

Item	Company & Group	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
1	AOPA		<p>AOPA recommends that references to the Airworthiness Concern Process be included in appropriate sections of this revision.</p> <p>As an example, Chapter 2 of the Airworthiness Manual titled "General Rulemaking" should include the proper use and timing of the Airworthiness Concern Process by either referencing or incorporating the pertinent information from the existing Airworthiness Concern Process Guide. The addition of the Airworthiness Concern Process to Chapter 2 should also make clear that this process is intended to be conducted prior to the rulemaking process and is not considered an ex parte communication as covered by Chapter 3 entitled "Ex Parte Contacts."</p>	<p>Currently the Airworthiness Concern Process Guide is a supplement to the Airworthiness Directive Manual but no direct reference is made to the Airworthiness Concern Process in the Airworthiness Directive Manual itself. The system requires that Aircraft Certification Office engineers and other Airworthiness Directive authors remember that there is a supplement covering the Airworthiness Concern Process and elect to participate in that process. The current edition of the Airworthiness Directive Manual should standardize the use of the Airworthiness Concern Process.</p>		<p>Non-concur. The Airworthiness Concerns Process is pre-AD process. The AD process only involves drafting, coordination, and distribution of an AD action. Determination of an unsafe condition and appropriate corrective action is part of the continued operational safety (COS) process. Monitor Safety Analyze Data (MSAD) will address the above items.</p>
2	Richard Williams		<p>There are three places in each AD (NPRM) where the manufacturer of the affected product must be the same (i.e., Subject, Product Identification, and applicability statement).</p>			<p>Concur, revision to manual reflects this requirement.</p>

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3	Richard Williams		If the AD applies to an Airframe, Engine or Propeller, the indicated manufacturer must be the product's Type Certificate holder.			Concur, revision to manual reflects this requirement.
4	Richard Williams		If the indicated manufacturer is not the Type Certificate holder, the product to which the AD applies must be an Appliance.			Concur, revision to manual reflects this requirement.
5	Richard Williams		Do not insert a graphics table in the AD. These are un-searchable.			Concur, revision to manual reflects this requirement.
6	Experimental Aircraft Assoc. (EAA) Doug Macnair	FOREWORD	Request that the following sentence be added to the end of the FOREWORD: a. "ADs and safety directives are not applicable to amateur-built aircraft or light-sport aircraft for which the FAA has issued an experimental certificate under §21.191; ultralights and hang gliders not having airworthiness certificates; and components or products installed on such aircraft,"	i. In accordance with §21.191 experimental amateur-built and experimental light-sport aircraft are non-TC'd aircraft. Per §103.1(c) and §103.7 ultralight aircraft, including hang gliders, do not have any U.S. or foreign airworthiness certificate. ii. In the final rule <i>Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft</i> (FAA-2001-11133, effective September 1, 2004), Section IV Comparative Tables, Light-Sport Aircraft Maintenance and Certification Requirements, the FAA clearly established that ADs and safety		Non-concur. Although this is good information, it does not belong in the Foreword of the AD Manual. AIR-140 is considering the appropriate place for this information (e.g., Advisory circular, etc.)

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				<p>directives were not applicable to experimental light-sport and amateur-built aircraft.</p> <p>iii. <i>14 CFR part 43.1b</i>: “This part does not apply to any aircraft for which the FAA has issued an experimental certificate, unless the FAA has previously issued a different kind of airworthiness certificate for that aircraft.” All AD and safety directives must be accomplished by using Part 43 guidance (how it will be applied, who can do the work, what standard will be used, and how it will be recorded), and since Part 43 does not apply to these aircraft, ADs and safety directives therefore also do not apply.</p> <p>iv. <i>Special Airworthiness Information Bulletin No. ACE-97-04, dated May 29, 1997</i>: “Under current certification requirements, an aircraft with an experimental certificate is not considered to have an approved „type design. This means that an aircraft with an experimental certificate is not required to comply with Airworthiness Directives.”</p> <p>v. <i>FAA letter, Applicability of an AD against a type certificated article</i></p>		

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				<p><i>installed on an amateur-built aircraft, dated September 5, 2000, Mr. James Jones, Manager Aircraft Engineering Division: “Because an amateur-built aircraft has no required airworthiness standards, an off-the-shelf type certificated article, such as an engine, may be installed on it without regard to the limitations derived in type certification that are essential to safety. This, of course, is the installer’s choice. The intent of type certification of the article is nullified by the lack of an installation approval because the level of safety defined by the type certificate no longer remains validated for the article.”</i></p> <p><i>vi. Report to the Aircraft Certification Management Team, Airworthiness Directive Applicability Team, April 28-30, 1998: “A type design can exist only with a type certificate, and only after a showing of compliance with applicable requirements and approval by the FAA. A non-TC’d aircraft cannot have a type design. “Type design” as defined in §21.31 is the intent of Part 21. And, “The wording of the rules shows clearly that in writing the rules, FAA had no intention of issuing ADs for non-TC’d aircraft. §39.1 requires that</i></p>		

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				the aircraft have a type design as defined in §21.31. A non-TC'd aircraft has no type design. §21.31 requires that the TC holder report product safety problems to the FAA, and §21.99 requires that the TC holder prepare corrective fixes. A non-TC'd aircraft has no TC holder. There is no credible interpretation of existing rules that implies FAA ever intended to issue AD's against non-TC'd aircraft."		
7	EAA	Chapter 2, para 2b	Change to read: "14 CFR part 39. This regulation sets the legal framework for ADs which are legally enforceable rules that apply to type-certificated aircraft, aircraft engines, propellers, and appliances when installed on a TC'd aircraft."			Non-concur. Although this is good information, the intent of this paragraph is to reflect what is in 14 CFR part 39. AIR-140 is considering the appropriate place for this information (e.g., Advisory circular, etc.)
8	Joe White	Chapter 2, para 3b(1)(b)	A compliance time of 60 days or less satisfies an impracticability finding because a final rule after NPRM generally takes at least 60 days to issue. A compliance time of more than 60 days can still meet an impracticability finding if you explain in the Supplementary Information section why earlier compliance isn't required.		Recommend providing specific guidance here regarding compliance times that indicate an immediately adopted rule is appropriate. Common understanding is that an immediately adopted rule is appropriate when compliance is required within 31 to 120 days.	Non-concur, an IAR (impracticality finding) is not solely based on compliance time. Removed reference to compliance time in paragraph.

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9	Joe White	Chapter 2, para 7	<p>There have been instances where an AD clearly would not pass a ‘full’ cost-benefit analysis because the safety benefit was exceedingly low and the cost very high. These include instances wherein the aircraft was found to have had, ever since certification, a minor, “technical” deviation from type design. Though not stated in this draft manual, compliance times for ADs effectively are capped around 60 to 72 months regardless of the results of a cost-benefit or risk analysis. This paragraph should explain the type of cost-benefit analysis that FAA <i>should</i> do for each AD, and acknowledge that in certain relatively rare instances compliance times in excess of 72 months may be appropriate if indicated by risk analysis and SMS principles.</p> <p>In addition, the highlighted justification for this paragraph appears invalid . We are aware of no cost-benefit determinations for Part 25 products or subcomponents with respect to a level of safety. If true, there only were determinations of compliance with Airworthiness Standards, and the justification should explain this.</p>			Entire section was rewritten for clarity.

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10	Joe White	Chapter 3, para 1	<p>“Ex parte contacts are based on when the contact occurs in the rulemaking process.”</p> <p>The manual should identify when a rulemaking process is considered to have commenced. We have assumed it is when the cognizant official has decided to begin making a NPRM or rule.</p>			Concur, revised as follows “In the context of rulemaking, which begins when the AD worksheet is signed, an ex parte contact is any communication between the FAA (including anyone representing the FAA) and someone outside the government regarding a specific rulemaking proceeding before the publication of a final rule or the withdrawal of an NPRM if the communication affects the basic openness and fairness of the agency’s decision-making process.”
11	Joe White	Chapter 3, para 1	<p>“An ex parte contact is any communication between anyone in the FAA and ...”</p> <p>The manual should state that FAA designees (eg, DARs) are not “in the FAA”, and are not bound by ex parte policies.</p>			Concur revised sentence as follows: “...an ex parte contact is any communication between the FAA (this does not include FAA designees) and someone outside the government ...”

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12	Joe White	Chapter 3, para 4	<p>“Ex parte contacts that influence the agency’s position must be documented before the AD is issued and placed in the AD docket immediately after publication of the AD.”</p> <p>Unclear. This line should focus on when the contact is placed on the docket, not when it is “documented”.</p> <p>Further, once a docket is established, contacts should be entered on the docket as they are made.</p>			<p>Concur, revised as follows “Ex parte contacts must be placed in the AD docket immediately after publication of the AD action.”</p> <p>Concur, however, dockets are established after the AD action is published.</p>
13	Joe White	Chapter 3, para 5	<p>Suggest deleting this paragraph (5.) Provides redundancy with previous paragraph.</p>			<p>Concur, paragraph deleted.</p>

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14	Joe White	Chapter 3, para 6b	<p>“In preparation of notices and immediately adopted final rules without notices, it is the practice of the FAA to obtain technical information and information on operational and economic impacts from manufacturers and aircraft operators.”</p> <p>The ATA specifically supports this position. It allows processes such as the “Airworthiness Concern Coordination” and “Lead Airline” processes to make valuable contributions in the development of timely, effective and safe Airworthiness Directives.</p>			No action required by comment
15	Joe White	Chapter 4, para 1	<p>Recommend that this section be expanded to discuss:</p> <ul style="list-style-type: none"> • The purpose of the NPRM process. • The value of coordination with manufacturers and operators in the development of an NPRM. • Goals of publishing each NPRM in a form that could be adopted without change and minimizing the need for Alternative Methods of Compliance. 			<p>Concur. Purpose of NPRM process is discussed in Chapter 2.</p> <p>Concur, revised Chapter 3 to reflect this information.</p> <p>Non-concur. Although this is the current goal, comments received on NPRMs do provide valuable information that sometimes requires making changes to the proposed rule.</p>

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16	Joe White	Chapter 4, para 3	Again, recommend providing specific guidance here regarding compliance times that indicate an immediately adopted rule is appropriate. Common understanding is that an immediately adopted rule is appropriate when compliance is required within 31 to 120 days.			Non-concur. This chapter does not define compliance times; furthermore the APA does not prescribe compliance time parameters for immediately adopted rules.
17	Joe White	Chapter 4, para 5	<p>Again, recommend providing specific guidance here regarding compliance times that indicate an immediately adopted rule is appropriate. Common understanding is that an immediately adopted rule is appropriate when compliance is required within 31 to 120 days.</p> <p>This section may also be the most appropriate to add guidance providing for an emergency AD when compliance is required in 30 days or less.</p>			Non-concur. This chapter does not define compliance times; furthermore the APA does not prescribe compliance time parameters for immediately adopted rules or emergency ADs.
18	Joe White	Chapter 6, para 1	<p>“The AD process begins when the AD worksheet is signed by the appropriate persons and ...”</p> <p>Is this when ex parte policy comes into effect?</p>			Yes. Chapter 3 revised to identify when ex parte is in effect.

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19	Joe White	Chapter 6, para 2b(2)	<p>“...send it to the directorate responsible for that product.”</p> <p>Should this be “ACO manager”?</p>			No. The AD Manual is correct as written.
20	Joe White	Chapter 6, para 4	<p>“...for guidance on boilerplates for MCAI-related AD.”</p> <p>Recommend that the format for MCAI ADs be aligned more closely with the format for U.S. ADs.</p>			Non-concur. MCAI templates are the result of a streamlined process covered in Order 8040.5.
21	Joe White	Chapter 6, para 9b	<p>“We may issue and publish an ANPRM in the <i>Federal Register</i> to solicit preliminary comments concerning a rulemaking action.”</p> <p>Recommend that this line be revised to emphasize that an ANPRM is appropriate when a concern or its resolution or impact is complex and not understood adequately enough to propose specific action. It also should emphasize that an ANPRM provides a method for gaining any insight or information on such issues that the public may provide.</p>			Partially concur. Paragraph was deleted.

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22	Joe White	Chapter 6, para 9b	<p>“You can’t use an ANPRM as an alternative to a full NPRM. You must follow the ANPRM with an NPRM before you issue a final rule.”</p> <p>Recommend revising these sentences for a positive tone. For example, “After taking public comments into consideration, you must publish a NPRM to provide for public comment to the actions specifically proposed for adoption.”</p>			Partially concur. Paragraphs were deleted.
23	Joe White	Chapter 7, para 2	<p>Directorate identifier is unique to each directorate.</p> <p>With the new Docket numbering system, could directorate identifiers be dropped?</p>			The Directorate ID is currently required for record keeping purposes. When revising ADs issued prior to the FAA using the new Docket numbering system (FDMS), the Directorate ID is used as the docket number.

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24	Joe White	Chapter 7, para 4a(2)	<p>“If many different models are affected, use the product’s basic model number (e.g., Boeing Model 747).”</p> <p>The manual should state that a separate AD should be used for each applicable model/series when the service instructions for a particular issue vary among equipment model/series. This practice would facilitate better review of proposals and compliance with final rules.</p>			Concur. The following was added to Chapter 6: Typically, separate AD worksheets are used for each applicable model or series when the complexity of the AD (e.g., multiple product configurations, multiple actions, and multiple compliance times) for a particular unsafe condition varies among those models or series. This practice facilitates better review of proposed ADs and easier compliance with final rules for owners and operators.’
25	Joe White	Chapter 7, para 5	<p>If AGENCY and ACTION paragraphs will precede the SUMMARY paragraph, recommend inserting descriptions here.</p> <p>When applicable, recommend that the ACTION line state “Immediately Adopted Rule”, rather than Final Rule; Request for Comments. As a second alternative the SUMMARY paragraph should state “Immediately Adopted Rule” when applicable. The compliance times of IARs warrant that they be readily recognized.</p>			Non-concur. The contents of the AGENCY and ACTION paragraphs are prescribed by the OFR DDH. Using “Immediately Adopted Rule” is not allowed by the OFR, but is a commonly used term.

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26	Joe White	Chapter 7, para 6	<p>“It presents the detailed history of the information that the FAA has received to date. It also describes what would happen if we did not take AD action (i.e., this condition if not corrected could result in ...).”</p> <p>These provisions should be emphasized. Discussion sections rarely present a “detailed history”. They rarely reflect risk analysis or SMS processes – simply a determination of an unsafe condition. For example, some discussions justify the AD “based on an occurrence”, or by stating that the hazard is “foreseeable”, meaning ‘not impossible.’ We recommend more evidence of risk analyses in the discussion section.</p>			<p>Partially concur. Revised paragraph now states: “This section clearly justifies why the AD action is necessary. Fully explain the unsafe condition and the circumstances that created a need for the AD. Present the history of the information that the FAA has received to date. Describe what would happen if we did not take AD action (i.e., this condition if not corrected could result in ...). To further support why the AD action is necessary, we also may describe elements of a risk analysis.”</p>
27	Joe White	Chapter 7, para 7	<p>This paragraph also should discuss documents that may be affected by the service instructions, for example, a maintenance program change that is required due to a service bulletin modification.</p>			<p>Concur. Paragraph now states: “This section describes all service information that is relevant to the AD action and gives a brief description of the procedures specified.”</p>

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28	Joe White	Chapter 7, para 9	<p>“You can express the labor and parts costs for individual products, and when known, give a total cost for the entire affected U.S.-registered fleet.”</p> <p>Recommend providing guidance to avoid corrective action through ADs that apply only to one airplane, particularly when there is insufficient data to show that the issue of concern likely would apply to other airplanes of the same type design. In these cases, corrective action should be accomplished through means other than an AD. This para appears to be the most appropriate location for this recommended guidance.</p>			<p>Concur. New paragraph added to Chapter 4 that states: “ADs are issued when (1) an unsafe condition exists in the product (i.e., aircraft, aircraft engine, propeller, or appliance), and (2) the condition is likely to exist or develop in other products of the same type design. Once an AD is issued, no person may operate a product to which the AD applies except in accordance with the requirements of that AD. If the unsafe condition only exists on one product and there are no other existing products of the same type design, corrective action must be accomplished through means other than an AD.”</p>

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29	Joe White	Chapter 7, para 9f	<p>“Existing regulations under 14 CFR part 43.13(b) and 91.7 already require that, once identified, an unsafe condition be corrected. The cost of doing so is imposed by those regulations and not by the AD.”</p> <p>These regulations do not provide for an complete or useful presentation of the impact of ADs, bringing into question the value of documenting costs per this paragraph (f).</p> <p>Also, the Manual should describe the costs that should be taken into consideration when FAA decides to perform a “full” cost-benefit analysis.</p>			<p>Concur. Paragraph revised to include on-condition costs as follows: “Include on-condition costs (e.g., those costs associated with follow-on actions to a required inspection, such as repairing a crack detected during an inspection) per product. Do not include the total fleet costs.”</p> <p>Non-concur. Compliance with the Regulatory Flexibility Act (RFA) as it applies to the Airworthiness Directives (AD) program is currently under development to address the “full” cost-benefit analysis issue.</p>

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30	Joe White	Chapter 8, para 2d	The recommendation on page 29 applies here too --- The manual should state that a separate AD should be used for each applicable model/series when the service instructions for a particular issue vary among equipment model/series. This practice would facilitate better review of proposals and compliance with final rules.			Concur. The following was added to Chapter 6: Typically, separate AD worksheets are used for each applicable model or series when the complexity of the AD (e.g., multiple product configurations, multiple actions, and multiple compliance times) for a particular unsafe condition varies among those models or series. This practice facilitates better review of proposed ADs and easier compliance with final rules for owners and operators.'

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31	Joe White	Chapter 8, para 2d(5)(a)	<p>“You must identify those categories that are excluded from the AD if the unsafe condition does not exist in all of the categories for which the aircraft is type certificated.”</p> <p>Similarly, recommend that FAA include in this area an example of an applicability statement for engines only if installed on certain aircraft. The applicability statement for this type of AD should include a statement that the applicability excludes the affected engine when it is installed on other aircraft. The applicability statement of AD 2008-02-17, for example, caused confusion because the affected model/series engines were known to be installed on more aircraft model series than listed.</p>			Partially concur. Engine and propeller ADs will no longer contain the statement “installed on, but not limited to” in the applicability section of the AD.
32	Joe White	Chapter 8, para 2e(1)	See recommended text inserted on page 43. Alternatively, that text may be placed in this section.			Non-concur, the proposed language conflicts our general risk management philosophy which involves eliminating or alleviating risk at the earliest reasonable opportunity. The proposed language focuses alignment of AD actions with the operators’ maintenance schedules rather than emphasizing risk reduction.

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33	Joe White	Chapter 8, para 2e(2)	<p>Two recommendations.</p> <ul style="list-style-type: none"> • A section should be added providing guidance for specifying compliance times that are specified in DAH service instructions that are incorporated by reference (IBR). • While incorporation by reference is a useful tool, it is rather inconvenient for the NPRM or AD to refer to DAH service instructions for all compliance time information, particularly because service instructions are not posted on the FDMS docket. At a minimum, compliance times for a ‘first round’ of actions should be spelled out in the text of the NPRM and AD. For any immediate rule that IBR service instructions, compliance times should be spelled out in full in the AD to facilitate rapid, clear communication. 			<p>This issue is being discussed/worked by the AD CRT group. Any changes recommended by these subgroups will be considered for inclusion in a later revision to the AD Manual.</p>
34	Joe White	Chapter 8, para 2e(9)	<p>Add text as noted.</p> <p>“For commercial air carriers, alignment of AD-required actions with scheduled maintenance allows accomplishment at base best facilitates compliance. Whenever possible, compliance periods and intervals should be established to exceed or coincide with the scheduled maintenance interval</p>			<p>Non-concur, the proposed language conflicts our general risk management philosophy which involves eliminating or alleviating risk at the earliest reasonable opportunity. The proposed language focuses alignment of AD actions with the operators’ maintenance schedules rather than emphasizing risk reduction.</p>

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			<p>allowed by a time frame for safe operation established according to the principles of risk-management and Safety Management Systems. If those processes indicate a shorter period or interval, alternative or supplementary corrective actions should be considered. In addition, the compliance period or interval indicated by risk-management should not be reduced solely because the corrective action appears relatively simple. This practice can have a cumulative, disruptive effect on maintenance schedules. If the corrective action appears relatively simple, compliance periods and intervals may be reduced if the action clearly could be accomplished without adding elapsed time to scheduled maintenance visits, including overnight visits.</p> <p>Certain intervals for scheduled aircraft intermediate and heavy maintenance visits are the most common among commercial air carriers. Compliance periods and intervals aligned with these maintenance intervals facilitate the accomplishment of ADs during the scheduled aircraft maintenance visits</p>			

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			<p>of the greatest number of air carriers. For aircraft intermediate maintenance visits, the highest “C” check interval specified by the manufacturer (e.g., 24 months) is the most common. Intervals that facilitate the greatest accomplishment during scheduled aircraft heavy maintenance visits typically are the highest “D” check interval specified by the manufacturer (e.g., 72 months).</p>			
35	Joe White	Chapter 8, para 2f(1)	<p>“Refer to the applicable service bulletin or document for the inspection procedures if the procedures are in that document.”</p> <p>Recommend that this paragraph also state that in certain cases, maintenance records may be used in lieu of a physical inspection consistent with the standard provision of “unless previously accomplished”.</p>			<p>Concur. Paragraph added that states: “Records Review in Lieu of Inspection. When the need to take corrective action depends on whether a particular P/N is installed, we allow review of maintenance records instead of inspection of the product, if the P/N can be positively identified from the review.”</p>

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36	Joe White	Chapter 8, para 2f(4)(d)	<p>ATA recommends that FAA establish a streamlined method for addressing ‘later FAA-approved revisions’ to service instructions in order to avoid wholly unnecessary AMOC applications. For example, the AD language could provide for compliance using a ‘later FAA-approved revision containing a statement that the revision is specifically approved as an alternative method of compliance to AD 2008-XX-XX.’ FAA also could adopt a policy of requiring this statement in any service instructions that could affect a previously adopted AD whether or not the statement could be included in the language of ADs.</p>			<p>This issue is being discussed/worked by the AD CRT group. Any changes recommended by these subgroups will be considered for inclusion in a later revision to the AD Manual.</p>
37	Joe White	Chapter 8, para 3d(2)(c)	<p>Recommend revising this line to read “Makes a maintenance record entry or gains Principal Operations Inspector approval of change to a customized AFM.”</p> <p>A maintenance record entry cannot be made by operators who use a customized AFM. The POI approves the customized AFM and this approval should be used as the record that the AD change has been accomplished.</p>			<p>Concur, revised accordingly</p>

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38	Joe White	Chapter 9, para 3b(2)	<p>“Identify all commenters by name or organization.”</p> <p>The ATA recommends abandoning the practice of identifying commenters by name. This practice is inconsistent with that used for ex parte communications, which rarely are cited in preamble of an AD. As with ex parte communications, identifying information is available on the docket. Persons interested in the identity of a commenter should review the docket for the exact comments attributable to the commenter rather than relying on summary statements in the AD, which sometimes are viewed as inaccurate.</p>			Non-concur. AGC-200 has coordinated on a policy memo requiring that all commenters be identified by name or organization

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39	Joe White	Chapter 10, para 1b	<p>“This material, like any other properly issued regulation, has the force of law.”</p> <p>Be aware that the AD Compliance Review Team Report is pending release by FAA. Last seen, it recommends that service bulletins incorporated by reference clearly state the safety intent of the bulletin – an intent that, if satisfied, may establish compliance, and that if not satisfied, may establish non-compliance. Also, the Report may recommend that service bulletins designate provisions that must be accomplished precisely as written. Other procedures may be accomplished using certain standard practices.</p> <p>If the Report is published in the near future, these recommendations should be addressed in para 1.b.</p>			<p>This statement was taken from the <i>Explanation</i> section in 14 CFR part.</p> <p>This issue is being discussed/worked by the AD CRT group. Any changes recommended by these subgroups will be considered for inclusion in a later revision to the AD Manual.</p>
40	Joe White	Chapter 10, para 2	<p>“However, the OFR will not publish the reference material with the AD.”</p> <p>This sentence appears inconsistent with the following para (3.a.).</p>			Concur. Text deleted.

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41	Joe White	Chapter 10, para 3a	<p>“...or send the entire document to the Director of the <i>Federal Register</i> for IBR approval.”</p> <p>1. I anticipate that the AD Compliance Review Team Report also will recommend that service bulletins proposed for IBR be published with the NPRM on the FDMS Docket. I believe Boeing has provided agreement with this action. I recommend that the same action be applied to service bulletins IBR in a final AD.</p> <p>2. This paragraph appears to have been written in the age of paper publication. It should be updated as necessary to address electronic publication.</p>			<p>1. This issue is being discussed/worked by the AD CRT group. Any changes recommended by these subgroups will be considered for inclusion in a later revision to the AD Manual.</p> <p>2. Concur, text revised.</p>