

Aircraft Certification Service Update



Federal Aviation
Administration



Presented to: Aeronautical Repair Station Association

By: Dorenda Baker, Director,
Aircraft Certification Service

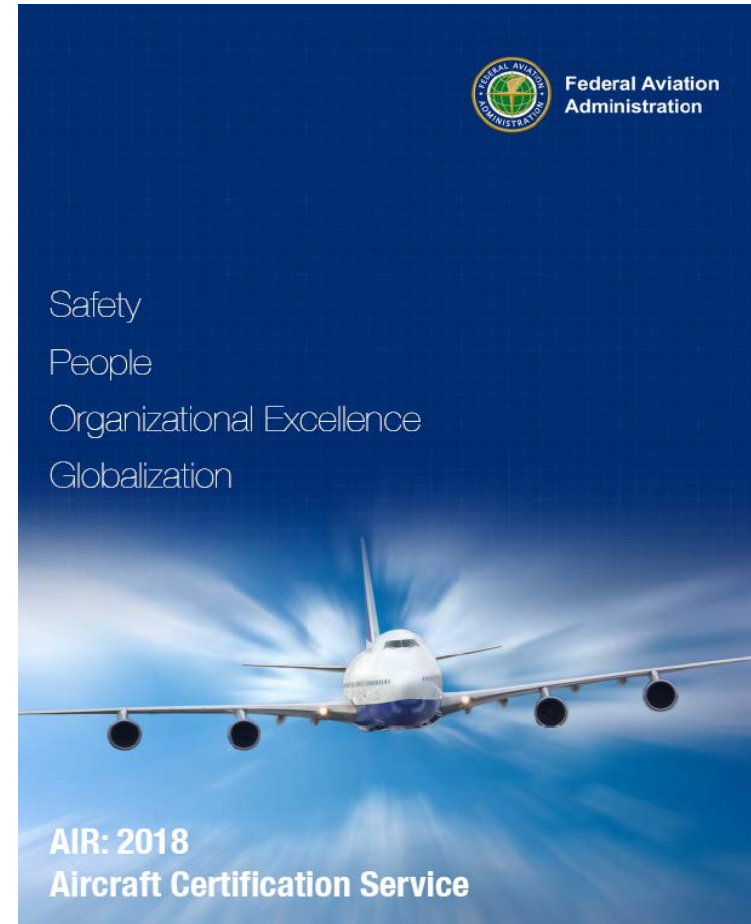
Date: March 17, 2016

Agenda

- **From Certification Reform to AIR Transformation**
- **Refreshing Certification Strategy**
 - What are the benefits for Industry?
- **Investing in Management Systems**
 - ODA Scorecard as a tool and process for AIR Transformation
 - Prototype Findings and Results
 - Next Steps: 2016 ODA Scorecard Plan
- **Improving our Organization**
- **Industry Commitment**



Our Journey to Transforming AIR



AIR Transformation Improves Efficiency and Effectiveness

AIR Transformation



Refresh certification strategy

- Ensure appropriate support of standards activities
- Minimize unnecessary involvement in critical path
- Implement risk-based systems oversight



Invest in management systems to improve performance

- Measure performance with goals and targets
- Improve governance and operating norms
- Invest in new tools and infrastructure



Improve organization and invest in our people

- Adapt organization to execute on certification strategy
- Invest in people and build skills to empower the workforce of the future

Change management

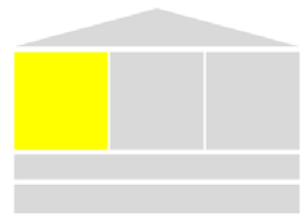
Help organization embrace holistic transformation by creating clear communication channels with our people

Industry commitments

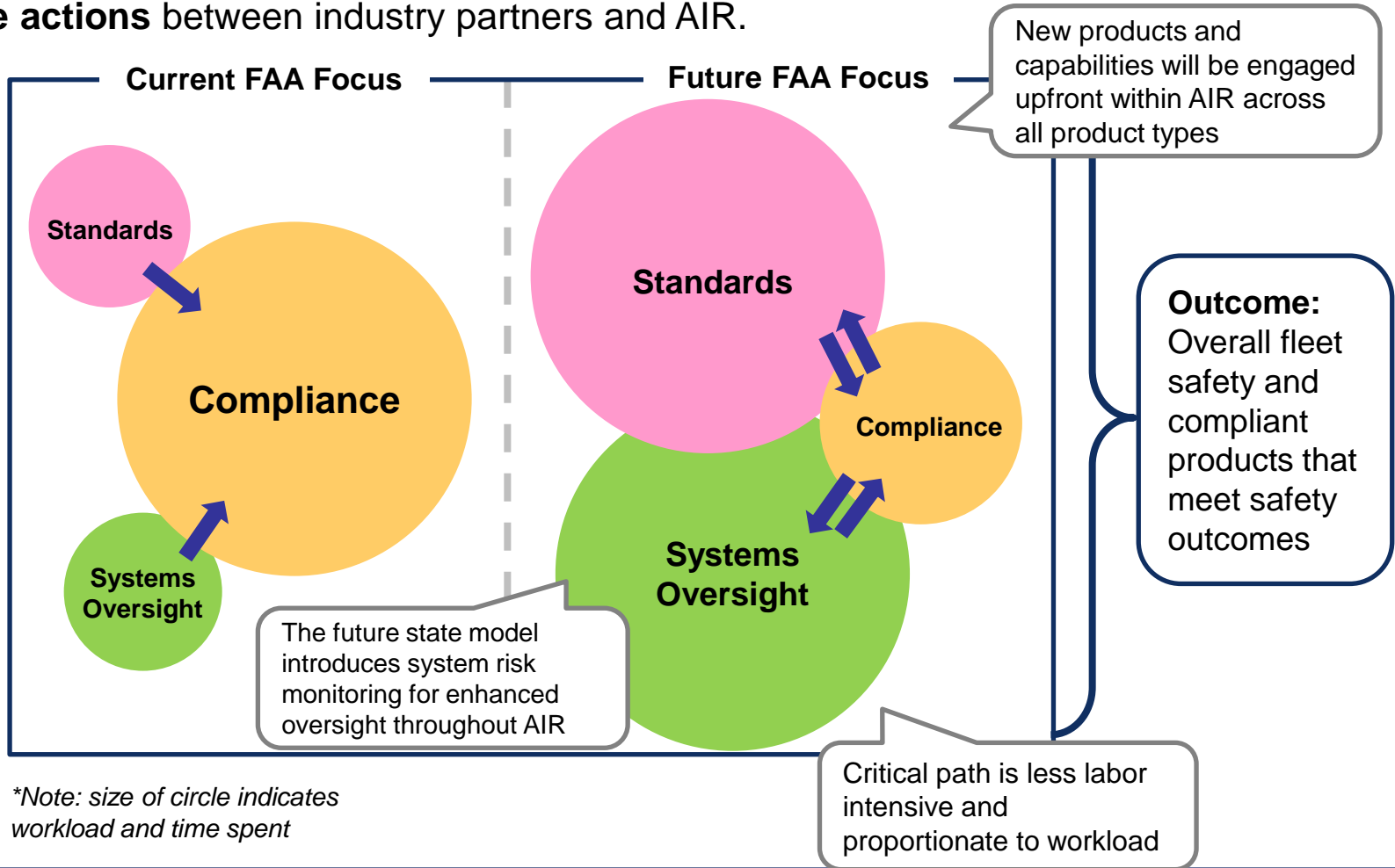
Embrace systems safety with a compliance culture, engage FAA early on innovation, and work with FAA on performance management



Refresh Certification Strategy



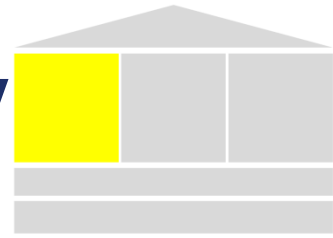
AIR's future state model will streamline compliance activities and promotes **early and iterative actions** between industry partners and AIR.



**Note: size of circle indicates workload and time spent*

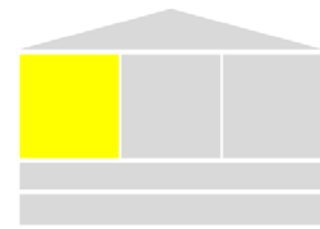


Refreshing Certification Strategy



- Revised [Part 21](#)
- Institutionalized RBRTa and RBRTo to provide a recommended level of FAA involvement
- Published new guidance to reduce level of FAA involvement
 - Applicant Showing on [Standard Certification](#) and [ODA Projects](#)
 - No Program Notification Letters (PNL)
 - Deviation to FAA Order 8100.15A for [PNL](#)
 - PNL Requirements for [ADS-B Out](#) Certification Projects
 - PNL Requirements for [Supplemental Type Certificate \(STC\) Organization Designation Authorization \(ODA\) Projects](#)
 - [ODA Procedures on PNL Requirements](#) for ADS-B Out Certification Projects

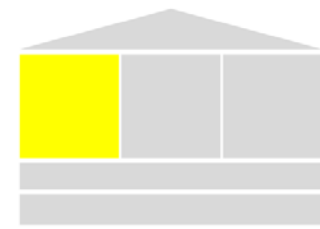




Validation Improvement – CMT

- **Certification Management Team Charter**
 - FAA, EASA, TCCA, ANAC formed the CMT to collaborate on multi-lateral topics
 - Resolve certification issues in a multi-lateral way
 - Greater emphasis on creating broad solutions
 - Promote seamless exchange of products from one State to another; more efficient for industry and authorities
 - Product groups to resolve technical issues and promote policy harmonization
 - Based on industry request for a multi-lateral agreement – achieve functional alignment by harmonizing principles/procedures in agreements.



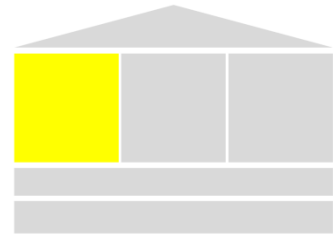


Validation Improvement – CMT

- **Working CMT to leverage our bilateral agreements**
 - CMT Roadmap under development:
 - Improve validation process by applying risk-based level of involvement
 - work-plan concept for top-down oversight
 - measure and monitor performance
 - Streamline validation - accept CA approvals without further technical involvement and issue VA approval
 - criteria for basic STCs developed
 - develop criteria for “simple” TCs for some small airplanes, rotorcraft and engines and propellers
 - Reciprocal acceptance of TSO approvals



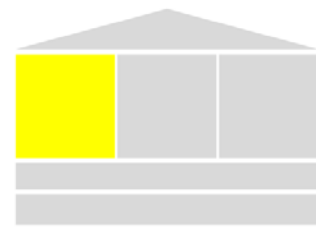
Refreshing Certification Strategy – Parallel International Efforts



- **Working with international partners to leverage our bilateral agreements with respect to certificate management activities**
 - With Canada and European Union
 - Implemented reciprocal acceptance for TSOA
 - Streamlined STC validation by accepting certification authority Basic STCs without further review to issue validating authority STC (TIP Rev 5 with EASA only)
 - Improving validation programs by focusing level of involvement in key areas and monitoring performance



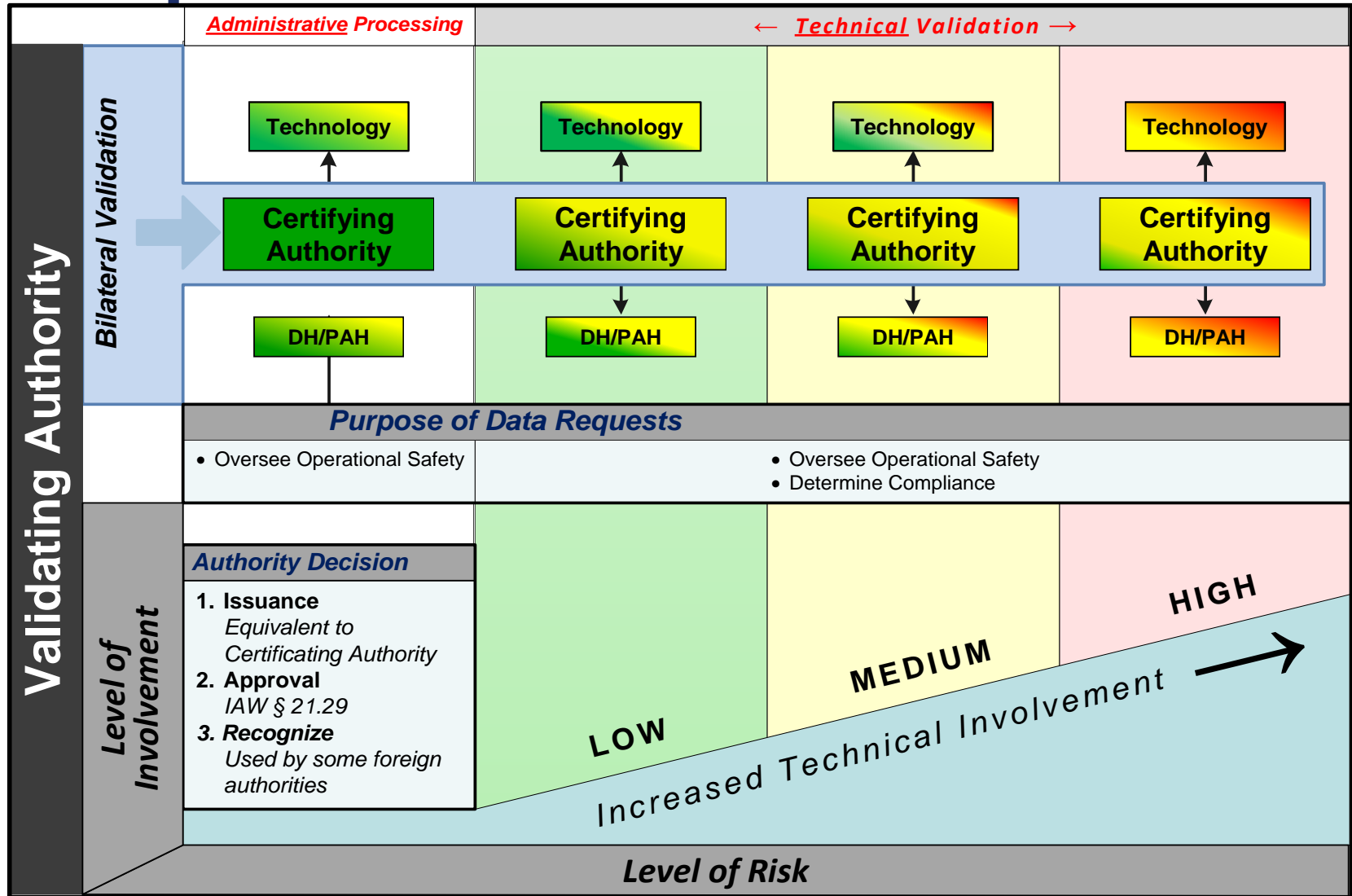
Validation Improvement – ANAC



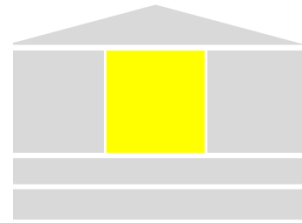
- **FAA-ANAC (Brazil) – IPA Revision 2016**
 - Accept each other's TSO Articles *without* issuing its own design equivalent design approval.
 - Accept each other's Basic STCs and issue its own equivalent without technical involvement



Comprehensive Validation Risk Model



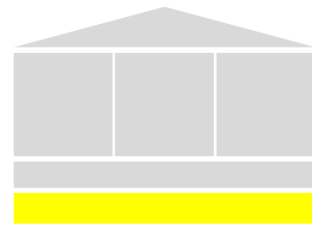
Investing in Management Systems



- **Implemented ODA Scorecard Prototype as a tool and process for culture change**
 - Collaboration
 - Open dialogue and transparency
 - Accountability
 - Valuing each other
 - Planning for the future
 - Continuous improvement
- **Joint standardized measurement tool and data with flexibility to add custom data when needed**
- **Promotes partnering, mutual accountability and objective measurements of progress.**



Industry Commitment



- **CFR Title 14 Part 21.20: Compliance with applicable requirements**
 - The applicant for a type certificate, including an amended or supplemental type certificate, must—
 - (a) Show compliance with all applicable requirements and must provide the FAA the means by which such compliance has been shown; and
 - (b) **Provide a statement certifying that the applicant has complied with the applicable requirements**

[FAA-2006-25877, Amdt. 21-92, [74 FR 53385](#), Oct. 16, 2009]

Embrace systems safety with a compliance culture, engage FAA early on innovation, and work with FAA on performance management



Questions?



MAG Change 5 Updates

- **U.S.- based repair stations raised concerns regarding**
 - Requirement to issue 8130-3 for all parts shipped to all EASA repair stations
 - Effective date of the MAG and the revision to part 21 did not align.
- **Industry recommended the MAG change be aligned with the change to part 21**
 - FAA and EASA agreed to change the date of the MAG to April, 1
 - The effective date of the part 21 rule changed to Jan, 4



MAG Change 5 – Field Feedback

- **MAG Change 5 impact has resulted in PAHs seeking and/or requesting additional DMIRs.**
 - Since there is no mandate to pursue 21.137(o), they prefer to request a DMIR.
 - There is no cost for training DMIRs (tags only) and the PAH would not be required to make changes to their quality procedures.



PAH Issuing Authorized Release Documents (ARDs)

- **How many companies have been approved to issue ARDs?**
 - 3 PAH has incorporated 21.137(o) provisions.
- **Approximately 14 companies are working with their MIDOs to develop 21.137(o) procedures.**



PAH Issuing Authorized Release Documents (ARDs)

- **Communication**

- MIDOs sent letters to PAHs in Dec/Jan. The letter provided information on the changes and where to direct questions.
- AIR-400 distributed letters to bilateral partners informing them of changes on January 19.
- AIR-100 is maintaining a frequently asked questions page to provide further assistance.
- *Part 21 Rule Change FAQs* are available on the AIR-100 Part 21 Rule Change [SharePoint](#)



PAH Issuing ARDs – Contentious Issues

- **Suppliers to PAHs are requesting PMA Technical Assist Letters allowing PAH suppliers to obtain PMA.**
 - This would allow suppliers to generate the required ARDs to meet MAG Change 5 requirements.
- **PAHs are reluctant to move towards 21.137(o)**
 - Certain ODAs are requiring the PAHs retain their DMIR function codes so they can stay on as unit members for their ODA.

