



# Federal Aviation Administration

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## Memorandum

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To: See Distribution List

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Subject: Deviation, ODA Prototype Alterations at Foreign-Certificated Facilities  
Order 8100.15A, Organization Designation Authorization (ODA) Procedures

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This memorandum allows for ODA prototype alteration installations to be conducted at certain foreign facilities which are not authorized under Title 14, Code of Federal Regulations (CFR) part 43 for approval of return to service for the type of product being altered.

Current limitations in Order 8100.15A, paragraphs 8-7, 11-6a, and 11-8 require that prototype alterations in support of type design changes or STC be accomplished at a facility authorized under CFR part 43 to perform the alteration and approve for return to service for the type of product being altered. Since individuals are precluded by the language "a facility," this effectively limits ODA prototype alterations to being conducted at manufacturers, 145 Repair Stations, 121 or 135 Operators, or Canadian Approved Maintenance Organization facilities.

This memorandum allows for prototype alterations to be conducted at those foreign facilities authorized by their Civil Aviation Authority (CAA) to perform the alteration and approve the altered product for return to service. To conduct ODA prototype alterations at foreign non-Federal Aviation Administration (FAA) certificated facilities, the ODA holder must comply with the existing 8100.15 off-site policy requirements as well as the following limitations/requirements:

### Eligible Projects

1. The prototype project product may not be U.S.-registered.
2. The project must be classified as non-significant in accordance with 14 CFR section 21.101.
3. Projects which require any on-site FAA participation for FAA specific findings, ODA supervision or any other reason will be subject to availability of FAA funding and resources to support the activity.

### Eligible Facilities

1. The facility must be in a country with which the FAA has a bilateral agreement which includes design approval processes for products.
2. The facility must be in a country which holds a CAT 1 rating under the International Aviation Safety Assessment (IASA) program with no limitations or remedial work plan.
3. The facility must be authorized by its CAA to perform the type of alteration involved and approve the type of altered product for return to service.

### ODA Holder Requirements

1. The ODA holder must have satisfactory performance conducting similar off-site projects at FAA-certificated facilities prior to conducting projects at foreign non FAA-certificated facilities.
2. As part of the evaluation of the facility required by Order 8100.15, the ODA holder must conduct and document an on-site assessment of the facility to ensure that the facility requirements of Order 8100.15A paragraphs 8-7 and 11-8 have been met.
3. The ODA holder must have oversight of personnel at the facility and remain directly in charge of prototype alteration work performed by the facility.
4. The ODA procedures manual must be revised to account for these procedures prior to any project conducted at a foreign-certificated facility.
5. The ODA holder must submit preliminary information to the OMT identifying the facility, description of alteration, planned installation dates, and any other information required by its OMT at least 60 days prior to any installation activity.
6. The ODA holder must notify the OMT at least 60 days prior to any planned assessment of a foreign non FAA-certificated facility.

### Organization Management Team (OMT) Requirements:

1. An OMT ACO representative must notify the CAA of the state of registry if required by Order 8100.15A paragraph 8-6k, or 11-11.
2. The OMT must notify the CAA of the country where the alteration is taking place about the ODA holder's activity if required by Order 8100.15A paragraph 8-8 or 11-10.

The authority to conduct these projects under the ODA authority, like all ODA projects, is granted at the FAA's discretion. ODA holders should not enter into contractual commitments to conduct such projects until the acceptability of the project has been agreed to by its OMT.

This authority will be provided for in a future revision to Order 8100.15. For more information, contact Ralph Meyer of the Engineering Procedures Office, AIR-110, at (405) 954-7072, or at [ralph.meyer@faa.gov](mailto:ralph.meyer@faa.gov)

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