

MARPA fully endorses the FAA proposed concept of Designated ORGANIZATIONS rather than individuals and that those organization shall have EXISTING APPROVALS, (TC-PC, PAH, TSO, etc.)

PARA	PAGE	COMMENT
13-2A	85	Add "or licensing agreement"
13-3a	85	This function "approve technical data and/or find compliance to airworthiness requirements" is the single most important PMA ODA function. The wording is acceptable, however, we suggest adding for clarification a comment on ELIGIBILITY approval. This function includes MODEL ELIGIBILITY as part of "Design Data".
13-3b	85	Needs clarification. Inferred is that PMA final approval can be made. Final approval now is issuance of a PMA supplement by FAA. Is this authority except for identity to be granted the PMA ODA? Para 3-8a lists PMA as a function that IS NOT DELEGATED.
13-3c	85	Add "Included is authority to approve PAH service bulletins".
13-4a	86	Suggest add "All T and C applications shall include a PSCP (Project Specific Certification Plan)". FAA signatures within the PSCP constitute concurrence.
13-6d	88	Same as 13-3b (13-3b and Fig. 3-1)
13-3b	85	May the ODA issue supplements by licensing agreement only? That is inferred here. Yet, 13-3b and Fig. 3-1 indicate unrestricted issuance of PMA Supplements.
Fig.3-1	13	
9-3	63	Suggest add to Chapter 13 approval of minor changes to QA manual such as here in Chapter 9. Why require a production ODA to gain this minor authority for a PMA PAH?

117 MARPA suggests that the sample procedures manual contain only the subject categories of pages 118 and 119. MARPA's experience is that sample manuals that go into detail are often followed BY ROTE without the thinking necessary for the specific kind of organization, and its staffing. The sample manual appears to be more detail of requirements that should be in each chapter. Not in "the sample manual". The ODA applicant will be stronger for providing the manual detail for the specific organization, and its staffing. Even if it takes several iterations, both FAA and the applicant will have thought it through for the particular organization. Perhaps another (compromise way) is to include SUB-HEADINGS only, (i.e. 17.1 Licensing Agreement 17.2 Statement of Conformity, etc.

Another idea for clarity of the sample manual coding with no over instructions:

I thru VI - Use as is.
1.0 thru 11.0 - Use as is
12.0 thru 18.0 - Use Chapter 8.0, Chapter 140

(1.0 thru 7.0 not applicable so manual number agrees with Chapter number.)

MARPA fully endorses the FAA proposed concept of an ODA Management Team

MARPA fully endorses the FAA proposed concept of certain functions that are NOT DELEGATED.

MARPA's comments apply to Chapter 13 only, however, MARPA reviewed all chapters to assure an understanding of the context of Chapter 13 within the ODA System.

MARPA is a non-profit association, the only one dedicated solely to FAA PMA. Its acronym stands for "Modification and Replacement Parts Association" words from FAR 21.303.

Our comments for changes or additions are presented as follows: