

**Clearance Record
DOCUMENT COMMENT LOG**

	Document Description: AC20.166A Issue Paper Process	Reviewer Name	Reviewer Company & address	Date of Review September 2014
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Commenter	Page & Paragraph	Comment	Reason for Comment	Recommendation	Disposition
Bombardier Aerospace	General & multi page/paras	It is recognized that FAA have attempted to align this draft AC with the equivalent update to Order 8110-112A. However, there are some sections where FAA should use language directly from the draft Order 8110-112A to avoid different understanding between the Applicant and FAA staff. In that regard, BA has used specific references to the draft Order in several of the comments below as the Order is believed to contain the more appropriate text.	Consistency	With alignment of the Order 8110.112A and this AC in mind, it is recommended that FAA consider these comments as equally applicable to the Order, specifically when the draft AC and Order language are proposed to be the same.	Adopted. Will compare documents and comments dispositions side-by-side. Agree that AC and Order language are to be the same to avoid confusion and conflicting text.
Bombardier Aerospace	General & multi page/paras	When FAA reviews all comments, BA believes FAA will realize the benefits of dedicating a section of the AC to address the process when FAA is validating the approval of a bilateral partner. In such circumstances, much of the requirement to produce IPs as stated in the AC are not present, even though the requirement is appropriate when FAA is the CA, or the VA to a CA not covered under a bilateral. In validations with bilateral partners, a much simpler review, acceptance and tracking of the equivalent CA IP would suffice.	Significant differences in the validation process exist, depending on the level of cooperation between the FAA and the Certifying Authority.	Develop separate sections for validation, dependent on whether or not bilateral agreements are in effect	Concur but Out of Scope. AIR-40 is now in charge of FAA Order 8110.52. Your suggestion is valid but it really belongs now to AIR-40 more than AIR-100.

Bombardier Aerospace	General & multi page/paras	While the effort to speak of FAA, Applicants etc. in the impersonal third party has been mostly successful, there remain a few examples where terms such as “us” (meaning the FAA) have been missed. In this regard, it is also somewhat confusing when the FAA refers to itself as ‘FAA’ and then implies it is speaking of the FAA but uses the term ‘VA’ (for example section 5b, last 2 sentences).	Clarity	It is suggested that when FAA are speaking of themselves as a VA, then the text is changed to read FAA.	Adopted. Changed to third person throughout the document. Substituted “we” and “us” for “the FAA”.
Bombardier Aerospace	Page 1 & 2 Para 4b & 4c	Terms such as ‘significant’ should be avoided, This comment equally applies to Chapter 2 of Order 8110-112A. Due to the confusion with Changed Product Rule [CFR 14 Part 21.101] and simply because the magnitude of an issue is somewhat redundant. What is more pertinent is that an issue ‘warrants’ an Issue Paper for resolution, or that an Issue Paper is required by process (as described in Section 5).	Clarity	Suggest using the term “Certain issues” as used in 4a and avoid use of relative terms, essentially relying on the described criteria for when an IP is required.	Not accepted. Not adopted. It is clear that the adjective significant is for issues and not for changes in type design. The text in the AC cannot differ from the Order text and the Order just got published. This is done in order to avoid discrepancies between the two documents.
Bombardier Aerospace	Page 2 Para 4d	Unsure why this section is different from Order 8110-112A, where FAA describe use of IPs to mainly address differences in Standards and interpretations between FAA and the CA. The use of terms like “particular interest”	Consistency	Use same text as the Order, Chapter 2.1d, or alternatively... For bilateral partners, FAA should be more imperative in the last sentence as follows: “ <i>When FAA has a bilateral agreement with the CA, the FAA and CA shall jointly develop procedures to</i>	Adopted. We are using the exact text from the order, chapter 2, par. 2.1d.

		does not reflect how FAA should proceed in a certification program, particularly when FAA as a VA are a bilateral partner with the CA. The criteria presented in this AC must be more definitive for the Applicant. The impression conveyed by “particular interest” leans towards whims and notions, providing no bounds to individuals in the Agency or guidance to FAA Management in their oversight		<i>allow FAA to accept the CA’s IP or equivalent in place of an FAA IP”</i>	
Bombardier Aerospace	Page 2 Para 5a	<p>The heading of section 5 is misrepresentative.</p> <p>The addition of ELOS to IP G-1 is acknowledged, but is in fact an omission in the draft FAA Order, 8110-112A, Chapter 2.3a.</p> <p>Further comments on ELOS IPs are provided against section 5f.</p> <p>In line with comments to Sections 4b & c the, use of ‘significant’ as a measure for when an IP is appropriate is not necessary and not an accurate lead in to the process criteria of sections 5a,b,c,d,f,g,I,j,k,o,p & q.</p>	Clarity	<p>Change section heading to <i>Subjects that require an Issue Paper</i>.</p> <p>Similarly, amend Order 8110.112A, Chapter 2 heading to <i>Subjects that require an Issue Paper</i> and update Chapter 2-3a to include reference to ELOS as done for the AC.</p>	Partially adopted. We changed the heading to read – “Items Considered Significant Issues and Addressed by IPs.” FYI-We cannot address changes to the order anymore since it is published and we cannot have different text in the AC versus the order.
Bombardier Aerospace	Page 2 Para 5b	Although present in the current version, BA believes the statement that FAA must make a finding that the type design complies with the US Type Certification Basis for foreign manufactured products is misleading.	Significant differences in the validation process exist, depending on the level of cooperation between the FAA and the Certifying Authority.	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on what is required for import.	Not accepted. Not adopted. The Canada BASA IPA example that you are providing is

		<p>This comment equally applies to the Order, Chapter 2.3b and is in fact more pertinent where an instruction to FAA staff could misinform on the need for FAA finding. It is essential that FAA instill a firm understanding of the differences between when FAA have a BASA with the CA – to appreciate the absence of requirement to make their own [FAA] Finding and all the process that goes with that effort can be avoided.</p> <p>It is the BA understanding that under the Canada-US BASA & IPA (for example), the FAA would ‘accept’ the CA (TCCA) statement to the greatest extent possible that the type design complies with the importing authority (FAA) Type Certification Basis. In this case, no FAA Finding would be required.</p> <p>Furthermore, in the case of a mature CA/FAA BASA, the G-2 IP should only need to refer to the IPA to define the CA/VA relationship.</p>			<p>too specific. And this paragraph is intended to be general. We get into CA/VA relationships further down in the document.</p>
Bombardier Aerospace	Page 3 Para 5e	<p>The term “peculiarities” is inappropriate to describe when an Applicant’s chosen MOC requires an IP to resolve an Issue.</p> <p>This comment is equally applicable to the Order, 8110-112A, Chapter 2.3f.</p> <p>Just because a feature of a type design may be peculiar, the rationale and understanding by FAA of the MOC should be achieved during Familiarization – and only if the FAA then disagrees or has an Issue with</p>	Objectivity of Language	<p>Revise text as follows: <i>“...office coordination as a result of FAA concerns with the acceptability of the MOC to show that the type design complies with the applicable certification basis or the need to define....”</i></p>	<p>Adopted the suggested language. Eventhough, it will differ from the FAA order text, we believe it is going to be a more clear explanation of the MoC IP’s purpose.</p>

		acceptability of the MOC (perhaps when different from an AC) should an IP be required.			
Bombardier Aerospace	Page 3 Para 5f	BA acknowledges the AC criteria when FAA is the CA. However, when FAA is the VA, specifically where there is a BASA between the CA and FAA, the need for IPs for each ELOS requested by the Applicant may not be required. Furthermore, the AC should describe the case when an Applicant is fully able to comply literally with the Standard but presents a case for an alternative approach via an ELOS	Significant differences in the validation process exist, depending on the level of cooperation between the FAA and the Certifying Authority.	Revise text as follows: <i>“ELOS findings will be made when literal compliance with an airworthiness standard will not be shown and compensating factors exist which can be shown to provide an ELOS (see 14 CFR 21.21(b)(1)).”</i>	Not accepted. Not adopted. The discussion in the paragraph is for US domestic projects. We are not discussing validation issues in the paragraph.
Bombardier Aerospace	Page 3 Para 5g	The ‘Note’ adds a phrase different from the equivalent Note in Order 8110-112A, Chapter 2.3g(2). BA requests FAA to explain the addition of the phrase and why it is considered necessary compared to the Order.	Consistency	Align Order 8110-112A and the AC in the explanation of when Specials Conditions are not to be used	Adopted. We will have the exact same note from the order, par. 2.3.g(2).
Bombardier Aerospace	Page 4 Para 5i	For VAA validations with a bilateral partner, it should be imperative that procedures <i>shall</i> be developed to allow FAA to accept the CA “FIP”. With the proposed text, FAA imply this is optional. The last sentence unnecessarily raises the possibility for FAA to use a CIP, which is adequately addressed in 5j. The term “peculiarities” is even more	Consistency of Process	Change the penultimate sentence as follows: <i>“When FAA has a bilateral agreement with the CA, the FAA and CA shall jointly develop procedures to allow FAA to accept the CA’s IP or equivalent in place of an FAA IP.”</i> Delete last sentence (CIPs are adequately addressed in 5j).	Not accepted. Not adopted. “Shall” is ambiguous and is not used in everyday speech and leads to confusion. “Shall” is imprecise. It can indicate either an

		<p>inappropriate to describe when a foreign Applicant’s chosen MOC requires an IP to resolve an Issue, specifically when their CA is a bilateral partner with FAA.</p> <p>The ability of FAA to accept the CA IP when a BASA is in place should also apply to type design features that require a Special Condition or ELOS.</p> <p>The BA understanding is that FAA do not need to make a Finding when Validating an approved type design covered by a BASA. In such cases, FAA can equally ‘accept’ a CA IP that addresses an SC or ELOS.</p> <p>Recognition and tracking of these elements of the Certification Basis does not need to be any different than other IPs generated by the CA.</p>			<p>obligation or a prediction. We use “Must” –for obligation. We use “Must not” for prohibition, And we use “May” for discretionary action and “Should” for a recommendation . The FAA reserves the right to make or not make a finding of compliance when validating an approved type design covered by a BASA. We may elect not to do our own finding with EASA and Canada, but that will be too specific and this paragraph is more general – on purpose.</p>
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<p>Bombardier Aerospace</p>	<p>Page 4 Para 5j</p>	<p>For a validation with a bilateral partner, the AC should describe the need for FAA to review, oversee & track the acceptance of CA IPs without the need to automatically require a CIP. Raising a CIP is only one option for FAA to manage the CA IPs.</p> <p>This comment is in line with recent experience working with FAA in a validation program where deviation from AIR-ANM-050-W2 work instructions was granted. The deviation and accompanying process allowed the ACO to determine if a FAA CIP was necessary based on evaluation of the equivalent CA IP (see FAA memo ANM-100 to NYACO, dated January 28th, 2013).</p> <p>The AC should also include the option to raise a single CIP to cover more than one CA IP.</p> <p>The need for FAA to manage issues can be satisfied in several ways. It is understood that any proposed Applicant/CA process must be acceptable to the FAA, with the premise that the FAA will rely on the CA to the maximum extent possible when Standards and interpretations are identical. In such cases, a CIP or ACIP may not be required if other project management tools are selected to manage acceptance of CA IPs (tracking lists, routine reviews with Applicant and CA). The scope and limitations on use of CIPs and process alternatives would form part of the</p>	<p>Completeness.</p>	<p>In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on the options available to manage issues, only some of which will require the use of FAA IPs, CIPs & ACIPs and take advantage of the opportunity to incorporate the process defined in the January 28th, 2013 deviation to FAA work instruction AIR-ANM-050-W2.</p>	<p>Adopted. The explanation for a CIP states – “For an FAA validation program, a CIP could be used to...”</p> <p>Besides, we agree that for a validation with a bilateral partner, the need for FAA to review, oversee & track the acceptance of CA IPs without the need to automatically require a CIP is an option.</p>
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		procedures described in 5i above.			
Bombardier Aerospace	Page 4 Para 5k	<p>FAA should describe additional uses for an ACIP, as employed in recent validation programs with bilateral partners (the newly created IP G-6 and ‘multi-use’ IPs).</p> <p>FAA have employed the following types of ACIPs that approve previously approved FIPs or domestic IPs for a new certification program: G-X IPs (6 and onwards) – used to establish criteria for applying previously approved IPs to the new certification program that provides a summary listing of those documents that meet that established criteria. In lieu of drafting new FAA IPs for each of the issues, approval of the ACIP will indicate FAA approval of those [CA/FAA] documents for the program.</p> <p>Multi-Use IP – Endorsement by the FAA of a previously approved FIP for a new certification program, allowing the</p>	Completeness	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on the options available to manage issues taking advantage of the multiple uses of the ACIP .	Not accepted. Not adopted. FAA’s current position is to allow for re-usability of IPs provided we are dealing with the same applicant.

		<p>applicant to following the same methodology for future installations on transport category airplanes, without the necessity of creating a separate FAA IP. Concurrence with a Multi-Use IP is requested by the applicant of their domestic CA and communicated to the FAA to finalize the IP.</p>			
Bombardier Aerospace	Page 4 Para 5m & 5n	<p>Areas of new technology and changes in interpretation are not required to be addressed by an IP in a validation with a bilateral partner.</p> <p>As previously commented, when FAA is performing a validation, a specific FAA IP will not be required if the CA has already addressed the development of acceptable MOC or changes in interpretation/policy through their IP - which is then found to be acceptable to the FAA and tracked through process described in 5i.</p>	Applicability	<p>In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on the options available to manage issues, only some of which will require the use of FAA IPs.</p>	<p>Not accepted. Not adopted. The intended audience or pupose of these sections is for US domestic applicants and certification programs.</p>
Bombardier Aerospace	Page 5 Para 5p	<p>The use of Admin IPs in the context discussed in this section of the AC is not directly relevant when FAA is performing a validation with a bilateral partner.</p> <p>The role of the TCB is not the same when FAA is performing a validation with a bilateral partner as it is when FAA is the CA.</p> <p>As previously commented, when FAA is performing a validation, an Administrative IP will not be required if the CA has already addressed the policy issue or non-standard</p>	Applicability	<p>In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on the options available to manage issues, only some of which will require the use of FAA IPs.</p> <p>Revise Appendix C, item 12 to describe the relevance of or need for the TCB when FAA is a VA, specifically with a bilateral partner.</p>	<p>Not accepted. Not adopted. The intended audience or pupose of these sections is for US domestic applicants and certification programs.</p>

		MOC through their IP - which is then found to be acceptable to the FAA and tracked through process described in 5i.			
Bombardier Aerospace	Page 5 Para 6a	In line with comments to Sections 4b & c the, use of 'significant' as a measure for when an IP is appropriate is not necessary	Use of the term 'significant' is redundant	Revise text as follows: “... <i>identify any issues that may require an IP for resolution.</i> ”	Not accepted. Not adopted. It is clear that the adjective significant is for issues and not for changes in type design. The text in the AC cannot differ from the Order text and the Order just got published. This is done in order to avoid discrepancies between the two documents.
Bombardier Aerospace	Page 5 Para 6b	In line with comments to Sections 4b & c the, use of 'significant' as a measure for when an IP is appropriate is not necessary	Use of the term 'significant' is redundant	Revise text as follows: “... <i>for resolution so all issues that require an IP are identified to allow sufficient time for IP development, approval and closure.</i> ”	Not accepted. Not adopted. It is clear that the adjective significant is for issues and not for changes in type design. The text in the AC cannot differ from the Order

					text and the Order just got published. This is done in order to avoid discrepancies between the two documents.
Bombardier Aerospace	Page 5 Para 6d	In line with comments to Sections 4b & c the, use of 'significant' as a measure for when an IP is appropriate is not necessary	Use of the term 'significant' is redundant.	Revise text as follows: <i>“Routine items relative to showing compliance and work relationships would not normally require IPs to resolve unless some special problems are anticipated or develop during the course of the program. Decisions and actions will be documented in correspondence, data submittals, and file records of meetings, conversations, and events. In this regard, it is recognized that what may be routine with an experienced applicant may be treated as an issue that may require an IP with an applicant who has limited or no current FAA type certification experience.”</i>	Not accepted. Not adopted. It is clear that the adjective significant is for issues and not for changes in type design. The text in the AC cannot differ from the Order text and the Order just got published. This is done in order to avoid discrepancies between the two documents.
Bombardier Aerospace	Page 6 Section 7 intro & para 7a	The role of the TCB is unclear when when FAA is performing a validation with a bilateral partner. Furthermore, in Appendix B, section 15, FAA do not describe the TCB in context with a validation.	Section 7 has not been drafted with a validation program in mind.	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on FAA IP development.	Not accepted. Not adopted. The intended audience or pupose of these sections is for US domestic applicants and certification

					programs.
Bombardier Aerospace	Page 6 para 7b	Para 7b does not describe the work performed by FAA when involved in a concurrent validation certification program in reviewing and accepting the CA IPs, whether in draft or not.	Section 7 has not been drafted with a validation program in mind.	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on FAA IP development.	Not accepted. Not adopted. The intended audience or pupose of these sections is for US domestic applicants and certification programs.
Bombardier Aerospace	Page 6 to 8 para 7c to 7p	Para 7c through p does not describe the role of the CA and/or when FAA is the VA.	Section 7 has not been drafted with a validation program in mind.	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better direct their staff and non-US Applicants on FAA IP development.	Not accepted. Not adopted. The intended audience or pupose of these sections is for US domestic applicants and certification programs.
Bombardier Aerospace	Page 9 Figure 1	The flow chart should be expanded and revised to better reflect CA and FAA activity (as the VA) when FAA are validating a bilateral partner approval. The flow chart is appropriate for when FAA is the CA, or the VA to a non-bilateral state of design CA	Completeness	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better describe steps involving the CA prior to the 'entry point' to establish if an FAA IP is necessary.	Not accepted. Not adopted. The intended audience or pupose of the flowchart is for US domestic applicants and certification programs and

					also for when the FAA is the VA in general terms. For detailed procedures covering validation procedures when there is a BASA IPA in existence, we refer the reader to FAA Order 8110.52.
Bombardier Aerospace	Page 14 - 16 Appendix B Para 5 and 10 to 15	The description of the CA and FAA relationship is insufficient, particularly when FAA is the VA to a bilateral partner. The responsibility of the FAA PM/PO & Project Team (TCB) in managing the VA decision to require an IP or not is not well stated. The CA and VA relationship implied in para 5 underestimates the need for FAA to rely on the CA system.	Clarity	In the dedicated section proposed for this AC to address IP process when validating with a bilateral partner, FAA will be able to better describe the relationship of the CA and FAA (as the VA), together with incumbent role and responsibilities of the FAA offices and staff.	Not accepted. Not adopted. The intended audience or purpose of the appendix B is for US domestic applicants and certification programs and also for when the FAA is the VA in general terms. For detailed procedures covering validation procedures when there is a BASA IPA in existence, we refer the

					reader to FAA Order 8110.52.
Bombardier Aerospace	Page 17 & page 20 Appendix C Para 2, 15 & 16	FAA should include Transport Canada in the definition of CA, Type Validation and Validating Authority as Transport Canada are a bilateral partner similar to EASA	Completeness	FAA should include Transport Canada in the definition of CA, Type Validation and Validating Authority	Not accepted. Not adopted. We obtain definition verbatim from FAA Order 8110.52. Also, if we include Canada, we must also include other countries for which we have bilateral agreements such as Brasil, South Korea, Japan, Israel, etc., etc., and that will not be practical.
BOEING	Page 1, Paragraph 4.b. (Purpose of IPs)	The proposed text states: b. IPs provide a structured means for describing and tracking the resolution of significant technical, regulatory, and administrative issues that occur during a project. The IP process establishes a formal communication for addressing significant issues between the applicant, the validating authority (VA) or the certificating authority	We recommend revising the text as follows: <i>"b. IPs provide a structured means for describing and tracking the resolution of significant technical, regulatory, and administrative issues that occur during a project"</i>	We recommend that the text be clarified as indicated to promote consideration of the reuse of issue papers. Whenever possible, issue papers should be developed with multi-project use in mind. Issues should be general in nature and have broad application, such that reuse has value. This must be made clear in the description of an issue paper's "purpose.	Not accepted. Not adopted. Other industry groups are protesting the reuse of IPs by other than the original applicant. Also, our General Counsel office has determined

		<p>(CA) for type validation programs, and the FAA. They are also very useful in addressing novel or controversial technical issues.</p>	<p><i>and, if possible, for establishing conditions under which the IP can be reused on other projects. The IP process establishes a formal communication for addressing significant issues between the applicant, the validating authority (VA) or the certificating authority (CA) for type validation programs, and the FAA. They are also very useful in addressing novel or controversial technical issues."</i></p>		<p>that IPs are not to be re-use by applicants, other than the original applicant.</p>
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BOEING	Page 2, Paragraph 4.c. (Purpose of IPs)	<p>The proposed text states:</p> <p>“c. For type certification projects, IPs are useful tools for keeping an unbiased uniform certification approach between applicants. They also form a valuable reference for future type certification programs and for development of regulatory changes. By describing...”</p>	<p>We recommend revising the text as follows:</p> <p><i>“c. For type certification projects, IPs are useful tools for keeping an unbiased uniform certification approach between applicants. They also form a valuable reference for future type certification programs and for development of regulatory changes, and they can be reused within established conditions. By describing...”</i></p>	<p>We recommend that the text be clarified as indicated to promote consideration of the reuse of issue papers. Whenever possible, issue papers should be developed with multi-project use in mind. Issues should be general in nature and have broad application, such that reuse has value. This must be made clear in the description of an issue paper’s “purpose.” (See our additional comments elsewhere on this subject.)</p>	<p>Not accepted. Not adopted. Other industry groups are protesting the re-use of IPs by other than the original applicant. Also, our General Counsel office has determined that IPs are not to be re-use by applicants, other than the original applicant.</p>
BOEING	Page 2, Paragraph 5.c.	<p>The proposed text states:</p> <p>“c. Environmental Consideration (G-3). G-3 is an IP that designates the applicable environmental regulations (i.e., the regulations establishing standards for aircraft noise and, for turbine-engine powered airplanes, fuel venting and exhaust emissions). The FAA must obtain certain information for compliance with U.S. statutory environmental requirements in addition to the 14 CFR requirements listed in the certification basis for certification projects (TC, amended TC, STC, amended</p>	<p>We recommend revising the text as follows:</p> <p>“c. Environmental Consideration (G-3). G-3 is an IP that designates the applicable environmental regulations (i.e., the regulations establishing standards for aircraft noise and, for turbine-engine powered airplanes, fuel venting and exhaust emissions).</p>	<p>Deleting the text as shown makes the statement clearer and better-aligned with the parallel wording in FAA Order 8110.112A-DRAFT, paragraph 2-3.c.</p>	<p>Accepted. Adopted.</p>

		STC) or for type design changes.”	The FAA must obtain certain information for compliance with U.S. statutory environmental requirements in addition to the 14 CFR requirements listed in the certification basis for certification projects (TC, amended TC, STC, amended STC) or for type design changes. ”		
BOEING	Page 3, Paragraph 5.e. (Items Considered Significant Issues and Addressed in IPs)	The proposed text states: “e. Method of Compliance (MoC). The most common type of IP defines a particular MoC that requires directorate or policy office coordination as a result of peculiarities in the type design or the need to define specific conditions and/or establish the environment under which substantiation must be shown.”	We recommend revising the text as follows: “e. Method of Compliance (MoC) . The most common type of IP defines a particular MoC that requires directorate or policy office coordination as a result of one or more of the following: (1) Peculiarities in the type design with respect to the established MoC. (2) The need to document the agreement on a precedent-setting MoC proposed by an applicant. (3) The need to	While we understand that the proposed text is unchanged from the original, we maintain that it should be revised and clarified as indicated. An IP is appropriate to clarify existing guidance; however, rulemaking is appropriate to define specific conditions or establish an environment. Unless an applicant is proposing a precedent-setting MoC, or has introduced a design containing novel or unusual design features within their product, the definition of specific conditions and the environment under which substantiation must be shown must be accomplished using normal rulemaking procedures, not an issue paper. The rulemaking process will ensure that an appropriate means of compliance is established and introduced into the fleet, and a cost analysis of the safety benefit is accomplished.	Not accepted. Not adopted. Rulemaking takes years. We do not see the benefit in the proposed rewrite. IPs are not appropriate to clarify existing guidance. Also, the following statement is not correct: “The rulemaking process will ensure that an appropriate means of compliance is established and introduced into the fleet, and a

			<p>define-clarify <i>specific conditions and/or</i> establish-the <i>environment under which substantiation must be shown where the established MoC is not clear.</i> <i>(4) Applications of new technology or design that are not novel or unusual with respect to the airworthiness regulations, but for which the MoC with the existing airworthiness regulations would set a national precedent.</i> \</p> <p>In addition, we request that a definition of the term "national precedent" be included.</p>	<p>We also recommend that the text of the "Areas of New Technology" discussion that is shown as paragraph 5.m. in the proposed AC, be moved to this section as paragraph 5.e.(4), as shown. (See also our comment #9.) In that text, the term "national precedent" is used and it should be defined. Without a clear explanation of "national precedent," the term is left open to varied interpretations.</p>	<p>cost analysis of the safety benefit has been accomplished" FYI- When we publish a rule we do not mandate a particular MoC.</p>
BOEING	Page 3, Paragraph 5.g.	The proposed text states: "g. Proposed Special Conditions. ...Special conditions are unique to the specific certification program for which they are issued. The FAA has..."	<p>We recommend revising the text as follows: <i>"g. Proposed Special Conditions. ...Special conditions are unique to the specific</i></p>	<p>We recommend that the text be clarified as indicated to promote consideration of defining and documenting the broadest appropriate applicability for special conditions. Whenever possible, issue papers should be developed with multi-project use in mind. Issues should be general in nature and have broad application, such that reuse has value.</p>	<p>Not accepted. Not adopted. IPs are project specific and unique to the certification program for which they are created. Also,</p>

			<p><i>certification program for which they are issued, except when additional applicability is defined and documented. The FAA has..."</i></p>	<p>This must be made clear in the scope of items addressed in proposed special conditions issue papers.</p>	<p>for the case of Special Conditions, the IP serves to develop the basis, need, and wording of the special condition and not the resolution. Resolution of the proposed special condition must be handled by the rulemaking process in the form of an NPRM.</p>
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BOEING	Page 4, Paragraph 5.h.	The proposed text states: “h. New Information. It is conceivable that an IP might be required to examine issues that arise from a better understanding of environmental or other hazards that were not well understood in the past or that did not exist previously. Such items could include new scientific information on weather threats such as the quantification of microbursts that occurred in the last 30 years; the substantiation of super-cooled liquid droplets environment; cabin ozone hazards; and other potential hazards where the existing applicable regulations were developed unaware of the threats.”	We recommend deleting this paragraph. Why is	New hazards that are driven by a change in the understanding of the environment, where the applicable regulations were developed unaware of the threats, and that are not due to novel or unusual design features of a product, should properly be addressed via the normal rulemaking process, not on a project-by-project basis via the issue paper process. The rulemaking process will ensure that an appropriate means of compliance for such discoveries is identified, and a cost analysis of the safety benefit has been accomplished.	Not accepted. Not adopted. Rulemaking takes years. Also, the following statement is not correct: “ The rulemaking process will ensure that an appropriate means of compliance is established and introduced into the fleet, and a cost analysis of the safety benefit has been accomplished “ FYI - When we publish a rule, we do not mandate a particular MoC.
BOEING	Page 4, Paragraph 5.k.	The proposed text states: “k. Administrative Collector Issue Paper (ACIP). An ACIP is an IP that approves previously approved foreign IPs (FIP) or domestic IPs for a new certification program, provided that the current applicant is the same as the applicant of the	We recommend revising the text as follows: “k. An ACIP is an IP that approves <i>can be used to approve the use of previously-</i>	The proposed text could be interpreted to mean that the only means of reusing a previous IP on a subsequent project is via an ACIP. Our suggested revision would improve clarity. Also, a pointer to the new paragraph that we have recommended to address reuse and	Not accepted. Not adopted. ACIP is the only way we are allowing the re-use of IPs.

		previously approved IP or FIP.”	<i>approved foreign IPs (FIPs) or domestic IPs for a new certification program, provided that the current applicant is the same as the applicant of the previously-approved IP or FIP. (See Appendix E for procedures related to the use of an ACIP.) Also see paragraph [xx*] for other alternatives addressing reuse of IPs.”</i>	multi-use of IPs (see our comment #11) will guide readers to more information on this topic. Creation of an IP is a significant investment for both the FAA and the applicant. We concur that the ACIP is a good tool for reuse of numerous IPs on large complex projects; however, we find that it is not efficient for reuse of a small number of IPs, for example in a production change project where a single IP is proposed to be reused. Therefore, we recommend the clarification of the proposed paragraph as indicated above, as well as a reference to our newly-proposed paragraph*. *See our related comment #11.	
BOEING	Page 4, Paragraph 5.1.	The proposed text states: “1. Unsafe Features or Characteristics. Unsafe features or characteristics are those that preclude certification in accordance with 14 CFR 21.21(b)(2).”	We recommend revising the text as follows: “1. Mitigation of Potential Unsafe Features or Characteristics. Potentially unsafe features or characteristics are those that could preclude certification in accordance with 14 CFR §21.21(b)(2). This type of issue paper is used to document the necessary mitigation.”	The proposed issue paper type has been particularly problematic in Foreign Validation discussions, because it reads as though our product has unsafe features. Since no product can be type certificated with unsafe features or characteristics, it appears inappropriate to label a product’s features or characteristics as “unsafe” where suitable mitigations are available and have been agreed to. Our suggested changes would more accurately convey the issue being addressed in an issue paper of this type.	Partially Adopted. Partially Adopted. It is not Mitigation, it is Corrective Action. Rewrote the paragraph like this: “Corrective action of potentially unsafe features or characteristics that could preclude

					certification in accordance with § 21.21(b)(2). This type of issue paper is used to document the necessary corrective action.”
BOEING	Pages 4 - 5, Paragraph 5.m.	The proposed text stats: "m. Areas of New Technology. <i>Areas of new technology or novel design are those that do not require a special condition, but might require the development of an acceptable MoC with existing regulations that would set a national precedent."</i>	We recommend deleting this paragraph at this point in the document and moving it to paragraph 5.e., Method of Compliance (MoC), to raise awareness of this issue that may be addressed in an IP. We also request that a clear definition of the term "national precedent" be included.	Proposed paragraph 5.m. actually describes a subset of the reasons for writing a MoC IP. Thus, separating it out as a discrete IP type is likely to lead to confusion. It would be clearer if this situation were addressed in proposed paragraph 5.e., Method of compliance (MOC). (See also our comment #4.) Without a more exact explanation of "national precedent," the term is left open to varied interpretations.	Not accepted. Not adopted We do not agree with the proposed re-write. We use IPs for areas of new technology that would(could) set a national precedent. We interpret MoC IP as the most common type of IP defines a particular MoC that requires directorate or policy office coordination as a result of FAA concerns with the

					acceptability of the MoC to show that the type design complies with the applicable certification basis or the need to define specific conditions and/or establish the environment under which substantiation must be shown.
BOEING	Page 5, Paragraph 5.n.	The proposed text states: “n. Changes in Interpretation. Changes in interpretation include new interpretation or policy of existing regulations using precedent-setting new technology in an IP at the early stages of the certification project.”	We recommend deleting this paragraph.	Criteria for a new MoC should be handled as part of the MoC IP criteria and not as separate IP types. We consider that, with the incorporation of the associated changes that we have requested in these comments, paragraph 5.e. contains the needed criteria for MoC IPs. This text of the proposed paragraph 5.n. should be carefully reconsidered, as it can be interpreted as addressing changes in MoCs that invalidate previous MoCs. In those cases, the issue needs to be appropriately treated as new rulemaking and promulgated through the normal rulemaking process.	Not accepted. Not adopted. We do not believe that changes in accepted MoCs should be appropriately treated as new rulemaking and be promulgated through the normal rulemaking process. Our rules do not mandate a particular MoC.

BOEING	N/A	N/A	<p>We recommend following paragraph 5. (Items Considered Significant Issues and Addressed in IPs) with a new section that would:</p> <p>(1) provide criteria and procedures for reuse of existing IPs, and</p> <p>(2) contain guidelines for writing IPs conducive to reuse or multi-use.</p> <p>Criteria for reuse of IPs could be taken from Appendix E of FAA Order 8110.112A-DRAFT.</p>	<p>Creation of an IP is a significant investment for both the FAA and an applicant. Clear guidelines supporting the creation of IPs conducive to reuse or multi-use, as well as clear criteria and procedures for reuse of existing IPs, is needed to increase overall system efficiency and capacity, both for applicants and for the FAA. See also our comment #7.</p>	<p>Not accepted. Not adopted. Other industry groups are protesting the re-use of IPs by other than the original applicant. Also, our General Counsel office has determined that IPs are not to be re-use by applicants, other than the original applicant.</p>
BOEING	Page 6, Paragraph 7.a. (IP Development)	<p>The proposed text states:</p> <p><i>"a. For type certification projects, new IPs can be proposed to the TCB by the standards staff specialists, the project officer (PO), the program/project manager (PM), or by technical specialists for technical issues in their areas, through the PM. This can occur at any time during the process but before final type certification. ..."</i></p>	<p>With regard to the highlighted text above, we recommend that paragraph 7.a. be revised to:</p> <p>(1) encourage raising issues early in a project, and</p> <p>(2) require additional justification for raising issues late in a program when there may be insufficient time for an applicant to address the issue without undue burden.</p>	<p>Our recent experience has shown that IPs are sometimes raised late in a project to document issues that were addressed and documented in the applicable certification plans much earlier in the program. Such late IPs cause delays in airplane programs and cause undue burden on applicants without requisite or evident benefit.</p>	<p>Not accepted. Not adopted. Although we favor early creation of IPs, 14 CFR 21.17(a)(1)(i) gives the FAA the authority to add additional airworthiness requirements that are made effective subsequent to the date of</p>

			<p>In providing guidance on when issues need to be addressed by IP, the FAA should also give consideration to whether the applicant provided required documentation of the issues in certification plans earlier in a project.</p>		<p>application for the type certificate, but prior to the date of issuance of the TC. The FAA has taken regulatory action to require that existing A/W requirements adopted subsequent to the date of application for a TC be applied to a product as a condition to the issuance of that certificate. And quite often those additional requirements will be captured by IPs.</p>
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BOEING	Page 5, Paragraph 6.c.	The proposed text states: “c. An IP is not required to document a particular MoC that is consistent with existing directives, ACs, or other written FAA policy, or that does not fall into one of the common types of IPs listed in paragraph 4.”	We recommend revising the text as follows: <i>“c. An IP is not required to document a particular MoC that is consistent with existing directives, ACs, or other written FAA policy, or that does not fall into one of the common types of IPs listed covered in paragraph 4 5.”</i>	Paragraph 6.c seems to point to the types of issue papers covered in paragraph 5. If the intent is actually to point to paragraph 4, different wording should be used to increase clarity.	Adopted. Corrected the paragraph number from 4 to 5.
Cool City Electronics, Inc.	AC 20-166A-Whole Document	There is no time period or limit time for the completion of the Issue Paper specified in this document.	The IP can be, and has been, used as a weapon by the FAA. Delay times of years have been seen while working through the IP process. Applicants are will ing to fold to FAA pressure rather than face an IP or wait for an IP to finalize.	A strict time period should be imposed on the IP processes. A possible scaling of the effort agreed to between the Applicant and the FAA, could be used. More serious, or complex issues would be allowed more time, than simpler issues. In all cases, a limit time would be imposed on the FAA to complete the IP or drop it.	Not adopted. Not accepted. We disagree your opinion that the FAA uses the IP process as a weapon. Besides, we will never impose a strict time limit in our inherited governmental duties and actions (regulatory actions) during a certification

					<p>process. Although we strive to be proactive and address all issues (controversial or not) at the on-set of a certification program, we cannot impose a strict time limit in our functions.</p>
DASSAULT-AVIATION	Par. 6.c	<p>It seems that the FAA does not intend to issue an Issue Paper to make a Policy Statement applicable to a new program. However, the case of modifications to a program which exists when the PS is issued is unclear. The IP would be a very useful tool to explicitly make a new PS applicable to an existing program. This would be consistent with the EASA issuing CRIs to manage Certification Memorandum applicability.</p>			<p>Not accepted. Not adopted. Although we favor early creation of IPs, 14 CFR 21.17(a)(1)(i) gives the FAA the authority to add additional airworthiness requirements that are made effective subsequent to the date of application for the type certificate, but prior to the date of issuance of</p>

					<p>the TC. The FAA has taken regulatory action to require that existing A/W requirements adopted subsequent to the date of application for a TC be applied to a product as a condition to the issuance of that certificate. And quite often those additional requirements will be captured by IPs. Examples are SFARS, newly adopted regulations, and Policy Statements.</p>
Garmin	<p>Page 1 Paragraph 1.a.</p>	<p>Regarding: “This advisory circular (AC) provides information on the use of issue papers (IP) and gives guidance on their role in the IP process to applicants seeking approval for a type certificate (TC), an amended TC, a supplemental type certificate (STC), an amended STC, type design changes,</p>	<p>The reference linking IPs to TSOAs is newly added. In the past, TSOA projects have not been subject to Issue Papers (IPs) but rather IPs have been issued for the related STC that will provide for installation</p>	<p>Remove “Technical Standard Order Authorization (TSOA) approvals” from this list.</p> <p>Remove all references to TSO and TSOA from AC 20-166A.</p>	<p>Not accepted. Not adopted. Our Operational Oversight Policy Branch Manager (AIR-140) has requested the</p>

		approval of articles (14 CFR 21.8(d)), Technical Standard Order Authorization (TSOA) approvals, or parts manufacturer approval (PMA).”	of the TSOA article.		TSO process to be subject to the IP process, when warranted. When there is an issue to be resolved between the FAA and a TSO applicant, AIR-140 now wants the issue to be handled by the IP process.
Garmin	Page 1 Paragraph 1.a.	Regarding: “This document provides guidance to applicants relative to FAA Order 8110.112A, <i>Standardized Procedures for Usage of Issue Papers and Development of Equivalent Level of Safety Memorandums.</i> ”	Neither Order 8110.112 nor the draft of Order 8110.112A that was recently available for public comment make any mention of "TSOA". The only mention of "TSO" in 8110.112 is in the context of the Appendix D Technical Programs Branch (AIR-120) duties under the Aircraft Engineering Division (AIR-100) definition. The entire AIR-100 definition was removed from draft 8110.112A, so there is no longer any use of "TSO" within draft	Remove “Technical Standard Order Authorization (TSOA) approvals” from the IP process.	Not accepted. Not adopted. Our Operational Oversight Policy Branch Manager (AIR-140) has requested the TSO process to be subject to the IP process, when warranted. When there is an issue to be resolved between the FAA and a TSO applicant,

			8110.112A.		AIR-140 now wants the issue to be handled by the IP process.
Garmin	Page 5 Paragraph 6.a.	Regarding: “For applicants seeking a TC, STC, PMA, TSOA, or other type design approval, FAA technical personnel will work closely with the applicant to identify any significant issues that may require a special emphasis for resolution.”	Including TSOA in this list implies it is a “type design approval”, which is inappropriate.	Remove “TSOA” from the list.	Not accepted. Not adopted. Our Operational Oversight Policy Branch Manager (AIR-140) has requested the TSO process to be subject to the IP process, when warranted. When there is an issue to be resolved between the FAA and a TSO applicant, AIR-140 now wants the issue to be handled by the IP process.
Garmin	Page 6 Paragraph 7.	It is unclear how the development process for IPs will be applied to TSOA.	The focus on this section is how IPs are handled on type certificate (e.g. TC, STC) projects.	Remove TSOA from the IP process.	Not accepted. Not adopted. Our Operational Oversight Policy Branch

					Manager (AIR-140) has requested the TSO process to be subject to the IP process, when warranted. When there is an issue to be resolved between the FAA and a TSO applicant, AIR-140 now wants the issue to be handled by the IP process.
Garmin	Page 6 Paragraph 7.a.	The acronym “DSCO” is used without being defined.	This is the first use of the abbreviation.	Define the acronym “DSCO”.	Adopted.
Garmin	Page 8 Paragraph 7.m.	Regarding the last sentence: “FAA’s responses to such efforts must refer to the current stage and date of the IP as well as indicate whether the new effort provides new information warranting a reconsideration of, and revision to, the IP, or the IP “CONCLUSION” stands as written.”	It seems like “or” should be “otherwise” in this sentence. The term “otherwise” conveys a clearer distinction between the two conditional phrases in the sentence.	Change wording - From: “...and revision to, the IP, or the IP “CONCLUSION” stands as written.” To: “...and revision to, the IP; otherwise the IP “CONCLUSION” stands as written.”	Adopted.
HON Chief Engineers	5.m.	How will the FAA protect a company’s intellectual property when developing a MOC that sets a “national precedent”?	Publishing a company’s specific MOC could reveal intellectual property	Delete wording about a “national precedent”. If MOC becomes commonplace, propose a change to the AC.	Not accepted. Not adopted. The FAA protects a

					company's intellectual property by sanitizing the IP, by removing proprietary information and just making the acceptable MoC available in general/ high level terms among the FAA certification offices and cognizant directorate(s). The intent is to protect proprietary/intellectual property from being published.
HON Chief Engineers	5.n.	FAA needs to provide the background and concerns that led to change in interpretation	Enable an applicant to respond appropriately and efficiently to a change in interpretation	This IP must provide the definitive justification for the change in interpretation.	Concur but Out of Scope. The best way to explain the meaning of this paragraph is by including specific examples from the different directorates and that will be too

					<p>extensive. The best way to understand the meaning of this paragraph is to actually have a certification program and be in the certification basis establishment and certification plan approval stage. In that stage, the cognizant directorate via the project officer (PO) and also the PM will communicate to the applicant those existing regulations for which the directorate in question has developed a new interpretation or new policy.</p>
HON Chief	Figure 1	Flow chart implies that any proposed IP will eventually approved. There is no	Applicant would like to understand criteria	Add a decision diamond in the FAA coord, approval process for the TCB	Not accepted. Not adopted.

Engineers		explicit review to decide to continue or reject.	to move forward with a proposed IP	to screen proposed IP's	The decision to move forward with the IP (approval) or to return the IP to the PM in order to get it revised further and repeat the process at every single stage of the process is in the sub-process named "FAA coord., approval and transmittal sub-process". Also, in paragraph 7 o. we say – "If the applicant does not comply with the criteria of an IP, the project will not be closed and the approval will not be issued." We also have a separate paragraphs 7.j. and 7.m. that say – "All new or revised IPs
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					<p>are coordinated with the applicant, the project team members, and the accountable directorate. If coordination with the applicant and project team members happens without impasse, the PACO will <i>close</i> the IP by revising it and will then coordinate it with the accountable directorate without holding a formal TCBM. If the applicant is not satisfied with the conclusion reached through the IP process, further discussions, correspondence, or appeals must focus on new</p>
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					information or proposals. FAA's responses to such efforts must refer to the current stage and date of the IP as well as indicate whether the new effort provides new information warranting a reconsideration of, and revision to, the IP; otherwise the IP "CONCLUSION" stands as written."
HON Chief Engineers	7.b.	IP's (at least a draft) should be issued within a specified time period after receipt of the certification plan (or a revision) and not tied to the timing of the TCBM	IP's should be a response to the certification plan to address gaps in regulations or MOC's. The FAA or applicant should be able to request a familiarization meeting to clarify the certification plan.	IP's should be proposed within a specified time after receipt of the certification plan	Not accepted. Not adopted. Although we strive to be proactive and address all issues (controversial or not) at the on-set of a certification program, we cannot impose

					<p>a strict time limit in our functions. Further, although we favor early creation of IPs, 14 CFR 21.17(a)(1)(i) gives the FAA the authority to add additional airworthiness requirements that are made effective subsequent to the date of application for the type certificate, but prior to the date of issuance of the TC. The FAA has taken regulatory action to require that existing A/W requirements adopted subsequent to the date of application for a TC be applied to a product as</p>
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					<p>a condition to the issuance of that certificate. And quite often those additional requirements will be captured by IPs. Examples are SFARS, newly adopted regulations, and Policy Statements.</p>
<p>HON Chief Engineers</p>	<p>7.b.</p>	<p>IP's should be issued (at least a draft) prior to the preliminary TCBM</p>	<p>FAA should have received the certification plan prior to the TCBM. The TCBM can/should be used to clarify the STATEMENT OF ISSUE</p>	<p>IPs should be proposed prior to the TCBM where the STATEMENT OF ISSUE can be clarified / finalized</p>	<p>Partially Adopted. Although we strive to be proactive and address all issues (controversial or not) at the on-set of a certification program, we cannot impose a strict time limit in our functions. Further, although we favor early creation of IPs, 14 CFR 21.17(a)(1)(i)</p>

					<p>gives the FAA the authority to add additional airworthiness requirements that are made effective subsequent to the date of application for the type certificate, but prior to the date of issuance of the TC. The FAA has taken regulatory action to require that existing A/W requirements adopted subsequent to the date of application for a TC be applied to a product as a condition to the issuance of that certificate. And quite often those additional requirements will be captured by IPs. Examples are</p>
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					SFARS, newly adopted regulations, and Policy Statements.
HON Chief Engineers	7.c.	Significant features of the type design should not be identified later in the certification process	This paragraph accepts poor planning / communication on the part of the applicant and results in IPs late in the certification process.	Significant features of the type design should be identified and clearly communicated in the certification plan which should be issued prior to the TCBM	Partially Adopted. Although we strive to be proactive and address all issues (controversial or not) at the on-set of a certification program, we cannot impose a strict time limit in our functions. Further, although we favor early creation of IPs, 14 CFR 21.17(a)(1)(i) gives the FAA the authority to add additional airworthiness requirements that are made effective subsequent to the date of

					<p>application for the type certificate, but prior to the date of issuance of the TC. The FAA has taken regulatory action to require that existing A/W requirements adopted subsequent to the date of application for a TC be applied to a product as a condition to the issuance of that certificate. And quite often those additional requirements will be captured by IPs. Examples are SFARS, newly adopted regulations, and Policy Statements.</p>
HON Chief Engineers	7.	There should be a paragraph describing the development of a mutually agreed upon project schedule for the IPs	Both the FAA and the applicant need a plan to avoid late resolution of IPs and ensure the	7.q. The FAA and applicant should develop a mutually agreed upon plan/schedule for processing and closing IPs which should be monitored	Concur but Out of Scope. That should be in the overall

			required resources are available when needed	on a specified interval by the PM and an applicant project manager.	certification program scheduling. Also, if the applicant has entered into a PSP/PSCP with the FAA (recall CPI Guide), that is included in the agreed upon program scheduling.
Williams International	General	Throughout this draft, the use of issue papers in certification and validation programs is comingled and often confusing.	The current organization of the material is confusing for the reader in that the certification and validation issues are comingled.	Suggest reorganizing to address FAA validation aspects in a unique section from the certification aspects.	Not accepted. Not adopted. We make distinction between domestic certification process separate from validation, when warranted. . Examples: Paragraph 4.c separated from paragraph 4.d. Also, paragraphs 5.i., 5.j., separated from the rest of the paragraphs in section 5. Finally,

					paragraph 7 covers the IP development process, but it makes the distinction when we are working in a validation program versus domestic certification program throughout the section.
Williams International	Paragraph 5(f)(2) Note	This note is not necessary.	The note provides clarification that an ELOS finding and an equivalent safety finding have the same meaning. However, the term “equivalent safety finding” has not been used in the document.	Remove note.	Not accepted. Not adopted. We retain the note because both terms are used interchangeable in our regulatory language (including preambles and NPRMs) and our published guidance material.
Williams International	Paragraph 5(i)	This paragraph is redundant.	The text in the paragraph is almost identical to that in paragraph 4d and 5(j).	Suggest deleting entire paragraph.	Not accepted. Not adopted. Paragraph 4 discusses in general terms

					the purpose of the IPs, whereas paragraph 5 covers the items considered significant issues and that need to be addressed by IPs, therefore we need to retain the text in both paragraphs.
Williams International	Paragraph 7(a); Figure 1 Note 5; Appendix B Paragraph 2	These sections use new terminology Delegation Systems Certification Office.	The term Delegation Systems Certification Office (DSCO) is not used anywhere else in FAA documentation nor is it defined on the FAA website.	Suggest removing this terminology.	Not accepted. Not adopted. DSCO is new. It is a newly created office in Fort Worth, TX.
Williams International	Paragraph 7(c)	This paragraph talks about “Stages” for the first time without any definition.	The paragraph talks about how IPs are generally issued at Stage 2 however at this point in the draft AC there has been no definition of the various stages.	Recommend adding a discussion of the various stages and what each involves prior to this paragraph.	Partially Accepted. Partially Adopted. Labeled every Stage with the corresponding ste in the IP process through paragraph 7.
Williams International	Paragraph 6(e)	This paragraph adds requirements for the ODA Manual.	Requirements for the ODA Manual content	Suggest removing last sentence in this paragraph.	Not accepted. Not adopted.

