



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Transport Airplane Directorate  
Aircraft Certification Service**

1601 Lind Avenue Southwest  
Renton, Washington 98057-3356

**FEB 9 2009**

In Reply

Refer To: 140S-09-58

Mr. Jordan B. Zundell  
Lead Project Administrator, Production and Retrofit  
BCA Delegated Compliance Organization  
P.O. Box 3707, M/C 63-73  
Seattle, WA 98124-2207

Dear Mr. Zundell:

**Subject: Federal Aviation Administration Clarification of Items Related to Special  
Federal Aviation Regulation 88 Maintenance Requirements**

The Seattle Aircraft Certification Office (ACO) initiated Airworthiness Directives (AD) applicable to each Boeing Model manufactured in the Puget Sound that require operators to revise their the Federal Aviation Administration (FAA)-approved maintenance program by incorporating certain airworthiness limitations (AWL) for fuel tank systems to satisfy Special Federal Aviation Regulation (SFAR) No. 88 requirements. The ADs were issued by the FAA to prevent the potential for ignition sources inside fuel tanks caused by certain fuel system failure conditions.

There have been several requests from the public to clarify certain aspects of the content in the AWL section within Section 9 of Boeing Maintenance Planning Data (MPD) Documents for multiple Boeing models. We have provided clarification below, and we request that this letter be distributed to your operators via a Multi-Operator Message (MOM) for their clarification.

**1. Scope of FAA-Approved Airworthiness Limitations:**

For references cited in the Boeing AWLs, such as references to the aircraft maintenance manual (AMM), that do not require use of a specific version of a document, it was not our intent to approve the referenced document or control its configuration other than through the normal review and acceptance process for instructions for continued airworthiness (ICA). Different versions of those documents may be used without approval as an alternative method of compliance (AMOC) with the applicable Airworthiness Directive (AD). However, use of a different document would require AMOC approval in accordance with the applicable AD.

The references to component maintenance manuals (CMM) in the AWLs added by the recent ADs cite a specific version of each CMM that must be used. It was our intent to control the configuration of those documents. Use of any other CMM version, deviation, or other alternative procedure therefore requires FAA approval.

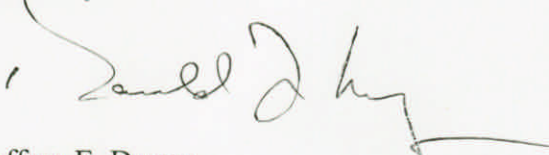
## 2. **MPD Use of Alternate Tools and Materials:**

We have recently been asked to confirm that the use of equivalent tooling or materials, if shown to be equivalent, are allowed without further approval by the Seattle ACO. The current wording in the approved Boeing MPDs state that "For AWLs which require use of certain tools, use of alternate tools requires prior approval from the Seattle ACO." It was the FAA's intent to require strict compliance with the original equipment manufacturer (OEM) CMM, so where there is no such allowance in the CMM for alternate tooling or materials, then the alternative procedures must be substantiated and submitted to the Seattle Aircraft Certification Office for approval prior to use. However, if alternate equipment or equivalent materials are currently permitted by a CMM, then further review and approval by the ACO is not required.

It should also be emphasized that the use of equivalency only applies to equipment, materials, and tools used for maintaining a part where that equivalency is permitted by the OEM CMM. It is not the intent to permit equivalency for materials or parts that would change the configuration of the component, except where that alternate material or part is already identified in the OEM CMM procedures and is permitted by the type design (in the applicable engineering drawings and/or engineering specifications) for that component.

If you have any further questions, please contact Mr. Thomas Thorson of the Propulsion Branch at telephone number (425) 917-6508.

Sincerely,



*for* Jeffrey E. Duven  
Manager, Seattle Aircraft  
Certification Office, ANM-100S