

**Clearance Record
DOCUMENT COMMENT LOG**

Originating Office: AIR-110	Document Description: Draft Policy Statement Order 8110.4C, Change 6	Project Lead: Maddie Miguel, AIR-111	Reviewing Office:	Date of Review:
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Company & Group	Page & Paragraph	Comment	Rationale for Comment	Recommendation	Disposition
Honda Carl Jones FAA DAR	8110.4C CHG. 6, Cover Page Para. 1.	Location of forms need to also be in a public location.	FAA Designees and applicants need access to all forms. The public can't access the internal FAA website.	Revise para. 1. to add public FAA website location for all forms, such as "Forms for Designees" www.faa.gov/other_visit/aviation_industry/designees_delegations/resources/forms/	Concurred. Adopted. Will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Honda Carl Jones FAA DAR	8110.4C CHG. 6, Page 51, Para. 2-6 r.	Form 8110-1 – location of form needs to also be in a public location.	FAA Designees and applicants need access to Form 8110-1. The public can't access the internal FAA website.	Revise para. 2-6 r. to add public FAA website location for Form 8110-1, such as "Forms for Designees" www.faa.gov/other_visit/aviation_industry/designees_delegations/resources/forms/	Concurred. Adopted. Will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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Honda Carl Jones FAA DAR	8110.4C CHG. 6, Page 58, Para. 2-7 b.(2)	Form 8110-26 – Form should also be used for Amendments to Type Certificate (TC).	It appears form should only be used for STC’s. This form is also used for Amendments to TC.	Revise para. 2-7 b.(2) to say, “FAA Form 8110-26, Supplemental Type Inspection Report (STIR), provides a way for the manufacturing inspector to record the inspection and test results conducted on modified products presented for supplemental type certification or amendments to TC. “	Non concurred. Not adopted. Historically the STIR form has always been used for STCs. Historically, the TIR form (8110-31) has been used for TCs and Amended TCs.
Honda Carl Jones FAA DAR	8110.4C CHG. 6, Page 58, Para. 2-7 b.(2)	Form 8110-26 – location of form needs to also be in a public location.	FAA Designees and applicants need access to Form 8110-26. The public can’t access the internal FAA website.	Revise para. 2-7 b.(2) to add public FAA website location for Form 8110-26, such as “Forms for Designees” www.faa.gov/other_visit/aviation_industry/designees_delegations/resources/forms/	Concurred. Adopted. Will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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GE Aviation	Page 57, Para. 2-7	<p>“a. Certification Summary Report.</p> <p>(1) The Certification Summary Report should be tailored to the complexity and significance of the project and should be an executive summary containing a high-level description of major issues and their resolution. The report should be used as a means for retaining corporate knowledge and lessons learned that could be beneficial for future type certification projects involving the same or similar type design. Another benefit of this summary report is in a non-concurrent validation type certification project,</p>	<p>GE is unaware of this level of information being shared with foreign CAA. The information shared with foreign CAA should be consistent with individual country bilateral agreements, which can vary depending on the specific circumstances.</p>		<p>Non-concur. Not adopted. The CSR is a high level executive summary and it has been used by the FAA for decades but for aircraft(including rotorcraft), 75K lbs. m.g.w. or more, or for aircraft (regardless of weight) involving significant technology issues and having unusual or novel features. It is a high level summary report which is not intended to substitute the in depth type of information shared with the foreign CAAs with which the FAA has bilateral agreements . In other words, this high level summary report is not intended to subsatitute the detailed information requested and negotiated under documents such as TIPs or IPAs.</p>

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Cont.	Cont.	it serves as a useful tool for a foreign CAA to learn what FAA concerns surfaced during the type certification project.”			
Bell Helicopter	Introduction Section 1. Purpose	<p>“<i>All of these forms are now available at https://employees.faa.gov/tools_resources/forms. “</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Bell Helicopter	Page 23 (2) PC Application	<p>“<i>the applicant must submit the application accompanied by a document describing the organization in accordance with 21.135 and one copy of their Quality Control (QC) procedure showing compliance with 21.137, to the manager of the manufacturing inspection office (MIO)</i>”.</p> <p>While this is appropriate for an initial PC application, the PAH should not be required to provide this information for a PC extension.</p>	Exclude PAH from providing this information, since the organization and QC procedure has already been approved by the MIDO.		Non concurred. Not adopted. We cannot exclude the PAH from providing this info. since it is in the regulations. Recall that we are covering here the initial PC application at a high level.

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Bell Helicopter	Page 49 m. Compliance Reports	<p><i>“The deliverables necessary to show compliance must be documented in the applicant’s statement of compliance and submitted to the FAA, unless the applicant has a data retention agreement that preserves the FAA access to all data used to show compliance at any time in the future.”</i></p> <p>The above statement does not provide clarity on which deliverables are required to show §21.20 compliance.</p>	Define the deliverables necessary by the applicant in showing compliance.		Non concurred. Not adopted. This is an order, this is not directed at industry. Industry has AC 21.51 to assist them in understanding and complying with this requirement. Also, ample discussion regarding “deliverables” is already covered in this order’s chapter 2, par 2-6. j. Compliance Substantiation, pages 47 thru 49.
Bell Helicopter	Page 51 Par 2-6 r. Type Inspection Authorization (TIA).	<p><i>“The ACO prepares the TIA on FAA Form 8110-1 (refer to https://employees.faa.gov/tools_resources/forms).”</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Concurred. Adopted. Will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Bell Helicopter	Page 58 Par 2-7 b. Type Inspection Report (TIR). (1) General.	<p><i>“Use FAA TIR form 8110-31, located at https://employees.faa.gov/tools_resources/forms.”</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Concurred. Adopted. Will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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Bell Helicopter	Page 58 Par 2-7 b. Type Inspection Report (TIR). (2) FAA Form 8110-26	<p><i>“Use the STIR Form 8110-26, located at https://employees.faa.gov/tools_resources/forms , and complete the report in a similar manner as the TIR.”</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Concurred. Adopted. Will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Bell Helicopter	Page 65 3-2 Type Certificate a. Issuing a TC (1)	<p><i>“The certifying ACO issues a TC when the applicant completes the 14 CFR airworthiness requirements. Refer to https://employees.faa.gov/tools_resources/forms for FAA Form 8110-9, Type Certificate, in a pdf-fillable format”.</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Non concur. Not adopted. TC and STC forms can never be accessible to the public. It will prompt fraudulent activities. Similarity: Any state DMV will never put in their website the drivers license form/template. Nor the Dept. of State will put in their website the passport form/template. The same situation applies to certificates issued by the FAA. However, for those companies that have become ODAs and that are authorize to issue STCs, the ACO’s OMT responsible for that company always facilitates the STC form when requested.

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Bell Helicopter	Page 65 3-2 Type Certificate c. Amendment to a TC (3)	<p><i>“To amend a TC, applicants must send an FAA Form 8110-12 to the appropriate ACO. Refer to https://employees.faa.gov/tools_resources/forms, for FAA Form 8110-12, in pdf-fillable format.”</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Bell Helicopter	Page 65 3-2. Type Certificate c. Amendment to a TC (2)	<p><i>“Also, some major changes in type design may be indicated in the Airplane Flight Manual rather than on the TCDS, e.g., different cockpit equipment configurations for the same model aircraft.”</i></p> <p>Include verbiage “or Rotorcraft Flight Manual” after Airplane Flight Manual.</p>	<p>Add verbiage “or Rotorcraft Flight Manual”</p> <p>Numerous places in the Order, AFM is used. A note should be placed in the acronym list that states “AFM is used broadly to include RFM”</p>		Concurred. Adopted.
Bell Helicopter	Page 68 (3)	<p><i>“(3) If the receiving party selects the option in paragraph 3-2j(2)(a) or 3-2j(2)(b) above, then the original TC holder remains responsible for the continued integrity of the approved type design.”</i></p> <p>References to 3-2j(2)(a), (b), are now found in 3-2k(2)(a), & (b)</p>	Update references from 3-2j(2)(a), (b), to 3-2k(2)(a), (b)		Concurred. Adopted.

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Bell Helicopter	Page 68 (4)	<p><i>“(4)If the receiving party selects the option in paragraph 3-2j(2)(c) above, then the certification basis is effective on the date of the new application”.</i></p> <p>References to 3-2j(2)(c), are now found in 3-2k(2)(c)</p>	Update references from 3-2j(2)(c), to 3-2k(2)(c)		Concurred. Adopted.
Bell Helicopter	Page 68 (5)	<p><i>“(5)Under the option in paragraph 3-2j(2)(c) above, when the applicant for the new TC is located outside the U.S., the FAA must not issue a new TC unless the applicant is located in a country having a bilateral airworthiness agreement with the U.S.”</i></p> <p>References to 3-2j(2)(c), are now found in 3-2k(2)(c)</p>	Update references from 3-2j(2)(c), to 3-2k(2)(c)		Concurred. Adopted.

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Bell Helicopter	Page 77, 3. Reserve NOTE 3 for reference to the Instructions for Continued Airworthiness (ICA). (a) (b)	<p><i>“a. The note related to the ICA (see §§ 23.1529, 25.1529, 25.1729, 27.1529, and 29.1529) should address methodology; avoid referring to a specific facility or company. Avoid language promoting a TC holder or their suppliers as the sole source for maintenance or overhaul.</i></p> <p><i>b.It is contrary to 14 CFR parts 43 and 21 to include a note that all repairs or modification schemes must be approved by the TC holder prior to FAA approval.”</i></p>			Missing Comment.
Bell Helicopter	Page 90 Section 4-8 Supplemental Type Inspections Report (STIR)	<p><i>“The manufacturing inspector should complete the STIR in the same manner as the TIR (refer to https://employees.faa.gov/tools_resources/forms)”.</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Bell Helicopter	Pages 94-95 4-15 STC Projects Involving Foreign Registered Aircraft and Import Products b(5)	Change bar mis-located. The change to paragraph (5) is to the next to last sentence in the paragraph at the top of page 95; however, the change bar is located next to the first two sentences in the paragraph at the bottom of page 94.	Locate change bar next to the revised sentence at the top of page 95.		Concurred. Adopted.

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Bell Helicopter	Page 97 4-19 Preparing FAA Form 8110-2 Supplemental Type Certificate STC Numbers	<p><i>“Use STC form 8110-2, located at https://employees.faa.gov/tools_resources/forms, in order to prepare the certificate.”</i></p> <p>Form refers to a link to an employee FAA site that non-FAA employees cannot utilize.</p>	Add the option of finding the forms at the Regulatory and Guidance Library (RGL) website (http://rgl.faa.gov)		Non concur. Not adopted. TC and STC forms can never be accessible to the public. It will prompt fraudulent activities. Similarity: Any state DMV will never put in their website the drivers license form/template. Nor the Dept. of State will put in their website the passport form/template. The same situation applies to certificates issued by the FAA. However, for those companies that have become ODAs and that are authorize to issue STCs, the ACO’s OMT responsible for that company always facilitates the STC form when requested.
Bell Helicopter	Page 121	<p><i>(c) The manufacturing inspector can witness the inspection using the following:</i></p> <p><i>1 The TIR form 8110-31, as a guide</i></p> <p>This form is not publically available.</p>	Make Form 8110-31 available publically on http://rgl.faa.gov		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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Bell Helicopter	Page 130	<p><i>(6) Report all information obtained during function and reliability testing on the applicable FAA Form 8110-31, TIR, and provide a copy to a FAA flight test engineer for inclusion in the consolidated report of the test.</i></p> <p>This form is not publically available.</p>	Make Form 8110-31 available publically on http://rgl.faa.gov		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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Bell Helicopter	Page 138 Section 6-9	<p><i>“Section 6-9 EVALUATING NON-TSO FUNCTION(S) INTEGRATED IN A TSO ARTICLE was removed from 8110.4C as part of Change 6. The purpose of changes for 8110.4C Change 6 states, “In addition, this change removes policy related to procedures for non-technical standard order (TSO) function data submitted with an application for TSO authorization (TSOA). This policy is now available in the FAA Order 8150.1, Technical Standard Order Program.”</i></p> <p><i>FAA Order 8150.1C, Section 8-2, Non-TSO Function states, “Reference FAA Order 8110.4c, Change 4, for information pertaining to non-TSO functions and associated installation evaluation and limitations.”</i></p> <p>Keep Section 6-9 of 8110.4C unchanged until 8150.1 is revised to include the Non-TSO information.</p>	Keep Section 6-9 of 8110.4C unchanged until 8150.1 is revised to include the Non-TSO information.		Non concur. Not adopted. FAA Order 8150.1D is about to get published before this Change 6 gets issued and the revised policy and procedures will trump what paragraph 6-9. says.

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Bell Helicopter	Page A1-1	<p><i>“APPENDIX 1. FORMS AND GUIDANCE FOR CERTIFICATION PROJECTS (CONTINUED)”</i></p> <p>Does this replace Figure 1 from Change 5 which contained useful information on forms, in particular information for completing form 8110-12? If so, why does this Appendix state CONTINUED?</p>	Provide clarity whether the Figure 1 from Change 5 is included or does this replace Figure 1 from change 5.		Concurred. Adopted. Corrected title of the appendix on page A1-1. This figure 1 is going to replace figure 1 from change 5.
Bell Helicopter	Page A3-1 Appendix 3. List of FAA Forms	<p><i>12. FAA Form 8110-31, Type Inspection Report</i></p> <p>This form is not publically available.</p>	Make Form 8110-31 available publically on http://rgl.faa.gov		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Bell Helicopter	Page A-10-1 Appendix 10. Data Retention	<p><i>“FIGURE 1. PROJECT RECORDS (The ACO or MIDO must maintain these records, at an FAA facility.)”</i></p> <p>The option for data retention if an MOA is applicable is not covered in this statement.</p>	Update the title to include the option for Add Data Retention MOA if applicable.		Concurred. Adopted. Rewrote title as : (The ACO or MIDO must maintain these records, at an FAA facility, unless there is a data retention agreement in place.)

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Bell Helicopter	Page A-10-1 Appendix 10. Data Retention	<p><i>“Chief Scientist and Technical Advisors’ significant correspondence”</i></p> <p>Define significant as it was added to this comment</p>	Define significant as it is open to interpretation		Concurred. Remove “significant” since it is not defined.
Bell Helicopter	Page A-10-1 Appendix 10. Data Retention	<p><i>“Aircraft Evaluation Group’s significant correspondence”</i></p> <p>Define significant as it was added to this comment</p>	Define significant as it is open to interpretation		Concurred. Remove “significant” since it is not defined.
Bell Helicopter	A-10-1, Appendix 10. Data Retention FIGURE 1. PROJECT RECORDS	<p><i>Type Inspection Report (FAA Form 8110-31)</i></p> <p>This form is not publically available.</p>	Make Form 8110-31 available publically on http://rgl.faa.gov		Partially concurred. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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Boeing	Page 15, Paragraph 1-9 (22)	The reference to Order 8900.1 may be out dated.	If the Order reference is related to determination of Field Approval versus Required STC, then that information has been moved from FAA Order 8900.1 to FAA Order 8300.16 and the associated JobAid.	Change reference from: (22) FAA Order 8900.1, Flight Standards Information Management System (FSIMS) to: (22) FAA Order 8300.16, Major Repair and Alteration Data Approval.	Partially Adopted. Kept the 8900.1 reference but added the 8300.16 reference, which is now (26).

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Boeing	Page 49, Paragraph 2-6 m.	The statement regarding deliverables necessary to show compliance is ambiguous regarding documentation and submittal of the deliverables. It is not clear if the word, “unless,” refers back to having to list the deliverables or to providing the deliverables or both. The sentence currently reads as follows: “The deliverables necessary to show compliance must be documented in the applicant’s statement of compliance and submitted to the FAA, unless the applicant has a data retention agreement that preserves the FAA access to all data used to show compliance at any time in the future.”	As written in Change 6, the sentence could be interpreted to mean that that the applicant must always identify the deliverables necessary to show compliance in the applicant’s statement of compliance. The sentence would then continue to read that those deliverables must be submitted to the FAA unless there is a retention agreement. Alternatively, the sentence could be interpreted to mean that the applicant must either list the deliverables necessary to show compliance in the applicant’s statement of compliance and those deliverables must be sent to the FAA or the applicant can have a data retention agreement, in which case it is not necessary to list all the deliverables in the statement of compliance. This second interpretation is the accepted method currently in use.	Revise the sentence to read as follows: “Unless the applicant has a data retention agreement that preserves FAA access to all data used to show compliance at any time in the future, the deliverables necessary to show compliance must be documented in the applicant’s statement of compliance and submitted to the FAA.”	Concurred. Adoted. Incorporated revised text.

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Boeing	Pages 51-97, multiple sections	The proposed document refers the reader to go a specific url for example: (https://employees.faa.gov/tools_resources/forms) to view forms. It seems that only FAA employees can access the forms since the url is not open for the public. In order to do a thorough review, the public should have access to this information as well.	No access to referenced url limit the readers ability to complete a thorough review and to have access to information that must be understood by the applicant(s), delegated personnel, or delegated organizations (ODA). Various links within the document open an FAA employee sign-in page, thus access by the public is limited.	The FAA can either include an example figure of the form in the order, or include a link that works for both FAA and the public.	Partially concur. We are no longer putting sample forms in the order in order to avoid conflicting information between current forms and samples residing in orders that do not get revised as often as we revise forms. We cannot put forms in RGL but will request from our FMO to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31. TC and STC forms can never be accessible to the public. It will prompt fraudulent activities. However, for those companies that have become ODAs and that are authorize to issue STCs, the ACO OMT responsible for that company always facilitates the STC form when requested.

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Boeing	Page 58, Paragraph 2-7 b.(2)	Change 6 refers to TIR form 8110-31 which is only available to FAA employees and deletes the instructions provided on pages 59-60 of the existing order to prepare Part II of the TIR.	In the existing version of the order, the applicant is allowed to partially prepare Part II of TIR form 8110-31 in a format established by the ACO. Addition of a form not available to the applicant removes the applicant's ability to prepare the form for the ACO.	Add provisions to allow the applicant to continue to use an existing ACO-accepted process and format to prepare a TIR form.	Partially concurred. The newly revised TIR form 8110-31 contains new blocks/blanks and revised instructions quite different from what we have in current version of the order. One way to resolve the accessibility issue is to request from our Forms Management Officer (FMO) to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.
Boeing	Page A1- 2	The definition of "D" in the numbering system description is incomplete.	The requirement for the -D on the STC number was still required for STC ODAs operating under FAA Order 8100.15 (Rev New).	Change definition from: D = indicates Designated Alteration Station (DAS) issued STC (blank if not DAS issued) to: D = Indicates Delegation Organization (Delegated Alteration Station (DAS)) and early Organization Delegation Authorization (ODA) issued STC.	Concurred. Adopted.

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Boeing	Page A13-1, Paragraph 3	Feedback is not possible with the online link provided (https://ksn2.faa.gov/avs/dfs/Pages/Home.aspx)	The request for feedback links to the FAA Knowledge Services Network which requires a user name and password. There are no instructions to request an account.	The FAA can allow the public to have an online feedback method.	Non concur. Not Adopted. Public (Industry) can use the Consistency and Standardization Initiative process (CSI) to submit feedback and comments to us . The Feedback form 1320-19 is not for public use. Is used internally only.
Duncan Aviation	General	I noticed that the order now drove the user to the FAA employee's website for access to forms such as the STIR, TIA, and STC (Ref. para.s 4-8 and 4-19 as examples). This is OK for internal FAA use, but designees such as ODA's do not have access to these sources for the forms which are a necessary part of our operations.	Fortunately our ACO has provided us copies of these forms for use, but other designees may not have been provided with them. Also, it would be nice to be able to quickly check if the forms we are using are current, without having to go to our ACO and wait for responses.		Partially concurred. One way to resolve the accessibility issue is to request from our Forms Management Officer (FMO) to see if it is possible to post the following forms in the FAA designees page: 8110-12, 8110-1, 8110-26, 8110-31.

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