd paragraph.</p> <p>The 1st sentence of this paragraph states that <u>selecting</u> appropriate checks/tests is part of the necessary instructions.</p>	Remove the word “selecting” so that the sentence makes sense. It is the checks/tests that are part of the instructions?	We concur and made the change as requested.
5.	<p>Page 4, 1st paragraph.</p> <p>Is the statement that the NTSB SR A-04-007 recommend FAA require <u>applicants</u> of part 121 aircraft to perform functional checks correct? Should it say <u>operators</u> instead of applicants?</p>		<p>The wording in the proposed policy is partially incorrect. The NSTB recommended that <u>manufacturers</u> of aircraft operated under part 121 “identify appropriate procedures for a complete functional check of each critical flight system....”</p> <p>We revised the policy by replacing the referenced sentence with the exact language used in the safety recommendation.</p>
6.	<p>Page 6, Conclusion.</p> <p>Consider clarifying in the 1st sentence that this is for part 25 airplanes.</p>		We concur and revised the first sentence of the Conclusion as requested.

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No.	Comment	Requested Change	Disposition
Commenter: Dionne Palermo, ANM-106 and Doug Tsuji, ANM-130S			
1.	<p>Page 5, Policy, 1st sentence states: “This policy statement provides guidance for developing a process to establish post-maintenance checks and tests <u>and include them in AMMs.</u>”</p> <p>This wording could be misinterpreted to the extent that the “process” needs to be included in the AMM.</p>	<p>Revise wording to eliminate the potential misinterpretation.</p>	<p>We concur and revised the policy. Same as Groves/Palermo comment #2 on page 8.</p>

No.	Comment	Requested Change	Disposition
Commenter: Doug Tsuji, ANM-130S			
1.	<p>Page 5, Section 1, “Process Development,” 1st sentence states: “<u>As one means of complying with section H25.3(b)(1) and (4) of appendix H</u>, each applicant should develop a process to identify appropriate airplane-level checks and/or tests that verify the system performs its intended function correctly after maintenance...”</p> <p>This statement suggests that if the applicant develops a process to identify post-maintenance checks/tests it relieves them of developing the “normal” maintenance instructions of H25.3(b)(1) and (4).</p>	<p>Delete phrase “As one means of complying...” and revise to read “As part of complying...”</p> <p>or</p> <p>“As part of one means of complying...”</p>	<p>We concur and revised that sentence using the first option proposed by the commenter.</p>

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2.	<p>Page 5, section 3, “Process Submission”: This section states “each applicant should obtain FAA concurrence with the process(es)....”</p> <p>Is the expectation of this Policy Statement that this be part of the ICA submittal? Or a separate submittal? Who provides the concurrence (Cert or AEG)?</p>	The policy statement should provide clarification.	We concur with providing clarification. We revised the policy to state that “each applicant should submit to the applicable aircraft certification office (ACO), or other appropriate delegated oversight office, the process used to identify appropriate post-maintenance checks and tests in showing compliance with §§ 25.1529 and 25.1729 and appendix H. Each applicant should also obtain concurrence from that ACO or office.”

No.	Comment	Requested Change	Disposition
Commenter: Charles Fellows, AFS-300			
1.	<p>Summary, “The purpose of this proposed policy statement would be to describe a process for applicants for design approval to use to identify checks and/or tests that may prevent an airplane from being returned to service in an unsafe condition.”</p> <p>The policy statement does not describe a process; It states a requirement (to develop a process) and the purpose of that process.</p>		The policy describes the items that the applicant should use to develop their own process for selecting checks and tests and directs applicants to develop a process. These items are high level. The policy provides flexibility for the manufacturer on how to develop the details of their process. If the applicant’s process includes all the items listed in the policy section, and they follow their process, appropriate tests and checks will be incorporated that will detect maintenance errors and issues. No change was requested or made.

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2.	Summary, First paragraph is convoluted; since the term “post maintenance checks and tests” is not a formal term and has not been defined a first time reader can’t even grasp the subject. It appears to me the intent of the policy statement is to describe a new requirement for applicants, to provide the FAA with a procedure for identification of certain test requirements.		We concur with the comment. We added a definition of what post-maintenance checks and tests mean relative to this policy.
3.	Summary, “This proposed policy would provide criteria.” There are no criteria provided in the policy statement.		Other general procedures including procedures for system testing during ground running. The criteria are whether the maintenance error or issue could result in a hazard category of hazardous or catastrophic as defined in AC 25.1309-1A, which we discussed in the “Best Practices” section of the policy. However, we clarified the policy by revising that sentence to read: “This policy provides criteria for determining when these checks and/or tests are appropriate (i.e., failure to perform them could result in a condition with a hazard category of hazardous or catastrophic as defined in AC 25.1309-1A).”

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Commenter: Charles Fellows, AFS-300			
4.	<p>Summary, “Applicants may also select additional checks and/or tests for non-safety business purposes.”</p> <p>I am not sure what this is saying. If it suggests applicants should add checks and tests for non-safety business purposes to the ICAs I am opposed.</p>		<p>The commenter is not requesting a change to the policy, only asking for clarification. However, we determined that sentence is unnecessary and deleted it.</p>
5.	<p>Summary, “This proposed policy provides a means of complying with §§ 25.1529 and 25.1729 and appendix H to part 25”</p> <p>Post maintenance checks and tests are not described or mandated in these citations. In fact, Instructions for Continued Airworthiness must include information essential to the continued airworthiness of the aircraft. The maintenance instructions must include appropriate methods to determine the result of the activity is an airworthy condition. This new concern of proposing tests to determine if the maintenance was performed properly is an extension from regulatory requirements.</p>		<p>After evaluation, we found that these rules and the appendix are sufficiently broad and include language to support requiring post-maintenance checks or tests that verify the airplane is fit to return to service. Current standard AMMs include <i>Test and Adjustment</i> sections. Therefore, the selection should have always been done per these criteria. Note, if an appropriate check had been specifically called out on the airplane involved in the Air Midwest Flight 5481 accident as given in the NTSB report, the maintenance facility might have corrected this condition. No change to the policy was made.</p>

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6.	<p>Definition, “As used in this proposed policy, “checks” and “tests” are generic terms for the tests and/or checks that should be conducted after performing maintenance procedures.” This says nothing! Please define your terms. Checks, tests, and inspections are used synonymously In the text however in the comment resolution matrix proper distinction was acknowledged.</p>		<p>We concur with the comment. In the “Definition” section of the policy, we added text defining post-maintenance checks and tests.</p>
7.	<p>Current Regulatory and Advisory Material, “This policy statement is based on the FAA’s conclusion that post-maintenance checks and tests are “inspections necessary to provide for the continued airworthiness of the airplane.”</p> <p>This is a significant statement and incorrect. Informal discussions I have had with an attorney in the Chief Counsel’s office suggest this statement might not have been nationally coordinated.</p>		<p>We have addressed this with AGC deputy regional counsel. Additionally, this policy has now been routed twice for FAA internal coordination. No changes were made to the policy.</p>

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8.	<p>Current Regulatory and Advisory Material,” Additionally, the FAA released Order 8110.54A, <i>Instructions for Continued Airworthiness Responsibilities, Requirements, and Contents</i>, October 23, 2010, that includes instructions to include appropriate tests after maintenance.”</p> <p>I am unable to find this citation. The order does not address tests designed to determine if maintenance was improperly performed. The order describes a functional check to determine if a system is airworthy and capable of performing its intended function.</p>		<p>The commenter is not requesting a change to the policy, only asking for clarification.</p> <p>Section 4(a)(6) of Order 8110.54A states: “Descriptions of how to adjust and test the systems; including flight control systems functional checkout procedures after maintenance, and any required equipment and precautions;”</p> <p>The purpose of performing functional checkout procedures after maintenance is to verify the system is operating properly after maintenance. This type of testing will detect failure conditions after maintenance. This policy verifies that such checks or tests will support every system. Chapter 5 of the Order contains ACO responsibilities. This policy will help ACOs in that responsibility.</p>
9.	<p>Relevant Past Practice, 2nd paragraph is convoluted. What does the example followed by “However, it does not provide direction on how to select the checks and/or tests” mean?</p>		<p>While <i>iSpec 2200</i> contains the quoted statement, it provides no criteria on when a check or test should be used to evaluate a part, appliance, component, system, or airplane. This policy provides this information.</p>

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10.	<p>Relevant Past Practice, “The intent of this proposed policy is to clarify that selecting appropriate post-maintenance checks and/or tests is part of the necessary instructions that should be provided to comply with....”</p> <p>This does not make sense. Should the word describing be used rather than selecting?</p>		<p>We partially concur. This is similar to Palermo comment #6 on page 9. Instead, of replacing “selecting” with another word, we deleted it from the sentence.</p>
11.	<p>Relevant Past Practice, “...the FAA has concluded that, to meet the intent of these part 25 regulations, applicants should identify necessary checks and/or tests and include if required by the defined process as a means of compliance with section H25.3(b)(1) and (4...)”</p> <p>This does not make sense.</p>		<p>We concur. This is similar to Groves comment #2 on page 6. We revised the sentence to say “...and include them in the ICA.”</p>
12.	<p>Relevant Past Practice, “The applicant should make selections using a process that considers the safety impact of maintenance (including potential errors) based on data in the FHA and/or SSA analyses.”</p> <p>From the disposition of comments I think this is the major element of the requirement being imposed. The FHA and SSA pops in with no introduction and isn’t even mentioned in the actual policy statement.</p>		<p>The policy does mention the SSA. The Summary section mentioned the SSA, and the “Best Practices” section indirectly referred to the SSA process. That section referred to AC 25.1309-1A, which discusses using SSA to determine the severity of an error. However, we agree that the policy can be clarified. We revised paragraph 2.1 to state:</p> <p>“For each maintenance task, the analyst reviews SSA data to determine catastrophic or hazardous functional failures and to determine if the components being maintained can contribute to one or more of these hazardous or catastrophic</p>

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			functional failures according to the definitions given in AC 25.1309-1A or latest revision.”
13.	<p>Background, “The NTSB identified several problems with maintenance on a critical system that might have been prevented if checks and/or tests had been in place”</p> <p>Was the NTSB stating that the ICA lacked the instructions to return the aircraft to an airworthy condition or were they stating that the ICAs were not properly followed and additional tests to determine that maintenance was performed properly are needed?</p>		<p>The commenter is not requesting a change to the policy, only asking for clarification. The proper tests existed in the test and adjustment section. However, after tensioning the cables, the maintenance instructions did not direct the maintenance crew to conduct particular tests for this limited procedure. The maintenance personnel used discretion to select tests they felt were appropriate. Not all checks were done that might have detected this fault, and some checks were done incorrectly.</p>
14.	<p>Background, “In the interest of safety management, this proposed policy describes how applicants can develop specific processes for selecting checks and/or tests”</p> <p>It does not; there is no description provided. It promulgates a requirement on the applicant.</p>		<p>We partially concur. We agree that better language is needed to indicate how the process is developed. This policy does not promulgate a new requirement on the applicant.</p> <p>We have reworded that referenced sentence to indicate the policy not only tells how to develop the process, but also directs applicants when checks and tests should be specified.</p>

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15.	<p>Background, “It only provides high-level safety criteria that should be included in the processes that the applicants develop.”</p> <p>I don’t see criteria in the policy statement.</p>		<p>The criteria in the policy is that, for any maintenance error or issue that can result in a hazard category of hazardous or catastrophic as defined in AC 25.1309-1A to the airplane, the maintenance instructions should call out a test or check that will detect that error or issue. It is in the policy statement. We have not changed policy based on this comment. Additionally, we have clarified that such tests need to be identified for scheduled, nonscheduled maintenance and installations. See Fellows comment #1 on page 11.</p>
16.	<p>Background, “Aircraft Certification Service personnel perform airplane and system safety analyses and evaluate the safety impact of failures during the certification process.</p> <p>Aren’t these performed by the applicant?</p>		<p>Yes, the applicant performs the SSA, but Aircraft Certification Service personnel evaluate and approve them. Therefore, we changed the “perform” to “evaluate” in that sentence.</p> <p>The Aircraft Certification Service has personnel that are experts in SSA. They have received training on developing SSAs. Many conduct SSAs informally in their daily work and review applicants’ SSAs for acceptability. Additionally, many of these personnel have worked in industry where they developed SSAs. Even though applicants develop these analyses, FAA personnel support their development by conducting many reviews and providing feedback. We have adjusted this statement to acknowledge that ACO folks also evaluate such analyses.</p>

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17.	<p>Policy, “This policy statement provides guidance for developing a process to...”</p> <p>This statement does not provide guidance for developing, it states a requirement.</p>		<p>The requirement is contained §§ 25.1529 and 25.1729 and appendix H to part 25. This policy provides information on how to comply with aspects of this rule. It also provides the applicant the option to propose other means of compliance.</p>
18.	<p>Policy, “The post-maintenance test/check should:”</p> <p>This is a new term, not defined or discussed in the background.</p>		<p>We concur. We added definitions that are relative to this policy.</p>
19.	<p>Policy, “Ensure that the maintenance task would not inadvertently result in an unsafe system operating condition.”</p> <p>This is an impossible tasking. There is a reason our regulations require making the determination of airworthiness. Turning this requirement around to identifying elements that would inadvertently result in an unsafe condition is undefinable.</p>		<p>The SSA defines a hazard for all airplane and system failures on the airplane. Systems engineers with the appropriate backgrounds will understand where adjacent systems may be impacted and the hazard assessment of such an impact. If the error or issue results in a hazardous or catastrophic failure as defined AC 25.1309-1A, a check or test will be specified. This will ensure airworthiness after maintenance.</p> <p>Additionally, we have altered the policy to identify functional failures that might result from maintenance that have a hazardous or catastrophic failure. Both of these changes will improve the identification of critical tasks without needing to understand every human error.</p>

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No.	Comment	Requested Change	Disposition
Commenter: Charles Fellows, AFS-300			
20.	<p>Policy. “Ensure that these selected checks and/or tests reliably detect incorrect system operation that can result in a major or worse hazard to the airplane.</p> <p>As stated above, this is the opposite of requiring a determination of airworthiness. While we have a regulatory basis for requiring airworthiness we have no basis to make this requirement.</p>		<p>Per the regulatory references cited in the policy, we have determined that this is within our regulatory purview and should be included as part of ICA. Additionally, a successfully completed test or check, as applicable, supports a determination of airworthiness.</p>
21.	<p>Policy, “During airplane certification, each applicant should obtain FAA concurrence with the process(es)....”</p> <p>This plain and simple is promulgation of a requirement without due process.</p>		<p>We have examined the language in §§ 25.1529 and 25.1729, as well as appendix H to part 25. This policy provides a means of compliance necessary to satisfy these rules.</p>
22.	<p>Conclusion, “The FAA has concluded that it is necessary to provide guidance on procedures for post-maintenance checks and/or tests.”</p> <p>Please provide a reference to this determination. To be on the level of the “FAA,” I would expect this to be signed at least on the AVS-1 level.</p>		<p>The policy is the basis of the conclusion. At this point, since this affects only part 25 airplanes, the policy will be signed by ANM-100.</p>
23.	<p>Conclusion,” This policy statement provides new guidance on the recommended steps to establish a process.”</p> <p>No it does not.</p>		<p>Section 4 provides the actual policy, and the Best Practices section provides guidance to develop a process for identifying checks and tests that should be conducted after maintenance.</p>