

COMMENT LOG

Document: FAA Order 8110.56B Restricted Category Type Certification	Reviewer/Reviewing Organization: David Downey	Date of Review: 6-6-2016
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	Page & Paragraph	Comment & Rationale	Recommendation	
1	Paragraph 3 and 4	The flow charts are excellent but putting them at the beginning of the paragraphs would help a reader understand the flow.	Move the flow charts to the beginning of the paragraphs.	Accepted.
2	3-3	<p>Regarding the load analysis, recommend that the applicant be allowed to specifically reference the military load spectrum and operational use.</p> <p>If the military does not have a restriction on cycles or loads, as long as the applicant uses those data they comply.</p>	Regarding the load analysis, recommend that the applicant be allowed to specifically reference the military load spectrum and operational use.	<p>Not accepted. Para 3-3 relates to civil-derived aircraft, so this comment is not applicable here. For military surplus aircraft, para 4-10 includes the ability to compare useage spectrum for military and civil use.</p> <p>Not accepted. The special purpose operating environment might require additional limitations to ensure that the aircraft is safe for its intended use.</p>

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3	3-4 b.	This requirement causes the exclusion of many civil-derived foreign aircraft that have an excellent service history like the KA-32. Other authorities like TCCA have accepted this. Consider using the 10 years of service history as a new criteria.	Put some language that foreign RC are not specifically banned by this paragraph. See paragraph 3-13.	Not accepted. Aircraft issued a restricted category TC under 21.25(a)(1) must have an engine approved under Part 33. This applies to domestic and foreign aircraft.
4	3-11	The paragraph makes no mention of the military maintenance program as being equivalent ICAs. There is no mention of subsequent maintenance action such as DMWR (Depot Maintenance Work Req.) which are military-approved.	Add a sentence that states that subsequent maintenance actions or referenced procedures in the military maintenance program are ICAs and approved.	Not accepted. Para 4-12 address ICAs for military surplus aircraft TC'd under 21.25(a)(2). Any subsequent changes to the ICAs must be accepted by AEG.
5	Paragraph 4	There is not mention of OEM RC TC'd aircraft such as Lockheed and Sikorsky. The non-OEM applicants should benefit from any OEM approved actions and should have to comply with any SBs as appropriate.	Perhaps add some words that there are aircraft that are TC'd by multiple applicants to include the OEM.	Para 4-1(e) addresses multiple TCs issued for a particular military aircraft model, including the OEM. Non-OEM TC holders must obtain their own approvals for any design changes to their TC. Non-OEM TC holders can choose to comply with applicable service bulletins offered by OEM. No changes made to

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				document.
6	Paragraph 4.	There is no mention of MMEL	Add some words that RC aircraft are eligible for an MMEL and to follow those procedures.	Concur but no change needed to document. TC holders can submit an MMEL for FAA approval if desired.
7	4-19	There is no guidance on TC holder SBs.	Add language in 4-12 that says IAW with military-issued (SBs) the RC TC holder must evaluate that guidance and issue appropriate SBs in the TC Holder's name to operators	Partially accepted. Language added to para. 4-20 (Continued Operational Safety) to encourage TC holders to evaluate military safety of flight messages issued post-TC. Also, FAA encourages TC holders and operators to evaluate military SBs issued for that model aircraft.
8	4-21(e)	Parts eligibility can be problematic. The guidance does not completely address such issues as: What if the military subsequently "approves" the civil part number on an FMS aircraft? Or if the OEM approves the PN?	Open installation to approvals based on: equivalent minor change to TC, direct FAA approval (PMA) or OEM approval	Accepted. New para 4-21f added to address new part numbers approved by armed forces (para 4-21e addresses similar situation when there is a civil counterpart to the military model). In either case, the

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				new parts need to be shown to be acceptable to the FAA as replacement parts.
9	5-3	Adding a Special Purpose should not go to the ACO. The ACO should be consulted however, adding a Special Purpose is rulemaking.	The applicant should submit a petition to amend §21.25 per the procedures in §11.17	Not accepted. AIR-100 approves new special purpose operations in coordination with the ACO and the appropriate directorate. New special purposes are approved under 21.25(b)(7), “Other” and do not require rulemaking.
10	4-21 a	Two exemptions to §21.9 have been issued by the FAA. The FAA cannot leave the un-aware public without the knowledge that this rule change is contemplated.	Perhaps add a comment that there is an on-going rulemaking effort that will address this. For parties seeking production please contact the FAA. Then have the FAA share the exemption possibilities.	Not accepted. Exemptions are made public through the Federal Register and FAA’s RGL. No change to the document is needed.