



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
National Policy

NOTICE
N 8000.334

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11/17/07

SUBJ: Voluntary Disclosure Reporting Program (VDRP) Revisions, Including
Introduction of an Internet-Based VDRP System

1. PURPOSE. This notice updates current handbook guidance relating to the Voluntary Disclosure Reporting Program (VDRP) and provides inspectors with information on implementing the Internet-based VDRP and its use in processing voluntary disclosures. This notice applies to principal operations inspectors, principal maintenance inspectors, and principal avionics inspectors who have oversight responsibility for certificate holders, qualified fractional ownership programs, or Production Approval Holders (PAH) that voluntarily disclose, to the Federal Aviation Administration (FAA), apparent violations of the following regulations: Title 14 of the Code of Federal Regulations (14 CFR), parts 21, 119, 121, 125, 133, 135, 137, 141, 142, 145, 147, and, qualified fractional ownership programs operating under part 91, subpart K (those portions pertaining directly to the duties and responsibilities of the program manager or management specifications (MSpecs)).

2. DISTRIBUTION. We will distribute this notice to the division level in the Flight Standards Service in Washington headquarters, including the Regulatory Standards Division at the Mike Monroney Aeronautical Center; to the branch level in the regional Flight Standards divisions; and to all Flight Standards District Offices. Inspectors can access this notice through the Flight Standards Information Management System (FSIMS) at <http://fsims.avr.faa.gov>. Operators may find this information on the FAA Web site at: http://www.faa.gov/library/manuals/examiners_inspectors/8000/.

3. BACKGROUND. In the past few years, significant changes have occurred to the regulations applicable to the VDRP and to the aviation environment. Those changes include:

a. Responsibility and authority for oversight of all air carrier and indirect air carrier security functions were transferred to the Transportation and Security Administration (TSA). On February 17, 2002, in conjunction with this transfer of responsibility, 14 CFR parts 107, 108, and 109 were canceled. As a consequence, all references to VDRP application to security functions of air carriers, or indirect air carriers, 14 CFR parts 107, 108, and 109 have been removed from Advisory Circular (AC) 00-58A, Voluntary Disclosure Reporting Program.

NOTE: An error exists in AC 00-58A. Part 129 was erroneously included in paragraph 3, "Related Regulations." With the removal of foreign air carrier security program requirements from part 129, AC 00-58A is no longer applicable to apparent violations of part 129. This error will be corrected in subsequent issuances of this AC.

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b. Extension of the VDRP to include qualified fractional ownership programs, as provided by N 8000.323, Voluntary Disclosure Reporting Program Participation by Fractional Ownership Programs.

c. Application of the International Organization for Standardization (ISO) 9001 standards to Flight Standards, and consequently to VDRP, necessitating improved tracking, accountability, data analysis, and feedback loops within the system.

d. Industry and FAA acceptance of Internet-based systems for the collection and processing of data, reports, etc.

4. DISCUSSION. While the VDRP will remain essentially the same in terms of the data collected and the process by which the inspector interfaces with the operator, the Internet-based VDRP implements a number of changes to previous versions of the program. Enhancements introduced by the Internet-based VDRP include the following:

a. All VDRP data is now protected from public release in accordance with the provisions of 14 CFR part 193 and FAA Order 8000.89, Designation of Voluntary Disclosure Reporting Program (VDRP) Information as Protected From Public Disclosure Under 14 CFR Part 193.

b. The Internet-based VDRP provides any authorized VDRP user (FAA and authorized “regulated entities”) a 24-hour, 7-day-a-week Internet-based site for the submission, acceptance, and processing of voluntary disclosures.

NOTE: For the purposes of this notice and other guidance dealing with the VDRP, the term “regulated entity” refers to a certificate holder, qualified fractional ownership program, or PAH authorized to submit voluntary disclosure reports in accordance with the current version of AC 00-58.

c. Submission of a voluntary disclosure via the Internet-based VDRP by a qualified regulated entity meets all notification requirements for the regulated entity, including notification of the appropriate principal inspector (PI) for that regulated entity.

NOTE: Submission of the voluntary disclosure via the Internet-based VDRP provides automated e-mail notification of all PIs assigned to oversight of that regulated entity upon submission of the initial disclosure by the regulated entity. The voluntary disclosure submission by the regulated entity is also date and time stamped immediately upon submission to enable the PI to evaluate the timeliness of the initial report.

d. The Internet-based VDRP provides FAA inspectors and authorized representatives of the regulated entities a “quick glance” summary of the current status all voluntary disclosures currently in process for that regulated entity. It also provides the capacity to review and analyze previous voluntary disclosures submitted by that regulated entity.

NOTE: Access to records pertaining to voluntary disclosures is limited to internal FAA access and to those representatives designated by the regulated

entity. No regulated entity will be granted access to any other regulated entity's records under any circumstances.

e. The Internet-based VDRP provides reporting tools for FAA personnel and for the authorized representatives of the regulated entity to analyze data related to that entity.

NOTE: FAA personnel have additional reporting tools that will enable analysis of industry trends by incorporating data from all regulated entities.

5. PROVISIONS AND LIMITATIONS.

a. To support the enhancements and deployment of the Internet-based VDRP, AC 00-58A was published on September 8, 2006. The basic steps for a voluntary disclosure to be taken by a regulated entity and by the FAA, respectively, remain the same. The revised AC clarifies policy on the timeliness of submissions, the relationship between the Aviation Safety Action Program (ASAP) and the VDRP, and the application of the VDRP to audits (inspections) conducted jointly by a regulated entity and the FAA. Inspectors should refer to the AC for that information.

b. The Internet-based VDRP will be phased in, with the initial application being limited to certificated air carriers operating in accordance with parts 121 and 135.

c. A transition period began effective October 1, 2006. Following that date, voluntary disclosures submitted by air carriers operating under part 121 and/or 135 will be accepted and processed in accordance with AC 00-58A, appendix 1 (for the Internet-based submissions), or may be submitted in accordance with the provisions of appendix 2 (for a paper-based submission). Effective December 8, 2006, all air carrier VDRP submissions must be processed using the Internet-based VDRP.

d. Other regulated entities authorized to submit voluntary disclosures in accordance with AC 00-58A will be granted access to the Internet-based VDRP in a phased expansion of the program, beginning no earlier than January 1, 2007. Announcements relating to expansion of the Internet-based VDRP to other users will be available on the VDRP home page: <http://av-info.faa.gov/vdrp>.

NOTE: Fractional Ownership Program Managers can use VDRP, but not the Internet-based VDRP until notified. Only certificated air carriers may use Internet-based VDRP as noted in AC 00-58A.

6. ACTION.

a. Access authorization for the VDRP Internet-based site. Only authorized users may access the VDRP Web site. Authorized users fall into four categories:

(1) PIs, as reflected in the automated Operations Safety System (OPSS).

NOTE: Only PIs and those personnel granted administrative privileges for system maintenance by the Voluntary Safety Programs Branch, AFS-230, or Application Development Branch, AQS-230, are granted access to the VDRP

site without further action. Other users, including FAA inspectors not listed in OPSS and persons named by the regulated entity to represent them, require a PI (or an FAA employee with privileges granted by a PI to act on behalf of that PI), to add users to the system. Once a user is added to the system, that user will continue to have access to the system until that access is withdrawn by the PI or FAA management.

(2) Non-principal aviation safety inspectors who have been granted access to the VDRP site by a PI in accordance with the procedures listed in paragraph 6b below.

(3) Representatives of an authorized regulated entity who have been granted access to the VDRP site by a PI assigned responsibilities with that regulated entity, in accordance with the procedures listed in paragraph 6c below.

(4) Other FAA employees granted access to provide management or other support functions.

b. Procedure for PIs to add users to the VDRP system:

(1) Login to the VDRP system.

(2) Select “Add New User” from Administration Menu on the left.

(3) Complete data in the following fields:

(a) New User ID. (For FAA inspectors, use their AVS Login ID and for “regulated entities,” such as air carriers, use the operator’s alpha-numeric designator (e.g., UALA for United Airlines), followed by the initials of the individual being added to the system.

(b) User Type (select from drop-down list).

(c) User Level (select from drop-down list).

(d) Designator ID (select authorized designator from list).

(e) Password (enter password and note password for the new user).

(f) Confirm Password (enter same password).

(g) Last Name (of individual being added to system).

(h) First Name (of individual being added to system).

(i) E-mail Address (of individual being added to system).

(j) Phone Number (of individual being added to system).

(k) Job Title (of individual being added to system).

(1) System Access (select “Yes” for system access).

(4) When complete, select “Save” (at bottom right corner).

c. Instructions on use of the Internet-based VDRP may be obtained from the VDRP Web site in several forms. Prior to login, the VDRP homepage contains a link to AC 00-58A as well as announcements related to the VDRP system. Following login, there are four resources available to the user. The first three are found in the lower left menu area on the opening screen and the Help button is located in the upper right of every screen. The four resources include the:

(1) VDRP Demo—an audio-video guide for users of the Internet-based VDRP.

(2) VDRP Welcome Package—a user’s guide to the Internet-based VDRP.

(3) VDRP Users Guide—a detailed guide intended for use by help desk personnel and technical support.

(4) Help Button—contextual help is available in the upper right portion of each page.

7. PROGRAM TRACKING AND REPORTING SUBSYSTEM (PTRS) INPUT. To track VDRP monitoring activities, the inspector should enter the code “VDRP” in the “National Use” field of the PTRS (without the quotes) for work associated with oversight of the operator’s VDRP. It is also important to complete the Designator Block with the appropriate designator code for the operator.

8. DISPOSITION. We will permanently incorporate the information in this notice in FSIMS before this notice expires. Questions concerning this notice should be directed to the Voluntary Safety Programs Branch, AFS-230, at (703) 661-0278.

ORIGINAL SIGNED BY

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