

# Regulations, Policy, and Guidance

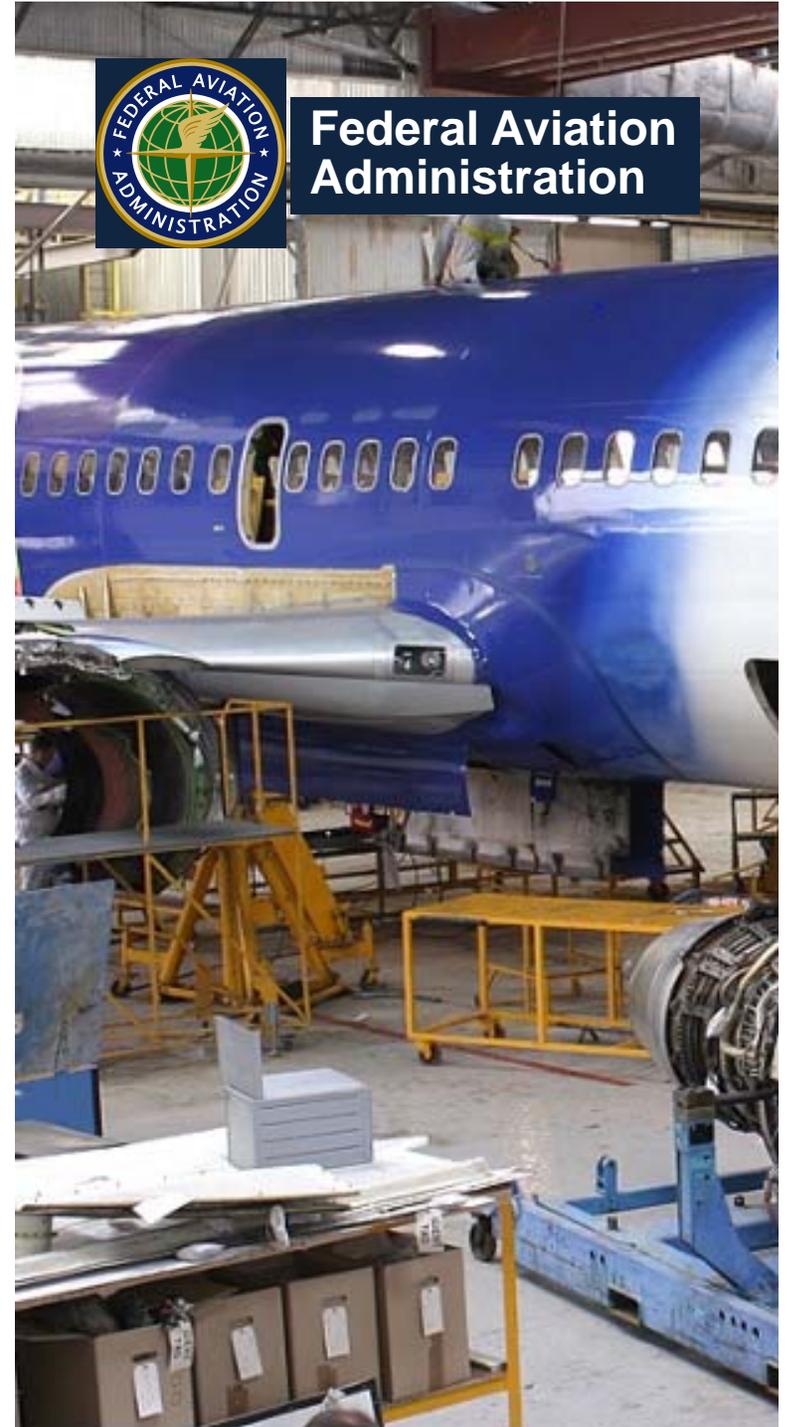
## What's changing?

Presented to: Aviation Suppliers Association

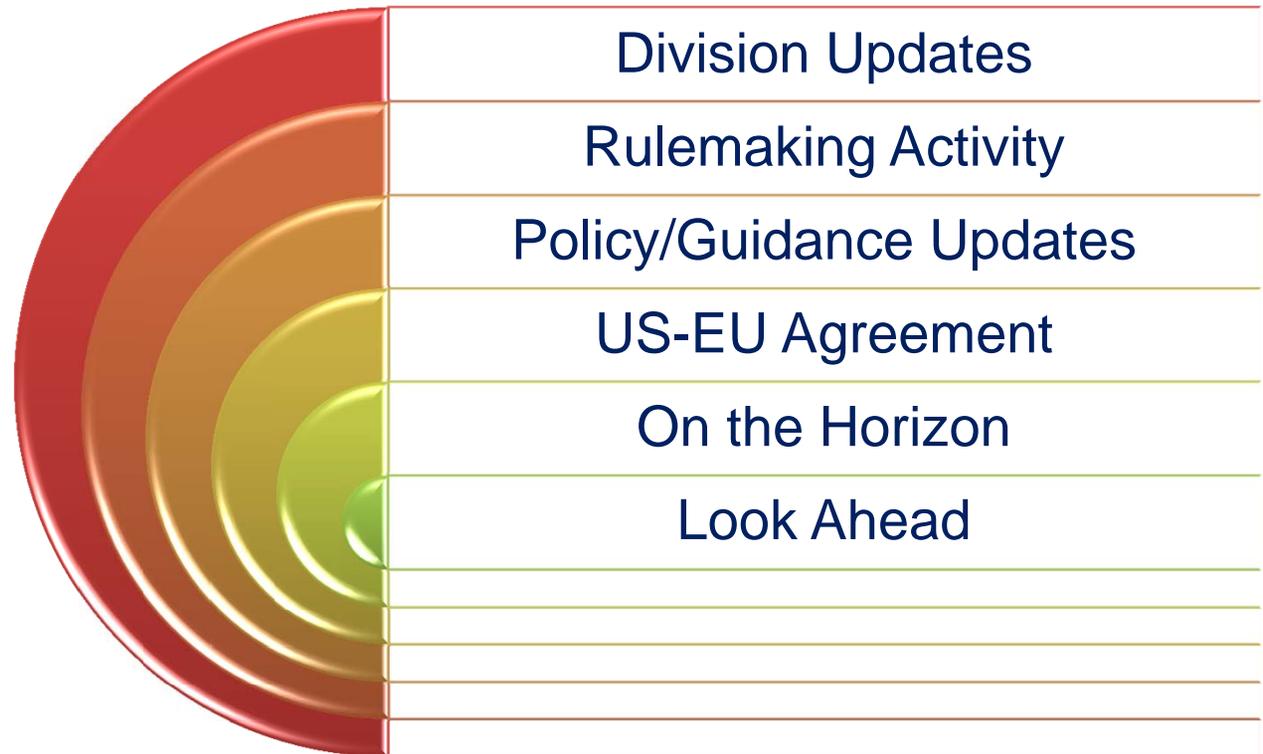
By: Steve Douglas, Manager

Aircraft Maintenance Division, AFS-300

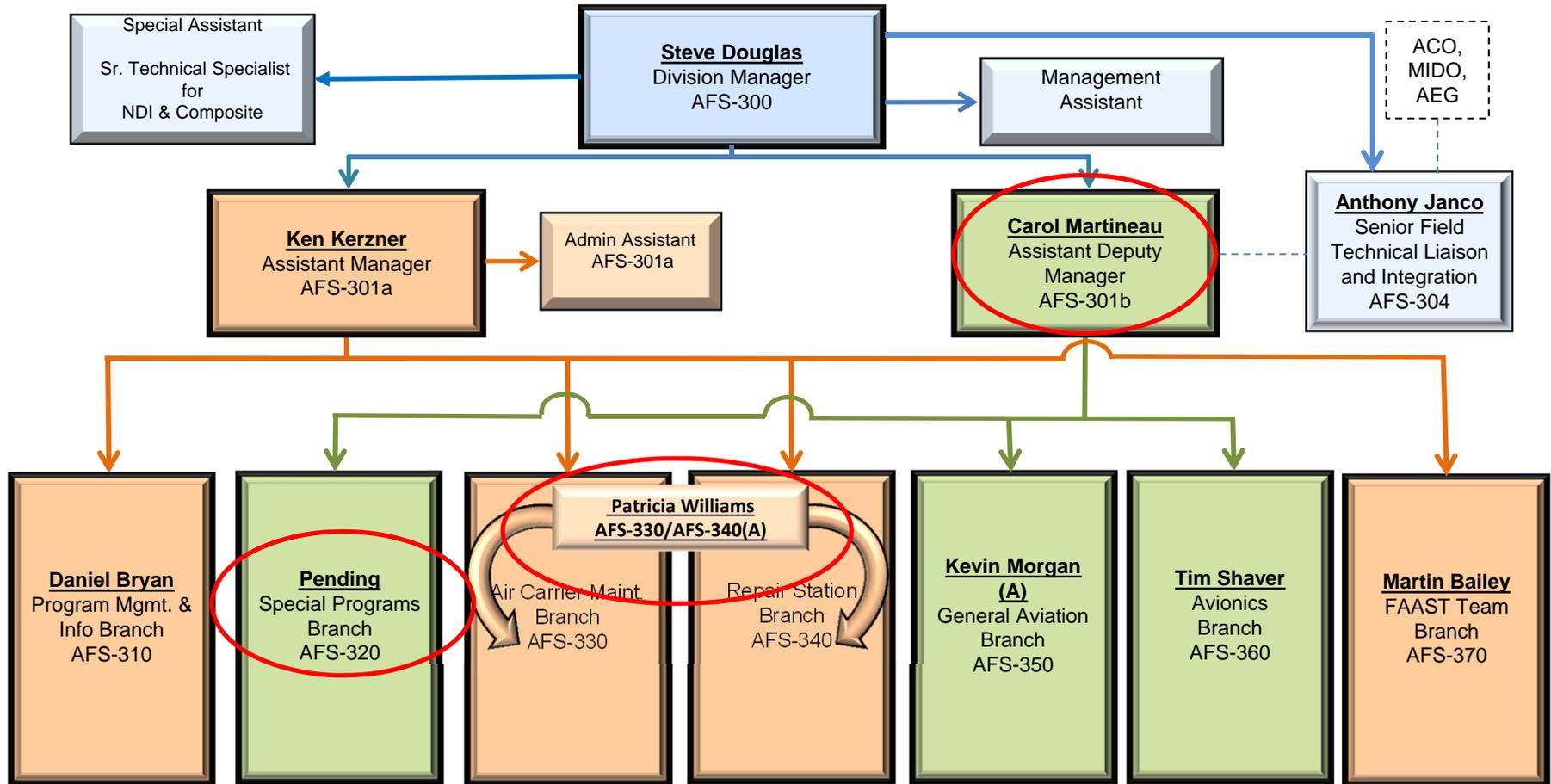
Date: June 16, 2014



# Overview



# Aircraft Maintenance Division, AFS-300 Organization



# Aviation Education



The Aviation Career Education Program initiative called “Walk in My Boots” gives students a chance to shadow an A&P mechanic on the job and fosters partnerships between high schools and working aircraft repair stations.

## Sponsors

- United Technologies Flight Department, CT
- University of Alaska, AK
- Moody Aviation, WA
- Eagle Creek Aviation, IN
- Bombardier Aircraft Service Center, CT
- Gulfstream Aerospace, MA
- Standard Arrow, TX

Web  
links

<http://www.faa.gov/education/>

<http://www.youtube.com/aarcorpnews>

*“The Bureau of Labor Statistics predicts a 6% growth in the aviation field over the next 5 years”*

# Rulemaking Activity



# Rulemaking Activity

## Part 145 Repair Stations

- A new system of ratings
- Revised certification requirements
- Revised rules for repair stations performing maintenance for air carriers



**Status:** Work continues toward Final Team Concurrence and alignment with part 13 rulemaking project. Expected delivery January 2015.

# Rulemaking Activity

## TSA Repair Station Security Rule Published

### Vision 100 Century of Aviation Reauthorization Act of 2003 (Public Law 108-176, 117 Section 611)

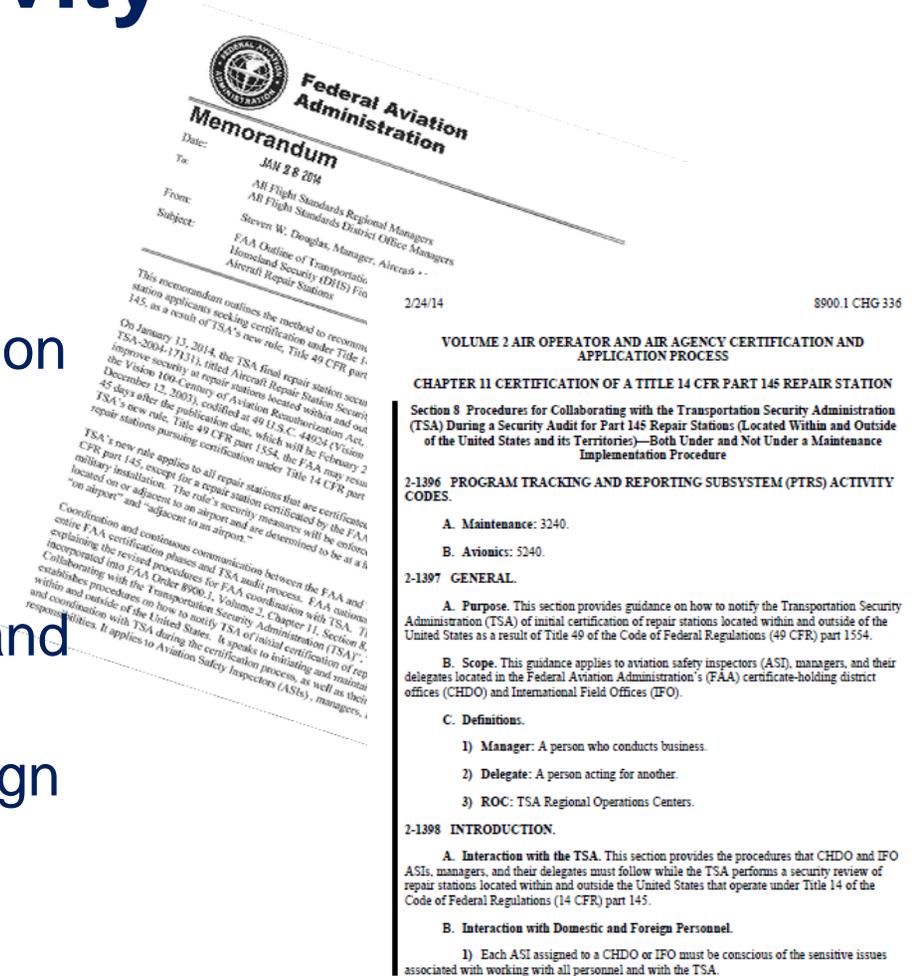
- Signed into law on December 12, 2003
- Amended on August 3, 2007 by the “9-11 Bill” (Public Law 110-53, Section 1616)
- **Rule published January 13, 2014 (Docket Number TSA-2004-17131)**
  - Rule became effective February 27, 2014.



# Rulemaking Activity

## FAA & TSA

- FAA to resume certification on February 27<sup>th</sup>, 2014
- FAA memorandum to field offices outlined next steps and method to recommence the certification process of foreign applicants seeking 145 certification.



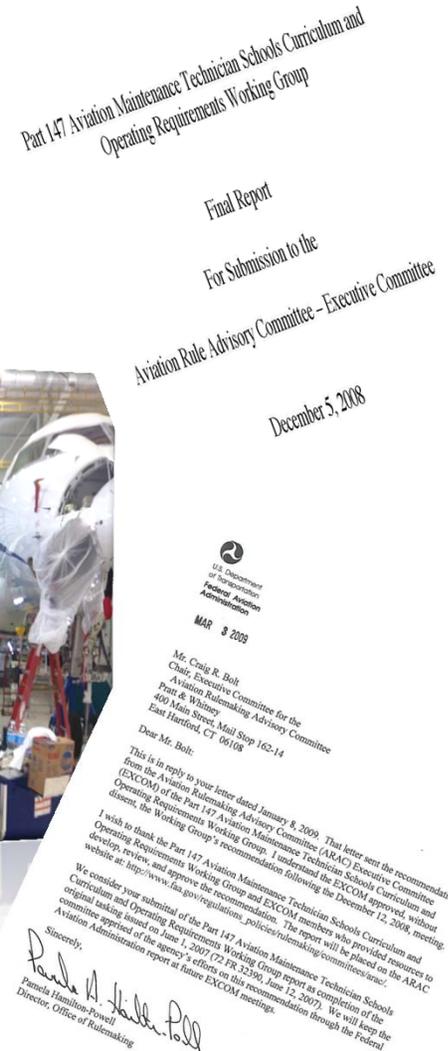
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# Rulemaking Activity

## Part 147, Aviation Maintenance Technician School

- Project accepted and approved to move forward in April 2014
- Team working toward Preliminary Team Concurrence October 2014



# Rulemaking Activity

## Safety Management Systems (SMS) for Part 121 Certificate Holders, Part 5

FAA Aviation Safety and its Lines of Business to develop & implement Safety Management Systems (SMS) requirements for:

- FAA certificate holders' service providers
- Applicants
- Products

**Status:** Pending OMB  
(Nov 2014)



# Policy/Guidance Updates

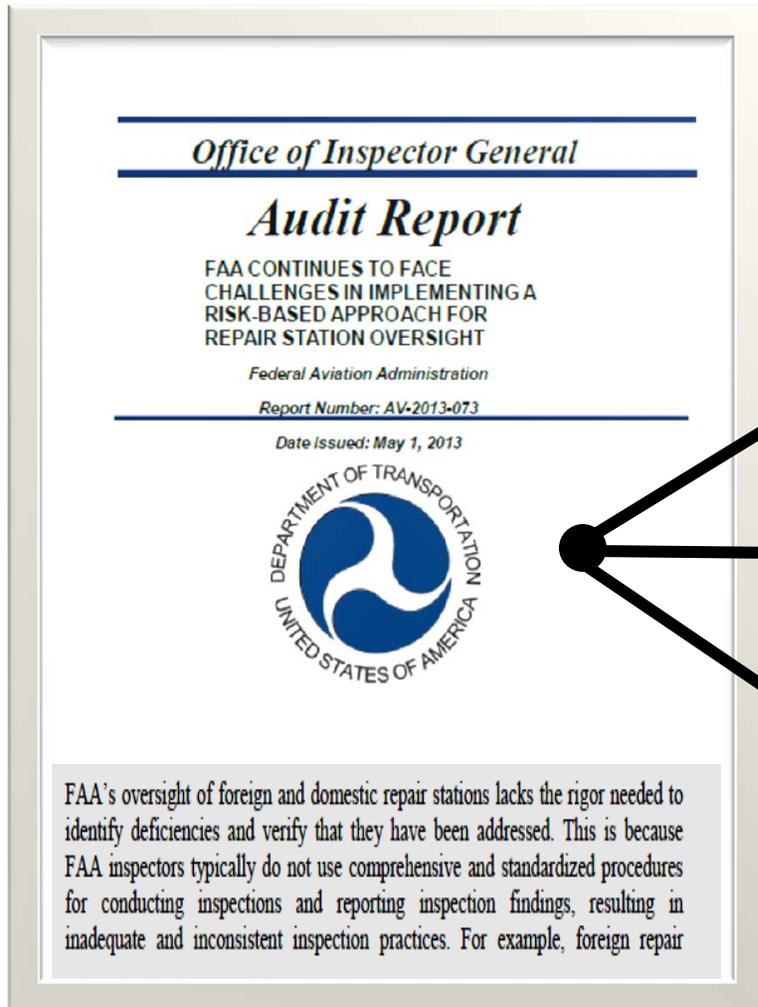


# Policy/Guidance Updates

## Published FAA Order 8300.16, Major Repair and Alteration Data Approval (April 18, 2014)

- Provides guidance applicable to the data approval process for major repairs and alterations including field approvals
  - Does not provide guidance for making decisions on major or minor changes in type design
- **Guidance for FAA; ASI, DAR, DER, ODA and ACO**
- **Order and Job Aid on AFS-300 web site:**  
[http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs300/](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/)

# Policy/Guidance Updates



## Systemic Deficiencies Persist at Repair Stations

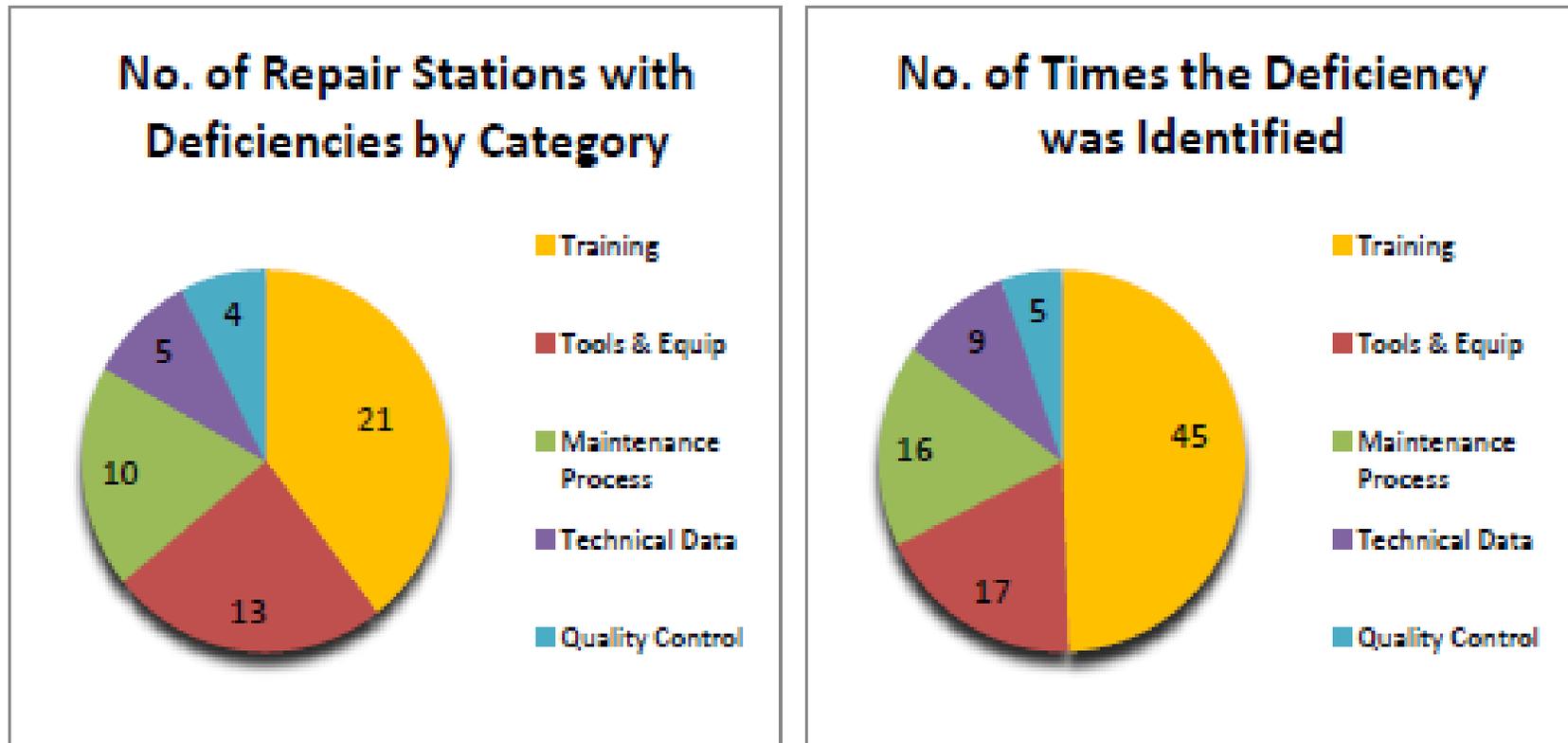
Ineffective Inspector Training and a Lack of Adequate Data Have Hindered Risk-Based Oversight Efforts

FAA Developed Risk-Based Inspection Tools, but the Tools Are Ineffective and Inspectors Do Not Use Them

Lack of Standardized Processes Has Resulted in Inconsistencies in FAA's Surveillance of Repair Stations and Confusion Among Repair Station Officials

# Industry Deficiencies

Figure 3. Number of Work Order Deficiencies by Category



Source: OIG analysis of repair station work orders

# Policy/Guidance Updates

## New Part 145 Check List



### Flight Standards Service - Aircraft Maintenance Division

The Aircraft Maintenance Division is responsible for regulations and national policy governing the certification, inspection, and surveillance of the maintenance aspects of:  
 General aviation, air carrier, and commercial operators  
 Avionics (mechanics, repairmen, designees, parachute riggers)  
 Air agencies (aviation maintenance technician schools (AMTS), and repair stations)  
 Maintenance requirements, performance standards, and practices applied to ensure the airworthiness of civil aircraft.

#### Aircraft Maintenance Division Branches

- Program Management and Information Branch (AFS-310) ([http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs310](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs310))
- Special Programs Branch (AFS-320) ([http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs320](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs320))
- Air Carrier Maintenance Branch (AFS-330) ([http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs330](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs330))
- Repair Station Branch (AFS-340) ([http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs340](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs340))
- General Aviation Branch (AFS-350) ([http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs350](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs350))
- Avionics Branch (AFS-360) ([http://www.faa.gov/about/office\\_org/headquarters\\_offices/avs/offices/afs/afs360](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs360))
- AFS-300 Job Aids
- Major Repair and Alteration Data Approval (media/Major\_Repair\_Alteration\_300-311.pdf) (PDF)
- Part 145 EASA Domestic Checklists (media/Part145EASADomesticChecklists.pdf) (PDF)



### Aircraft Maintenance Division

#### Part 145 Repair Station Checklists

Last Name	Details
<a href="#">3601-5601 (PDF)</a>	V6C9S12 Parts and Materials
<a href="#">3604-5604 (PDF)</a>	V6C9S4 Certificate and Operations Specifications
<a href="#">3605-5605 (PDF)</a>	V6C9S6 Records Systems
<a href="#">3606-5606 (PDF)</a>	V6C9S16 Work Away From Station
<a href="#">3607-5607 (PDF)</a>	V6C9S23 Contract MX Facility, Non-Certificated
<a href="#">3608-5608 (PDF)</a>	V6C9S11 Quality Control System
<a href="#">3610-5610 (PDF)</a>	V6C2S42 In-Depth Team Inspection Contract MX
<a href="#">3618-5618 (PDF)</a>	V6C9S18 MX Performed For Air Carriers (CAMP)
<a href="#">3654-5654 (PDF)</a>	V6C9S15 Maintenance Process
<a href="#">3656-5656 (PDF)</a>	V6C9S10 Technical Data
<a href="#">3657-5657 (PDF)</a>	V6C9S8 Housing and Facilities
<a href="#">3658-5658 (PDF)</a>	V6C9S9 Tools and Equipment
<a href="#">3659-5659 (PDF)</a>	V6C9S13 Personnel
<a href="#">3660-5660 (PDF)</a>	V6C9S7 Manuals
<a href="#">3661-5661 (PDF)</a>	V6C9S14 Training Programs
<a href="#">3663-5663 (PDF)</a>	V6C9S23 Contract Maintenance Program, Certificated
<a href="#">3669-5669 (PDF)</a>	V6C9S24 EASA Domestic Repair Station Surveillance
<a href="#">EASA Sampling (PDF)</a>	V12C10S2 Sampling/Independent AA Inspection.

[http://www.faa.gov/about/office org/headquarters offices/avs/offices/afs/afs300/](http://www.faa.gov/about/office_org/headquarters_offices/avs/offices/afs/afs300/)



# Policy/Guidance Updates

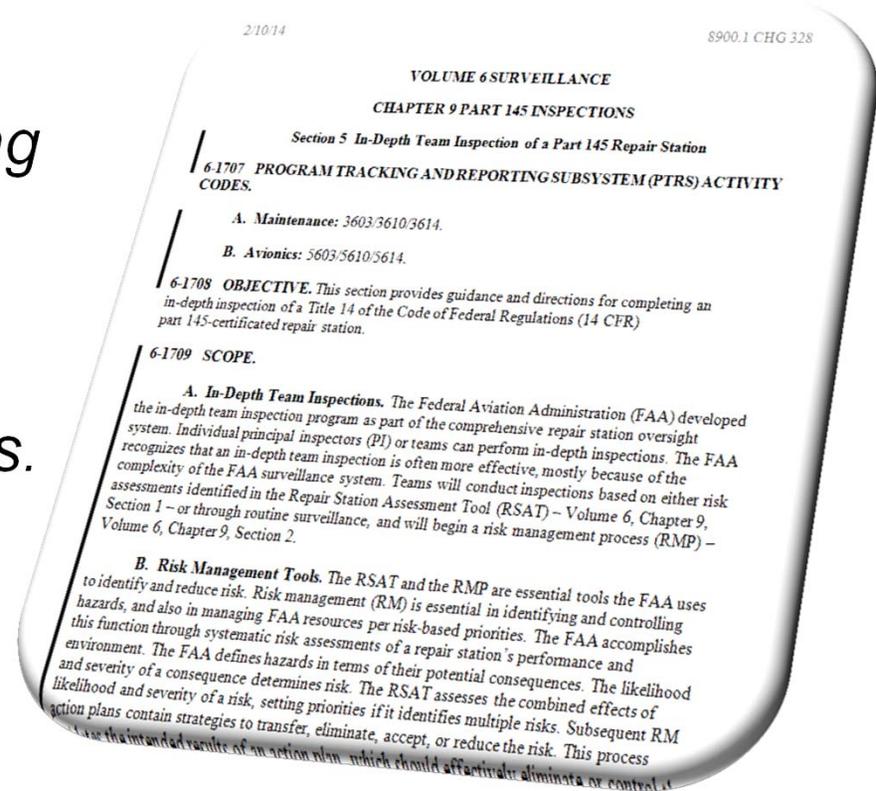
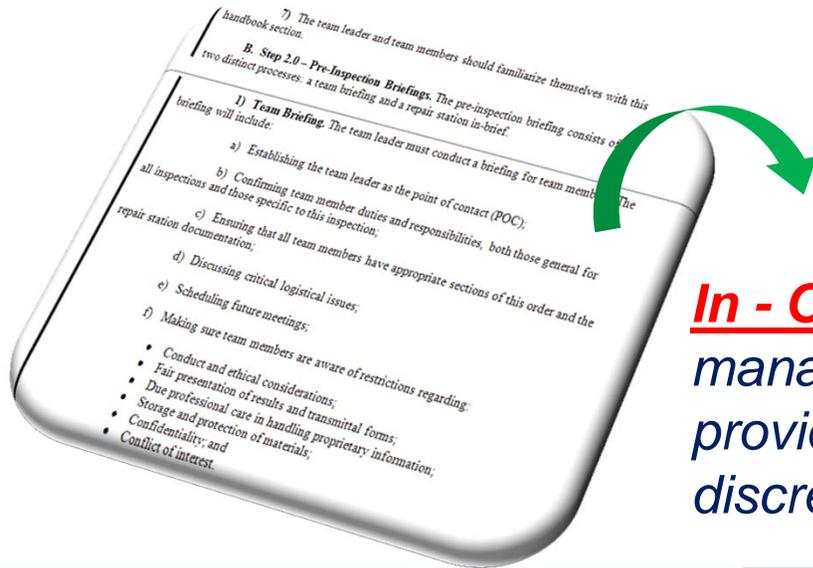
## New Part 145 Check List

Revision 0 12/2013		Part 145 Repair Station Check List		Page 2 of 8	
Repair Station Name: _____			Date of Inspection: _____		
Certificate Number: _____		Inspector's Name: _____			
RSAT MAINTENANCE PROCESS - 3654/5654			FSIMS Reference: <a href="#">FAA Order 8900.1 Volume 6, Chapter 9, Section 15</a>		
Additional References: <a href="#">14 CFR Part 145</a> <a href="#">14 CFR Part 43</a> <a href="#">14 CFR Part 183</a> <a href="#">Advisory Circulars</a> <a href="#">Order 8100.15</a> <a href="#">Order 8110.37</a>					
<b>Special Instructions:</b> - When inspecting a PART 135 or 121 Work Order, enter 4 letter designator into PTRS Affiliated block (Aff Designator) Note: The following steps serve as a guide in performing a process/task inspection. Certain steps may not be appropriate, depending on the complexity of the repair station.					
PTRS KEYWD E-802	5 - Are personnel identified and authorized by the carrier who perform required inspection item (RII) inspections?			<input type="text"/>	
	Comments: _____			14 CFR: 121.371(a) 135.429(a) 145.205 121.371(d) 135.429(e)	
PTRS KEYWD E-802	6 - Are inspection personnel within their area of authority? Note: Record information on the last page of this checklist.			<input type="text"/>	
	Comments: _____			14 CFR: 145.155	
PTRS KEYWD E-802	7 - Are internal audits conducted to verify compliance with FAA-approved or acceptable data, and appropriate procedures?			<input type="text"/>	
	Comments: _____			14 CFR: 145.211(c)(1) (v) 145.109(d)	
PTRS KEYWD E-610	8 - Are personnel provided with current technical data and changes? Note: record information on the last page of this checklist.			<input type="text"/>	
	Comments: _____			14 CFR: 145.109(d)	



# Recommendation #9

Develop guidance and training to inspectors on how to conduct comprehensive briefings to repair station officials on inspection findings.



**In - Out brief** to repair station's management personnel and provide a preliminary copy of all discrepancies or observations

# Policy/Guidance Updates

- **Key items developed from OIG Report**
  - In - Out brief to repair station's management personnel and provide a preliminary copy of all discrepancies or observations
  - Checklists for part 145 inspections – web based
- **Updated 28 Sections of FAA Order 8900.1**

# Policy/Guidance Updates

## AC 00-56A Changes

- Updated table to show the standards currently being used
- Removed General Aviation Parts Suppliers Association (GAPSA) due to their lack of activity
- Recommend a self audit prior to arranging the accreditation audit
- Allow for electronic submission of an application
- Updated the required information needed in the distributor's certification letter
- Allow the distributor to remain listed for 30 days if their accreditation expires during the re-certification process
- Removed AC 20-36; AC 21-38; AC 21.303-2; and AC 43-26
- Added AC 20-142 Eligibility and evaluation of U.S. Military Surplus Flight Safety Critical Aircraft Parts, Engines, and Propellers



## Advisory Circular

Subject: **VOLUNTARY INDUSTRY DISTRIBUTOR ACCREDITATION PROGRAM**

Date: 6/13/02  
Initiated By: AFS-300  
AC No: 00-56A  
Change:

**1. PURPOSE.** This advisory circular (AC) describes a system for the accreditation of civil aircraft parts distributors on the basis of voluntary industry oversight and provides information that may be used for developing accreditation programs. The Federal Aviation Administration (FAA) strongly endorses participation in such a program to improve the ability of certificated persons to establish the eligibility of parts and products for installation on type-certificated products. This AC has been revised in order to meet current changes in regulatory requirements and industry practices since its original publication.

**2. CANCELLATION.** AC 00-56, Voluntary Industry Distributor Accreditation Program, dated September 5, 1996 will be canceled 30 days after the issuance of AC 00-56A. All distributors seeking initial or renewal accreditation shall comply with the requirements listed in AC 00-56A, 30 days after the issuance of this document. Distributors that are already identified in the database of accredited distributors under AC 00-56 may maintain their accreditation until they are renewed, canceled, or removed in accordance with AC 00-56A. However, they may not exceed the 24-month requirement under which they were accredited.

**3. RELATED READING MATERIALS.** The information contained in this AC complements the documents listed below.

a. Copies of current editions of the publications listed below, as amended, may be obtained free of charge from the following address: U.S. Department of Transportation, Subsequent Distribution Center, Ardmore East Business Center, 3341 Q 75th Avenue, Landover, MD 20785.

(1) AC 20-62, Eligibility, Quality, and Identification of Aeronautical Replacement Parts, contains guidance and information regarding the eligibility of aeronautical parts and materials to be installed on U.S. type-certificated products.

(2) AC 21-20, Supplier Surveillance Procedures, contains guidance and information on how production approval holders establish surveillance procedures over suppliers.

## Publication status of AC 00-56B

- Targeting late 2014



# US-EU Agreement



# Last year's MAG Highlights

- **MAG Change 1:** immediate response to initial shortcomings of the guidance material
- **MAG Change 2:** mainly address Section B issues
- **MAG Change 3:** mainly address Section C issues
  - ✓ Triple release:
    - Introduced with MAG change 3



# MAG Updates 2014

## Maintenance Annex Guidance, Change 4, effective 01/29/2014

- **Editorial Changes:**

- ✓ Address's FAA regulatory change; Implement Order 8130.21H
  - ❖ Section A, Appendix 6, FAA Annex to EASA Form 6: update of PTRS codes in line item 12
  - ❖ Section B, Appendix 1, Paragraph 10 and Section C, Appendix 1, Paragraph 7: “block numbers” updated as a result of changes to FAA Order 8130.21 and “block number” updates to FAA Form 8130-3

# US-EU Agreement

## What's Next in Workshops

- Tentatively planned for February 2015
- Additional workshops/briefings in EU and US are planned
- Topics to be covered:
  - Last years changes to the MAG
  - Changes to the agreement
  - Updates to trainings

# US-EU Agreement

## Enhancements

- InFO -----
  - Heighten awareness and understanding of the FAA/EASA Bilateral Technical Implementation Procedures (TIP)
  - Data approval under EASA system are considered to be approved by FAA



## FAA/EASA Collaboration



# US-EU Agreement

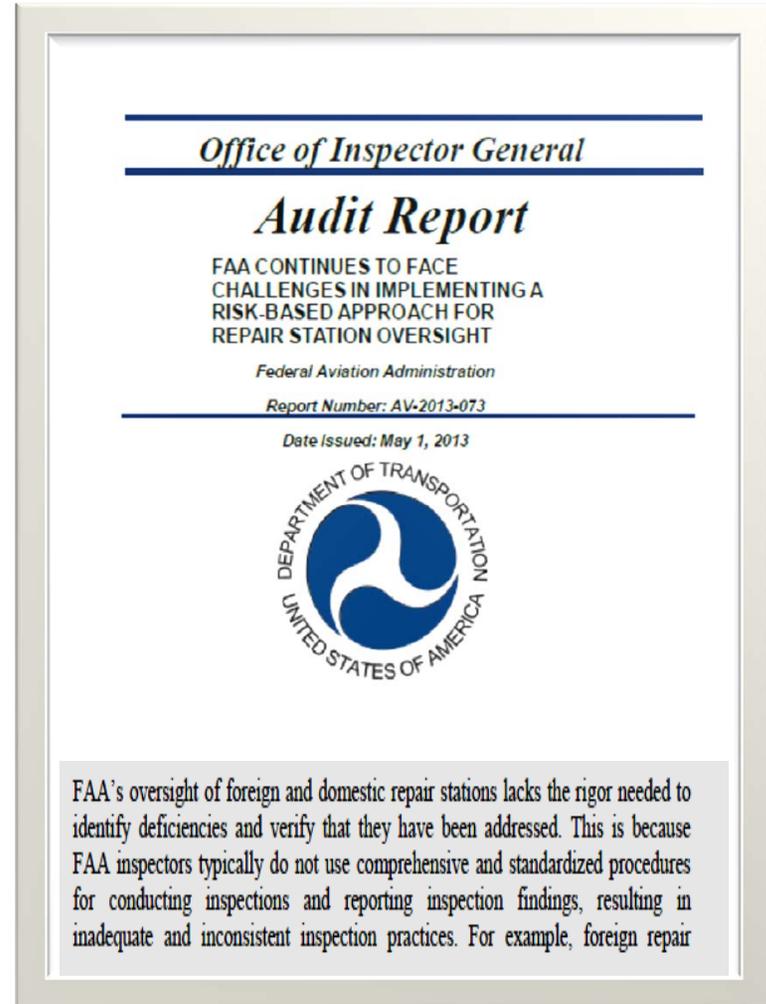
## Confidence Building

- **Sampling Inspection System (SIS)**
  - Conducted by EASA in US
  - Conducted by FAA in EU
  
- **Results are evaluated jointly and presented at the Joint Maintenance Coordination Board (JMCB)**
  - Guidance and training updated from results
  - Industry concerns addressed

# FAA / EASA /AA Collaboration

Audits of  
System  
outside of  
FAA/EASA

Office of Inspector General  
auditing of FAA's oversight  
under NEW Agreement

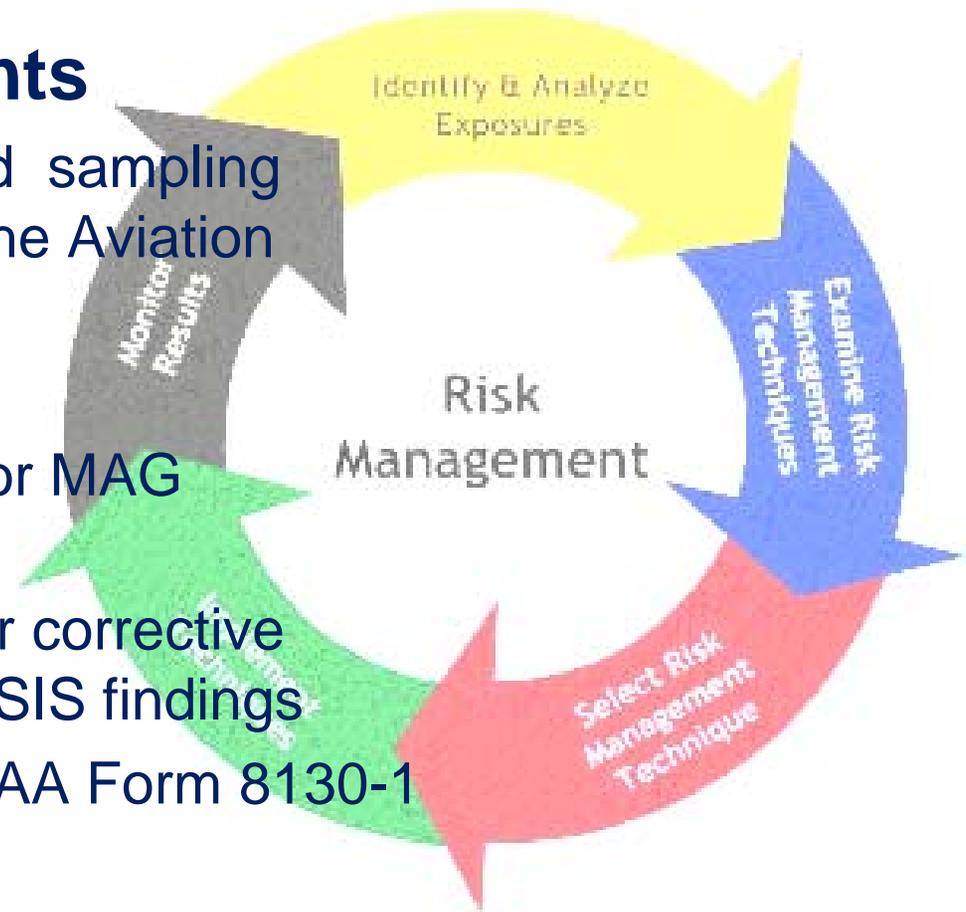


# US-EU Agreement

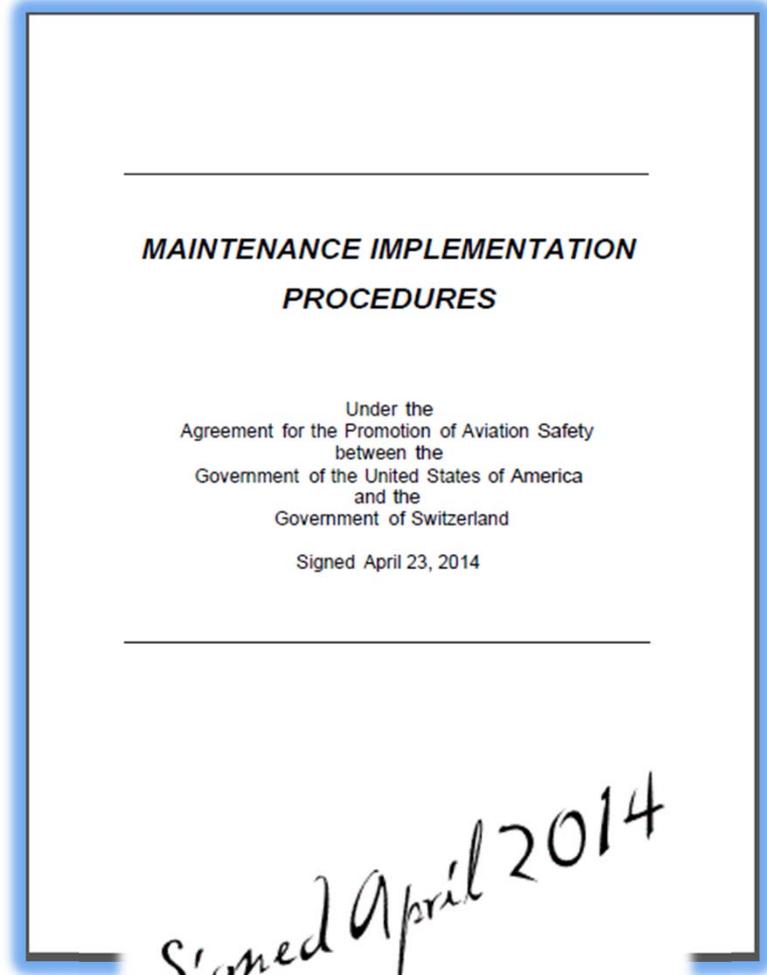
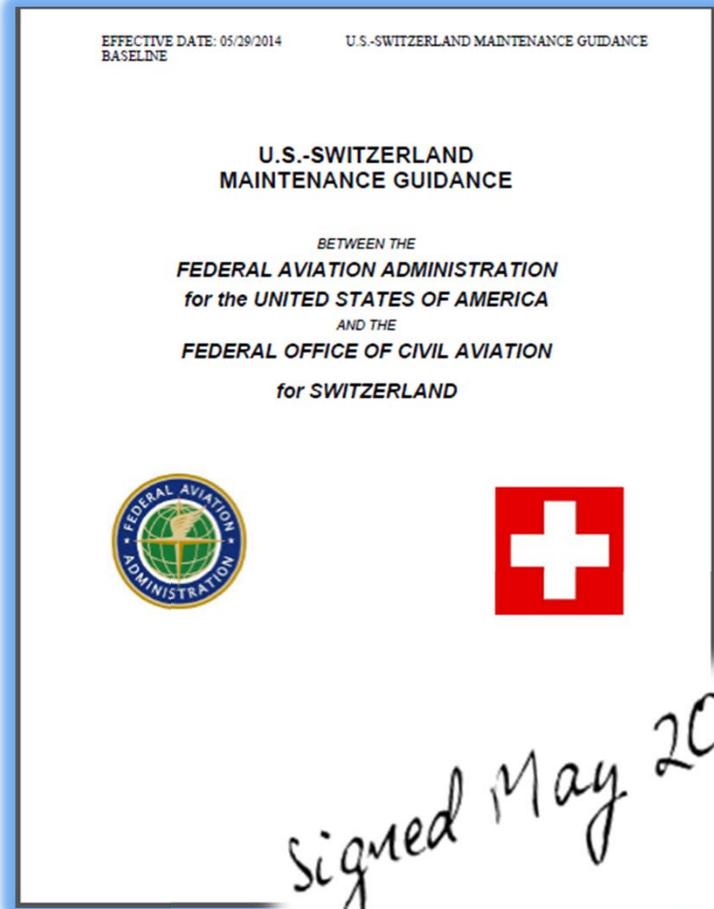
## What's Next?

### ■ Policy Enhancements

- Enhance the risk based sampling inspection process of the Aviation Authorities
- Recurrent training
  - Follow-on training for MAG revisions
- Define requirements for corrective actions to address the SIS findings
- Continue to evaluate FAA Form 8130-1 and EASA Form-1



# US-Switzerland Agreement



# On the Horizon

Flight Standards next evolution certification and surveillance oversight system;

Safety Assurance System (SAS) is risk-based and incorporates data-supported decision making oversight

**SAS**  
Safety Assurance System

**Standardized Oversight**

- Forms a closed-loop business process
- Allocates resources based on risk
- Allows for scalability to Certificate Holder's size and complexity

**System Safety**

- Employs a risk-based, data-supported system
- Optimizes safety by aiding in the identification of risks
- Verifies that safety is built into system design

**SAS Rates**

- Include the following:
  - Initial Certification
  - Continued Operational Safety
  - Assurance Support

**Continuous Improvement**

- Builds on current successes
- Improves the safest aviation system in the world
- Meets future demand and complexity

**SAS Tools**

- Includes data collection tools to:
  - Collect, report, and review data
  - Conduct objective and repeatable oversight

**The Next Evolution of System Safety Oversight**

To leave comments or ask questions about SAS, send an email to [9-AWA-AFS-900-SASO@faa.gov](mailto:9-AWA-AFS-900-SASO@faa.gov), or contact your office START Member.

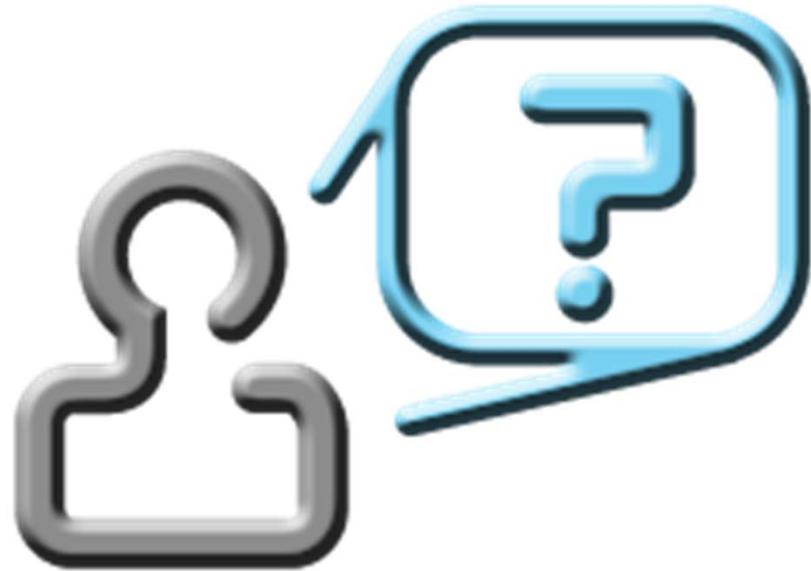
Federal Aviation Administration

# Look Ahead

- **Audits – Repair Stations/Airlines/Maintenance Repair & Overhaul (MRO)**
- **Promotion of Maintenance Voluntary Disclosure Reporting Program**
- **Mobile Maintenance Units**



# Questions



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