



# Federal Aviation Administration

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## Memorandum

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To: See Distribution List

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Subject: Deviation to Order 8100.15B, *Organization Designation Authorization (ODA) Procedures*, on Program Notification Letter (PNL) Requirements for Automatic Dependent Surveillance-Broadcast (ADS-B) Out Certification Projects

Memo No.: AIR100-15-140-DM30

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In support of NextGen implementation goals, this memorandum grants a deviation to allow ODA holders to conduct ADS-B Out certification projects in a more efficient manner. Specifically, ODA Holders are allowed to conduct these projects, which may include associated avionics, without submittal of PNLs when certain criteria are met.

Currently, the Supplemental Type Certificate (STC) ODA project notification requirements of Order 8100.15B, section 11-7.a.(7), define criteria that qualify a new or amended STC, or major change, to be conducted without submittal of a PNL. This memo authorizes a deviation from section 11-7.a(7) of the order. It allows ODA holders to also conduct ADS-B and associated avionics projects e.g., Global Positioning Systems or Electronic Flight Information System displays, without submittal of a PNL for new or amended STCs, and major changes, when:

1. The structures, electrical systems and flight test Organization Management Team (OMT) representatives have determined that the ODA holder has demonstrated satisfactory performance on previous certification projects of a similar type and complexity; and
2. The scope of authority, limitations, types of projects allowed, and specific procedures used when not submitting a PNL are prescribed in the ODA procedures manual.

A PNL is required for any ADS-B project that:

1. Is a significant change pursuant to 14 CFR 21.101;
2. Involves a novel or unusual design feature that may require a new, special condition;

3. Requires a new equivalent safety finding, exemption, or special condition;
4. Involves a new method of compliance, or a method of compliance not previously used by the ODA;
5. Involves new interpretations of the airworthiness standards or associated methods of compliance that have not been previously applied or documented for the specific design change under consideration;
6. Involves a change that is the subject of a planned Airworthiness Directive (AD), or impacts compliance with an existing AD i.e., an Alternative Methods of Compliance (AMOC) is required; and
7. Involves approval of any ADS-B and position source pairings not previously qualified in accordance with the latest revision of Appendix 2 of Advisory Circular 20-165. When in doubt, the ODA holder should contact the ADS-B equipment manufacturer or the OMT for pairing information.

This deviation applies to ADS-B Out systems being approved per the guidance in Advisory Circular 20-165A, *Airworthiness Approval of Automatic Dependent Surveillance-Broadcast (ADS-B) Out Systems*. For information on ADS-B In systems, see Advisory Circular 20-172, *Airworthiness Approval for ADS-B In Systems and Applications*. Additional operational approvals are necessary to fully utilize ADS-B enabled capabilities such as In-Trail Procedure. See Advisory Circular 90-114A, *Automatic Dependent Surveillance-Broadcast Operations*, for more information.

This deviation does not affect other requirements in Order 8100.15B, section 11-7.a.(7) e.g., notification to the OMT if there is any question of authority, procedural coordination, etc., nor does it affect other requirements to complete, follow, and maintain documents such as certification plans, conformity plans, and compliance checklists for projects authorized without PNL submittal. The ODA holder procedures must account for any FAA coordination required for the project, such as coordination with the Aircraft Evaluation Group (AEG) for Instructions for Continued Airworthiness or operational suitability aspects, or coordination with the Aircraft Certification Office (ACO) for any needed approvals.

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

The procedures manual revision necessary to incorporate this change only requires approval by the OMT lead and the structures, electrical systems and flight test OMT representatives. The structures, electrical systems and flight test OMT representatives should consult the technical guidance in Advisory Circular 20-165A when considering the provisions of this memo.

This deviation will be incorporated into a future revision of Order 8100.15. For more information, please contact Ralph Meyer at [ralph.meyer@faa.gov](mailto:ralph.meyer@faa.gov), or at (405) 954-7072.

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