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Sent via facsimile
With transmission confirmed: 214.277.8570

Original by certified mail
Return receipt requested
Receipt Number: 7011 0110 0001 3259 4089

Lewis C. Gonzales Jr.
North Texas Flight Standards District Office
8700 Freeport Parkway
Suite 225
Irving, Texas 75063-1944

RE: Acceptance of requests by "hard copy" only

Dear Mr. Gonzales:

It has come to the association's attention that you have instituted a local office policy that requests for action from the public or certificate holders are only accepted by facsimile or other "hard copy" format.¹ The purpose of this new policy is to ensure proper workflow within your office.

While we certainly appreciate the desire to ensure tracking of official governmental matters, there are several laws and FAA directives that do not support your restrictive methodology.

The agency certainly may dictate the "form and manner" acceptable for specific actions.² However, when a form is not approved and provided in accordance with the Paperwork Reduction Act the FAA's national policy would become the acceptable form and manner for transmitting requests or information to the agency. The FAA has specifically acknowledged that the Electronic Signatures in Global and National Commerce Act requires the government to handle electronic transmissions just like "traditional" methods of communication, i.e., "hard copy" transmissions.³

¹ The local policy only allows "hard copy" transmissions; facsimile is a form of hard copy. The other possible "hard copy" delivery methods are hand (personal or messenger), United States Postal Service or overnight.

² Even where there are "official" forms, the agency is now "demanding" electronic submissions, for example FAA Form 337 submittals, Service Difficulty Reports and voluntary disclosure documentation may (and indeed in some cases, must) be provided electronically.

³ For repair stations in particular, see the note in Order 8900.1, Vol. 2, Chapter 11, Section 4, paragraph 2-1299B, which begins: "Federal agencies can no longer refuse electronic versions of manuals, forms,

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The FAA's internal guidance to all aviation safety inspectors, found in Order 8900.1, does not support limiting requests to facsimile or hard copy. The directive allows the acceptance of verbal and email requests. This is particularly true when it comes to certificate holders submitting requests for approval under established methods in FAA-required manuals.⁴

Your local office's method for ensuring all requests are properly recorded, tracked and fulfilled (i.e., work flow project tracking requirements are met) is readily adaptable to all forms of transmission. It would be a simple matter of forwarding an email request to the point person for proper entry and tracking. Alternatively, the office can make more efficient use of the PTRS entry requirements set forth in the Order 8900.1.⁵

The association understands that most certificate holders under your office's jurisdiction have operated successfully and efficiently using email and verbal communications to request or fulfill queries. The restrictions recently imposed are contrary to effective management and create more bureaucracy than is necessary to ensure jobs are completed properly and in a timely manner.

Please reconsider your prohibition against receiving requests in other than hard copy transmissions.

Your Servant,



Sarah MacLeod
Executive Director

cc: Timothy D. Miller
John S. Duncan

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record systems, etc. Federal law prohibits agencies from making the use of electronic media more difficult, or from requiring additional steps or procedures for users of electronic media."

⁴ See, numerous references in Order 8900.1, Vol. 2, Chapter 11, Section 1-4, Vol. 3, Chapter 55, Section 1 to acceptable methods for transmitting updates, revisions, approval and acceptance of manuals, forms, capability lists, maintenance functions and the like.

⁵ See, <http://fsims.faa.gov/PICDetail.aspx?docId=8900.1,Vol.8,Ch3,Sec2> for details on use of the PTRS for documenting, tracking and ensuring proper workflow of verbal and electronic requests.