

ARSA Requests Interpretation on AMOC Order

On Aug. 28, ARSA sent the Federal Aviation Administration (FAA) a [request](#) for a legal interpretation confirming question “f” in the appendix of [Order 8110.103A](#) is inaccurate and that it and the answer will either be corrected or removed.

The question and answer listed in the Order are as follows:

Question: The AD requires that I accomplish specific instructions in a SB [Service Bulletin]. Those instructions require actions from a manual, and the manual requires actions from a standard practice manual. My operating procedure differs from the standard practice manual. Do I need an AMOC [Alternative Methods of Compliance] to keep using my operating procedure?

Answer: Yes. You must accomplish the specific instructions in the SB specified in the AD (Airworthiness Directive), including any second- or third-tier documents that are required to complete the action(s).

ADs are part of the Code of Federal Regulations and are therefore subject to the Administrative Procedures Act, which requires an agency obtain approval for each document it wishes to incorporate by reference (IBR) in a rule. In its request, ARSA argued the answer to question “f” does not make clear what exactly is “required to complete the action(s),” and that the language in the Order does not comply with the requirements governing IBRs.

Stay tuned to ARSA for the FAA's interpretation.