

Key	Paragraph	Reviewing Organization	Comment	Reason for Comment	Recommendation	Disposition
3	Cover Page	Textron	Aircraft only? What about articles and other products?			A2Q. Related content for articles and other products have been deleted from the order. Policies and procedures concerning airworthiness of aircraft engines, propellers, and articles are provided in Order 8130.21
9	1-4.	Learjet	This paragraph states that The FAA inspection must be stopped if the applicant's evidence is insufficient for the FAA to make its findings. The inspection should be allowed to continue until all the findings are discovered.	Clarification, this statement may be construed literally as stop as soon as there is insufficient applicant evidence for a determination.	Clarify language to prevent numerous start/stop cycles of FAA inspection.	Adopted. Change "should" to "may."
18	Table 1-1 3-5. 19-1.a	UA RS 011A	This Order suggests 21.183(c) is applicable only to "new" import aircraft. 21.183(c) is applicable to both new and used aircraft imported to the U.S. The statements in the order could give a person the impression it is not applicable to used aircraft.		The order needs to clarify 21.183(c) is applicable to all imported aircraft and is the certification standard for AW certification for new aircraft imported to the U.S. and while still applicable to used import aircraft the certification standard for uses import aircraft is 21.183(d).	<p>NC. Although 21.183(d) does not specifically use the word, "import," this para covers all used aircraft. And although 21.183(c) does apply to "import aircraft" the text of this paragraph limits it to aircraft from a foreign SOM and accompanied by an export certification from the SOM -- this only makes sense for new, import aircraft. 21.183(d) applies to all used aircraft, including used, import aircraft. And 21.183(c) applies to import of new aircraft from a foreign SOM.</p> <p>Notes to support coordination: Paras a, b, d are titled new, new, and used aircraft respectively. No such title for c. But text of c clearly has limiting language such that it's not applicable to all imports: foreign SOM; "is produced" implies new; wouldn't make sense to require ECofA from SOM for 3rd country aircraft; wouldn't make sense to have hard requirement for ECofA for all used imports. Nothing in the text for why all used aren't covered by d -- the title says used and the content works for all used, including all used imports.</p> <p>Original text following recodification in 1965 indicated that PC/TC/Import paras applied to</p>

23	2-2	Textron	Special flight permit and Authorized designee references gone	Will this omit allowance for ODA issued special flight permit?	Put reference to ODA and special flight permits back in.	NC. Per paragraph 2-1, this chapter does not apply to SFP. However, revise the chapter on SFP, chapter 18, to clarify provisions for designees to issue an SFP.
27	2-2.b	Gulfstream	Says of "its certificate of..."	Typo	Should say, "his/her certificate of..."	NC per disposition of comment from AIR-160 on paragraph 2-2.
28	2-2.b	Textron	Designees & Unit Members are authorized by their function codes and the guidance of FAA Order 8100-1, 8000.95, and 8100.15. FAA Order 8130.2 is to give guidance on certification not the supervision of the Designees & UM's.		Should be referring to orders rather than trying to define here	NC per disposition of comment from AIR-160 on paragraph 2-2.
40	2-3.a(3)	Learjet	The term "aircraft listing" is not defined.	Defining this term could assist in understanding this paragraph, see item # 2 (comment on last 2 sentences of 2.3.a(3)) above.	Revise Appendix G. to define aircraft listing.	NC. Current text explains that an aircraft listing may consist of aircraft model and serial numbers associated with newly manufactured aircraft that are not yet listed on the TCDS; for example because the TCDS has not yet been revised with the latest information.
41	2-3.a(3)	Learjet	The last 2 sentences in this paragraph appear to be contradictory, how can an aircraft be "not yet listed" and "currently eligible on the TCDS at the same time?"	This statement is confusing to read.	Clarify language or intent.	Adopted.

45	2-3.b	Learjet	<u>Link https://home.spas.faa.gov/, was dead at time of review</u>	It's difficult to fully understand the full impact of these new requirements without an active link.	Activate link	NC. Delete paragraph. Para 2-3.c is sufficient for aircraft familiarization.
46	2-3.b	Learjet	Says to review Airworthiness/Registration/EDRS files to identifysafety issues, incidents. It is unclear what this information is to be utilized for.	There is no additional benefit from reviewing this information that isn't already contained within Part 39.	Remove safety issues and incidents or clarify how information is to be utilized.	Adopted. Delete paragraph. Para 2-3.c is sufficient for aircraft familiarization.
47	2-3.b	Aeropro	OKC Registry records rarely reveal incident or accident history. Are you suggesting that FAA Forms 337 may point to major repairs necessary after an accident?			Adopted. Delete paragraph. Para 2-3.c is sufficient for aircraft familiarization.

51	2-3.b(1)	Sterling Pacific		As a designee performing airworthiness certification I found, on occasion, aircraft having assigned registration and not officially U.S. registered.	Change this para to read, "The aircraft is not eligible for an airworthiness certificate if the registration is not current or is expired."	NC. Paragraph 2-3.b(1) includes, under "Review Registry Information," "Access the FAA Registry to verify the aircraft is currently registered per part 47." Delete second sentence; first sentence is sufficient. In addition, paragraph 2.3.d(1) includes, under "Inspect Aircraft Records," a requirement to review the registration to verify
52	2-3.b(1)	Textron	Registry access is the only way to verify registration,current rev lists multiple ways to verify		Reference revision H language.	PA. This paragraph requires accessing the FAA Registry as the only means of verifying current registration. However, the para title for 2-3.b is misleading since the subparas are not all related to reviewing Registry information -- revise the para title to: "Review Registration Information."
53	2-3.b(1)	Aeropro	I don't believe using the term "assigned" in regard to a registration number means that the aircraft is properly registered; in my experience it just means that its reserved.		Suggest clarification.	Adopted. Initial verification of aircraft registration to its owner is accomplished via accessing the Registry. The aircraft is registered when an N-number inquiry of the Registry shows that the N number is "assigned," and the status is "valid." Updated in the Order but waiting verification from Ken/750.

58	2-3.c	Learjet	Says to review information as necessary to become familiar with....."recent customer findings for new aircraft deliveries; histories of service difficulties; incidents and accidents;.....potential for degradation from long-term storage". It is unclear what this information is to be utilized for.	This is very labor intensive for little to no apparent value to the certification process that is not covered within existing guidance. As an example 1 popular aircraft has 2500 records to review. What is the FAA expected to use these results for?	Remove "recent customer findings for new aircraft deliveries; histories of service difficulties: incidents and accidents:.....potential for degradation from long-term storage" or clarify how information is to be utilized	NC. The first sentence explains the intent: "Review information as necessary to assist you in becoming familiar with the aircraft, aircraft engine, and propeller models and with potential safety hazards." The phrase, "as necessary," is important. If you have much experience with a particular aircraft make/model and are familiar with the related potential safety hazards, then it would not be necessary for you to review all this information. However, if you have little experience with a particular make/model, you need to do some research/review to get familiar with the unique safety hazards with that aircraft. Even so, the phrase, "For example," in the second sentence highlights that it is not mandatory to review every one of these records. The message should be clear: be familiar with the aircraft before showing up to review records and inspect the aircraft.
60	2-3.d(2)	Aeropro			I suggest you provide a link to the FAA's Exemption database.	Adopted.
63	2-3.d(3)	Aeropro	not all aircraft incorporate components that are life limited.		Suggest adding "if applicable" at the end of the sentence.	Adopted.
64	2-3.d(3)	Aeropro	records of major repairs are only required to be retained for 1 per 91.417(b). However most records are kept regardless but there are instances where they are not and its perfectly legal.		Suggest including mention of records retention per 91.417.	NC. Covered by "iaw part 43." All 337s go to EDRS. If the work is not done under a Form 337, the repair is recorded in the logbook and the logbook may not be purged. (d)(5): remove "all."
66	2-3.d(3)	Textron	Recurrent activity only, not common for issuance of an Airworthiness Certificate (original)			PA. Revise this text to clarify this applies to used aircraft.

69	2-3.d(3)	Learjet	Says when articles have been replaced since original manufacture, verify the articles are airworthy and eligible for installation. This requirement is impractical and may be impossible to achieve. It is a duplication of effort.	It is the installer's responsibility to verify airworthiness and eligibility. This can be a labor intensive effort on the part of the FAA. Records are not required to be maintained for this	Remove or simplify the requirement.	Adopted. Remove this text. Broader requirements for reviewing maintenance records in this para are sufficient.
70	2-3.d(3)	Gulfstream	This section states "when articles have been replaced since original manufacture, verify the articles are airworthy and eligible for installation". Verifying every part	Paragraph 2-3, sub paragraph (3) adequately defines the records requirements to §91.417 making subparagraphs (4)	Retain sub paragraph (3) of sub paragraph d. and remove sub paragraphs (4), and (6) as they are redundant to sub paragraph (3) or exceed the rule requirement	PA. Revised and combined this paragraphs for clarity.
72	2-3.d(5)	Aeropro	since this section contains language, which appears to incorporate part 91, (Flight Manual), how far into Part 91 do we go? Is it necessary to also ensure § 91.411 and § 91.413 checks have been accomplished or that the aircraft RVSM processes are approved for applicable aircraft prior to the issuance of a Standard? In other words, is it			A2Q. This order is limited to policies and procedures concerning the issuance of airworthiness certificates. Part 91 largely concerns requirements for operating an aircraft. So while compliance with part 91 requirements is mandatory for operations, only those part 91 requirements directly related to issuing
74	2-3.d(5)	Textron	should be "as applicable" does not apply to some experimental			Adopted. If the document is not required for a particular aircraft, this review would not apply. Modified text for clarity.

85	2-3.e(1)(c)	Kerry Moore	States that Manufacturers must get an SFA when operating a New aircraft for export delivery with foreign marks within the US for testing, demonstration, transfer to a completion center, or delivery	Manufacturers use a SFP for Prod Flt Testing and Customer Demo and Dealers Registration and display of foreign marks is allowed per 45.31 and AC 45.2E, Table 3. The AC only requires the SFA when it is registered in the Foreign Country.	Revise paragraph to remove last sentence and replace with "These flights, if the aircraft is on the foreign registry are performed under a SFA."	PA. Revise paragraph to clarify registration vs. marking. This special provision for displaying foreign marks applies to U.S. registered aircraft so any flights would be conducted under SFP. Any discussion of SFA doesn't belong in this paragraph.
86	2-3.e(1)(c)	Textron	Foreign marks for exporting aircraft should not be in section 2-3 at all			NC. Although this provision is exercised pursuant to exporting a new aircraft, the provision is exercised prior to the issuance of an export C of A. This is also a common provision that is applicable for any new aircraft, regardless of airworthiness classification or aircraft category.

88	2-3.e(1)(d)	UA RS 011A	The requirement “that the operator must also display on that aircraft near each entrance to the cabin, cockpit, or pilot station, in letters not less than 2 inches nor more than 6 inches high, the words “limited,” “restricted,” “light-sport,” “experimental,” or “provisional,” as applicable”. Large transport aircraft can have many entrances to the cabin, cockpit or pilot station.		Changing the requirement to; the operator must also display on that aircraft near the entrance to be use by the crew and passengers to the cabin, cockpit, or pilot station, in letters not less than 2 inches nor more than 6 inches high, the words “limited,” “restricted,” “light-sport,” “experimental,” or “provisional,” as applicable”.	Adopted: This text reflects 14 CFR 45.23. The recommendation points out that other entrances may exist than those used by the crew or passengers. For example, perhaps the galley has an entrance to facilitate ground services. Since the purpose of this display/placard is to communicate to the crew/passengers, this is a valid recommendation.
94	2-3.e.(2)	UA RS 011A	Requires an aircraft to have an ID plate with information IAW 45.13., 45.13 require a TC number, if any on the ID plate. The TC on an aircraft			NC. Although the regulation is ambiguous, our understanding is that the ID plate is intended to be a record of manufacture, analogous to a birth certificate for an aircraft. As such, in this
96	2-3.e(2)(b)	United Airlines	FAA should clarify that the ID plate information (§ 45.13(a)(4) (identification data, type certificate number) required for the issuance of the FAA Standard Airworthiness Certificate could include either the FAA type certificate number or the EASA type certificate number.	ID plates on the aircraft manufactured by Airbus only include the EASA type certificate number.	Add the following sentence after the last sentence in sub-paragraph (2)(b): "The type certificate number on the ID plate must be either the FAA type certificate number or the EASA type certificate number."	PA. Add note under this paragraph for clarity. Relocate text from Rev H, app D, para 3.g for this new note.
97	2-3.e(3)	Learjet	Heading appears to be missing from this section.	Section difficult to follow.	Add heading.	Adopted.

107	2-3.e(8)	Phil Beck	The document contains many terms that are not FAA defined, whereas these terms may be significant and therefore either need to be defined or the term itself, as used, changed. I.E. Chapter 2 page 2-5 item (3) (8). "Foreign Objects" First what is a "foreign Object" as used in this sentence ? Secondly how does the " <u>absence</u> " of a Foreign Object present a safety hazard. The presence of one may present this problem but the absence of one is the condition I think we are looking for.			PA. The sentence is correct but awkward. Revise for clarity and include examples (e.g., tools, scrap material, debris, etc.). When definitions are not included, the dictionary definition applies.
118	2-3.h	Textron	Letters of denial submission to AFS-750 by designee permitted?			A2Q: The designee may issue the denial and forward along with the incomplete airworthiness application to its managing office who will forward it to AFS-750. See appendix B.
122	2-5.	Aeropro	a general suggestion in regard to the issuance of an Amended certificate. FAA Form 8130-6 in Block V contains a check box but the reverse of the form, specifically Block VIII has never contained any logical instructions as to what to record in block "j." Many of us have been recording "§ 21.177" but I think we are probably all over the place.		Suggest including language to address this in the form instructions.	Adopted. The instructions for completing sections V and VIII of FAA Form 8130-6 were deleted in error and will be restored. 21.177 is not the correct regulation to enter into section VII for an amendment. Clarified in para A-2.b(9).
123	2-5.a	Kerry Moore	Para. 2-5.a(2)(a) and (b) refer to Paragraph "2.3.d" and "2.3.e" respectively. Paragraph Format is "2-3.d" and "2-3.e"	References in Order Text do not reflect proper Paragraph Numbering System used in the Order	Revise Paragraph 2-5.a(2)(a) and (b) to reference Paragraphs "2-3.d" and "2-3.e" respectively	Adopted. During final review, review and correct all paragraph references for format and correctness.
124	2-5.a(1)(c)	Phil Beck	Misuse of terms: Chapter 2 page 2-6 para 2-5 (a)(1)(c) uses the term "exceptions" in block 5 of the 8100-2.	This is incorrect. There are no "exceptions" allowed on an Airworthiness Certificate. There are "Exemptions" allowed as determined by the TCDS		NC. Block 5 of FAA Form 8100-2 uses the terms except/exceptions.

126	2-5.b/.c	Kerry Moore	Para. 2-5.b(2), b(2)(c), c(1), c(2), c(2)(c) and c(2)(d) refer to paragraphs "2.3" or "2.5" in 6 places on this page. Paragraph Format is "2-3" or "2-5"	References in Order Text do not reflect proper Paragraph Numbering System used in the Order	Revise the six places where the improper format is used referencing other paragraphs to the correct format (i.e. "2-3" or "2-5"	Adopted. Review and correct all paragraph references for format and correctness.
130	2-5.c(2)(c) and (d)	Gulfstream	This section states; "Inspect records/inspect the aircraft as necessary to verify the applicant's request is valid and the aircraft is eligible for the requested certificate."	Determining that an aircraft is eligible for the requested certificate can be interpreted as a determination of airworthiness. Replacing Airworthiness Certificates for an N-Number change or to correct inaccurate	The verbiage should be removed from the Order, or segregate replacement for N-Number change or to correct inaccurate and/or erroneous information from mutilated /no longer legible activities.	Adopted. Revise the language to clarify that replacing an airworthiness certificate does not require a finding of airworthiness but only a finding that the applicant's request is valid.
132	2-5.c(2)(d)	Textron	Inspection of aircraft is always necessary?			A2Q: replacement of an airworthiness certificate is considered an administrative action. An aircraft inspection is not always necessary.

133	2-5.c(2)(d)	UA RS 011A	For a replacement AW certificate “a complete aircraft inspection per paragraph 2.3.e is not required. Inspect the aircraft as necessary to verify the applicant’s request is valid and the aircraft is eligible for the requested certificate”. For a replacement certificate an aircraft inspection is not always required but may be accomplished if the FAA deems necessary		changing the statement to “an aircraft inspection per paragraph 2.3.e is not required. Inspect the aircraft if necessary to verify the applicant’s request is valid and the aircraft is eligible for the requested certificate” would allow this option.	NC. "As necessary" and "if necessary" mean the same thing. For a replacement certificate an aircraft inspection is not always required but may be accomplished if the FAA deems necessary
136	Fig 2.1	Gulstream PS	Typo..."Insepct" to Inspect	Typo	Correct	Adopted

146	3-3.a(2)	Learjet	States to review the manufactures records to verify that all quality system procedures have been completed satisfactorily. Verification of all quality systems is impractical.	There are hundreds if not thousands of quality system procedures utilized in the manufacture of aircraft. Especially when you include suppliers. FAA oversight & auditing of a PC holders quality system is already in place via FAA orders 8120-22 & 8120-23.	Remove.	Adopted.
147	3-3/3-4	Kerry Moore	References to other paragraphs is not the correct format. Refers to "2.3 and 3.2"	Paragraph Format is 2-3 and 3-2.	Revise to correct references from "2.3" to "2-3" and "3.2" to "3-2" in both paragraphs	Adopted.
148	3-4.a	Gulfstream	Does not mention that the authorization to produce under TC is limited to 6 months.	Per FAA Order 8120.22 (paragraph 2-3 (c)) that indicates, "FAA inspectors or authorized designees will conduct inspections and issue all of the necessary airworthiness	Include limitation.	Adopted. Revise para 3.4 to require verification that the manufacturer is still authorized to manufacture under a TC since such authority is time-limited.
152	3-6.a(1)	Kerry Moore	Requires 100 Hour Inspection be completed within 30 days of Application for 21.182(d) aircraft. Was not a requirement in H Revision of Order	This was a requirement in 8130.2G Chg 1, Paragraph 321 and was then removed in the "H" Revision of the Order. Now it is being	100 Hour within 30 days or No? Either way is fine but determine where this requirement originates.	A2Q: The 30 day requirement was dropped unentionally from Rev H. Rev J is correcting that.
153	3-6.a(1)	Textron	"the inspection must have been completed within 30 days before the date of application" has been added back into the order. This is restrictive.		Remove	NC. The 30 day requirement was dropped unentionally from Rev H. Rev J is correcting that.

155	3-6.a(1)	United Airlines	FAA should clarify that inspections in accordance with an approved progressive or continuous airworthiness inspection program can be used in-lieu of a sign off for the 100-hour inspections, if all inspections and scheduled maintenance are shown to be current.		Add the words "In-lieu of an 100-hour inspection, it is acceptable to inspect..." and remove the words "If inspected..." at the beginning of the third sentence, so that the sentence reads: "In-lieu of an 100-hour inspection, it is acceptable to inspect in accordance with an approved progressive or continuous airworthiness inspection program,	Adopted. The proposed changes do not change the meaning of the original language.
157	3-6.a(1)	UA RS 011A	The 100 hour inspection requirement or equivalent acceptable to the FAA must have been completed within 30 days of the application. A used aircraft must also be in compliance with a FAA approved maintenance program as required by the appropriate part 91, 121, 125 or 135 requirements. This is two separate requirements although some aircraft a 100 hour inspection could meet both requirements. When an aircraft is current with a progressive or CAMP is the FAA approval of that program also acceptable to show FAA acceptance that the maintenance program meets the 100 hour inspection requirement.		A statement in this paragraph, such as "aircraft that are current with a FAA approved progressive or continuous airworthiness inspection program meet the 100 hour inspection requirement", would better address the requirements.	PA. Clarify that a current inspection under an approved progressive or continuous inspection program meets the requirements for inspection under 21.183(d)(2).
158	3-6.a(1)(d)	Textron	Part 119 reference is conflicting to 21.183d which references part 121			NC. Per 14 CFR 119.39 and 121.1(f), certificates are issued "under" 119. Consider amending 21.182(d)(2) to clarify as part of ongoing Part 21 rulemaking.
167	4-6.	Kerry Moore	This is Section 2 and states to "Follow the Procedures for issuing airworthiness certificate in Section 1 of this chapter and the following".	Circular Reference. Section 1 says to go to Section 2 for Experimental and Section 2 says follow		Adopted. Section 1 applies to all specials - including experimental - and points back to the policies that apply to all aircraft in chapter 2. Section 2 applies to all experimentals and points
168	4-6.	Textron	Should say just go to paragraph 2.3 or 2-3 instead of section one			NC. Section 1 of chapter 4 applies -- especially the procedures for issuance of operating limitations.

169	4-6.a(1)(a) 4-9.(d)	GAMA	Manufacturers have encountered inconsistencies with respect to different offices interpretation of who is considered essential personnel.	49 CFR 91.319 does not in the regulatory text limit movement of aircraft or personnel as long as the program letter is adhered to by the operator.	The FAA should further clarify that market survey flight operations may include operations with essential personnel on-board the aircraft that involve movement of company personnel for marketing operations / industry trade shows between locations. This would also include defining essential personnel to include persons who are employees of the company or contractors with	NC. Neither 14 CFR nor this order limits passengers to essential personnel for the purpose of market survey.
170	4-6.a(1)(c)	Textron	routes and specific airports definition is excessive			NC. This reflects current policy and is necessary to verify compliance with 14 CFR 91.319(c).
171	4-6.a(1)(c)	Learjet	Says to verify the program letter defines the specified area over which the aircraft will be operated including routes to and from specified airports. In certain circumstances this information might not be known and can	For aircraft that have complied with 91.319 (b), specifying all airports including to/from routes is impractical and not necessary considering operations limitation #46	Clarify language.	NC. This information is required by 14 CFR 21.193.d(3).
172	4-6.a(2)	Textron	Paragraph adds confusion and possible limitation for marketing, coverd in regulation - redundant			NC. This para is longstanding policy and includes a clear exception for market survey.
173	4-6.a(4)	Kerry Moore	References Paragraph 4.5.a(1) for speaking to Program Letter requirements. There is no Paragraph 4.5.a(1). Also refers to Paragraph 4.7 for Multipurpose Certificates. Paragraph 4-7 is "Flight Test Areas"	References do not call out paragraphs by Proper Numbering format within the Order. References should be "4-6.a(1)" and "4-8"	Correct references to proper format and change paragraph 4.5.a(1)..." to "paragraph 4-6.a(1)" and "paragraph 4.7..." to "paragraph 4-8..."	Adopted. Review and update all para references.
174	4-6.a(4)	Learjet	In the first sentence there is a reference to paragraph 4.5.a (1). 4.5.a (1) cannot be located.	Apparent typographical error.	Provide correct paragraph number.	Adopted.

175	4-6.a(4)	Learjet	In the first sentence there is a reference to paragraph 4.5.a (1). Neither 4.5. a (1) (dot) or 4-5. A (1) (dash) can be located.	Use of dots and dashes for paragraphs is inconsistent. Noted through the entire document.	Provide correct paragraph numbers.	Adopted.
176	4-6.a(4)	Learjet	The last sentence says see paragraph 4.7 for additional policies and procedures concerning multiple purposes. Paragraph 4-7 concerns flight test areas.	The appropriate paragraph would appear to be 4-8.	Provide correct paragraph number.	Adopted.
180	4-6.c(1)	Kerry Moore	States "For Flight Testing, see paragraph 4.6 for additional...."	Paragraph dealing with Flight Test Areas is 4-7, not 4.6	Revise reference and correct format for paragraph to read "For Flight Testing, see paragraph 4-7 for additional..."	Adopted.
181	4-6.c(1)	Gulfstream	Says for flight testing, see paragraph 4.6.	Typo	Should say for flight testing, see paragraph 4.7.	Adopted.
183	4-7.b	Aeropro	suggest adding language to the effect that organizations such as ODAs routinely issue flight test operating limitations for R&D and Show Compliance, especially for Transport Category aircraft, the	The flight test areas for these organizations were established long ago and the operator is required to notify ATC of the experimental nature of	Suggest adding language to relieve redundancy.	NC. Order already has provision under para 4-9 for PC holder or modifier to establish approved procedures to streamline this type of activity.

188	4.7.f.	GAMA	The current order is interpreted by some offices to only allow for very limited operating areas.	Currently, the inconsistencies between offices generate inefficiencies and additional engagements between the manufacturer and their local office with little added value.	The FAA should increase the flexibility for market survey flight operations compared to other flight operations using experimental airworthiness certificates with respect to where the operation is conducted. Manufacturers conducting market survey flight operations would have greater latitude in reaching the intended market for the program without frequent updates to the program letter limitations. This would provide for domestic market survey operations without limitations to a	PA. The paragraph cited by the commenter, C-2.g(1), contains the following statement that sufficiently clarifies the acceptability of the requested operating area: "Using the term, 'the United States' to describe the operating area may be acceptable for low-risk aircraft such as a type certificated aircraft that has been altered in a manner that does not affect reliability or controllability." However, remove the example in the sentence and revise the remaining text of that sentence to clarify that "United States" may be appropriate for any low risk aircraft.
189	4.7.f.	GAMA	The current order is interpreted by some offices to only allow for very limited operating areas.	This prevents manufacturers from taking advantage of transient testing opportunities such as, but not limited to, specific weather conditions.	The FAA should establish a process to allow for the expansion of geographical limitations for specific research and development purposes which were unforeseen at the time of the issuance of the program letter. It is especially important that this process is timely to allow the applicant to take advantage of transient testing opportunities. This process should not require a reissuance of the experimental airworthiness certificate.	NC. It is up to the applicant to propose operating areas in its program letter with sufficient contingencies to take advantage of emergent or transient testing opportunities. Re-issuance of the certificate is not required if the "unforeseen testing" can be accomplished within the limitations of the existing certificate. However, we've softened this... Consider a policy change to remove operating area from the operating limitations on the cert. Remains in program letter.
190	4-7.f and 4-8	Kerry Moore	References are made to "paragraph 4.8" in two places	Format of paragraph reference is incorrect and	Change to "paragraph 4-9: in both places on Page 4-5	Adopted.
192	4-8.	Aeropro			suggest adding the holder of an ODA along with PC holders since ODAs possess an FAA Approved Quality System.	NC. This order not intended to establish scope of ODA activities.

193	4-8.b, Example 1	Kerry Moore	This example indicates that an applicant can hold an EX Exhibition and an EX R&D Ticket at the same time for the same aircraft.	In Chapter 7, Paragraph 7-2, wording indicates that this is limited to Restricted and Standard or Limited and Restricted. Is there a conflict in the example in Paragraph 4-8?		Adopted. This can be confusing. Chapter 7 is limited to implementing 21.187 for restricted category aircraft. Our policies also provide for issuance of multiple airworthiness certificates for multiple experimental purposes and for issuing an airworthiness certificate with multiple experimental purposes. Revise text in both chapters to clarify this.
194	4-10.	Learjet	This paragraph refers you to FAA Order 8900.1 for related policies and procedures for inspection programs. FAA order 8900.1 is a Flight Standards Order.	Prior to original aircraft certification (MIDO aircraft) should a flight standards order be used?	Clarify scope.	NC. AFS is responsible for approving inspection programs and Order 8900.1 is the appropriate reference. This is relevant to original certifications.
195	4-10.	Gulfstream	This section states to; "Refer to FAA Order 8900.1 for related policies and procedures."	Not consistent with both Orders 8110.4 and 8130.2	Change to; "4-10. Inspection Programs for Experimental Aircraft That Are Turbine-Powered or Weigh Over 12,500 Pounds. Manufacturing ASIs in AIR are primarily responsible for Type Certification programs, and airworthiness ASIs in AFS are	NC. AFS is responsible for approving inspection programs and Order 8900.1 is the appropriate reference. This is relevant to original certifications.
196	4-10.	Textron	refers to 8900.1 - not enough information as this topic cannot be found in the referenced order			Adopted. Add more specific reference to 8900.1: Volume 3, Chapter 50, Section 1. Specifics restored to this order since the relocation of this text to 8900.1 will not be completed before this revision is published.
209	4-11.e	Textron	should move the R&D portions to chapter 10 for all applicable aircraft			NC. This information applies to former-military aircraft regardless of experimental purpose and, as such, fits best in the general section for experimental, not in a particular experimental purpose.
219	7-2.d and 7-2.d(2)	Kerry Moore	7-2.d refers to "Standard" as a Category. Also, Paragraph 7-2.d(2) refers to "Standard Configuration". What is "Standard Configuration"?	Standard is a "Classification" with numerous categories (Normal, Utility, Transport, etc). Standard Configuration is not defined?	7-2.d revise to read "...if the application is for Restricted Category and a category within the Standard Classification issue FAA Form 8100-2 ..." Paragraph 7-2.d(2) change the word "configuration" with "classification" in 2 places in this	Adopted.
227	9-3.c(9)(c)(2)	Gulfstream	Says verify that he maintenance...	Typo	Should say verify that the maintenance...	Adopted.

228	9-3.c(9)(c)(2)	Kerry Moore	States "Verify that he maintenance..."	Typo, "he" should be "the"	Revise to correct typo.	Adopted.
230	10-2.	Kerry Moore	States "Follow Chapter 4 and the following.."	All of Chapter 4 is not applicable to issuance of an Experimental Special AW Cert. Only Section 2 is and Chapter 2 is not	Revise to read "Follow Chapter 4, Section 2, Chapter 2 and the following..."	NC. Chapter 4, Section 1 applies to all specials and this section requires following Chapter 2. Chapter 4, Section 2 applies to all experimentals. So for any particular experimental pupose, the following chapters apply: Chapter 2, Chapter 4,
231	10-2.a	Learjet	Says to verify the applicant has a project that is consistent with the requested experimental purpose. The word project as used is confusing.	Typically the term project means an FAA project. Not all Research & Development activities require an FAA project.	Clarify intent.	Adopted. Restore language from Order 8130.2H that provides a fuller description of work that may be done under R&D. Revise to remove the word, project, to avoid confusion.
233	10-3 10-3.a 10-3.b 10-3.b(2) 10-3.b(3) 10-3.c(3)	Kerry Moore	Refers to "R&D or Showing Compliance".	Order 8130.29A (Cxd by 8130.2H) allowed for issuance of multipurpose R&D "and / or" Show Compliance certificates. The wording in this paragraph appears to	Revise Paragraph 10-3 Title and Text and 10-3.a to change "..R&D or Showing Compliance" to "R&D and/or Showing Compliance". Same change for Paragraphs 10-3.b, 10-3.b(2), 10-3.b(3) and 10-3.c(3)	Adopted: "Or" does not allow the applicant to hold both R&D / Show compliance under this shirtpocket provision. Revise this chapter accordingly.
234	10-3.b(1)	Textron	Need Designee and ODA referenced for holding the certificate in suspension (change MIDO/FSDO to FAA?)			Adopted. Rev H allows a designee to hold a certificate in suspension. Add text to clarify this is still the case in Rev J.
235	10-3(b)(3)	Gulfstream	Procedures for Issuing an Airworthiness Certificate states to "Follow Chapter 4..." Chapter 4 takes to Chapter 2, paragraph 2-3. Following the procedures in paragraph 2-3. d. (3) to (6) for issuing a special airworthiness certificate for the purpose of Research and Development (R&D), Showing Compliance with Regulations, Crew Training, or Market Survey certificated in the Experimental Category is extraneous.	The aircraft has a valid Airworthiness Certificate with exception to the project modification and 8130.2 requires that the applicant must ensure the aircraft remains in compliance with all of the maintenance and preventive maintenance programs required under the airworthiness certificate that is intended to be held in suspension.	Define paragraph 2-3. d. (3) to (6) as "scope and detail of the aircraft evaluation should be based on the extent of aircrafts project modification."	Adopted. The applicant is temporarily surrendering a valid standard airworthiness certificate so the FAA does not need to conduct a full airworhiness assesment of the aircraft to issue an temporary R&D or Show Compliance. Revise "shirt pocket" procedures accordingly.

236	10-3.c(1)	Gulfstream	This section states; "Require only the documentation and/or inspections necessary to confirm what has occurred since the airworthiness certificate was suspended and that the aircraft	The verbiage "that the aircraft conforms to its type design" can be misinterpreted that a nose to tail verification is required. 8130.2 already	Change verbiage in paragraph 10-3.c to: After flight testing has been completed and the applicant requests the return of the suspended certificate, perform the following: (1) Ensure that either the	Adopted. Agree with modifying text.
237	10-3.c(2)	Gulfstream	R&D aircraft maintenance record entry was omitted and should be included since the R&D statement is different from the Show Compliance Statement.	Existing policy found in 8130.2H.	Text should be changed to include the following R&D aircraft maintenance record entry from 8130.2H, "I find this aircraft meets the requirements for the reinstatement of the current [standard or restricted] airworthiness certificate, following completion of R&D flight testing, based on an inspection confirming	Adopted.
240	10-3.c(3)	Learjet	Says to enter "do not code" on FAA Form 8130-6, FAA coding block. This action is not always accurate.	If within the temporary suspension process the Airworthiness Certificate did get surrendered "Do not Code" should not go on the coding block.	Correct paragraph	NC. "Do not code" correctly applies for a temporary R&D while the standard is temporarily held in suspension. This paragraph is limited in scope to temporarily holding the standard airworthiness certificate in suspension, not when the standard is permanently surrendered/suspended. Note the commenter identified the incorrect paragraph – 10.2 instead of 10.3.
241	11-2.	Kerry Moore	States "Follow Chapter 4 and the following..."	All of Chapter 4 is not applicable to this task,	Revise to read "Follow Chapter 2 and Chapter 4, Section 2, and the	NC: Same as dispositions for paras 4-6 and 10-2 from this commenter.

243	12-2.	Kerry Moore	States "Follow Chapter 4 and the following..."	All of Chapter 4 is not applicable to this task, Only Section 2 and no reference to Chapter 2	Revise to read "Follow Chapter 2, Chapter 4, Section 2, and the following..."	NC: Same as dispositions for paras 4-6 and 10-2 from this commenter.
244	13-2	Kerry Moore	States Follow Chapter 4 and the following..."	All of Chapter 4 is not applicable to this task,	Revise to read "Follow Chapter 2, Chapter 4, Section 2, and the	NC: Same as dispositions for paras 4-6 and 10-2 from this commenter.
248	15-4	Kerry Moore	States "Follow the procedures in paragraph 2.3 and Chapter 4, and the following:"	All of Chapter 4 is not applicable to this task, Only Section 2 and paragraph reference is incorrect format. S/B	Change to read "Follow the procedures in Chapter 2, Chapter 4, Section 2, and the following"	NC: Same as dispositions for paras 4-6 and 10-2 from this commenter.
257	16-2	Kerry Moore	States Follow Chapter 4 and the following..."	All of Chapter 4 is not applicable to this task,	Revise to read "Follow Chapter 2, Chapter 4, Section 1, and the	NC: Same as dispositions for paras 4-6 and 10-2 from this commenter.
258	17-3	Kerry Moore	States Follow Chapters 2 and 4 and the following..."	All of Chapter 4 is not applicable to this task, Only Section 1.	Revise to read "Follow Chapter 2, Chapter 4, Section 1, and the following..."	NC: Same as dispositions for paras 4-6 and 10-2 from this commenter.
267	18-2.d	Boeing	The proposed text states: "SFPs for purposes other than production flight testing and customer demonstration flights will be issued by the FSDO, MIDO, or International Field Office (IFO) geographically responsible for the area in which the flight is to originate. If the applicant's aircraft is outside the jurisdiction of the FSDO, MIDO, or IFO receiving the request, the applicant should be referred to the appropriate office. This paragraph does not apply to part 121 or part 135 certificate holders."	The removal of this note takes away some of the needed clarification regarding the ability to issue an SFP except for production permits and customer demonstrations (i.e. ferry flight permit).	We suggest revising the text to add the following note from the current revision (8130.2H top of page 4-84) into the proposed order: Note: ODA holders and designees may issue special flight permits if it is an authorized function. Refer to FAA Order 8100.15 (ODA) and FAA Order 8100.8, <i>Designee Management Handbook</i> , for further clarification and guidance."	PA. Since chapter 2 does not apply to SFPs, modify para 18-1.b to state, any representative of the FAA with the appropriate authorized function may issue a SFP. But also need to be clear designees must inspect the aircraft and cannot provide the SFP electronically.

268	18-2.d	Gulfstream	Who May Issue an SFP does not include designees.	Designees and ODA Unit Members have function codes to perform the task allowed by policy found in FAA Orders 8100.8 and 8100.15.	Include verbiage that identifies designees as being eligible to issue an SFP as authorized in the certificate of authority or letter of designation. Include verbiage that identifies ODA Unit Members as being eligible to issue an SFP as authorized in their ODA procedures manual. Note: Chapter 2 paragraph	Adopted. Same as previous, related comment on 18-2.d
269	18-2.d	Textron	No allowance for designee or ODA issuance, conflicts 8100.15/8100.8/8000.95		Put back in the note that is in 8130.2H Note: ODA holders and designees may issue special flight permits if it is an authorized function. Refer to FAA Order 8100.15 (ODA) and FAA Order 8100.8, Designee Management Handbook,	Adopted. Same as previous, related comment on 18-2.d
271	18-3 intro text	Healy			Change "The following particular operations are considered within the scope" to "The following particular operations are also considered within the	PA. Concur with potential for confusion. Change the second sentence of the introductory text to, "In addition to the specific purposes listed in 21.197, the following particular operations are considered within the scope of 21.197."
273	18-3.b	Healy			Change "The delivery of an aircraft to the base of the purchaser or to a storage point in the United States" to "The delivery of an aircraft to the base of the purchaser or operator or to a storage point in the United States."	Adopted. 21.197(a)(2) includes broad provision for issuance of an SFP for delivery. Specifying delivery to the base of an operator is unnecessary, but, since we include other specific scenarios (that is, delivery to the base of a purchaser), there is no harm in clarifying that delivery to the base of an operator is an acceptable purpose for obtaining an SFP.
278	18-4.c(3)	Kerry Moore	States "... and the AD does not prohibit ferrying, you..."	"Ferrying" is not standard nomenclature in 14 CFR 21.197. Perhaps better terminology reflecting the	Revise to read "...and the AD does not prohibit operating the airplane to a location where the requirements of the AD can be	Adopted.
279	18-4.c(3)	Learjet	This paragraph discusses Airworthiness Directives and ferrying aircraft. It does not indicate that it applies to AD's that have not been complied with.	The subject matter is relevant only an applicable AD has not been complied with.	Clarify language.	Adopted.
280	18-4.c(3)	Kerry Moore	States "...article's operation during a ferry flight..."	"Ferry Flight" is not a term used within regulation in and of itself. Perhaps use	Revise to read "...article's operation during a flight conducted under 21.197.a(1)	Adopted.

281	18-4.d	Textron	SFP is not an airworthiness certificate			NC. An SFP is an airworthiness certificate per 14 CFR 21.175(b).
284	18-4.d(2)	Kerry Moore	States "Except for an SFP for overweight operations, the completed and signed permit may be transmitted electronically"	This Order covers designees and ASI's. Only ASI's are allowed to "Fax" permits. The wording in this paragraph appears to allow designees to "electronically transmit" SFP's.	Add a statement following the "transmitted electronically" statement that reads as follows: "Only an FAA ASI may electronically transmit SFP's"	Adopted.
285	18-4.d(2)	Textron	if designees are allowed to operate under chapter 18, can they now use electronic transmittal?			A2Q: Since designees have been and are still required to physically inspect the aircraft, electronic transmittal of an SFP is not necessary or permitted.
287	18-5	Kerry Moore	Paragraph refers to paragraphs 18.10 and 18.9. Order Paragraphs not formatted in that manner	Paragraph format is 18-10 and 18-9.	Change references within this paragraph to paragraphs 18-10 and 18-9 respectively	Adopted. Review and correct all paragraph references for format and correctness.

289	18-5.a(2)	Textron	Conflict with regulation			Adopted. The rule does not require a TC or PC for conducting production flight testing. That is why the FAA can issue an SFP for production flight testing of LSA and UAS. Yet for a new aircraft not yet issued a TC, this para requires a
292	18-7	Kerry Moore	Refers to paragraph 18.6. Incorrect reference and not correct format.	Paragraph 18-8 is where the Production Flight Test AND Customer Demonstration Permits are discussed.	Change reference to read "...as stated in paragraph 18-8"	Adopted. Review and correct all paragraph references for format and correctness.
293	18-7.b(2) and 18-7.b.(3)	Kerry Moore	Wording requires statement "Subject to D(2) on Reverse Side" on a Customer Demonstration Permit (and only on that permit)	Order 8130.2H, Para. 803.c(2) requires this statement be entered when operations are going to be outside the US. This revision to the order reflects only required on Customer Demonstration permits and no other kind of permit.	The requirement for the entry of "Subject to D(2) on reverse side" in Block C of the FAA Form 8130-7 should be moved to Paragraph 18-1(c) as it is required when the permit will encompass operations outside the US (On the "TO" Line of the FAA form 8130-7)	Adopted. Rev H and draft Rev J are both confusing on this matter. The block-by-block instructions for completing the special airworthiness certificate indicate in para 803.c for Rev H and App A para 3.c for Rev J that the para does not apply to production flight testing -- yet both paras include requirements applicable to production flight test. The "Subject to D(2)" entry is required in Rev H para 494.b(2) for customer demonstration flights. Revise the text to consolidate all block by block instructions to the Appendix. Delete the requirement for the "Subject to D(2)..." entry. "D" applies to all specials without the need for this statement. We don't refer to other operating limitations on the face of the airworthiness certificate.
296	18-9.b(3)	Lessors	We request that the final order provide for acceptance of manufacturers' maintenance planning documents ("MPD") as satisfying the requirements of 14	Factual Background. LeaseCos operate N-registered aircraft on a limited basis, such as ferry flights, transferring aircraft	Insert the following after the 1st sentence: "Eligible programs include the manufacturer's maintenance planning documents ("MPD") or other related maintenance	NC. An MPD is acceptable if it meets 91.409(e). However, an MPD typically only covers the airframe. The rule requires the airframe, engines, propellers, rotors, appliances, survival equipment, and emergency equipment
298	18-9.b(3) Note	Lessors	Same as 1	Same as 1	Change the note to read: "Note: Only an AFS ASI can approve the inspection program for in service	PA. Change to "Only an airworthiness ASI can approve an inspection program."

299	18-9.b(3) Note	Sterling Pacific		By making the change suggested would bring the Order in concurrence with 91.904(f)3 which allows the owner/operator to select a maintenance program recommended by the manufacturer.	Change note as follows: "Note: Only an AFS ASI can approve the maintenance program selected under §91.409(f)2 or 4."	PA. Change to "Only an airworthiness ASI can approve an inspection program."
300	18-9.b(3)	Lessors	Same as 1	Same as 1	Change "approved" to "accepted."	NC. The FAA approves all 91.409F4 inspection programs.
301	18-9.b(3)	Lessors	Same as 1	Same as 1	Change "approved" to "accepted."	NC. The FAA approves all 91.409F inspection programs.
307	18-9.b(5), Example 3	Lessors	Same as 1	Same as 1	Change "approved" to "accepted."	NC. Revise this example to clarify that it applies to 91.409F4 inspection programs, which are approved by the FAA.
308	18-9.b(5), Examples	Lessors	Same as 1	Same as 1	Insert new example to read: "Example 3: XYZ Leasing will take possession of a B 787 coming off of a lease and wants to operate the aircraft for ferry or maintenance purposes, after the aircraft is off of the lease. The aircraft is N-registered. When applying for the SFP, XYZ identifies a MPD as the program specified under § 91.409(f)(3). The FAA issues the SFP with the conditions and limitations under which XYZ may operate its aircraft."	PA. Add example to read, "Inspection Program Recommended by the Manufacturer: XYZ Leasing wishes to operate its Airbus 320 from one storage location to another. When applying for the SFP, XYZ submits a description of the inspections and tests it considers necessary to ensure safe operation of the aircraft. The inspection program selected and identified in the maintenance records is the manufacturer's recommended program that meets § 91.409(f)(3). Upon review and evaluation of the application, the FAA issues the SFP with any specific operational conditions and limitations under which XYZ may operate its aircraft following the satisfactory completion of the inspections and tests described in the selected inspection program. XYZ must comply with all the applicable inspections and tests described in the selected inspection program prior to operating the aircraft."

309	18-9.b(9)	Sterling Pacific		This change would streamline the reporting process and alleviate	Change this para as follows: (9) To provide proper surveillance	NC. This is not necessary. Delete this paragraph.
310	18-9.c(1)	Lessors	Same as 1	Same as 1	Add new note to read: "Note: Inspections and maintenance procedures as specified by the	NC. Inspection program must meet 91.409F. This recommendation is only acceptable if the manufacturer's inspection program is approved
314	20-1.a and 20-1.b	Kerry Moore	Paragraphs refer to "Standard Category aircraft". Standard is a classification, not a category. Also references to paragraphs 3-5 and 3-6.	Change the word "Category" to "Classification". 21.183 lists the different types of	Revise to read: "Standard Classification" in 5 places. Para 20-1.a change to paragraph 3-5. Paragraph 20-1.b change to	Adopted. Search globally and replace "standard category" with "standard classification." Review and correct all paragraph references for
315	20-1.b	United Airlines	As proposed, the Draft Order appears to suggest that the FAA may not provide the support necessary to obtain standard		Remove "under bilateral agreements" at the end of the first sentence, so that the sentence reads:	Adopted. For a used, import aircraft being certified under 21.183(d) neither a bilateral agreement nor an ECofA is mandatory. An ECofA is helpful, lowers risks to importer/FAA, but is
316	20-1.b	UA RS 011A	When an applicant applies for a standard AW certificate for a used aircraft the application is made under section 21.183(d). If the used aircraft is being imported into the U.S. as a U.S. manufacture aircraft			PA. Application for a used aircraft is made under 21.183(d). 21.183(c) is for new, foreign SOM aircraft. Agree that we should delete the phrase, "under bilateral agreements" since it is permissible to import used aircraft from countries with which the United States does not
318	20-2.a	United Airlines	(See previous comment)		Add the word "typically" before the phrase "issued by a CAA under a bilateral agreement" in the first	PA. Deleted the phrase, "under a bilateral agreement" since the FAA receives these documents from CAAs of countries with whom

322	20-3	United Airlines	Likewise, the general proposition that the FAA's exercise of its export certification authorities is discretionary is also sound, but FAA's exercise of its discretion should be tempered by reason and context. While the FAA has interpreted that it may deny a request for exercise of its export certification authorities based on the "undue burden" placed on the agency by the overseas location of the aircraft (see Legal Interpretation to Susan Fournier (Sept. 23, 2014)), this denial of service should certainly be unusual and limited to circumstances where there is in fact an undue burden. In order to ensure that the Final Order supports the global commerce in aircraft and does not impede legitimate acquisitions by U.S. carriers of aircraft located abroad, the Final Order should include language in chapter 19 making it clear that it is not an undue burden to the FAA to		Add the following sentence: "No undue burden exists where the used aircraft is being imported by a Part 121 certificated carrier or a U.S. citizen entity, such as a trust company, lessor or financial institution, acting on behalf of a Part 121 certificated carrier."	NC: Specifying policies or requirements for determining undue burden is beyond the scope of this order.
323	20-4.a(1)(a) 20-4.a(1)(b)	Kerry Moore	Both paragraphs refer to a "Standard Category" aircraft. Standard is a classification, not a category.	Change the word "Category" to "Classification". 21.183 lists the different types of categories covered under the Standard Classification	Revise to read: "Standard Classification" in both paragraphs	Adopted. Corrected throughout the order.
324	20-4.a(1)(b)	Aeropro	I am not sure I understand the concept of a "used" import aircraft. If a foreign manufactured aircraft was at any time U.S. registered then sold and left U.S. registry and subsequently returned wouldn't it be considered a used aircraft under § 21.183(d)? AFS-750 records		I think clarification is necessary.	Adopted. This is a complex scenario. 21.183(c) applies only to new, imported aircraft manufactured under a foreign SOM. Used aircraft, including used import aircraft, are eligible for a standard airworthiness certificate under 21.183(d). Although an export C of A is

325	20-4.a(1)(b)	Aeropro	<p>The illusive FAA Export C of A. Case in point; I am working a 1980 Cessna 185, which was exported from the Cessna factory direct to Canada with a TCCA registration number. The only document we were able to find was a copy of the E Card. At least by reviewing the E card I was able to determine that no exceptions were issued. I would highly recommend that you include language here that allows for instances where a copy of the original Export C of A cannot be produced after exhausting all search avenues. If the aircraft is eligible by TCDS (make, model, serial number), and we know that it was properly exported, and after inspection it is determined to be in conformance with FAA standards then a Standard should be issued.</p> <p>You've also included this language; "In addition, inspect the export C of A from the exporting authority returning the aircraft to the U.S. to verify it certifies conformity to the</p>			<p>PA. Agree on need for clarification. All/most bilateral agreements specify the importing authority accepts aircraft with an export C of A from the exporting authority. As discussed previously, these documents facilitate showing/finding compliance to 21.183(d). Having the original FAA export C of A and the exporting authority's export C of A for returning U.S. SOM aircraft is helpful, but not mandatory. As long as the applicant meets 21.183(d), the FAA may not deny issuance of the certificate because the applicant does not have one or both export C of A's.</p>
326	20-4.a(1)(b)	Kerry Moore	<p>Paragraph starts with "In addition". In addition to what? This is the first subparagraph that refers to US SOM</p>	<p>There is not a requirement that an exporting CAA provide an Export C of A</p>	<p>Revise to read: "For US SOM Aircraft returning to the US, inspect the original..." (Delete "In addition" from</p>	<p>PA. As discussed above, concur with revising text to clarify that export C of As are strongly desired but not mandatory.</p>
327	20-4.a(1)(b)	Gulfstream	<p>There is no requirement for a U.S. SOM aircraft returning to the U.S. to have an Export C of A issued from all countries, not all US SOM aircraft are issued an Export when they leave the US system.</p>	<p>There may not be an export C of A.</p>	<p>20-2. b., 'Export C of A Not Provided,' should be expanded to include U.S. SOM aircraft returning to the U.S. without an export C of A from the exporting authority and/or an acceptable copy of the U.S. export C of A issued when the aircraft originally was exported from</p>	<p>PA. As discussed above, concur with revising text to clarify that export C of As are strongly desired but not mandatory.</p>

332	20-4b(2)	Aeropro	how will FAA Form 8130-6, block IV Inspection Agency Verification be handled moving forward for acceptance of the 100-hour performed by an AMO located in a bilateral country?			NC. Although in need of editing, AC 21-12, para 9.d(1)(c) already address this.
333	20-4b(2)	Kerry Moore	Paragraph references Paragraph 3.6.b(1). Reference is not in correct format. Also, among the conditions listed for acceptance of an inspection performed by an AMO appropriately certificated by the exporting CAA no mention is made of the 30 day requirement.	The 30 day requirement in 3-6.b(1) clearly states it must be done within 30 days of the date of application. Any inspection performed under this paragraph must also be done within 30 days of date of application.	Correct Paragraph reference to proper format of "3-6.b(1)" and revise last sentence to read "...the inspection must have been completed while the aircraft was operated on the registry of the exporting CAA and within 30 days of the date of application for US Airworthiness Certificate; and the ..."	PA. Need to specify reasonable limit for 100 hour inspection. 30 days seems too restrictive for imports. Revise to 60 days.
339	20-6	Textron	Following this procedure makes the issuance of the standard airworthiness certificate recurrent when the CAA dates the certificate			NC. Generally, issuance of an airworthiness certificate for an aircraft that was previously issued an export C of A would constitute a recurrent certification. However, for this

340	Chapter 21	Aeropro			Suggest including language from the July 7, 2016 FAA AIR-420 Memo, which speaks to "Conflicts Between Implementation Procedures for	Adopted. Add new note to paragraph 21-2.d(2).
345	20-1	Textron	If a conflict exist,...follow the bilateral...There should be some clarification as during the export			Adopted. Change "this chapter" to "this order" and relocated to para 1-8.
346	21-2.b	Aeropro			suggest including language that the aircraft is not required to be U.S. registered. That would mean that the E Card, AC Form 8050-72 would not contain a U.S. registration number.	NC. Per 21.329, for an aircraft manufactured under 14 CFR part 21 subpart F or G to be eligible for an export C of A, the aircraft must meet the requirements for a standard airworthiness certificate. U.S. registration is required to meet the requirements for a U.S. standard airworthiness certificate.
348	21-2.b(1)	Healy	Incorrect use of word, category.	"Standard" is not a category.	Change "standard category" to "standard classification."	Adopted
349	21-2.b(1)	Kerry Moore	Paragraph refers to "Standard Category". Standard is a Classification, not a category.	Change "Category" to Classification.	Revise to read "For Standard Classification aircraft..."	Adopted.

350	21-2.b(1)	Textron	This paragraph brings the requirements of a 100 hour inspection for a recurrent export. This requirement is cumbersome, very prohibitive and costly.			NC. This policy merely reflects regulations in 14 CFR that aircraft manufactured under part 21 subpart F/G meet the requirements for a standard airworthiness certificate per 21.329(a)(1) and, for a used aircraft, the requirement in 14 CFR 21.182.d(2) for the 100 hour inspection.
351	21-2.b(4)	Kerry Moore	States "For a standard, primary, or restricted category aircraft manufactured..." Also refers to paragraph 21.2.c(1) through (3).	Standard is a classification, not a category. Also reference to paragraphs is not formatted correctly reflecting the formatting of the Order	Revise to read "For a standard classification or primary or restricted category aircraft manufactured...". Also change paragraph reference to "21-2.c(1) through (3)"	Adopted.
355	21-2.c(3)	Textron	This paragraph states to verify the ID plates information match the application. There is no reference to verification of information to the TCDS.			NC. 14 CFR 21.329(a)(2) only requires an aircraft not manufactured under 14 CFR part 21 subparts F/G to hold a valid airworthiness certificate. This para specifies minimum requirements to verify the airworthiness certificate remains current/valid. Re-finding eligibility per the TCDS is not necessary.

358	21-2.f	Kerry Moore	Paragraph states "Prepare an accompanying cover letter..."	Paragraph does not stipulate that all communication is "authority to authority"	Revise to read "FAA will prepare a cover letter for direct transmittal to the importing CAA..."	Adopted. Revise this paragraph to clarify that the letter is on FAA letterhead and transmitted by the FAA.
360	21-2.f	Kerry Moore	Paragraph reads as though importing CAA's letter is required in all cases.	Only is [if] there are exceptions listed on the Export C of A would a letter from the CAA be	Add 'if applicable to the end of the first sentence to indicate that the letter may not be applicable.	Adopted.

363	21-3	Lessors	We request that the final order provide for issuance of an Export CofA for N-registered aircraft that are under FAA oversight (e.g., maintenance at FAA-certificated repair stations) and are located outside of the United States.	The Draft Order reflects the FAA's policy that DARs may issue Export CofAs outside of the United States. ⁵ However, in some cases, even when an N-registered aircraft is having work performed at a FAA-certificated repair station, the Lessors have received conflicting guidance about whether the geographical expansion authority could be used for an Export CofA. We recommend that the FAA revise Section 20-3 to clarify that in these circumstances DARs may issue Export CofAs outside of the United States. Under typical lease terms, lessees must return aircraft in a condition	Insert the following new notes after this paragraph: Note 1: A U.S.-registered aircraft located outside of the United States and subject to FAA oversight (e.g., maintenance by a FAA-certificated Part 145 repair station) is eligible for the issuance of an export CoA. Note 2: A U.S.-registered aircraft located outside of the United States having been maintained under a maintenance program consistent with the manufacturers MPD (based on the FAA-accepted MRBR) and satisfying the requirements of the importing country is eligible for the issuance of export CoA.	NC. 14 CFR 21.325(c) already provides for the issuance of export approvals for products and articles located in another country. However, this provision is subject to an undue burden determination --including potential undue burden concerning the use/oversight of designees. Policies and procedures concerning undue burden determinations are outside the scope of this order. Similarly, policies and procedures concerning the appointment, authorization, and geographic expansions of designees are also outside the scope of this order. Para 21-3 merely restates the basic provision of 14 CFR 21.325(c). Maintenance and inspection program requirements necessary for obtaining or meeting the requirements for an airworthiness certificate are addressed in the applicable chapters of this order for this issuance of the particular airworthiness certificate.
370	22-2.c	Kerry Moore	Wording reflects BOTH conditions must be met for requiring an SFA.	Either of the conditions necessitates the issuance of an SFA	Revise to read "An SFA is required when either of the following conditions exist:"	Adopted.
400	App A	Gulfstream	The instructions for the completion of Section V and VIII of FAA form 8130-6 are omitted from Rev J to	Most of the entries are self-explanatory however the underlined Section VIII	We recommend inclusion of these instructions in Appendix A of 8130.2J.	Adopted.
405	A-1.c	Gulfstream	This section states; "A digital signature that meets the requirements of FAA Order 1370.104, Digital Signature Policy, is also acceptable." FAA Order 1370.104 content can only be accessed from within the FAA	Policy that impacts designee activity should be made publically available.	Make the applicable content of FAA Order 1370.104 available to designees.	CBOS. Commenter should provide DF to OPR of Order 1370.104. Designees may also contact their managing specialists to obtain required information.

408	A-2.a(4)	Kerry Moore	Requires the name of the supervising ASI be typed in Block 23.	Should be "typed or printed" as all ASI's do not necessarily have access to	Revise "typed" to "typed or printed"	Adopted.
409	A-3.d	Aeropro			suggest including language to address the scenario of when a CAR 4a aircraft, as an example, is modified via STC that introduces a "Category" change such as "Normal." Block 4 should now reflect the new Category introduced by the STC. In this same section I suggest you speak to TCd Gliders as well. Many are certificated in the "Utility"	NC: This paragraph already addresses the scenario in this comment. The aircraft has a standard based on CAR 4a and TCDS number.
412	A-4.b(3)	Kerry Moore	Allows for shortening of "Research and Development" to R&D and "Showing Compliance to Regulations" to Show Compliance but for LSA only.	This allowance should extend beyond just LSA EX Tickets. When issuing multipurpose certificates it should be allowed as well.	Move the allowance for shortening to R&D and Show Compliance to paragraph 4, Section 2, Paragraph 4-8.	Adopted. Modify the block by block instructions in Appendix A to allow these abbreviations.
413	A-4.c-d	Kerry Moore	Paragraphs state "For Production Flight Testing" yet Paragraph 17-8 allows for a combined Production Flight Test and Customer Demonstration Permit to be issued.	The Prod Flt Test and Customer Demo permit would also require the Manufacturer Name and Address to be entered in Section B and N/A to be	Revise A-3.b to read "...SFP for the purpose(s) as identified in paragraph 17-8." Revise A-3.c(2) to read "For permits issued under Paragraph 17-8, enter..."	Adopted: Replace whole para. Enter to/from only for SFP for single purpose of production flight test (PFT) or multiple purpose of PFT and customer demo. For issuance of all other specials, enter N/A.
414	A-4.e	Kerry Moore	States "If the purpose is production flight testing of..." yet Paragraph 17-8 allows for Production Flight Testing AND Customer Demonstration Flight permit to be issued.	Section D can be marked as N/A for the production light testing and customer demo permit as well.	Revise to read "If the purpose(s) is (are) as identified in paragraph 17-8 (other than light sport category aircraft)..."	Adopted.

421	A-6.b(2)(c)	Aeropro			<p>Operating Times. As a suggestion please includes language to address propellers such as Hamilton Standard 14-RF series, which are modular, when it comes to overhaul. In other words, there is no solid total time in service for the entire propeller assembly.</p>	<p>NC. Per 91.417(a)(2), total time in service must be recorded for a propeller assembly, even if it's a modular assembly. If necessary, component times in service could be reported as additional information under exceptions.</p>
422	A-6.d(1)	Kerry Moore	<p>States "Sign the form". All forms require the typed or printed name as well as signature. This one does not?</p>	<p>Just a signature without the typed or printed name would be in keeping with the requirements for all other forms.</p>	<p>Revise to read "Enter typed or printed name and sign the form..."</p>	<p>Adopted.</p>

423	A-7.e	Michels	A comparison of Order 8130.2J (draft) to current Order 8130.2H finds a new requirement to submit the <u>original</u> [emphasis added] statement of acceptance from an importing country listing the specific nonconformities to the approved type design and noncompliance(s) to special requirements of the importing country, as applicable. This new requirement for the "original" statement is found on Order Page B-2 - Appendix B Section B-2. d. (2) and Order Page A-22 -	It is very typical for the importing country CAA to communicate via electronic mail and this method of communication does in fact support expeditious processing of export applications.	It is recommended that Order 8130.2J (draft) provide for submission of either the original (when available) or a copy of the statement of acceptance to AFS 750.	Adopted. Clarify in para 20-2.g(2)(b) and appendix B that written acceptance of exceptions submitted by a foreign CAA via electronic media is acceptable for issuance of the export C of A and for submission of records to AFS-750.
424	A-7.c	Kerry Moore	States to enter the applicable Specification or Type Cert Data Sheet for the aircraft in the space..."	Export C of A require the Specification or Type Cert Data Sheet for the Aircraft, Engine, and Propeller (if applicable.)	Revise to read "Enter the applicable specification or type certificate data sheet for the aircraft, engine, and propeller (if applicable) in the space..."	Adopted. Example includes TCDS numbers for aircraft and its engine/prop. Instructions say only to list TCDS for aircraft.
425	A-7.c	Textron	Paragraph States "Certifying Statement. Enter the applicable specification or type certificate data sheet for the aircraft in the space provided in the certifying statement." 8130.2H States "In the space provided in the certifying statement, enter the information identified in accordance with note (1) at the bottom of FAA Form 8130-4." Note (1) includes recording the engine and propeller TC as well.	Missing reference to note on 8130-4 form		NC. The information in Note 1 of FAA Form 8130-4 that specifies what is to be entered in the certifying statement on the form is now included in paragraph A-6.c. Referring to Note 1 is unnecessary.

426	A-7.h(3)(b)	Kerry Moore	Requires individual designee to enter the letters DMIR / DAR and the designation number.	FAA Order 8000.95 (Applicable to DAR's that have transitioned to DMS) are required to use their "nine digit authorization number on all documentation" and does not include "DMIR / DAR". FAA Authority is already next to signature.	Revise to read "An individual designee must enter their authorization number"	PA: Change to: "An individual designee must enter his/her designee number."
427	A-7.h(3)(c)	Textron	An ODA must enter the name of the company, "ODA" and their ODA number	existing requirement - Line on 8130-4 says "District office or Designee Number"		NC. Until FAA Form 8130-4 is revised to provide a better label for the signature line, following the procedure in this paragraph provides direction for an ODA.

440	B-2.e(2)	Michels	A comparison of Order 8130.2J (draft) to current Order 8130.2H finds a new requirement to submit the <u>original</u> [emphasis added] statement of acceptance from an importing country listing the specific nonconformities to the approved type design and noncompliance(s) to special requirements of the	It is very typical for the importing country CAA to communicate via electronic mail and this method of communication does in fact support expeditious processing of export applications.	It is recommended that Order 8130.2J (draft) provide for submission of either the original (when available) or a copy of the statement of acceptance to AFS 750.	Adopted. We will clarify that written acceptance of exceptions submitted by a foreign CAA via electronic media is acceptable for issuance of the export C of A and for submission of records to AFS-750.
441	B-2.e(2)	Learjet	Requires the submittal of the original statement of acceptance from the importing country. The	The original copy of a permanent waiver might not be available. The	Clarify language.	Adopted. Clarified that a copy is acceptable.
442	B-3	Aeropro			As a suggestion under "do not include" please add FAA Form 8100-1 since these forms seem to be making their way quite regularly into	PA. Clarified in para B-3.b(2) that any document not required by this appendix to be forwarded to 750 should not be forwarded.
448	Tables B-1/B-2	Kerry Moore	Table B-1 requires submittal of Superseded, Terminated, or canceled airworthiness certificates if recurrent is issued.	Replacement also includes for lost certificates. When you issue the replacement you cancel the previous one although it is not		Adopted. Clarify this in Table B-1 and B-2.
449	Tables B-1/B-2	Learjet	Requires the submission of a copy of FAA form 337 as applicable. It's unclear what the scope of this requirement is.	This requirement becomes subjective without clear guidance. For example do used foreign aircraft going on US registry require the issuance of FAA form 337 for prior FAA approved major alterations? If the FAA representatives require the issuance of a 337 during a certification	Provide guidance.	Adopted. Clarify in these tables as follows: Submit a 337 to the Registry if the modification approved via that 337 created the need for the application for airworthiness certificate. For example, if the modification changed (1) the aircraft model, (2) the aircraft category such as from normal to restricted, or (3) the exceptions in block 5 of a standard airworthiness certificate.
451	Table B-2	Learjet	"Aeronautical center Form 8050-3, certificate of registration" is restrictive.	There are other suitable forms of aircraft registration.	Revise to read "Aeronautical center Form 8050-3, certificate of registration, or other acceptable evidence of registration" same as	PA. Simplify with "aircraft registration."

452	App C	EAA	Add example of E-AB program letter	Guidance is given for program letters for other categories, but not E-AB. This can lead to confusion, especially since an (outdated) example is still found in AC 20-27G		CBOS. We will add this to the next revision of the order.
453	C-2.d(2)	Textron	Listing of Airports is not required by 14 CFR 21.193 just the areas			NC. Operation over and around airports is clearly included in the 21.193(d)(3) requirement for an applicant to specify the areas over which the experiment will be conducted. This para in draft Rev J reflects longstanding policy in support of this regulation.
454	C-2.d(3)	Textron	Identifying intended customers would be a moving target and it is not required by 14 CFR 21.193			NC. This is current policy. Identifying the intended customer is intended to help the FAA to verify eligibility for the requested certificate, not to obtain an exhaustive list of all intended customers or to limit the exercise of the certificate for only those customers named in the program letter.
455	C-2.d(3)	GAMA	The current Order constrains the manufacturer's ability to respond to changes in market conditions.	The term "intended customer" is interpreted by certain offices as requiring a great set of detail that may not be available at the time of the application.	The FAA should simplify the requirement to identify in the program letter the "intended customers" to allow greater flexibility when conducting market survey operations in response to changes in market conditions	Adopted. Identifying the intended customer is intended to enable the FAA to verify eligibility for the requested certificate, not to obtain an exhaustive list of all intended customers or to limit the exercise of the certificate for only those customers named in the program letter.

456	C-2.d(4)	GAMA	The current Order constrains the manufacturer's ability to respond to changes in market conditions.	The current process typically requires multiple program letters to be issued in response to changes to market survey activities.	The FAA should provide flexibility for how manufacturers specify dates for market survey activities to allow response to market conditions. GAMA proposes that allowance for market survey operations be established for the duration of a program letter as opposed to	NC. The order only requires "dates for the market survey activity." It's up to the applicant to identify reasonable dates with appropriate margin for flexibility.
458	C-2.f	Textron	Why would we have anything about public use flights on the program letter again it is not required by 14 CFR 21.193			NC. Public aircraft operations (PAO) may involve configurations and operations that exceed what is permitted on the civil airworthiness certificate. The FAA needs to know what is happening during PAO for potential impacts on the effectiveness of the civil airworthiness certificate. Additional procedures (e.g., configuration changes or inspections for exceeding civil limitations) may be required for transitions from PAO to civil operations. Such information concerning PAO may necessitate issuance of operating limitations on the civil certificate.
459	Fig C-1, 2(b)	Textron	Year of manufacture is not required on the program letter but will be listed as required on the 8130-6. Giving a sample with year of manufacture on it could actually make for errors when the project engineer writes the letter and does not know the year because he does not own the aircraft or have the log books at the time the letter is written.			NC. 14 CFR 21.193 provides the FAA with sufficient latitude to require such information on the program letter. The year of manufacture is one of many pieces of information that is helpful in becoming familiar with the aircraft and in showing/finding airworthiness.

466	Table D-1, OL 2	EAA	Add reference to 91.3 emergency PIC authority	Language on ATC clearance raises question of whether this also applies in emergency. Reiterate that 91.3 allows PIC to deviate from 91.319 (and thus these ops limits) in case of emergency.		NC. The rules stand on their own and do not need to be repeated in the operating limitations. The prior revision deliberately revised the operating limitations to remove quotes and paraphrases of the rules. Operators are expected to know and comply with these rules.
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469	Table D-1, OL 7	EAA	Add clear exception to category and class requirements referencing 61.31(l)	There are several not-uncommon exceptions to category and class requirements in FAR 61.31 (e.g. rec pilot, sport pilot, solo experimental ops) that would not require this limitation		NC. This operating limitation already includes a process for atypical aircraft: coordinate with AFS-800.
474	Table D-1, OL 15	EAA	Add language pertaining to mandated placards	Since language on placards was removed from this order in the transition from G to H, there has been confusion in the community as to whether these are still mandated. While referenced in Part 43...		Adopted. Restore passenger warning placard from Rev G.
475	Table D-1, OL 23	EAA	Include reference to additional pilot program (AC 90-116)	The APP may very well be useful in post-major change test flying, and		Out of Scope. AFS-800 will consider a change to AC 90-116.
478	Table D-1, OL 50	EAA	State that equipment must meet performance requirements of applicable FARs	It should be clarified that all IFR equipment must meet mandated performance specs where applicable, but need not		Adopted.

479	Table D-1, OL 53	EAA	If not already corrected change paragraph "3 and 5c" references to "4c and 5d"	References to "H" paragraphs that have been relocated in "J"		Adopted.
480	Table D-1, OL 53	EAA	Change "Issue if applicable" to "Issue in applicable special cases"	Emphasizes that this limitation is confined to rare cases		PA. Change to "Issue if any of the conditions of para D-4.e apply."
482	Table D-1, OL 56	Robinson Helicopter Company	As written, this limitation applies to All lighter-than-air, All gliders, Amateur-built, Primary kit-built, ELSA: Flight over a densely populated area or in a congested airway is authorized for the purpose of takeoff or landing; or unless sufficient altitude is maintained to make a safe emergency landing in the event of a power unit failure, without hazard to persons or property on the ground. (46)	As written, it appears to allow flight over densely populated areas at safe altitude for emergency landings for lighter than air, gliders, Amateur-built, and kit-built aircraft but not for powered aircraft produced by large Original Equipment Manufacturers. The same wording is found in the current revision of the order (8130.2H). Recently, our local MIDO and FSDO offices have been	Please clarify operating limitation #46.	NC. Neither 91.319(c) nor 91.305 include provision for experimental R&D, Show Compliance, or Market Survey aircraft to operate over densely populated areas.

483	Table D-1, OL 56	Robinson Helicopter Company	<p>As written, this limitation applies to All lighter-than-air, All gliders, Amateur-built, Primary kit-built, ELSA:</p> <p>Flight over a densely populated area or in a congested airway is authorized for the purpose of takeoff or landing; or unless sufficient altitude is maintained to make a safe emergency landing in the event of a power unit failure, without hazard to persons or property on the ground. (46)</p>	<p>(cont'd) We believe that several sections of the order contain text allowing latitude related to Limitation 46 but are not clearly referenced. The text of the relevant sections is reproduced below for reference. We believe this text is more relevant to our operations than the standard Limitation 46. Our operations are most commonly new equipment installations which do not affect powerplant installation, drive system, control system, or rotor system and are conducted under 21.191 (a – research and development), (b – show compliance), or (f – market survey) certificates.</p>	<p>If possible, please emphasize in Table D-1 that the above sections of the order can be applied to Limitation 46 “All others”.</p>	<p>NC. Neither 91.319(c) nor 91.305 include provision for experimental R&D, Show Compliance, or Market Survey aircraft to operate over densely populated areas.</p>
485	Table D-1, OL 65	EAA	<p>Add references to 21.190 and 21.191(i) placards</p>	<p>These categories also require passenger warning</p>		<p>Adopted</p>
488	Table D-1, OL 65	Kerry Moore	<p>Sign placed on Experimentally Certificated aircraft that states “Passenger Warning – This aircraft does not comply with federal safety regulations for standard aircraft” is</p>	<p>Should that sign be required anytime an aircraft is Experimentally Certificated and has seating for passengers</p>		<p>CBOS. Consider in the next revision to this order.</p>

489	Table D-1	IKHANA		As background, I am a DAR-F with authorized functions to include issuance of Special Airworthiness Certificate, Restricted Category in accordance with 14 CFR 21.185. Limitation Number 1 is the only limitation that is authorized for issuance for the Restricted Category. Issuance of Special Airworthiness Certificates in the Restricted Category are often issued in support of an STC. Restricted Category STC's are often intended to modify an aircraft holding a Standard Airworthiness Certificate to Restricted Category for	Restricted Category Operating Limitations should include provisions for the cognizant ASI or Designee (with approval from the managing MIDO/FSDO) to include special limitations to insure the aircraft is operated as intended in accordance with the applicable STC.	NC: Operating limitations for restricted category aircraft are already part of the type design of the aircraft and usually listed in the AFM. No need to repeat those. The ASI only needs to evaluate the need for any additional or special operating limitations as needed for safe operation.
498	E-3.m	Kerry Moore	Paragraph allows for variation of Date Format on Standard beyond that given in Appendix A, Paragraph A-1. App. A requires 2 digit day 3 alpha month and 4 digit year. This paragraph allows Month to be	Foreign Authorities issuing on behalf of FAA should be required to follow the requirements given in Appendix A like anyone else. Why the variation	Remove variation allowance regarding date format from this paragraph and levy the requirement of Appendix A.	Adopted.
499	E-3.m	Textron	This paragraph is in conflict with Appendix A, A-1, b			NC. Para A-1.b does not apply to this special procedure in appendix E. Appendix E is a special case that was developed in coordination with other Civil Aviation Authorities and applies only to certain CAA's who agree to provide this assistance.
503	App I	Aeropro	In regard to Original Certification the draft is silent for expired airworthiness certificates. Since we cannot renew an expired certificate, at least that's my understanding,			NC. The definition of original includes, "An aircraft that has never held an export C of A, an airworthiness certificate..." If it held an airworthiness certificate and that certificate expired, it still held that certificate. The

504	App I	Aeropro	In the same section the Draft states "An aircraft involved in a certification project such as developing a TC or STC, including issuing a standard airworthiness certificate after the certification project is complete." I am assuming that Special Airworthiness Certificates issued as R&D or Show Compliance is what you are referring to, correct?			A2Q: Yes. Aircraft in a certification project are typically operated under R&D or show compliance. Issuing a standard after the certification project would, under the current definition, be considered an original; valid arguments can be made for treating this as original or recurrent. Manufacturing ASI/designee has to understand or get help via cross-utilization to verify proper/current maintenance for experimental R&D/show compliance as well as the re-issued standard. Arguments are not strong enough to change this. Retain issuing the standard at the end of the cert project as original.
505	App I	Phil Beck	The "Original Certificate" definition conflicts with the Experimental Certificate R & D and Show Compliance procedures. The defined term of Original states that an original certificate is a condition that takes place when an aircraft is certificated in a TC environment or an STC environment. But in the Experimental section that speaks to the "shirt pocket" suspension of an Airworthiness Certificate during R&D or Show Compliance certificate the two sections conflict.	If you place an Original Certificate on an aircraft the date on that certificate signifies the date that the aircraft was found to meet the TC or the properly altered state of that TC via an STC. In a shirt pocket reinstatement It states that after Show Compliance of a newly installed STC the suspended certificate is placed back on the aircraft thus not reflecting the date of the properly altered state of the TC but rather the original date of issue of the original aircraft. This looks to me like a recurrent certification simply through the reinstatement process.		NC: Original/recurrent definitions only apply to issuance of certificates, not to returning/restoring/reinstating a certificate held in suspension under the shirt pocket provision. Therefore, the shirt pocket provision in chapter 10 specifies who does this. Since R&D and show compliance for a certification project are original certifications, these certificates would be issued by manufacturing unless handed off. Holding and reinstating the standard should be done by the same person who issues the R&D and/or show compliance. Concern with reinstating the standard that was issued for the production configuration is addressed via approval of STC alterations via the 337 process. Modifications must be approved or removed prior to reinstatement of the standard airworthiness certificate. Reinforce need for cross-utilization especially for MIDO verification of proper maintenance and FSDO verification of showing compliance --even for a field approval. Language needs to be broad enough to cover hand-offs to FSDO or for flight testing field approvals (no STC).

506	App I Original Certification, para b	IKHANA	The paragraph states that "An aircraft that has never held an export C of A, an airworthiness certificate, or equivalent document issued by a foreign CAA...". The requirement for the certifying document to be issued by a country which has a Bilateral Safety Agreement with the United States			NC. This definition is for the purpose of clarifying original vs. recurrent, not for prescribing requirements for import.
524	General	Aeropro	I have been involved as an FAA Inspector and now Designated Airworthiness Representative (Maintenance and Manufacturing) in the practical aspects of applying Order 8130.2 guidance in the field			Adopted. The FAA received approximately 550 internal/external comments during FAA field review/public review. Each one has been dispositioned and the specific comments/dispositions will be posted on RGL with the signed order.
525	General	Aeropro	In regard to "true copy) I received this response from NE Region Chief Counsel; To Legal From PWM FSDO:	Legals Response: I looked at the order and I think I understand the change. In the event that someone other than the owner of the aircraft signs	perhaps a short version should be included in this revision	Adopted.
533	General	Textron	Paragraph references incorrect throughout, number of examples of a "." where a "-" should have been used			Adopted.
535	General	Phil Beck	Typos		Correct	Adopted. Document will be fully scrubbed by a technical writer/editor prior to publication.

536	General	Phil Beck	The author of this document needs to go page by page and where there is a reference to another paragraph or page or chapter or section. Dozens of these references are not correct.	[Author...] needs to assure that the reference is correct.		Adopted. Document will be fully scrubbed by a technical writer/editor prior to publication.
537	General	Phil Beck	The formatting of paragraphs is inconsistent. I.E. some paragraph headings are in bold and some are not yet they carry the same weight in a section as each other.			Adopted. Document will be fully scrubbed by a technical writer/editor prior to publication.