Federal Aviation Administration

Memorandum

Date: March 13, 2009

To: Managers of Directorate Standardization Branches, Managers of Aircraft Certification Offices.

From: Manager, Certification Procedure Branch, AIR-110

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Subject: Clarification of Order 8110.4C regarding Certification Project Notification (CPN) Process

In response to the requests from ANM-113 relating to Order 8110.4C and the Certification Project Notification (CPN) Process, this memo contains our clarifications of policy in Order 8110.4C.

The following summarizes the requests and responses:

Description	**AIR-110 Response**	**Request Type**
Variations of how the Certification Project Notification (CPN) information is communicated	Attachment #1	Clarification
Directorate response indicating Significant Project	Attachment #2	Clarification
Determination of AEG involvement	Attachment #3	Clarification
Notification of the ACO of the Project Officer assignment	Attachment #4	Clarification
Posting the CPN to the bulletin board	Attachment #5	Clarification

See each attachment for the response to each individual item.

Description	Request Type
Variations of how the Certification Project Notification (CPN) information is communicated	Clarification

In response to the submittal of the Directive Feedback Form 1320-19, dated December 8, 2008, AIR-110 is in agreement that electronic means are acceptable means of communicating the CPN information, provided that they supply the necessary information required by Order 8110.4.

Table 1 below defines the required data needed for each step in the CPN process (ex: Part A terms are required for communicating from the ACO to the Directorate). Neither the order nor the exact title of the terms needs to be specified exactly as shown in Table 1. Data for multiple projects can be sent in tabular form. (Clarification of Order 8110.4C, Appendix 1 and will be included in the next change/revision).

The following summarizes the arguments for the change:

The CPN form found in Appendix 1 in PDF format, which can only be used when printed. However, all communication of CPNs today is done electronically, either in typed documents or in ones generated by software programs such as ACOS. These files, which are close representations of the CPN form, are usually passed from one person to another as email attachments.

The information in Part A of the CPN form usually comes from various electronic sources. Various existing databases (including those used internally within the FAA as well as those used by delegated organizations) are used to store project information and to produce an output that closely resembles the CPN form in the Order, but not exactly. They can also be used to transmit project information in batch, meaning for multiple projects at a time, in an electronic format suitable for computer to computer communication.

The responses to the CPN from the Directorate and the AEG (Parts B and C of the form) are often stored in a database. The Transport Directorate currently uses ANMINFO to store CPN data and responses. A new CPN system is also being built that will store CPNs for all projects, and it will be used service-wide. The data stored in the database can be output in a format that resembles the CPN form, either as a printable view from the program or as an automated email message.

The CPN form has certain fields that are unclear to those who use it. For example:

- *In Part A, the term "ACOS Project Number" is used. However, in many cases, the project number specified by the Delegated Organization is used, which is not produced by ACOS.*
- *In Part A, the Applicant Address is only a single line, but normally, the ACO provides the Street Address, City, State, and Zip Code. For foreign applicant, City, Country, and Postal Code are more appropriate.*

- *At the end of Part A, the form contains a line with the label "Manager, (Project or ACO)" underneath it. This looks like a signature line, but nowhere in the text of the Order does it state that the form be signed. And since the Order states that the form is sent electronically, it implies that it does not need to be signed.*
- *In Part B, there is a place for "Directorate ACOS Project Number", but most of the Directorates do not use the ACOS program.*
- *In Part B there is also a line called "File", which suggests an attached file, but the form is unclear on how to specify this on the form itself.*
- *Parts C and D have check boxes to indicate that you "do NOT want to submit the following for review".*

The CPN form does not specify which fields are required versus optional. Certain data are necessary to define a project, such as project number, project type, the ACO, Directorate, AEG office, applicant, model, description, and Project Manager. Other data on the CPN form are not, such as the Project Manager's telephone number (which is readily available on the Web) and the name of the Project Engineer (not all projects have one).

Additional information on the CPN form would be useful. For the response sections of the CPN form (Parts B, C, and D), there is not a good way to provide comments or requests in sentence form. The new Automated CPN Database will capture responses and store comments in sentence fashion, and a printed output from the system, resembling the CPN form, would show these.

Table 1: Data Needed in the CPN Process

Description	Type	Comments
Applicant (Part A)		
Project Number	Text	FAA or company number
Model(s)	Text	
Project Description	Text	
Applicant Name	Text	
Applicant Address	Text	
Application Date	Date	
Expected Completion Date	Date	
Project Type	List pick*	
Product Type	List pick*	
Is PMA for Critical/Life-Limited Part	Yes/No	Only if a PMA project
ACO (Part A)		
Date CPN sent to Directorate	Date	
ACO	Office	
Program Manager (PM)	Person	
Project Engineer (PE)	Person	Optional
Does ACO considers this a Significant Project	Yes/No	
Does ACO considers this a Significant Change	Yes/No	
Does ACO requests CSTA Involvement	Yes/No	
Does ACO requests AEG Involvement	Yes/No	
Does project need ACO-to-ACO Coordination	Yes/No	
Directorate (Part B)		
Directorate Standards Staff	Office	
Project Officer	Person	
Date of Directorate Response	Office	
Does Directorate consider this a Significant Project	Yes/No	
Does Directorate consider this a Significant Change	Yes/No	
Is Signature Authority delegated to ACO	Yes/No	
Directorate Comments/Requests	Text	Optional
AEG (Part C)		
AEG Office	Office	
AEG Representative	Person	
Date of AEG Response	Date	
Does AEG need involvement	Yes/No	
AEG Comments/Requests	Text	Optional
CMACO (Part D)		
CMACO Office	Office	
CMACO Representative	Person	
Date of CMACO response	Date	

Does CMACO need involvement	Yes/No	
CMACO Comments/Requests	Text	Optional

Note:
* Items designated as list picks (Project Type and Product Type) are defined in Appendix 1, Figure 5 of Order 8110.4C

Description	Request Type
Directorate response indicating Significant Project	Clarification

In response to the submittal of the Directive Feedback Form 1320-19, dated December 8, 2008, AIR-110 is in agreement that the accountable directorate must respond to **all** CPNs. This requirement will be contingent upon the implementation of the new Automated CPN Database. (Clarification of Order 8110.4C, Paragraph 2-4(c), Appendix 1, Paragraphs 2(a) and 2(b) and will be included in the next change/revision).

The following summarizes the arguments for the change:

The Order says that the ACO initially indicates on the CPN form whether or not they consider a project to be a significant project, but the directorate ultimately determines if it is significance. It also states that the directorate responds back to the ACO ***only when they disagree*** *with the ACO's determination of significant project. It also states that the directorate responds back to the ACO with the name of the project officer* ***for all significant projects****.*

The problem with replying to only some of the projects is that the ACO can only assume that the directorate agrees with their determination when no response is received within 10 working days. However, it may take more than 10 days to gain clarification on a project in order for the directorate to make their determination of significance.

It seems as though the rationale for not replying to all projects is to reduce workload. However, the new Automated CPN Database being built will make it much easier to respond to all projects. It will employ logic that keeps each project on a list until a directorate response is made.

Most of the Directorate Project Officers respond to ***all*** *projects, because they believe that a response is necessary to let the ACO know definitively whether or not the directorate considers it a significant project. Currently, only one of the other directorates will reply only when they disagree with the ACO determination of significant project, but their intent is to reply to all projects in the future.*

Description	Request Type
Determination of AEG involvement	Clarification

In response to the submittal of the Directive Feedback Form 1320-19, dated December 8, 2008, AIR-110 is in agreement that the aircraft Evaluation Groups (AEGs) must receive CPN information from the Project ACO for **all** projects so that they can make their determination of whether or not they need to be involved. Once the Automated CPN Database is implemented, the AEGs will use this system for retrieving the CPN information and responding to them. The AEGs must also provide a response for **all** CPNs. (Clarification of Order 8110.4C, Paragraph 2-4c(5) and Appendix 1 Paragraph 1(f) and will be included in the next change/revision).

The following summarizes the arguments for the change:

The Order states that the ACO must consult (i.e. coordinate) with AEGs when required, but it also states that the AEG determines their need for involvement in a project. Therefore, the ACO does not make the determination of AEG involvement.

Additionally, the Order does not specify how the AEGs receive the CPN.

*For TAD projects, the AEGs determine whether or not they need to be involved in a certification project for **all** TAD projects. The AEGs do this by regularly visiting a website to review all of the outstanding projects for which they have not yet responded. Emails of the CPNs are not sent to the AEGs.*

Description	Request Type
Notification of the ACO of the Project Officer assignment	Clarification

In response to the submittal of the Directive Feedback Form 1320-19, dated December 8, 2008, AIR-110 is in agreement that the Directorate should notify the ACO of the Project Officer assignment electronically. Paragraph 2-4c of Order 8110.4C states that the directorate will notify the ACO by telephone, but this is in contradiction to Appendix 1, which states that the notification will be done electronically. (Clarification of Order 8110.4C, Paragraph 2-4c and will be included in the next change/revision).

Description	Request Type
Posting the CPN to the bulletin board	Clarification

In response to the submittal of the Directive Feedback Form 1320-19, dated December 8, 2008, AIR-110 is in agreement that the directorate posts the CPN to the CPN bulletin board for CSTA review (Clarification of Order 8110.4C, Appendix 1, Paragraph 2e and will be included in the next change/revision).

Paragraph 2e misstates that the **ACO** posts the CPN to the CPN bulletin board. It is correctly stated elsewhere in the Order that the **directorate** posts the CPN to the bulletin board.