



Federal Aviation Administration

Memorandum

Date: June 27, 2013

To: See Distribution List

From: David W. Hempe, Manager, Aircraft Engineering Division, AIR-100 *DWH*

Prepared by: Ralph Meyer, AIR-110, Engineering Procedures Office

Subject: Order 8100.15B Implementation – ODA Holder Proposal and Rationale for Retained FAA Specific Findings and Participation

This memorandum provides additional guidance regarding the implementation of Order 8100.15B requirements for type certification (TC), supplemental type certification (STC), and parts manufacturer approval (PMA) ODA holders' submittal of recommendations for FAA specific findings, and subsequent FAA response, addressed in paragraphs 8-6, 11-7, and 13-6.

Order 8100.15B, issued May 16, 2013, imposes new requirements for TC, STC and PMA holders to submit additional information with Program Notification Letters (PNL) to identify those project compliance activities which the ODA holder recommends will require FAA specific findings or participation. There is a corresponding requirement for the organization management team (OMT) to identify the rationale for specific findings and participation in its response to the PNL.

The intention of these new requirements is to increase the understanding between the ODA holder and OMT of the reasons for FAA participation, providing the ODA holder the information needed to maximize the use of the designation. While some activities, such as those that involve rulemaking or the establishment of equivalent level of safety determinations, will always necessitate FAA involvement, it is the FAA's goal to fully utilize the authority of the ODA holder. FAA participation should be limited to those areas determined by the OMT as requiring specific findings per the description of specific findings in the Order.

Although the Order became effective on June 17, 2013, we recognize that some ODA holders may need time to develop procedures for the identification of activities recommended for FAA specific findings. As such, ODA holders are not required to submit those recommendations with a PNL until the applicable procedures are incorporated into their ODA procedures manual, which is required by January 17, 2014. In the interim, ODA holders may begin submitting recommended FAA specific findings as soon as desired, so long as the submittal of this information does not cause the ODA holder to violate the requirements of its ODA procedures manual. The FAA expects that ODA holders will make a real effort to identify recommended FAA specific based on

its previous project history and experience, results from self-audits, and knowledge of the proposed project. There is no specific format or content mandated for the identification of recommended specific finding activities, each ODA holder should submit its recommendations in a format agreeable to its OMT.

OMTs are not required to provide rationale for FAA specific findings or participation in the response to a PNL until the ODA holder includes its recommendations for those activities as part of the PNL submittal.

For more information, contact Ralph Meyer, AIR-110, at 405.954.7072 or ralph.meyer@faa.gov.

DISTRIBUTION:

Manager, Anchorage Aircraft Certification Office, ACE-115N
Manager, Atlanta Aircraft Certification Office, ACE-115A
Manager, Boston Aircraft Certification Office, ANE-150
Manager, Chicago Aircraft Certification Office, ACE-115C
Manager, Denver Aircraft Certification Office, ANM-100D
Manager, Engine Certification Office, ANE-140
Manager, Fort Worth Airplane Certification Office, ASW-150
Manager, Fort Worth Rotorcraft Certification Office, ASW-170
Manager, Fort Worth Special Certification Office, ASW-190
Manager, Los Angeles Aircraft Certification Office, ANM-100L
Manager, New York Aircraft Certification Office
Manager, Seattle Aircraft Certification Office, ANM-100S
Manager, Wichita Aircraft Certification Office, ACE-115W
Manager, Boeing Aviation Safety Oversight Office
Manager, Gulfstream Aviation Safety Oversight Office