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FAA-2003-16685-26

Subject: Response to Docket No. FAA-2003-16685; Notice No. 03-13 - Establishment of Organization Designation Authorization Procedures

Attached are comments from The Boeing Company Wichita Division (Wichita Development and Modification Center) delegated organizations SFAR 36 and DAS-501296-CE. The comments address both the NPRM and the Draft ODA Order.

The comments were provided by the names below.

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**Response to Docket No. FAA-2003-16685; Notice No. 03-13
Establishment of Organization Designation Authorization Procedures**

ODA NPRM Comments:

NPRM Comments:

- Based on previous experience with the DAS Manual development, the level of effort estimated in Tables 1 and 2 are grossly low. We expended hundreds of hours revising our DAS Prototype Procedures Manual to be compliant with the new 8100.9 Order.
- 14 CFR 183.67 identifies the Delegation Letter will identify the expiration date of the delegation but does not specify what the length can be (minimum or maximum) or how it will be determined.

FAA Draft Order Comments:

Note: From a DAS standpoint, there appears to be a greater oversight and management by the OMT than under the DDS and Order 8100.9. .

Para. 3-11 (2) "ARs must attend FAA provided seminars as required of other designees performing similar functions if the OMT has not authorized the ODA unit to provide comparable training." *Question: Does that mean the ODAs can provide FAA equivalent training and the FAA seminars are then not required?*

Figure 4-1 has typos. *Comments: RMA ODA should be MRA ODA. No mention of STC ODA for Consultant Group in table.*

Paragraph 4-4 Appointment - *Comments: Does not address the requirement of 14 CFR 183.67 concerning the expiration date of the ODA. It is unclear how long the appointment may be or what the expiration date will be based on (experience, performance, etc.). This requirement should also be aligned with the renewal requirement in paragraph 5-8.*

Para. 5-3(a)(3) Managing Type Certification Activity. "The OMT may delegate all aspects of the program, or retain some parts for FAA approval as they feel necessary." *Comment: This is a step back for the DAS organizations since DAS organizations are presently fully authorized as long as they have the infrastructure to support and perform program compliance functions unless the FAA determines to retain certain compliance activities. With this language, the ODAs will have to wait for level of delegation before proceeding. This may be understandable for new TC work but for STC work, it is considered questionable.*

Para. 5-3(c)(1) Assessing Performance "As determined necessary, the OMT must review the organization's work and data for accuracy and completeness. The amount of such review should be based on the experience of the organization, the quality of the work performed on previous projects, and the AR performing the function." *Comment: Is this in addition to FAA Audits? If not, the requirement will drive greater effort on both the existing DDS organizations and the FAA. It is a step backwards for the DAS Organizations.*

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Para. 5-8: Renewal – *Comments: ODAs will be evaluated for the purpose of renewal within a specific timeframe that has not been totally established. Some language can be lead to the idea that the renewal will be annually. FAA should consider an ODA's experience and performance in determining an ODA's renewal timeframe.*

6-2(a) [FAA] Evaluation Scheduling. The FAA evaluations will be performed at least every two years. The FAA may perform unscheduled evaluations. *Comments: No information on how unscheduled evaluations will be addressed.*

STC ODA

Para. 11-3(c) *Comments: Able to issue more than Special Airworthiness Certificates in other categories than "Show Compliance." (Contradiction to para. 11-8(g)(2) which only addresses issuance of "show compliance")*

Para. 11-6 Alteration Locations. *Comment: No language addressing specific tie to a facility (like a Repair Station or air carrier, etc.) but must list facilities in the procedures manual or approved through off-site procedures. Multiple facilities can be listed in the manual. Is it the determination of the FAA that any STC ODA will not require a "home" Repair Station, Operating Certificate, etc.*

Appendix 1 Sample Forms and Letters

Comment: It appears that the Letter of Designation for a STC ODA comes from the Directorate. Language within the Order Draft identifies the FAA signature is from the Manager of the Appointing Office.

Comment: MOU is signed between senior company management and the Directorate. Language within the Order Draft identifies the FAA signature is from the Manager of the Appointing Office.

Appendix 2 ODA Procedures Manual

Comment: Section 11 (Ratings and Limitations) is required for all ODAs but Section 11.1 (Ratings) requires a listing of the Air Agency Certificate No. and associated Operations Specifications which is not applicable to All ODAs and appears to be inconsistent with other language in the Order specifically that STC ODAs that do not appear to be required to be "tied" to a Repair Station, etc.