

DOCUMENT REVIEW LOG

1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Schober, David, Commercial Derivative Aircraft System Safety, AIR 4.1.6.2	4. Date of Review: December 6 & 19, 2011	5. Date of AIR-200 Disposition: May 6, 2013
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Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by AIR-200 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

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Adopted;
 Partially Adopted
 Non-Concur
 Concur but Outside of Scope (Will be considered in next change/revision)
 Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-200 Disposition:
1.	General	Order 8130-21 is Policy, not regulation. As an A&P mechanic, I am required to comply with the regulations. 14CFR 91.417 requires an aircraft owner to maintain specific maintenance records for specific periods of time. 14CFR43.9,.10,.11, & .12 provides the requirements for anyone performing maintenance to make appropriate record entries. Nowhere within the regulations does it specify on what type of paper, book, or other document how those records are made, or where they are kept. The most common form has been aircraft, engine, and propeller log books. The problem arises when maintenance is performed on an item that is not associated with one of the aforementioned aircraft, engines, or propellers. There is no common form for the entry of maintenance information for individual parts, accessories, or articles. If as an A&P, if I perform maintenance on any aeronautical product, I am required to make a maintenance record entry per 43.9, 43.10, or 43.11 as applicable. I agree that the use of an 8130-3 is inappropriate for an aircraft, so we can dispense with that easily enough.	However, if I can meet the requirements of 14CFR43 and overhaul or perform maintenance on, an accessory, or other aircraft or engine part that is not immediately installed on an aircraft, I am required to make a 43.9 maintenance record entry somewhere. There is no regulatory reference where that entry is made, only that the record has to be maintained under 91.417. That said, Form 8130-3 meets all the requirements of 14CFR43.9 and there is no regulatory prohibition from using it. Yes, your order says I'm not supposed to, but again, that is FAA Policy, and I can't be violated for not adhering to Policy, only for non compliance with a regulation.	Until there is a regulation that specifies I can't use an 8130-3 for maintenance as an A&P, I will continue to do so, since it is the only standardized form that meets the requirement of 14CFR43.9.	Non-Concur. Reason and recommendation is not accurate—discussed with AFS-340.

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2.	General.	I've been looking over the draft 8130.21 some more and find that the new draft calls for a change in the date format for blocks 13e and 14e. These blocks were 18 and 23 on the old form, and the format there was supposed to be mmm/dd/yyyy.	I can't tell you how many of these forms have had the wrong date format because it is different from the standard format used in the US. The traditional date format for the US is mm/dd/yyyy. Every other airworthiness form the FAA uses has the format as mm/dd/yyyy. It makes no sense to change the date format on this and only this form. I know the answer is for standardization with EASA, but the desire to standardize is going to cause more confusion here in the US. On top of that, there are other places within the order that call for dates in mm/dd/yyyy format. So much for standardization!	Again, I stress the importance of using the mm/dd/yyyy format since every other document the FAA has calls for this format.	Non-Concur. The date format is part of the harmonization effort with Form 8130-3 and other countries.
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-200 Disposition:
3.	Paragraph 2-7.	I would like to request that paragraph 2-7 Splitting Bulk Shipments of Previously Shipped New Products and Articles is being given a closer look.	There is frequently misunderstanding amongst sellers and buyers of surplus parts regarding the splitting of bulk quantities. There are many occasions that also batches of repaired or overhauled parts have to be split at a distributor's site. Very few people seem to know how to handle this correctly and are confused by the word New in the header of paragraph 2-7.	I experience this even with my own peers and inspectors. A simple solution in my opinion could be the removal of the word New from the title of this paragraph.	Non-Concur. Removal of the word "New" could introduce used products and articles with new manufactured ones when splitting bulk shipments.
4.	General.	With the removal of Block 9 Eligibility on the FAA Form 8130-3, what is being done about Block 15 on FAA Form 8130-1, Application for Export Certificate of Airworthiness?	If Eligibility is not an issue anymore for Form 8130-3 why still have it on Form 8130-1?		Adopted. Confirmed with Don Lausman and handed off this request to Nam Cho for inclusion into Order 8130.2.

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1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Christian Eickhoff, Manager Projects, Lufthansa Technik AG, HAM TQ1, Weg beim Jäger 193, 22335 Hamburg, Germany Phone: +49-40-5070-60823 Fax: +49-40-5070-9860823 christian.eickhoff@lht.dlh.de	4. Date of Review: 1/4/2012	5. Date of AIR-200 Disposition: May 6, 2013
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5.	General.	Regarding the draft order 8130.21H I noticed that the status of the component mentioned in block 11 differs from the standard used by EASA.	This results in unnecessary work for the receiving departments in European shops. These shops expect the status "inspected/tested" and not part of it, i.e. "inspected" or "tested". The status is listed on page 3-8.	As one of the goals of the new revision is the harmonization between FAA and other authorities, it makes sense to me to use EASA's wording. I would appreciate it if you could bring this issue to attention at the appropriate persons in order to harmonize it right from the start.	Partially Adopted. The words that will be used are, "Inspected and/or Tested". This was discussed with AFS-340 from what is currently in the MAG.

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1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Susan Fournier Managing Director, Aviation Designee Association (ADA)	4. Date of Review: January 9, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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6.	Chapter 1. Section, 1-1.	Note 2 was added and refers to a "record of completion."	We are not sure what this term means. Are we to assume that you are referring to FAA Form 8100--1 Conformity Inspection Record?		Non-Concur. Added as part of QMS Work Instructions.
7.	Section 1-4.	Wouldn't it be more accurate to indicate that FAA Order 8130.21G, Change 1 Dated April 14, 2010 is canceled?			Partially Adopted. Will put the correct order and date once order is approved from Mgt and DMO.
8.	Section 1-5.	We suggest you add to the Explanation of Changes the fact that Block 9, Eligibility, has been removed from the revised FAA Form 8130-3 which resulted in renumbering of the blocks.			Adopted. Put the specific changes of the form into this section.

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9.	Chapter 4 Section 4-5 Block 11, Status/Work.	When issuing this form for export purposes for a used product returned to service per part 43, and which has been determined acceptable to the importing country via written statement.	We suggest adding the term "Export" as a specific choice for Block 11.	We, as designees, are not authorized by part 43 to perform maintenance, which includes inspections, so we are of the understanding that we cannot record any of the existing terms listed, unless of course the FAA decides to authorize a Designee to record the last maintenance action performed into Block 11. This issue is creating non-standardization in terms of what is being recorded in Block 12 of the current FAA Form 8130-3. In other words, we're all over the board on this one; and by that, I mean the FSDOs down to the Designees. It seems by resurrecting the term "Export" it would solve the issue. Either that or allow the term "Used". An explanation will still be required in Block 12.	Partially Adopted. Discussed with Kim Barnette, AFS-340. This statement is correct that it does not apply to designees. They are not performing maintenance due to the fact they are returning to service either a product/article. Had focal point telecon regarding this issue and going with "New" and "Used" in Block 11 and removing the rest of the terms. Confirming with EASA personnel and awaiting response as of 4/30/12.
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10.	General	We do have one item of concern, however, and that is the planned timing of the release and the effectivity of the revised harmonized FAA Form 8130-3.	We urge that, once Order 8130.21H is finalized and published, the FAA should provide users of the form -- specifically, Production Approval Holders (PAH), Organization Designation Authorization (ODA) holders, and repair stations -- sufficient time to upgrade their business systems that electronically generate the form, and to update their procedures manuals and training.	Consider allowing use of the replaced Form (dated 06-01) until their electronic business systems can be upgraded to comply; or, alternatively, allow a phase-in period of 90 days before the Order becomes effective. This will prevent these users from finding themselves in immediate non-compliance with the Order and then needing to file a Deviation Request until such time that their systems are upgraded.	Partially Adopted. Will use 180 days for the order to be effective after order is published.
11.	Page 1-1. Para. 1-1.c. Note 2:	Correct the text as follows: <i>NOTE 2: The use of the world word "should" throughout this order refers to a recommended practice. The associated activity is not a requirement; therefore, a record of completion is not required.</i>	Typo.		Adopted.

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12.	<p>Page 2-8. Para. 2-8.j. Page 3-7, Para. 3-6.j. Page 4-6 Para. 4-5.j.</p>	<p>Add text, as indicated below, in each of these paragraphs concerning Block 10, Serial/Batch Number: Block 10. Serial/Batch Number. <i>If the product or article is required by 14 CFR part 45, Identification and Registration Marking, to be identified with a serial number, enter it here. Additionally, any other serial number not required by regulation also may be entered. <u>If a specific batch or lot number is used to control or trace the product or article, enter the batch or lot number here.</u> If no serial or batch number is entered in this block, enter "N/A."</i></p>	Correction	<p>This paragraph adequately addresses serial numbers, but provides no guidance for batch numbers. Since the stated purpose of the block is "serial/batch numbers," guidance for batch numbers is needed. Our suggested revision will help to ensure that Production Approval Holders (and Repair Stations for Return to Service, and other users of the form) have provisions for recording necessary information to allow for proper traceability of products or articles.</p>	Adopted. Will use these words in all 3 chapters.
13.	<p>Page 2-11 Para. 2-10.b.(2)</p>	<p>Correct the text as follows: (2) ... <i>The new FAA Form 8130-3 is not a statement of current condition and should refer to the previous FAA Form 8130-3 in Block 13 Block 12 by the following statement: ...</i></p>	Clarification	<p>Indicate correct block number. (Block 12 is now the Comments section.)</p>	Adopted.

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14.	General.	Do not remove references to ATA Spec 2000, Chapter 16.	Although Chapter 16 is included in the full Spec 2000 document, it is also published as a separate document which is available at no cost per agreement with FAA. By referring users to Spec 2000 only, without the reference to ATA Spec 2000, Chapter 16, it may inhibit adoption of the electronic Form 8130-3.		Non-Concur.
15.	Appendix A, Figure A-10,	There is an error in Appendix A, Figure A-10, Sample FAA Form 8130-3 for a Rebuilt Product or Article.	Block 11 states "See Block 13" and should state "See Block 12."		Adopted.
16.	Figure A-18	Figure A-18, Remarks Block contains the words "AIRWORTHINESS APPROVAL – FOR DOMESTIC SHIPMENT ONLY".	FAA did away with that wording in revision G I believe.		Adopted.

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17.	General.	My comment is if you are going to change the date format in the current blocks 18 and 23 from mmm/dd/yyyy (USA system) to the new blocks 13e and 14e dd/mmm/yyyy (European system), why not use the International ISO 8601 standard for dates which is yyyy/mm/dd	The FAA Form 8130-3 is used by many countries in the world who use a different date scheme that differs from the USA, Canada and EASA member countries.		Non-Concur. Date format change to Form 8130-3 is part of the harmonization effort of the ARC with other countries.
18.	Appendix A, Figure A-13.	The typo is in Appendix A Figure A-13 Dual Release Approval for Return to Service sample 8130-3.	In Block 12 the second paragraph should read "Certifies that work specified in Blocks 11/12 was carried out...." The sample says Blocks 12/13 which will no longer be accurate after the form is revised.		Adopted.
19.	Page A-13, Figure A-13, Block 12.	Second statement in Block 12 currently states in error "Certifies work specified in Blocks 12/13..."	Renumbering of the blocks on this form requires this statement to be revised.	Recommend revision to Block 12 to state "Certifies work specified in Blocks 11/12..."	Adopted.

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1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Howard A. Whyte Regulatory Compliance Manager, Customer Service – Aftermarket Hamilton Sundstrand Worldwide Repair – Windsor Locks Phone: 860-654-5608	4. Date of Review: January 16, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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20.	Appendix C	Provide definitions for Product and for Article.	Neither of these terms are defined in FAR 1, but are, instead, buried deep within the FAR's. These definitions would help clarify a sometimes confusing issue.		Adopted. Confirm with Don Lausman.
21.	In Section 3, Page 3-7, Under “Block 11-Status/Work”:	In the table provided for the words to be entered into Block 11, I suggest that “ <i>Inspected</i> ” or “ <i>Tested</i> ” be changed to “ <i>Inspected/Tested</i> ”.	This change would mirror exactly the requirements in EASA requirements for the same block, in their EC 2042/2003 M4, Appendix2, Item 5-Block 11. EASA uses the same wording as is used in our 8130-21. This change would more closely harmonize the two forms in both wording and intent.		Partially Adopted. Will adopt “Inspected and/or Tested”, per the MAG.

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1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Patrick D. Markham VP Technical Services HEICO Parts Group Mobile: 1.954.554.6235 email:pmarkham@heico.com	4. Date of Review: January 16, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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22.	Page 2-6, paragraph 2-7 c (2)	A quality representative can sign the statements required by this paragraph in place of the "quality control/assurance manager".	Any quality representative can make the same assessment as the "quality control/assurance manager" without compromising the airworthiness of the article.	Replace "quality control/assurance manager" with "quality representative" Modify the appendix A-7 example as appropriate.	Partially Adopted. Will use "or authorized representative".
23.	Page 2-7, 3-5, & 4-4 Paragraph 2-8, 3-6, & 4-5	Block 9 can be eliminated without renumbering the remainder of the blocks.	Renumbering the blocks 10-15 to 9-14 will cause a trickle down set of revisions to various internal procedures that call out the remaining blocks by number.	Leave the remaining block numbers with the current numbering scheme. In effect, the blocks would be numbered 1-8, 10-15. (Revert the remaining block # references to the Rev G block numbers.)	Non-Concur.
24.	Page 1-3, 2-1, & 4-3 Paragraphs 1-9b, 2-1e, 4-1h	Typo	AC 21-35 was canceled by AC 21-43	Replace "AC 21-35" with "AC 21-43" (paragraph 4-1 h, remove "(or AC 21-43 upon issuance)")	Adopted.
25.	Page 2-11 Paragraph 2-10 b(2)	Typo	Typo	Replace "Block 13" with "Block 12".	Adopted.
26.	Page 3-9 Paragraph 3-6 n	Typo	Typo	Replace "Block 13" with "Block 12"	Adopted.

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27.	Page 4-5, A-14 Paragraph 4-5(e)	Typo	Figure A-14 does not contain an example of the statement discussed in this paragraph.	Either drop the reference to figure A-14 of Appendix A, or add the statement “This is the certification statement for the products or articles listed on the attached document dated dd/mmm/yyyy containing pages X through Y” to figure A-14.	Partially Adopted. Changed it to Figure A-4.
28.	Page A-10 Figure A-10	Typo	Typo	Replace “Block 13” with “Block 12” in Block 11 of Figure A-10.	Adopted.
29.	Page A-13 Paragraph A-13	Typo	Typo	Replace “Blocks 12/13” with “Block 11/12” in Block 12 of Figure A-13.	Adopted.

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30.	None	Although Universal Avionics does not have any comments, we have taken into consideration that form 8130-3 will be revised. Block 9 Eligibility* is removed and subsequently all following blocks are renumbered. Also the acceptable date format is changed from (m/d/y) to (dd/mmm/yyyy).	None	None	Adopted.

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31.	Page 1-1 Para. 1-1 c. NOTE 2	The proposed Order states: "The use of the world....." Should be "The use of the word..."	Clerical error	Correct clerical error	Adopted.
32.	Page 1-1 Para. 1-4	No effective date is identified. Due to re-programming requirements to implement FAA Form 8130-3 changes, it is hoped that up to 12 months will be allowed as the implementation period from date of publication.	Changes to FAA Form 8130-3 will require some time to make programming changes.	Allow 12 months implementation period from date of publication.	Partially Adopted. Effective Date will be 180 days after order is published.
33.	Page 2-1 Para. 2-1g	The proposed Order states: The signature of the person authorized to issue FAA Form 8130-3 may be applied electronically to Block 14b from domestic or international locations. Reference to Block 14b is incorrect.	Correct block for signature is 13b.	Correct clerical error	Adopted.

DOCUMENT REVIEW LOG

34.	Page 2-8 Para. 2-8 l. Block 12 – Remarks (2) (b)	<p>The proposed Order states:</p> <p>When a new FAA Form 8130-3 is issued to correct errors, the following statement must be entered...”</p> <p>This is exactly the same as the requirement located on page 2-11, para. 2-10 b. (2)</p>	Redundancy in requirements.	Remove (2) (b) from Block 12 Remarks section.	Adopted.
35.	Page 2-9 Para. 2-8 l Block 12 – Remarks (2) (m)	<p>The proposed Order states:</p> <p>When issued at a supplier facility with direct shipment authorization from the PAH, the words, “Airworthiness approval – Direct shipment authorization” must be entered in Block 12.....”</p> <p>Not consistent with verbiage for same requirement in Chapter 4.</p>	Inconsistent with current language and proposed language on page 4-7, para. 4-5 l. Block 12 – Remarks (3) which states, “When used by authorized suppliers with properly documented direct shipment authorization from the PAH, the words “Direct Shipment Authorization” must be entered in Block 12.....”	Remove words “Airworthiness approval” from in front of “Direct shipment authorization.”	Non-concur. Differences are taking into account the product/article is an export meeting special import requirements and putting direct shipment authorization in block 12.

DOCUMENT REVIEW LOG

<p>36.</p>	<p>Page 2-11 Para. 2-10 b. (2)</p>	<p>The proposed Order states:</p> <p>The request for a new FAA Form 8130-3 may be honored without reverification of the product or article condition. The new FAA Form 8130-3 is not a statement of current condition and should refer to the previous FAA Form 8130-3 in Block 13 by the following statement: “This FAA Form 8130-3 corrects the error(s) in Block(s) [enter block number(s) corrected] of the FAA Form 8130-3 [enter original form tracking number] dated [enter original issuance date] and does not cover conformity/condition/release to service.” The erroneous form must be marked as such. Both forms should be retained according to the retention period associated with the original.</p> <p>Customers are not happy with the fact that the order is giving them an action to mark the original FAA Form 8130-3 as erroneous and are not happy with the verbiage that the form does not cover condition/conformity/return to service. They want a direct replacement document without needing to retain the original FAA Form 8130-3.</p>	<p>Customer dissatisfaction with current wording in FAA Order 8130.21G which is the same as in proposed FAA Order 8130.21H.</p>	<p>Revert to language same as or similar to that found in FAA Order 8130.21E:</p> <p>REISSUANCE BECAUSE OF TYPOGRAPHICAL ERRORS ON THE ORIGINAL. The original issuer may reissue Form 8130-3 if there are typographical errors on the original.</p> <p>(1) The end user must provide a written statement and a copy of the incorrect 8130-3 to the original issuer highlighting errors.</p> <p>(2) Once these actions are taken, the copy of the original form should be reviewed to determine the validity of the errors. If the errors are valid, a corrected form may be issued in accordance with the appropriate section (new, export, or approval for return to service) of this order, and the words “THIS FORM 8130-3 REPLACES FORM 8130-3 WITH FORM TRACKING NUMBER [insert number] DATED [enter original issuance date]”, must be entered in Block 12. The replacement form must have an original signature and the date the signature was applied.</p>	<p>Non-concur. Current version is less restrictive when correcting errors to original form.</p>
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DOCUMENT REVIEW LOG

37.	Page 4-3 Para. 4-1 j.	<p>The proposed Order states:</p> <p>The signature of the person authorized to issue FAA Form 8130-3 may be applied electronically to Block 14b from domestic or international locations.</p> <p>Reference to Block 14b is incorrect.</p>	Correct block for signature is 13b.	Correct clerical error	Adopted.
38.	Page 4-7 Para. 4-5 1 Block 12 - Remarks (2) (b)	<p>The proposed Order states:</p> <p>When a new FAA Form 8130-3 is issued to correct errors, the following statement must be entered..."</p> <p>This is exactly the same as the requirement located on page 4-9, para. 4-7 b. (2)</p>	Redundancy in requirements.	Remove (2) (b) from Block 12 Remarks section.	Adopted. Will change wording to match Chapter 3; confirmed with AFS-340.

DOCUMENT REVIEW LOG

<p>39.</p>	<p>Page 4-9 Para. 4-7 b. (2)</p>	<p>The proposed Order states:</p> <p>The request for a new FAA Form 8130-3 may be honored without reverification of the product or article condition. The new FAA Form 8130-3 is not a statement of current condition and should refer to the previous FAA Form 8130-3 in Block 13 by the following statement: “This FAA Form 8130-3 corrects the error(s) in Block(s) [enter block number(s) corrected] of the FAA Form 8130-3 [enter original form tracking number] dated [enter original issuance date] and does not cover conformity/condition/release to service.” The erroneous form must be marked as such. Both forms should be retained according to the retention period associated with the original.</p> <p>Customers are not happy with the fact that the order is giving them an action to mark the original FAA Form 8130-3 as erroneous and are not happy with the verbiage that the form does not cover condition/conformity/return to service. They want a direct replacement document without needing to retain the original FAA Form 8130-3.</p>	<p>Customer dissatisfaction with current wording in FAA Order 8130.21G which is the same as in proposed FAA Order 8130.21H.</p>	<p>Revert to language same as or similar to that found in FAA Order 8130.21E:</p> <p>REISSUANCE BECAUSE OF TYPOGRAPHICAL ERRORS ON THE ORIGINAL. The original issuer may reissue Form 8130-3 if there are typographical errors on the original.</p> <p>(3) The end user must provide a written statement and a copy of the incorrect 8130-3 to the original issuer highlighting errors.</p> <p>(4) Once these actions are taken, the copy of the original form should be reviewed to determine the validity of the errors. If the errors are valid, a corrected form may be issued in accordance with the appropriate section (new, export, or approval for return to service) of this order, and the words “THIS FORM 8130-3 REPLACES FORM 8130-3 WITH FORM TRACKING NUMBER [insert number] DATED [enter original issuance date]”, must be entered in Block 12. The replacement form must have an original signature and the date the signature was applied.</p>	<p>Non-concur. Same response as item #36.</p>
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DOCUMENT REVIEW LOG

40.	Page 1-1, 1-2, 1-3, More	The term “article” is used in several places in the document but it is not included in the list of defined terms.	“Article” is now replacing parts and appliances. It is not clear if an entire engine is an article. It is also unclear if a standard part is an article. Standard Part is included in the list of definitions.	Include a definition for the term “article” in the definitions section of the Order.	Adopted.
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DOCUMENT REVIEW LOG

1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Clay Barber Principal Engineer Garmin International	4. Date of Review: January 17, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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Instructions for Completing the Document Review Log

Blocks 1 & 2: To be completed by AIR-200 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

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The below columns to be completed by the Field Offices, except for "AIR-200 Disposition" column.

AIR-200 PMs disposition comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as one of the following:

● Adopted; ● Partially Adopted ● Non-Concur ● Concur but Outside of Scope (Will be considered in next change/revision) ● Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-200 Disposition:
41.	Page 2-10, Para 2-8.m.(2)	States: (2) Place a check in the "Non-approved design data specified in Block 12" box when FAA Form 8130-3 is used for—	Non-approved design data is now in 8130-3 block 13a.	Change "Block 12" to "Block 13a"	Non-Concur. Paragraph 2-8.m.(2) is supposed to say "Block 12" since it is under Block 13a category—commenter was confused.
42.	Page 2-11, Para 2-10.b.(2)	Includes a reference to FAA Form 8130-3 Block 13	New form 8130-3 block number has changed; on the new form it will be block 12.	Change "Block 13" to "Block 12"	Adopted.
43.	Page 4-7, Para 4-5.1.(8)	States: (8) If the PAH holds the type design data for replacement articles produced under an STC, "Produced by the STC design approval holder" must be entered in Block 12.	A replacement article would have "PMA" marked elsewhere on the 8130-3. Consequently, it is unclear what benefit is provided to the 8130-3 recipient by the notation "Produced by the STC design approval holder."	Remove 4-5.1.(8).	Non-Concur. This is an option for the exporter to use in Block 12, if product/article fits the statement.

DOCUMENT REVIEW LOG

1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Todd Sigler Assistant Vice President, Civil Aviation Aerospace Industries Association	4. Date of Review: January 17, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-200 Disposition:
44.	General	AIA and GAMA members are directly affected by the revised Order and offer the following comments for consideration by FAA. AIA and GAMA support efforts to modernize and harmonize FAA forms when driven by safety and alignment of requirements with other regulatory authorities.	However, AIA/GAMA remind FAA that mandatory changes to widely used forms come at a cost to industry. In the case of the Form 8130-3, many companies generate the form electronically and will bear direct and indirect costs to update these systems. While difficult to estimate the total burden on industry, these costs are not expected to be insignificant, especially when unplanned.	Secondly, once Order 8130.21H is finalized and published, AIA/GAMA request the FAA provide users of the form ample time to upgrade business systems that electronically generate the form and update related procedures and conduct training. This will avoid industry finding itself in immediate non-compliance and having to file deviation requests; such activity would not be valued added for either industry or FAA and is completely avoidable.	Partially Adopted. Will use 180 days to be effective after order is published.
45.	Paragraph 1-7(a) on page 1-2.	In closing, AIA/GAMA offer one specific comment in reference to The section states, "FAA Form 8130-3 is not a delivery or shipping document, nor should it be used for administrative purposes between two persons."	There is no guidance to define what actions or activity would constitute an "administrative" purposes.	As such, AIA/GAMA recommend FAA take this opportunity to add clarity of intent or simply delete the latter half of this point (wording after "nor").	Adopted. Talked to Todd Sigler, AIA/GAMA, verbiage deleted after "nor".

DOCUMENT REVIEW LOG

1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Susan J. Jackson, FAA Liaison, Regulatory Compliance Office, Pratt & Whitney	4. Date of Review: January 20, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-200 Disposition:
46.	General	<p>A customer LOST four 8130-3 tags and said they would accept a copy of our original FAA Form 8130-3 tag as long as it did not say DUPLICATE across the front. The only copies we had on file unfortunately had DUPLICATE stamped on them. When I went to the Order, it said:</p> <p>4-6. Lost FAA Form 8130-3 Issued for Export Airworthiness Approvals. If a copy of an FAA Form 8130-3 is requested, a file copy of the original form may be provided by an authorized person, if available.</p>	<p>The same is true for para. 2-9 and 3-6. When I researched previous versions of Order 8130.21, I found the verbiage I was looking for in the event a new original document needed to be issued to replace a LOST 8130-3 tag. I wondered if the FAA would consider adding that language back in the Order for Chapters 2, 3 and 4.</p>	<p>406. LOST FORM 8130-3 ISSUED FOR EXPORT AIRWORTHINESS APPROVALS.</p> <p>a. Forms may be reissued by authorized persons. b. If a copy of Form 8130-3 is requested by the original recipient, a file copy of the original form should be provided, if available. Otherwise, a new form will be issued in accordance with chapter 4 of this order, and the words "THIS FORM 8130-3 REPLACES THE LOST FORM 8130-3 DATED [enter original issuance date]" entered in Block 13, and the current date entered in Block 18 for airworthiness approval. The replacement form must have an original signature and the same data as the lost Form 8130-3.</p>	<p>Non-Concur. Moved sections into chapter 1 due to redundancy in all chapters.</p>

DOCUMENT REVIEW LOG

1. Document No.: FAA Order 8130.21 Revision H	2. Project Lead: Grant Schneemann	3. Reviewing Office: Reviewer's Name & phone #: Jason Dickstein, Aviation Suppliers Association cell: (202) 365-2422	4. Date of Review: January 17, 2012	5. Date of AIR-200 Disposition: May 6, 2013
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-200 Disposition:
47.	Paragraph 2-3.c.	"Cannot Be Used For Export Approval" From the Original Language of "Does Not Constitute Export Approval," is Causing Industry Confusion and Frustrating the Purpose of the Guidance	See Document.	Amend paragraph 2-3(c) to read, "does not constitute an export approval."	Adopted.
48.		Export Airworthiness Approvals Should Class Like Nations Together for Destination Purposes in Order to Facilitate Trade	See Document.	See Document.	Non-Concur. Not a practical recommendation—confirmed with AIR-40.
49.		Reference to "a specific country's special import requirements" may become a future source of confusion due to the implementation of the U.S.EU bilateral agreement because specific country standards in the EU have been superseded by uniform EASA standards.	See Document.	Amend paragraph 2-4(d) to read, "compliance with a specific airworthiness authority's import requirements".	Partially Adopted. AIR-40 approved using "or jurisdiction" in this paragraph.

DOCUMENT REVIEW LOG

50.		The New Guidance Regarding Rebuilt Engines in the European Union [sic] Creates a Safety Concern and Harms Small Businesses	See Document.	See Document.	Non-Concur. Required to follow bilateral agreement with EU, specific to “Rebuilt Engines”.
51.		References to the European Union Should be Amended to Reflect the European Community	See Document.	See Document.	Non-Concur. European Union is the correct term.
52.	Page 2-4. 2-6.d.(4)	Typographical and other minor errors.	A comma and the word “and” at the end of the sentence appear to be superfluous.		Adopted.
53.	Page 2-6. 2-7.c.(2)	Typographical and other minor errors.	In line two there appears a widowed bracket (“]”) following the word “attached”		Adopted.
54.	Page 2-6. 2-7.c.(2)	Typographical and other minor errors.	In line six the example number “[S1-054321]” is not underline. We suggest underlining to maintain consistency with other example numbers in the paragraph.		Adopted.
55.	Page 2-11. 2-10.b.(2)	Typographical and other minor errors.	In line three a reference is made to “Block 13.” This should be corrected to read “Block 12”		Adopted.
56.	Page 3-9. 3-6.n.	Typographical and other minor errors.	In line three a reference is made to “Block 13.” This should be corrected to read “Block 12”		Adopted.
57.	Page 4-5. 4-4.h.	Typographical and other minor errors.	At the end of line two a second period appears. This should be deleted.		Adopted.
58.	Page 4-8. 4-5.m	Typographical and other minor errors.	In line seven a reference is made to “Block 12.” This should be corrected to read “Block 11”.		Adopted.
59.	Page 5-6. 5-6.c.	Typographical and other minor errors.	In line one a reference is made to “Statements made in Blocks 14a and 14e.” 14e is a date box and therefore this reference appears incorrect. Perhaps the reference intended is to Blocks 13a and 14a. Unclear.		Adopted.
60.	Page A-4.	Typographical and other minor errors.	Figure A-4 sample form appears to have a date discrepancy. Blocks 5 and 12 make reference to the date “12 Oct 2005,” but Block 13e refers “12 Oct 2007.” It is unclear whether this discrepancy is intentional.		Adopted. Put same date.
61.	Page A-10.	Typographical and other minor errors.	Figure A-10 sample form Block 11 states “See Block 13.” This should be corrected to “See Block 12”.		Adopted.

DOCUMENT REVIEW LOG

62.	Page A-13.	Typographical and other minor errors.	Figure A-13 sample form Block 12 states “work specified in Blocks 12/13” This should be corrected to “work specified in Blocks 11/12”		Adopted.
63.	Page A-20.	Typographical and other minor errors.	Figure A-20 sample form Block 12 states “The installed is responsible” This likely should read “The installer is responsible” and should therefore be corrected.		Adopted.