



Federal Aviation Administration

Memorandum

Date: **MAR 09 2009**

To: All Aircraft Certification Offices, Manufacturing Inspection Offices, and
Manufacturing Inspection District Offices

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Subject: **INFORMATION:** Designee Support for Companies Holding Organization
Designation Authorization

Order 8100.15, Organization Designation Authorization Procedures outlines the functions available under the ODA program and the availability of those functions by different ODA types. As mentioned in 8100.15 paragraph 3-2, one of the expected results of ODA appointment is that an ODA holder significantly reduces the number of individual designees for the types of ODA functions it seeks. It further states that an ODA holder may retain individual designees when necessary. Additionally, Order 8100.8, Designee Management Handbook, paragraph 6, specifies that, with respect to individual designees, the FAA is solely responsible for determining if there is sufficient need for a designee and determining when the services of a designee may be used. As such, individual designees will only be used to support companies that have ODA only when the use of such designees benefits the FAA.

The necessity for designee resources, both individual designations and ODA, is based on the FAA's need for the designee, and the benefit to the FAA. As noted in Order 8100.15, oversight of ODA is generally more efficient for the FAA since the FAA oversees the organization collectively, whereas individual designees require direct supervision and oversight by the FAA. Under ODA, the holder is responsible for supervision and oversight of each individual. Although we need to be considerate of the impacts of different designee resources on our applicants, the decision to allow the use of a particular type of designee rests with the FAA. Once ODA is granted to a company, the FAA should utilize the ODA as much as possible for a company's designee needs.

If a company has ODA, the FAA will not appoint individual designees to perform functions for that company if the company is qualified to perform the functions under ODA authority. For example, a company with Type Certification (TC) ODA will not have Designated Manufacturing Inspection Representatives appointed to support production conformity determinations or airworthiness certificates, since these functions could be performed under a Production Certification (PC) ODA.

Companies with ODA have already invested in the processes and resources necessary to oversee the individuals performing functions under the ODA. The workload and resources needed to add additional ODA personnel or ODA types are minor compared to the workload needed to appoint and oversee individual designees.

Similar considerations should be applied when assessing the need and benefit of a particular ODA applicant. For example, a company obviously suited for STC ODA with lesser Parts Manufacturer Authority workload should also be considered for PMA ODA if they have the appropriate type of inspection and management capability. Even if the PMA workload might not warrant ODA appointment on its own, appointment as PMA ODA will probably benefit the FAA since the administration and related processes would have to already be established in their ODA manual.

As noted, the FAA seeks to minimize the use of individual designees as much as possible at a company with ODA. Although workload associated with transition of DAS, DOA, SFAR 36 and ODAR organizations might necessitate the use of individual designees for some companies on an interim basis, the managing FAA offices and companies should prepare to incorporate individual designee functions under the ODA authority. Individual company designees will be used to perform functions which could be performed under ODA only when it benefits the FAA to delegate that activity using individual designees.

In order to ensure consistency with respect to those companies with ODA, FAA field offices will coordinate with the appropriate office, AIR-100 or AIR-200, prior to appointing or allowing the use of individual designees at those companies.

If you have any questions with respect to usage of individual designees at a company with ODA, please contact your appropriate headquarters representative:

Engineering - Ralph Meyer, AIR-140, 405.954.7072.

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