



# Federal Aviation Administration

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## Memorandum

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From: Susan J.M. Cabler, Acting Manager, Design, Manufacturing, & Airworthiness  
Division, AIR-100 *SJM Cabler*

Prepared by: Ralph Meyer, Operational Oversight Policy Branch, AIR-140

Subject: Deviation to FAA Order 8100.15B, *Organization Designation Authorization Procedures*, Regarding Program Notification Letter (PNL) Requirements for Supplemental Type Certificate (STC) Organization Designation Authorization (ODA) Projects

Memo No.: AIR100-15-140-DM45

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This memorandum authorizes a deviation from the current STC ODA project notification requirements of FAA Order 8100.15B, paragraph 11-7a(7), that allow Organization Management Teams (OMT) to authorize STC ODA holders to conduct certification projects without submitting a PNL when certain criteria are met. This deviation memorandum expands that capability by allowing the OMT to establish project notification requirements based on criteria different from those in paragraph 11-7a(7).

An OMT may authorize an STC ODA holder to conduct STC projects without submitting PNLs for any new or amended STC, or any major change, when:

1. The OMT has determined that previous projects with the same scope and limitations have been completed satisfactorily by the ODA holder; and
2. The types of projects authorized, and specific procedures used when not submitting a PNL, are prescribed in the ODA procedures manual.

However, a PNL is required for any project:

1. That is a significant change pursuant to Title 14 of the U. S. Code of Federal Regulations (14 CFR) 21.101;

2. Involving items on the applicable directorate's issues list, unless: the issue has been dispositioned on that ODA holder's previous project through a completed stage 4 issue paper, the issue paper is marked for reuse, and all reuse conditions are met. Such an issue paper must be referenced in the certification plan and noted in the certification project notification (CPN);
3. Requiring issuance of an equivalent safety finding, exemption, or special condition, i.e., one that does not already exist as part of the product's certification basis;
4. Requiring a determination of compliance to a requirement for which the ODA holder has not previously demonstrated experience;
5. Involving a novel or unusual design feature not previously introduced, or a method of compliance not previously accepted by the OMT, for use on the ODA holder's projects;
6. Involving issuance of a new, approved model list STC;
7. Involving a change that is the subject of a planned airworthiness directive (AD) or affects compliance with an existing AD, e.g., an alternative method of compliance is required; and
8. For which the required FAA involvement, pursuant to paragraph 11-7d of FAA Order 8100.15B, cannot be established in advance.

The ODA administrator must notify the OMT of any planned certification project, or changes to an existing certification project, if it is unclear whether a PNL is required, or if there is any question regarding the ODA holder's authority to complete the project.

If a PNL is not required:

1. The ODA holder must still prepare and maintain certification and conformity plans for the project;
2. Procedural coordination requirements for CPN, offsite installations, and the use of foreign-registered aircraft must still be complied with for all STCs and any major change to type design. ODA procedures manuals must specify the procedures for submitting information for that coordination. Also, CPN information must highlight the project as a "No PNL ODA Project" in the project description field of the CPN database; and
3. The ODA procedures must ensure that any FAA involvement required as part of the project, is completed, such as coordination with the Aircraft Evaluation Group for instructions for continued airworthiness or operational suitability aspects.

In addition to meeting the reporting requirements of FAA Order 8100.15B, paragraph 11-5e, the ODA holder must submit design change activity reports in accordance with paragraph 3-16c of the order on all STCs issued without submitting a PNL, and include any other information established by the OMT.

This deviation will be incorporated into a future revision of FAA Order 8100.15. For more information, please contact Ralph Meyer, AIR-140, by email at [ralph.meyer@faa.gov](mailto:ralph.meyer@faa.gov), or by phone at (202) 267-1575.

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