

[Honeywell Letterhead]

December X, 2011

BY E-MAIL TO: [E-mail address]

ORIGINAL BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT NO: _____

Edith Stein
Manager, Quality Assurance
Maintenance and Engineering
Southwest Airlines
2832 Shorecrest Drive
Dallas, Texas 75235

RE: Letter regarding Outsourced Provider Standards Manual dated October 17, 2011

Dear Ms. Stein:

Honeywell shares Southwest Airlines' (SWA) views regarding continual operation to the highest standards of safety and compliance. Accordingly, Honeywell is fully compliant with the Federal Aviation Administration (FAA) regulations pertaining to the work it performs. In light of that fact, our earlier response to SWA's letter dated October 17, 2011 warrants further discussion.

Although Honeywell continually strives to support its customers' needs, the issues raised in the letter have far reaching consequences for the industry.¹ As a result, we discussed the topics of major repairs, deviations from work instructions and maintenance record requirements with the Aeronautical Repair Station Association (ARSA); it has agreed to address the age-old uncertainties surrounding major repair determinations and the applicability of part 43, Appendix A.² We hope that SWA will join us in supporting that effort.

In the meantime, we respectfully ask SWA to revisit its conclusion regarding § 121.707 requirements.³ That section, titled, "Alteration and repair reports" provides that:

¹ That is the case due to SWA's leadership role, and the likelihood that its beliefs will spread to other operators and, in turn, their maintenance providers.

² All references in this letter are to Title 14 of the Code of Federal Regulations (14 CFR).

³ Specifically, the letter stated that: "SWA is required to prepare and submit to the FAA a report of major repairs and alterations. Improper classification of a repair may result in a violation of 14 CFR 121.707."

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(a) Each certificate holder shall, promptly upon its completion, prepare a report of each major alteration or major repair of an airframe, aircraft engine, propeller, or appliance of an aircraft operated by it.

(b) The certificate holder shall submit a copy of each report of a major alteration to, and shall keep a copy of each report of a major repair available for inspection by, the representative of the Administrator who is assigned to it. (*Emphasis added*)

As highlighted, the rule requires that for major repairs, an air carrier must: 1) create a report; and 2) keep the report and make it available for inspection by the FAA.

If, as outlined in the October 17 letter, SWA considers appliance repairs contained in part 43, Appendix A as major, then all components sent to Honeywell can be listed on a § 121.707 report, either at your request or from your own system. The maintenance records provided by Honeywell at the completion of work already satisfy the major repair recording requirements,⁴ as our maintenance records state that the work is performed using service information developed by the manufacturer. If any *other* major repairs are performed, they are also recorded as required by FAA Order 8130.21G.⁵

For additional clarification, the regulatory definition of “appliance” states that:

Appliance means any instrument, mechanism, equipment, part, apparatus, appurtenance, or accessory, including communications equipment, that is used or intended to be used in operating or controlling an aircraft in flight, is installed in or attached to the aircraft, and is not part of an airframe, engine, or propeller.⁶
(*Emphasis added*)

As such, Honeywell considers the following elements when identifying appliances:

(1) Is the unit part of an engine or propeller? If so, it is **not** an appliance (e.g., an electronic engine control unit is not an appliance).⁷

⁴ See part 43, Appendix B, paragraph (b), which contains the major repair recording provision that is specific to certificated repair stations.

⁵ And, for FAA/EASA “dual release”, Maintenance Annex Guidance (MAG) Section B.

⁶ See § 1.1.

⁷ As provided in § 1.1, “*Aircraft engine* means an engine that is used or intended to be used for propelling aircraft. It includes turbosuperchargers, appurtenances, and accessories necessary for its functioning, but does not include propellers”. (*Emphasis added*)

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- (2) Is the unit part of an airframe? If so, it is **not** an appliance (e.g., a landing gear control interface unit is not an appliance).⁸
- (3) Is the unit used to operate the aircraft in flight? If so, it **is** an appliance (e.g., a communications transceiver is an appliance).
- (4) Is the unit used to control the aircraft in flight? If so, it **is** an appliance (e.g., a flight management computer is an appliance).

In any case, violation of § 121.707 should not be at the root of SWA's recent procedural notification.⁹ Of course, Honeywell stands ready to serve the needs of SWA, and we are confident that our relationship is strengthened through mutual recognition of the regulatory structure that currently exists for both parties. With that in mind, we anticipate future communication as ARSA's efforts move forward.

We appreciate your business, and we look forward to our continued dialogue on these issues. Please contact me if you would like to further discuss this letter, or any other matter.

Sincerely,

⁸ As provided in § 1.1, "*Airframe* means the fuselage, booms, nacelles, cowlings, fairings, airfoil surfaces (including rotors but excluding propellers and rotating airfoils of engines), and landing gear of an aircraft and their accessories and controls." (*Emphasis added*)

⁹ The fact that the SWA outsourced provider standards manual (OSPM) is under development prompted us to communicate our views.