



# Federal Aviation Administration

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## Memorandum

Date: Feb 22, 2007

To: ACO Managers

Cc: ACMT

From: David Hempe, Manager, Aircraft Engineering Division, AIR-100

Prepared by: AIR-140

Subject: \_\_\_\_\_ Clarification of Procedural Requirements for Delegated Organizations.

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A question was raised to this office concerning the extent that Delegated organizations are expected to follow FAA procedural requirements, in FAA Order 8110.4. The question was necessary to determine if delegated organizations needed to replicate our defined procedures or if they could have unique procedures that accomplish the same results.

AIR-140 has investigated this issue and determined that where delegated organization policy requires an organization to conduct a process, procedure, or project following the same process that the FAA uses, some latitude is given to the organization management team (OMT) to evaluate the organization's procedures and determine equivalence with the FAA process. However, when delegated organization policy has a statement that requires an organization to conduct a specific step in a process, procedure, or project using the forms specified for FAA use, the organization must comply or seek a deviation through their managing office.

Specifically, FAA Order 8100.9A paragraph 7-3.a. requires a DOA to use procedures defined in FAA Order 8110.4 for each new or changed product. This means that the OMT must ensure that the ODA unit's certification procedures are equivalent to those used by the FAA for standard certification programs. Likewise, the 8100.9A paragraph 7-2.a.(7) requires that a DOA accomplish conformity inspections in accordance with the guidance in FAA Order 8110.4 and specifies the use of FAA Forms 8130-9, 8120-10, 8100-1, and 8130-3. In this case the delegated organization's procedures can be found equivalent by the OMT but they must use the FAA forms and procedures to complete them. In order to achieve an acceptable level of standardization, any process variances deemed to be equivalent will be coordinated with the Aircraft Engineering

Division (AIR-100) prior to approval and will be shared with the Aircraft Certification Office Leadership Team (ACOLT).

Therefore, until such time as changes or revisions to delegated organization policy can reflect this clarification, OMTs may evaluate delegated organization procedures for equivalence to FAA processes for similar certification, evaluation, or approval activities.

If you have any questions, please contact a member of the Delegation and Airworthiness Programs Branch, AIR-140, at (405) 954-7066.