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August 6, 2010

DELIVERY VIA E-MAIL: Brennen.D.Roberts@faa.gov

Brennen D. Roberts
Aerospace Engineer
Federal Aviation Administration
Delegation and Airworthiness Programs Branch—AIR 140
6500 South MacArthur Boulevard
Room 308
Oklahoma City, OK 73169-6919

RE: ARSA Comments to Draft Order 8110-103A

Dear Mr. Roberts:

First, let me apologize for not making the July 29, 2010 deadline for comments to the referenced document. The importance of ensuring that the order was in complete compliance with the applicable regulations and the work of the Airworthiness Directive Implementation Aviation Rulemaking Committee (AD-ARC) caused a delay in completing our comments.

Please find attached a Microsoft Word version of the original draft with our tracked changes and comments. We hope this will make it easier for the agency to provide a comprehensive review of our suggested changes and specific concerns.

The draft document outlines the internal agency requirements that should be followed when its personnel review and approve or deny a request for an Alternative Means of Compliance (AMOC) to an AD.

The Aeronautical Repair Station Association (ARSA) attempted to rewrite the draft Order to conform to the regulatory responsibilities of the agency and to ensure AMOCs are only issued when an alternative means of compliance is necessary. Specifically it:

- Added a paragraph describing the “means of compliance”, including instructions on how to determine whether an AMOC is appropriate;
- Added paragraphs on the review and research an evaluator should conduct to determine: (1) the nature and extent of the unsafe condition, (2) the actions necessary to address that condition to help determine whether an AMOC is needed, and (3) whether an AMOC proposal will result in an equivalent level of safety;
- Deleted outdated and/or unnecessary information;
- Attempted to ensure consistency between and among paragraphs; and,
- Attempted to ensure consistent formatting throughout the document.

The association also included numerous comments to various sections and paragraphs questioning the inclusion or appropriateness of certain information. We are hopeful that the

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FAA will review each of these suggestions and consult with its legal department to ensure that it is providing the appropriate information to its workforce on this important issue.

We appreciate the opportunity to provide our comments. If you have any questions or wish further information, please do not hesitate to contact me.

Your Servant,

A handwritten signature in blue ink, appearing to read "Sarah MacLeod". The signature is fluid and cursive, with a large loop at the end.

Sarah MacLeod
Executive Director

cc: Steve Douglas
Paula Martori
Douglas Anderson

Steven.W.Douglas@faa.gov
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Attachments: Microsoft document "8110_103A_Draft_ARSAcomments-20100805.doc"