



Federal Aviation Administration

Memorandum

Date: June 21, 2013

To: Tim Vranna, Manager, Transport Airplane Directorate, MIO, ANM-108
Carlos Pestana, Manager, Engine and Propeller Directorate, MIO, ANE-180
James Jackson, Manager, Small Airplane Directorate, MIO, ACE-180
Bruce Cain, Manager Rotorcraft Directorate, MIO, ASW-180

From: James D. Seipel, Manager, Production and Airworthiness Division, AIR-200

Prepared by: Production Certification Branch, AIR-220

Subject: INFORMATION: Deviation to FAA Order 8130.21, Regarding Prepositioned Articles

This memorandum is in response to your May 31, 2013 memorandum, in which you requested that the Aircraft Certification Service Production and Airworthiness Division (AIR-200) provide clarification or a deviation to current Federal Aviation Administration (FAA) policy regarding a production approval holder's (PAH) eligibility to preposition articles during a type certification or supplemental type certification project.

Specifically, you proposed that the following orders and advisory circular (AC) be revised to state that all PAHs are eligible to preposition articles during a type certification project (that is, before the issuance of the type certificate (TC) or supplemental type certificate (STC)):

1. FAA Order 8120.22, Production Approval Procedures;
2. FAA Order 8130.21, Procedures for Completion and Use of the Authorized Release Certificate, FAA Form 8130-3, Airworthiness Approval Tag; and
3. FAA AC 21-32B, Control of Products and Parts Shipped Prior to Type Certificate Issuance.

AIR-200 concurs with your proposal to revise the above stated orders and AC. AIR-200 hereby grants a deviation to FAA Order 8130.21G, paragraph 2-6b, making products and articles produced under an FAA production approval eligible for prepositioning. The prepositioned products and articles must remain under the control of the PAH's FAA approved quality system

until such time as the TC or STC is issued. This information will be incorporated into the next change or revision to FAA Orders 8120.22 and 8130.21G, and AC 21-32B.

If you have any questions, please contact the Production Certification Branch, AIR-220, at (202) 385-6346.