

ASA Conference General Session

Regulatory Update

By: Steve Douglas, Manager
Aircraft Maintenance Division, AFS-300

Date: June 8, 2015



**Federal Aviation
Administration**



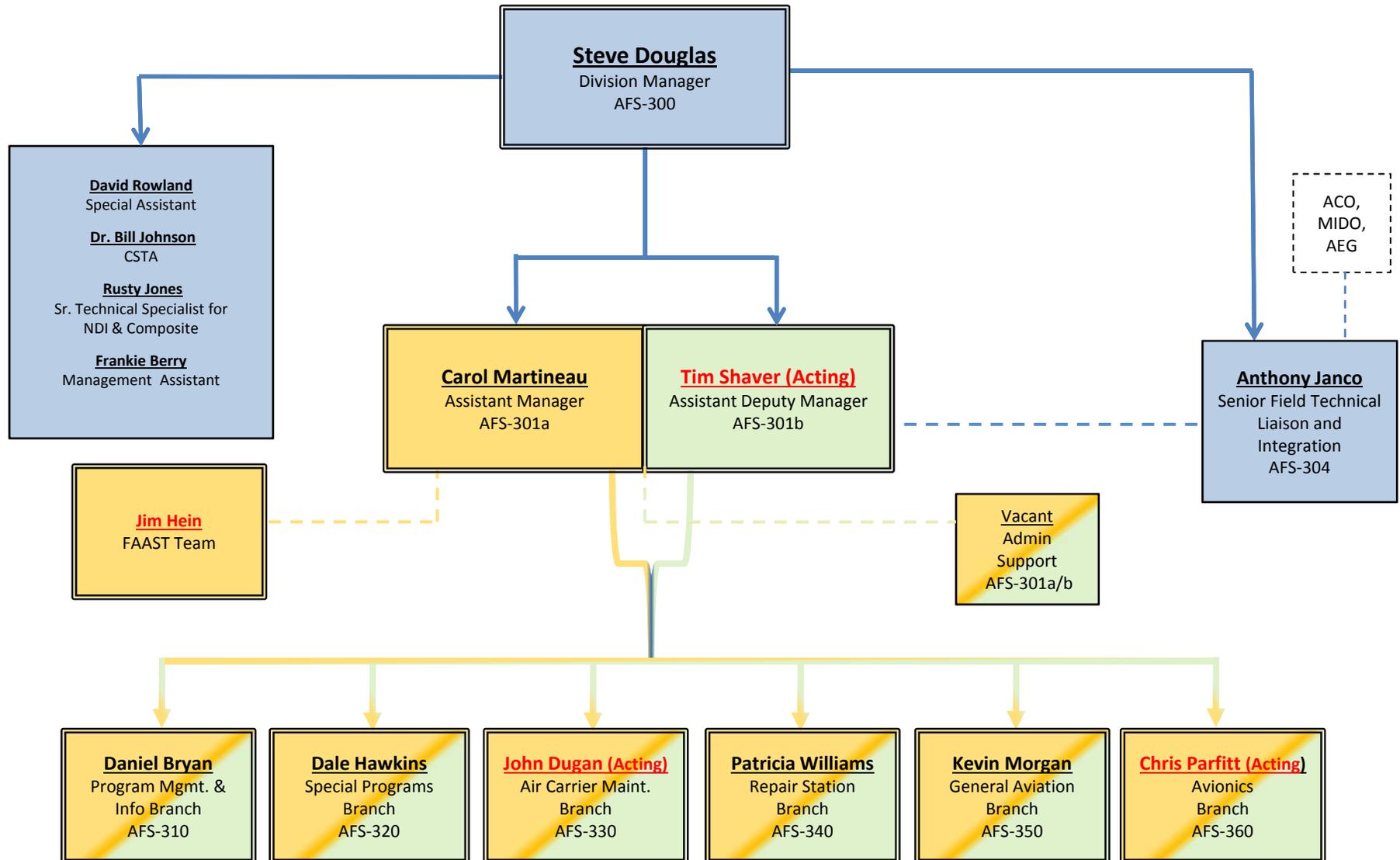
Aircraft Maintenance Division

➤ We develop and establish safety & certification standards and associated guidance material for:

- ☑ General Aviation Maintenance
- ☑ Air Carrier Maintenance
- ☑ Avionics Maintenance
- ☑ Designees
- ☑ Airmen
- ☑ **FAAST Airworthiness**



Aircraft Maintenance Division, AFS-300 Organizational Chart



Rulemaking Activity

Part 145 Repair Stations



- Amends FAA's repair station regulation regarding new certificate applications;
- Adds a new section addressing fraud and falsification of records;
- Enhances safety by reducing the number of individuals in the repair station industry who commit intentional and serious violations of the regulations or who demonstrate they are otherwise unqualified to hold repair stations;
- Edits and cleans up the rule

Status: The Repair Station Final Rule was published August 12, 2014 with an **effective date of November 10, 2014.**

Rulemaking Activity (AIR)

Rulemaking:

- NPRM: FR Docket No. FAA-2013-0933; Notice No. 14-01
- Would allow an FAA production approval holder (PAH) to issue domestic/export tags (8130-3)
 - As a PAH, not as a designee
 - Would require specific, approved procedures in the quality system
- Would not mandate issuance of domestic tags
 - Requirement originates via customer purchase orders and/or bilateral agreements
- A PAH may obtain tags via ODA/DMIR or issue under its quality system, but not both
- Final rule anticipated in Sep 2015

Concerns With 8130-Tags

Review of Current Process

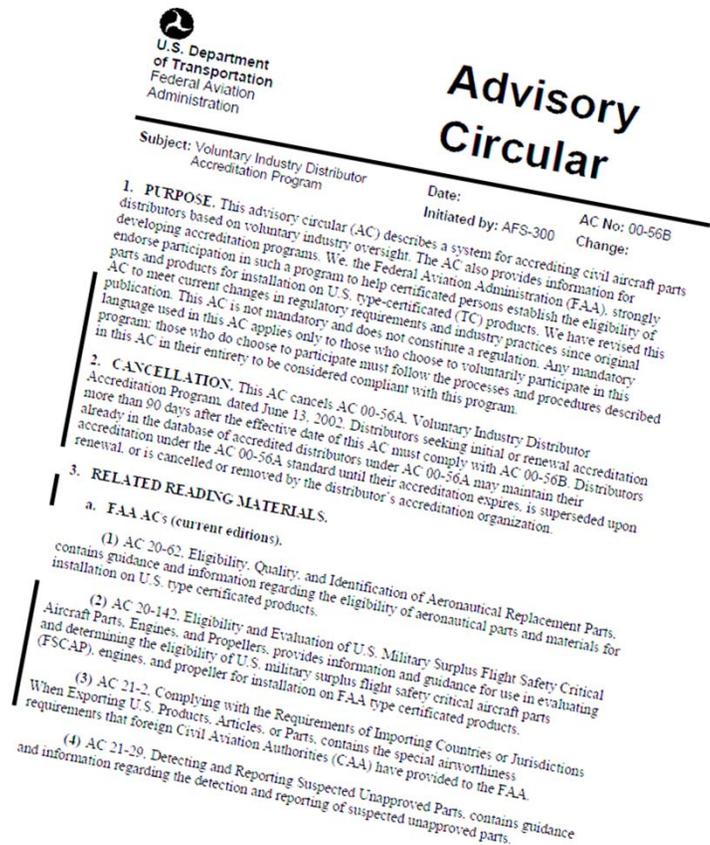
- AIR/AFS Established a team in December 2014 to:
 - Streamline movement of products & articles
 - Decrease burden
- Team reviewed related policies, procedures, & bilateral agreements
- Initial internal management reviews of team recommendations are promising
 - Should greatly simplify use of the tag & decrease burden
- Next step: discuss proposals with bilateral partners

Concerns With 8130-Tags

- Policies, procedures, & bilateral agreements—
 - Are unnecessarily complex
 - Are often unclear
 - Hinder the movement of products & articles
 - Adding burden to industry & FAA
- Source of ongoing confusion
 - Huge topic of FAQ for FAA

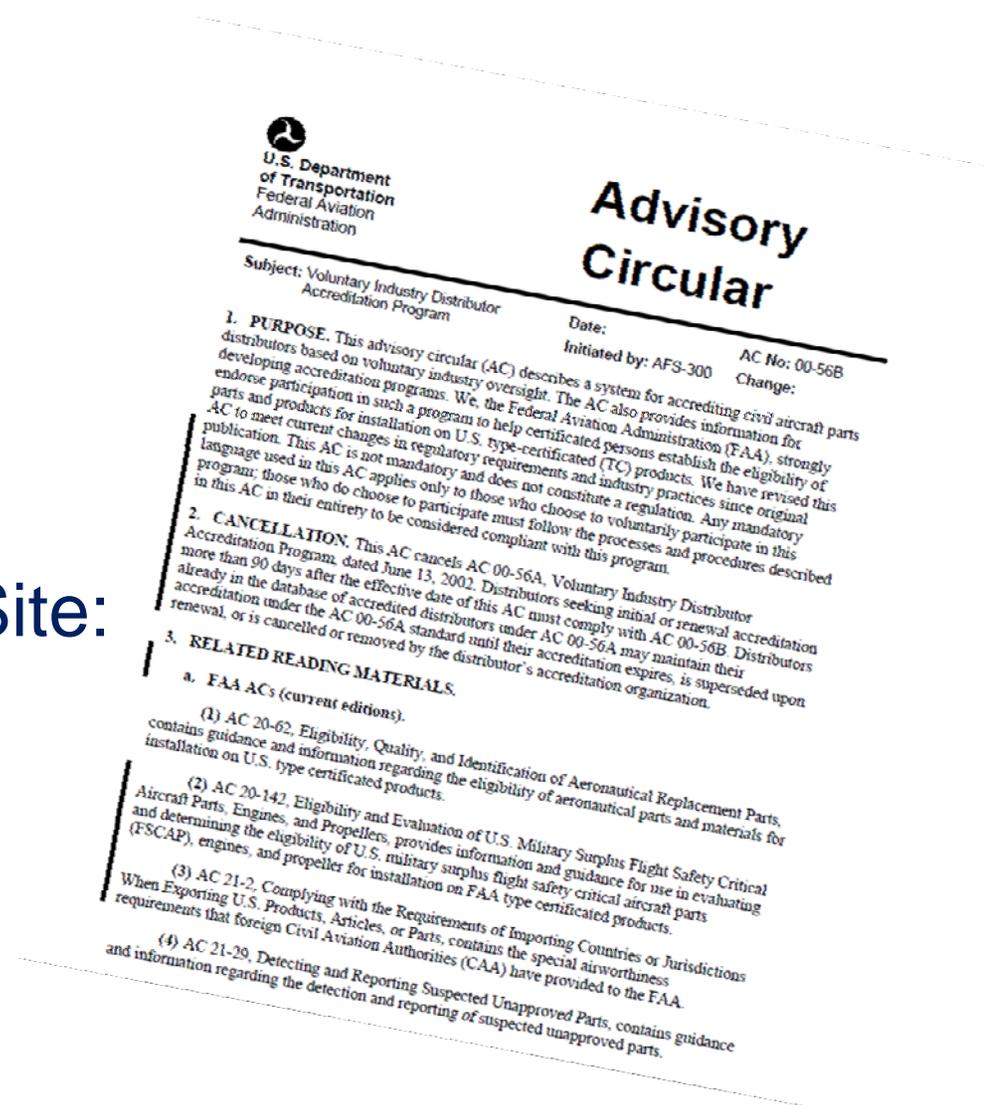
Advisory Circular AC 00-56B

- Public comment period ended January 4, 2015
- 48 public comments received
 - 46 comments adopted
 - 2 comments not accepted

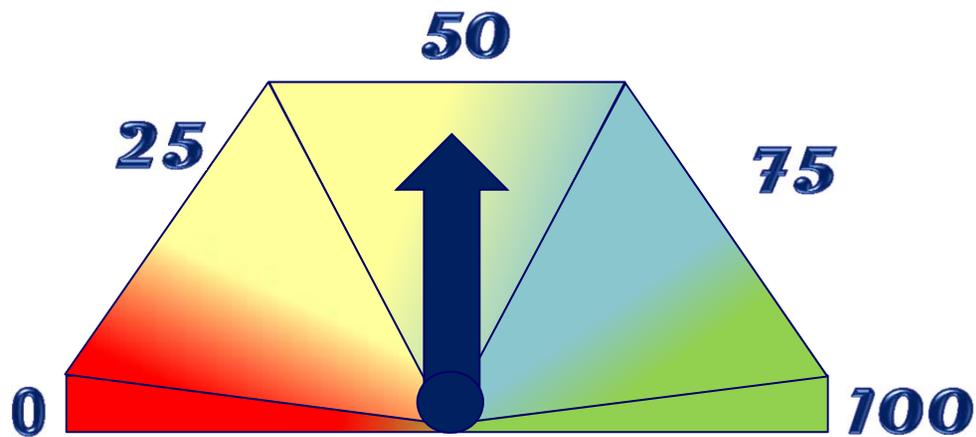


Advisory Circular AC 00-56B

- Published May 27, 2015
- Obtain AC on RGL Site:
<http://rgl.faa.gov/>



Safety Assurance System



50 of the **100**
Field Offices have
transitioned to the
SAS tool

SAS

Safety Assurance System

- 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
- Standardized Oversight**
 - Forms a closed-loop business process
 - Allocates resources based on risk
 - Allows for scalability to Certificate Holder's size and complexity
- SAS Roles**
 - 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 or contact your office START Member.

Federal Aviation Administration

Safety Assurance System

- SAS is not a separate safety standard and does not impose additional requirements on the certificate holders
- SAS is an FAA internal tool used to standardize our work and better identify and track the management of risk.

Federal Aviation
Administration

May 22, 2014

Mr. John Smith
Director of Operations
121/135/145 Certificate Holder, Inc.
123 Main Street
Anytown USA, TX 75001

Dear Mr. Smith:

The Flight Standards Service of the Federal Aviation Administration (FAA) is pleased to announce for an exciting change in the way we conduct business. Over the next two years, we will be transitioning to a risk-based, data-supported oversight system known as the Safety Assurance System (SAS).

SAS is based on system safety principles, safety attribution, and data-driven oversight. It is a logical evolution in the way the FAA conducts oversight. SAS will be used for standardization for initial certification, Continued Operational Support (COS), and other management activities.

During the initial phase of deployment, the FAA will be working with a subset of those certificate holders held under Title 14 of the Code of Federal Regulations (14 CFR) parts 121, 135, and 145 will transition to SAS in the next few months. Certificate holders held under different CFR parts may transition to SAS in the future.

It is important to note that SAS is not a separate safety standard and does not impose additional requirements on certificate holders. SAS is an internal tool that Principal Investigator Management Teams (CMT) will use to standardize their work and better identify and track the management of risk.

One of the key features of the SAS that I believe will be a great benefit to you is the External Portal – a secure, user-friendly, web-based interface for both existing certificate holders and applicants. Certificate holders and applicants can use the External Portal to submit or view the following:

- Configuration Data (*information about the scope and nature of your operation*)
- Changes to the scope of your operation
- Manuals and manual revisions
- Scoped Data Collection Tools (*What systems, and subsystems will be surveyed within the scope of your operation*)

Letter to Certificate Holders

Safety Assurance System

Noteworthy feature of SAS

External Portal- certificate holders and applicants can use the portal to submit or view the following:

- Configuration Data
- Changes to the scope of your operation
- Scoped Data Collection Tools
- For certification purposes;
 - Pre-Application Statement of Intent (PASI)



Maintenance,

Repair and

Overhaul (MRO)

Audit and Data

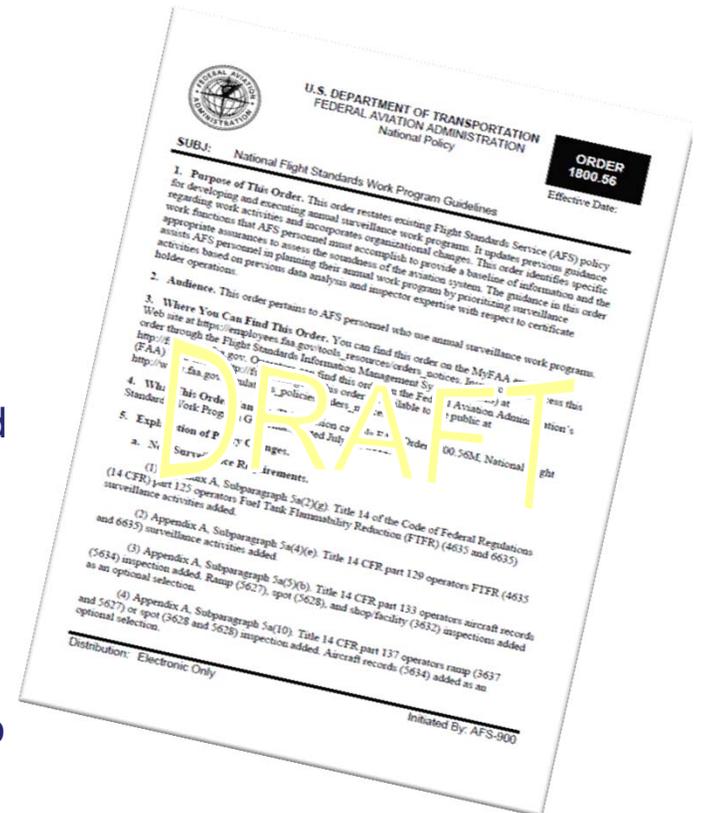
Sharing Initiative

Addressing the Issue

➤ We are initiating a new auditing concept for MROs: *MRO Audit and Data Sharing Initiative*

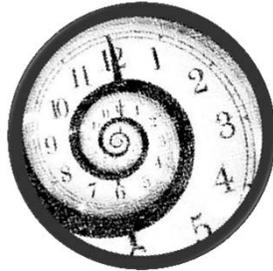
➤ Goals of this initiative are:

- ✓ Develop a process that will **reduce the number of unnecessary audits**. (Includes the multitude of regulator audits as well as those audits performed by certificated entities on each other)
- ✓ Develop a technical “Information Sharing of Safety Data” process that facilitates access to de-identified safety data of any participating MRO, airline, or regulator.
- ✓ Focused risk-based inspections **supported by data**, in lieu of random selection.
- ✓ Address Safety Management Systems as related to these audits.



Areas for Improvement

- Standardize audit techniques and systems to review audits performed by regulators and customers.



INEFFICIENCY



- Reduce redundancy of audits not only with MROs and airlines, but with FAA resources.

Duplication
Duplication
Duplication
Duplication

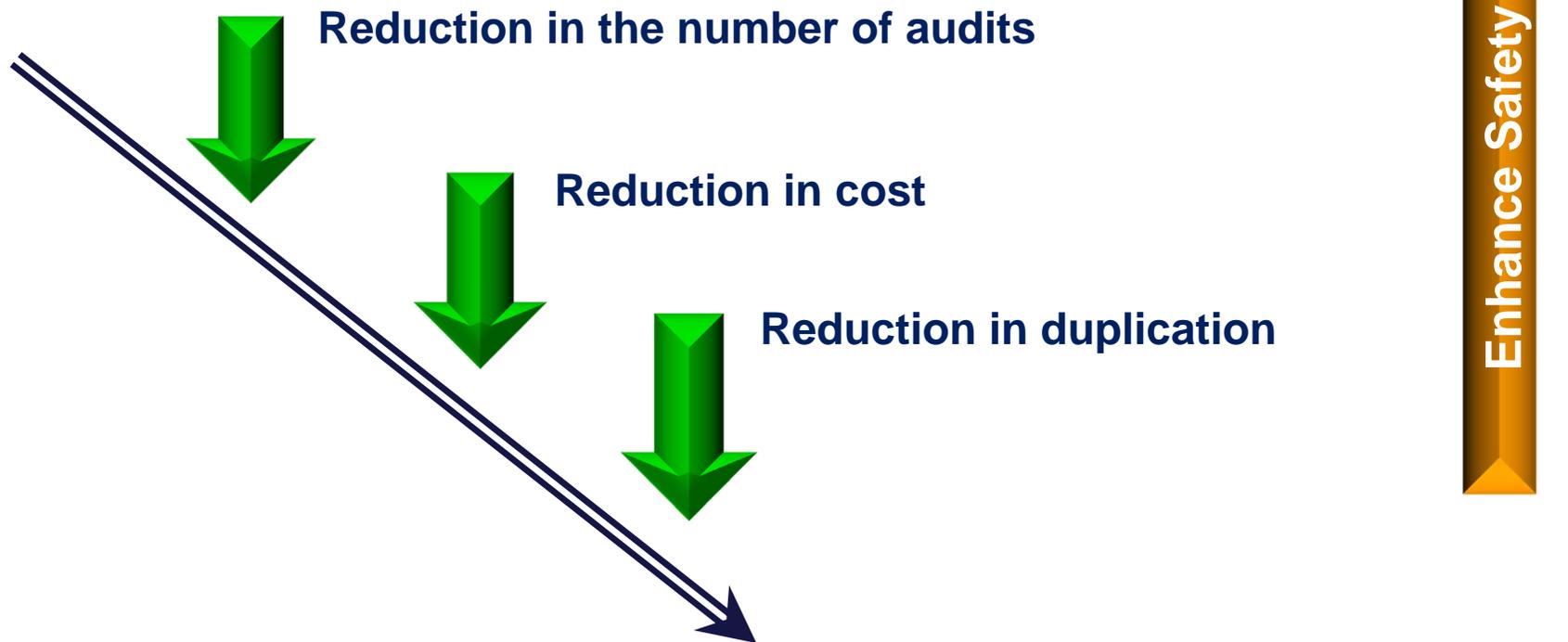


Manpower
and
Resources

Outcome

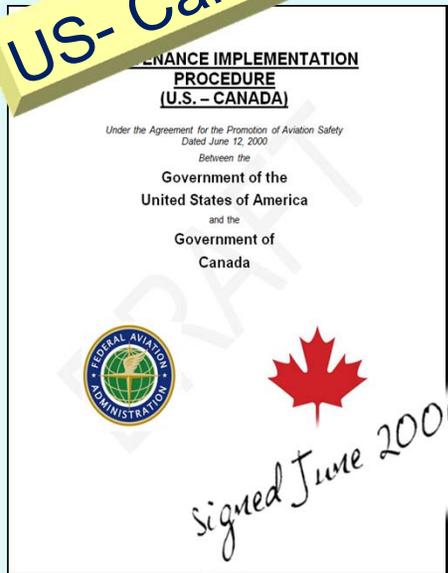
Streamlined and standardized audits +

Sharing of data =



Global Leadership

US-Canada



US- European Union



US-Switzerland



Singapore MIP

In Progress

 **Federal Aviation Administration**

Memorandum

Date: DEC 23 2013
To: John Duncan, Director, Flight Standards Service, AFS-1
THRU: John Barbagallo, Manager, International Programs and Policy Division, AFS-50
From: Steven W. Douglas, Manager, Aircraft Maintenance Division, AFS-300
Prepared by: Paul Cloutier, ASI, Repair Station Branch, AFS-340
Subject: ACTION: Decision to Pursue MIP with the Republic of Singapore, Civil Aviation Authority of Singapore (CAAS)

The Federal Aviation Administration is considering the pursuit of a Maintenance Implementation Procedure (MIP) with the Republic of Singapore, Civil Aviation Authority of Singapore (CAAS). Singapore currently has 53 FAA certificated repair stations and a BASA pertaining to a Maintenance Agreement. AFS-300 has not received a completed assessment job aid from the CAAS, therefore the estimated costs are based on similar MIP travel requirements, adjusted for Singapore's geographical location.

In accordance with Order 8000.85A (Program for the Establishment of a BASA) the team has prepared an action plan detailing the MIP with the CAAS. The following highlights the resource requirements. Please refer to the attached for a MIP with the CAAS.

FAA Capability A representative from AFS-300 (team leader) and a representative from Singapore would need to conduct an in-country assessment at the CAAS headquarters in Singapore to assess the ability of the repair stations under surveillance on behalf of the FAA. The estimated cost of the assessment is \$21,097.

Regulatory Comparison: AFS-300, in conjunction with the team, will review all CAAS regulations, procedures, and guidance pertaining to the certification of repair stations. The comparison is estimated to be completed within 90 days of receipt of the CAAS assessment job aid.

Decision to Pursue

As of February 20, 2014 there are 53 (7.5%) US repair stations based in Singapore and 11 on the CSOP List.

As of March 13, 2014, there are 6 AMO's based in the US with CAAS authorization.



Questions



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