

8130-3 Tag Privileges for Manufacturers under 21.137(o)

New Privilege for PAHs

- Production Approval Holders
 - New regulation 21.137(o) authorizes PAHs to issue 8130-3 tags (published October 1, 2015)
 - PAHs must have procedures for
 - Selection
 - Appointment
 - Training
 - Management, and
 - Removal
 - of individuals authorized by the production approval holder to issue authorized release documents.

Other Details

- Additional FAA guidance was issued in a June 24 Memorandum
- Contrary to past guidance, PAHs do not need to immediately surrender their ODA 8130-3 privileges
 - But the deadline for surrendering 8130-3 functions is April 1, 2018
- PAHs do not need FAA approval of the 21.137(o) procedures before implementing
 - Simply process the changes and notify the FAA like any other change to the production quality system, per 14 C.F.R. § 21.150

Caution

- Most BASAs still anticipate FAA as the course of 8130-3 tags
- Some authorities may be reticent to take PAH 8130-3 tags, until they get used to the change