

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Learjet PC/MRA ODA administrator Reviewer's Name & Phone #: Bill Kinkaid	4. Date of Review: 23 Jan 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	(Table) 8-1; Immediately following Pg 8-20	8130-9 required for aircraft manufactured under a PC with a PC ODA	No regulatory requirement	Remove	<u>Adopted.</u>
2.	(Table) 8-1; Immediately following Pg 8-20	Form 8050-64 required for replacement Certificate	8050-64 does not fit all registration scenarios.	Make allowances for FAA forms 8050-1 (with AFS-750 validation), AFS-750-FAX-4 (see paragraph 204 c. of this order), form 8050-6 as appropriate under CFR 47.	<u>Adopted. Clarified that the form is only required when changing the registration number.</u>
3.	(Table) 8-1; Immediately following Pg 8-20	FAA form 8050-3 required for Replacement C of A	This certificate is not immediately available.	Make allowances for FAA forms 8050-1 (with AFS-750 validation), AFS-750-FAX-4 (see paragraph 204 c. of this order), form 8050-6 as appropriate under CFR 47.	<u>Adopted.</u>
4.	(Table) 8-1; Immediately following Pg 8-20	FAA form 8050-3 required for aircraft manufactured under a PC with a PC ODA	This certificate is not immediately available.	Make allowances for FAA forms 8050-1 (with AFS-750 validation), AFS-750-FAX-4 (see paragraph 204 c. of this order), form 8050-6 as appropriate under CFR 47.	<u>Adopted.</u>
5.	(Table) 8-1; Immediately following Pg 8-20	8130-11 required for aircraft manufactured under a PC with a PC ODA	PC holders do not typically manufacture aircraft using spare and surplus parts.	Remove	<u>Partially adopted. Clarified only applies when constructed from spare and surplus articles.</u>
6.	Pg 2-12 Para 217 a. (1)	Form 8050-64 required for replacement Certificate	8050-64 does not fit all registration scenarios. This paragraph also conflicts with 2-12 a. (5) Must -vs.- or.	Make allowances for FAA forms 8050-1 (with AFS-750 validation), AFS-750-FAX-4 (see paragraph 204 c. of this order), form 8050-6 as appropriate under CFR 47.	<u>Non-concur. The paragraph states that the form is only required for a change in registration number.</u>

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7.	Pg 4-1 Para 402 a. (3)	Review accident and incident data for the aircraft type	Not practical, there can be thousands of documents to review.	Remove	<u>Non-concur. The information provided are examples of what "the FAA representative should become familiar with..."</u> <u>Review of all listed sources is not mandatory.</u>
8.	Pg B-1 Para 2. A. (2)	Include the number of aircraft required	Research and development certificates are only issued for a specific aircraft.	Remove or clarify ( <i>registration number?</i> )	<u>Non-concur. The program letter describes the project, which may include more than one prototype aircraft and other support aircraft such as a "chase" aircraft providing visual (did all the gear doors close?) or taking photos or video of the prototype aircraft.</u>
9.	Pg B-3 Para d. (1),(2),(3), (4)	Overly restrictive to industry	Manufactures may not know this information in advance.	Remove	<u>Non-concur. Note that the paragraph specifies that the information should be provided, it is not necessarily mandatory. Note that items 1, 2 and 4 are regulatory. See 21.193.</u>
10.	Pg C-11 no. 39	If restricted geographical limits	Context unclear	Clarify	<u>The geographical limitation requirements are in paragraph 5e of the appendix.</u>
11.	Pg C-11 no 39	Limits are restrictive to industry	Manufactures may wish to exhibit R & D aircraft at airshows (Ex. NBAA) during phase II.	Clarify/remove	<u>Phase II does not apply to R&amp;D. This limitation was not changed during this revision.</u>

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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Kenneth Vaughn		4. Date of Review: 02/06/2014	5. Date of Disposition: 02/14/2014
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	201.c.	Add: Qualified DAR's may be used on a short-time basis to support Conformity or Airworthiness of non-critical articles without being added as Unit Members if the support is anticipated to be for no more than 6 months and the DAR is current in the required delegations.	ODA's having short time needs for support at various suppliers have needs for DAR type support that can more efficiently and effectively be provided by a local DAR without the long process of being added to the ODA as long term unit members. This avoids the added expense of using added travel expenses to bring in ODA UM's located long distances away when DAR's might be locally available.		Outside of scope. FAA Order 8100.15 sets policy for ODAs.	
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Submitted by: Kenneth Vaughn, DAR 801-499-9770 Springville, Utah 84663 Date of comments: February 6, 2014

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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Draken International Reviewer's Name & Phone #: Jeff Spann		4. Date of Review: 28 Mar 14	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	Appendix C, Para 3	<p>Additionally, the operating limitations for former military aircraft that weigh more than 9,000 lbs maximum takeoff weight, with turbine power greater than 3,000 lbs of total engine thrust of all engines or 1,000 shaft horsepower of one engine or if it was originally equipped with an ejection seat system <b>must be coordinated with AIR-230.</b></p>	<p>No concerns for individuals or small companies with only 1 or a few experimental aircraft. This comment comes from a business with a fleet of experimental aircraft.</p> <p>How long will AIR-230 coord take? Does it apply to every 8130-7 or only initial certificate? Does it apply to each aircraft to be certified/recertified?</p> <p>Draken currently has over 20 Experimental aircraft (expanding to over 50 in next year) each needing annual renewal.</p>	<p>Please clarify intent for coordination with AIR-230. From a fleet management perspective, recommend Ops Limits for first aircraft of type series be coordinated with AIR-230 and be applied to remainder of fleet unless changes necessitate reapproval.</p>	<p>Partially adopted. Made coordination optional.</p>	
2.	Appendix C-1, No. 29	<p>MiG-21 MiG-23 F-104 F-4 Minimum runway length 8000 feet, unless calculated greater.</p> <p>Operations with the drag chute inoperative is prohibited.</p> <p>Flight in instrument meteorological conditions is prohibited.</p>	<p>OEM/military Take off/landing distance data should not be surpassed by FAA guidance.</p> <p>Pilot's operating handbook is the appropriate reference for determining if flight with inoperative drag chute is prohibited.</p> <p>Why is flight in IMC prohibited if the aircraft is properly equipped and maintained?</p>	<p>Recommend FAA ensure operators have and use OEM/Military derived TOL data for these aircraft.</p> <p>Recommend FAA direct operators to abide by OEM/Military derived guidance for determining if operations with inoperative drag chute are prohibited.</p> <p>Delete restrictions for IMC.</p>	<p>Concur</p> <p>Non-concur. Requiring the drag chute is more conservative.</p> <p>Partially adopted. We will allow IMC if the pilot can comply with 14 CFR 91.319.</p>	

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				A possible alternative is to only have these limits apply during Phase 1 operations only.	
3.	Appendix C-1, No. 30	L-39: Minimum runway length 5000 feet, unless calculated greater.	OEM/military Take off/landing distance data should not be surpassed by FAA guidance.	<p>Recommend FAA ensure operators have and use OEM/Military derived TOL data for these aircraft.</p> <p>Delete minimum runway length restrictions.</p> <p>A possible alternative is to only have these limits apply during Phase 1 operations only.</p>	Adopted.
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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: ABSOLUTE AVIATION LLC Reviewer's Name & Phone #: Phil Baker	4. Date of Review: 27-FEB-2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	Pg. 2-9, Par. 212	No definition of military aircraft. Just because an aircraft is operated by the military does not automatically make it a military aircraft that should be treated differently from an FAA aircraft. What about current military aircraft that are commercially derived, and hold a valid FAA Airworthiness Certificate?	Commercial derivative aircraft should be addressed. The military operates commercial derivative aircraft that are based on FAA TC and STC's.	Please define military aircraft as aircraft that do not meet FAA Type Design.	Non-concur. As the paragraph states, there are several former military aircraft that have an approved type design.
2.	Pg. C-1 App. C, Par 3.	Operating Limitations must be designed to fit the specific situation, but now all changes to the limitations and any additions to the limitations require coordination with AIR-230? This change will make it more difficult to design limitations to fit the specific circumstance. This change will add a significant administrative hurdle to the aircraft certification process, that will be compounded by the fact that AIR-230 has no insight on specific situation.	Inefficient and impractical from an industry standpoint with dubious safety benefit. This change will tend to discourage designing Operating Limitations to fit the specific situation.  Negotiating situation-specific operating limitations between the applicant, DAR, MIDO/FSDO, and AIR-230 will impact cost and schedule without significant safety benefit. Minor, yet potentially beneficial, changes may be left out in order to mitigate the hassle of coordinating with AIR-230.	Please make coordination with AIR-230 optional or recommended, not mandatory. The local FAA Office and Designee on the ground should continue to be trusted to design operating limitations that fit the specific situation, while providing a resource as required. Coordinating with AIR-230 on changes involving high performance military aircraft is wise, but please delete the following: <i>"Changes to the limitations below or additional limitations must be coordinated with the Aircraft Certification Service, Airworthiness Certification Branch (AIR-230) by the aviation safety inspector issuing the limitations, or the designee's managing specialist.</i>	Partially adopted. Removed coordination requirement for R&D, show compliance.

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				<i>Additionally, "</i>	
3.	Pg. C4 App. C, #4	Provided the acronym for FSDO but overlooked the acronym for MIDO.	Consistency	Include "(MIDO)"	Adopted.
4.	Pg. C4 App. C, #5	Why would an Airworthiness Designee be responsible for identifying specific pilot class and rating requirements for operating an aircraft?	Unnecessary and inconsistent. Pilots and mechanics are responsible for performing functions in accordance with the authority of their license. DAR's are not familiar with pilot certificate requirements, and if a mistake is made identifying a requirement, then confusion and violation are possible. Proposed limitations #6, #12, #13, #16, #17, and #18 address certificate requirements as appropriately rated. #5 should be no different.	Current Limitation #8 should be retained in place of proposed limitation #5.	Non-concur. The requirements must be established by the operating limitations. The designee can request assistance through their managing specialist.
5.	Pg. C7 App. C, #21	Should be "191 Except R&D and Showing Compliance"	The ACO and MIDO already have full control over major changes and FAA flight test operations during TIA, and the MIDO issues the Experimental certificate for Showing Compliance. Why would FSDO need to be involved during TIA?	Current Limitation #19 should be retained.	Adopted.
6.	Pg C7 App C, #22	U.S. Defense contractors modify commercial derivative aircraft for military purposes. Most of these modifications are approved through the FAA	The limitation is valuable to have for most situations, but presents a significant problem for contractors who modify commercial aircraft on behalf	Allow the FAA office issuing the certificate to continue using its own discretion to design operating limitations that fit the specific situation,	Non-concur. If the aircraft is being modified per a DoD contract, the testing may be performed as a PAO. If the testing cannot be performed

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		MCO, and include special military systems. R&D and Showing Compliance certificates are required during STC development. Sometimes these aircraft are transferred back to the contractor for modification before going to a new military customer. This limitation would make flight testing these systems (or their safe carriage) difficult.	of the military. The root cause of the problem is App. C Par 3 <i>"Changes to the limitations below or additional limitations must be coordinated with the Aircraft Certification Service, Airworthiness Certification Branch (AIR-230) by the aviation safety inspector issuing the limitations, or the designee's managing specialist."</i>	rather than coordinating with AIR-230.	as a PAO, the office can propose an appropriate limitation.
7.	Pg. C6 App. C, #15	Similar to Item 4 above. Military Commercial Derivative Aircraft often contain military equipment that is required to be maintained to military technical orders. If the aircraft has not yet been presented to the military, it can't be considered "former military" so this limitation would be an "additional limitation".	The limitation is valuable to have for most situations, but presents a significant problem for contractors who modify commercial aircraft on behalf of the military. The root cause of the problem is App. C Par 3 <i>"Changes to the limitations below or additional limitations must be coordinated with the Aircraft Certification Service, Airworthiness Certification Branch (AIR-230) by the aviation safety inspector issuing the limitations, or the designee's managing specialist."</i>	Allow the FAA office issuing the certificate to continue using its own discretion to design operating limitations that fit the specific situation, rather than coordinating with AIR-230.	Non-concur. If the limitation applies why would you not issue it?
8.	Pg. C-8 App. C, #25	All turbine aircraft (or turbo jet, or turbo prop)?  What about FAA TC'd turbo-prop aircraft that are used by the military? They are	It appears the intent is directed towards military jets, but it clearly says turbine airplanes.	Just checking.	Non-concur. If the aircraft has a standard airworthiness certificate, it will not have ops limits issued.

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		"military" aircraft, but their performance isn't affected by how the aircraft is operated (public vs civil).			
9.	Pg. C10, App. C #32	There is no provision to require Phase 1 testing for an R&D aircraft.	Some R&D configurations require multi-phase test limitations. The proposed limitation hinders the ability to design limitations that fit the specific situation.	Provide far more options in Operating Limitations to allow more plug and play flexibility, or better yet, remove the requirement to contact AIR-230 for every addition or alteration to the boilerplate limitations.	Non-concur. There is no provision for a "phase I" R&D. However, there is no prohibition for changes.
10.	Pg. C10, App. C #33	There is no provision to prohibit an R&D or Market Survey aircraft from performing aerobatics.	If something is not prohibited, the operator can view it as allowed. Most R&D aircraft have no need to fly aerobatic. The proposed limitation hinders the ability to design limitations that fit the specific situation.	Provide far more options in Operating Limitations to allow more plug and play flexibility, or better yet, remove the requirement to contact AIR-230 for every addition or alteration to the boilerplate limitations.	Non-concur. This limitation does not apply to R&D or market survey.
11.	Pg. C10, App. C #34	There is no provision to allow removable externally mounted equipment on R&D or Market Survey aircraft.	Some R&D and Market Survey aircraft carry external stores, so why restrict these operations from this limitation? The proposed limitation hinders the ability to design limitations that fit the specific situation.	Make the limitation applicable to ALL 191	Non-concur. This limitation does not apply to R&D or market survey.
12.	Pg. C11, App. C #35	There is no provision to restrict IFR operations to transit operations. Experimental configurations often make testing in IMC unsafe, but transition under IFR is fine.	It is impossible to create a boilerplate set of Operating Limitations that will fit every need, and it's not practical to obtain permission every time limitations are designed to fit a	Provide far more options in Operating Limitations to allow more plug and play flexibility, or better yet, remove the requirement to contact AIR-230 for every addition or	Non-concur. The aircraft can either be safely flown IFR or it cannot.

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		Even if it is safe, if the operator doesn't need to test in IMC, I always prohibit it because it reduces risk.	specific situation. The proposed limitation hinders the ability to design limitations that fit the specific situation.	alteration to the boilerplate limitations.	
13.	Pg. C11, App. C #38	Removing the requirement to notify passengers of the Experimental nature of the aircraft appears to be contrary to 14CFR §91.319(b). Under R&D, no person may be carried on the aircraft unless that person is essential to the purpose of the flight, but if there are test equipment operators or test witnesses carried on board, shouldn't the pilot be required to advise them that the aircraft doesn't meet Standard safety requirements?	14 CFR §91.319(b) does not differentiate between Experimental purposes, it requires the PIC to notify. Test personnel are sometimes oblivious to the nature of experimental aircraft. They are not aircraft crew members, but are people deemed essential to the nature of the flight. They sit in a passenger seat and monitor a computer screen. The pilot should advise/remind everyone of the experimental nature of the aircraft, for safety sake.	Split limitation #38 into two separate limitations.  The first limitation: "The PIC must advise all persons carried on board . . ."  The second limitations should combine Current Limitation 13 and "The carriage of passengers is prohibited."	Non-concur. The aircraft is allowed to carry passengers or it not. In any case the pilot must comply with 91.319(d)(1) regardless of what the operating limitation states.
14.	Pg. C11, App. C #39	This limitation is impractical for R&D with multiple test location requirements. Testing locations are often located beyond half-range, e.g. ocean testing, icing testing, military test range, transition to favorable test conditions, etc.  Also, for other purposes of Experimental certificates, this restriction will prompt people to not restrict geographical limits in order to avoid the	This limitation is overly restrictive. It is not practical to develop a once size fits all template, and the FAA is underestimating the level of effort required to customize limitations to fit the specific situation. This change will result in unforeseen and undesirable consequences.	Allow the FAA office issuing the certificate to continue using its own discretion to design operating limitations that fit the specific situation, rather than coordinating with AIR-230.  Also, change the word " <u>must</u> not be more than . . ." to "should".	Adopted.

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		approval hassle.			
15.	Appendix C	Why remove Current limitation #1?	The new limitations point to regulations (91.205, 91.305, 139.319, Part 61, etc.) so why not require the 8130-7 to be displayed? Some operators want to stick it in the flight log. Why not remind operators of critical requirements. They are more apt to read Operating Limitations than scan the CFR for potentially applicable rules. It is more effective to leave the rules in the Operating Limitations than to impose a requirement on Airworthiness Inspectors and Designees to remember to verbally remind operators of numerous regulations.	Allow the FAA office issuing the certificate to continue using its own discretion to design operating limitations that fit the specific situation, rather than coordinating with AIR-230.	Non-concur. The operator is required to comply with the applicable regulations.
16.	Appendix C	Why remove Current limitation #12, 16, 17, 23, 25, 26, 32, 33?	Inconsistent. The new limitations point to some regulations and deleted others. There is a misconception that many of these rules don't apply to Experimental aircraft, so keeping them in the Operating Limitations is a beneficial reminder. Operators are more apt to read and follow Operating Limitations than scan the CFR for potentially applicable rules.	Allow the FAA office issuing the certificate to continue using its own discretion to design operating limitations that fit the specific situation, rather than coordinating with AIR-230.	Non-concur. The operator is required to comply with the applicable regulations.

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			It is more effective to leave the rules in the Operating Limitations than to impose a requirement on Airworthiness Inspectors and Designees to remember to verbally remind operators of numerous regulations.		
17.	Pg. C2 App. C, Par. 5c-e	Why are some limitations in the table and some within the preamble text? This is very confusing and easy to miss.	I see far more changes to the Operating Limitations table than benefits. Much like many of the Operating System "upgrades" on Microsoft Windows.	All operating limitations should be placed together in one location, or grouped together purpose (like before).	Non-concur. The limitations are in the table.
18.	Pg 475, Par. 473d	Missing a word in the second sentence.		"FAA representative must . . ." verify or ensure?	Adopted.
19.	Pg. 4-1, Par 401	May an owner make application to the FAA through a DAR?	Applicants are notoriously unfamiliar with certification requirements and DAR's work well as a bridge between the applicant and FAA to improve accuracy and efficiency. Recent policy change requires applicants to go directly to the FAA office, which has resulted in certification delays and additional workload for FAA inspectors. The FAA must still delegate a function and approve operating limitations, so why not improve FAA efficiency and public satisfaction by utilizing DAR's to help the applicant through	Make a note in Par 401 and Par 306 that the applicant may send the application to the FAA or an appropriate Designee (at the discretion of the managing office).	Out of scope.

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			the application process?		
20.	Pg. 2-13, Par. 217b(6)	Are there other types of "administrative" paperwork amendments that would not require a new certification inspection? E.g., correction of errors, clarified wording, etc.	It would be beneficial if corrections and clarifications could be included as types of administrative amendments that do not require a new certification inspection.		
21.	Pg 3-14, Par. 321a	14 CFR §43.15 identifies performance standards for 100-Hr, Annual, and Progressive Inspections. Can a current continuous inspection program be used to demonstrate conformity to type design during airworthiness certification?	The application of this requirement is inconsistent within the industry, so clarification within this paragraph would be beneficial. It is impractical to perform a full inspection on a large aircraft, so progressive inspections are allowed per 43.15. Can a current progressive inspection be used? The FAA can always request additional inspections if the situation dictates it.	Clarify whether or not a current progressive inspection can be used for the basis of the issuance of a Standard Airworthiness Certificate. (allow)	Adopted.
22.	Pg 4-37 Par. 445c	Does this preclude the option of including both Phase 1 and Phase 2 flight testing on the same Operating Limitations?	Upon completion of Phase 1 flight testing, the pilot must make a log book entry certifying compliance with 14 CFR 91.319b. Once this has been completed, the operator may proceed with Phase 2 flight testing.		Non-concur. The instructions for issuing phase I / II limitations are in appendix C paragraph 2.
23.	Pg 4-32 Par 443	FAA Order 8900.1, Par. 4-660D says "An operator may operate an aircraft for which the FAA has issued an	Does this apply to only original, or original and recurrent certificates? There is no mention in 8130.2 on how to accommodate this. If the	Include a paragraph on the use of MEL's under an Experimental certificate.	Out of scope.

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		original experimental airworthiness certificate in accordance with § 91.213 only when authorized in that certificate's operating limitations."	base aircraft is type certificated and the inop item isn't affected by the experimental config, then the inop item should be able to be deferred per an FAA-approved MEL.		

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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Oliver Reinhardt, Flight Design GmbH, Zum Tower 4, 01917 Kamenz, GERMANY Reviewer's Name & Phone #:	4. Date of Review: 29-Mar-2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	Page C-2, App. C, Item 5. c.	Prohibition of carriage of passengers, flight over densely populated areas, and night or instrument flight rules operations is inadequate for ELSA aircraft that have formerly been SLSA aircraft.	The proposed order significantly increases the limitations for ELSA aircraft that have been formerly SLSA aircraft. Sufficient aircraft of this kind are in operation today that would allow for a proper judgment on the basis of real safety data. To my knowledge of these data there is no safety related evidence that would justify strengthening these data. Especially when considering that this would set the limitations for ELSA that have been factory built within a factory quality assurance environment to a higher level that those valid for a homebuilt experimental aircraft that did not undergo any specific quality assurance procedures, which is highly questionable.	Remove item (1) from the list of aircraft where this limitation applies to. This way do not apply this limitation to ELSA that have previously been SLSA – like it is within the current order.	Partially adopted. Clarified the restriction is for the first issuance of an experimental certificate and the SLSA is not in compliance with 91.327(b).
2.	Page C-3, App. C, Item 5. c.	Prohibition of carriage of passengers, flight over densely populated areas, and night or instrument flight rules operations is inadequate for electric powered aircraft.	Imposing this limitation to all kinds of electric powered aircraft without any reference to certification or qualification level implies, that any certification requirement that might be imposed by the	Remove item (6) from the list of aircraft where this limitation applies to. This way do not apply this limitation to electric powered aircraft.	Adopted.

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			<p>Authority, will in all cases be inadequate to provide adequate operational reliability for electric propulsion systems. This is denying all the attempts and efforts spent by the FAA in other sections to support generation of certification requirements that ensure comparable reliability to conventional propulsion systems.</p>		
3.	Page C-2, App. C, Item 5. e.	Requirement for all operations be conducted within a specified geographical area is inadequate for ELSA aircraft that have formerly been SLSA aircraft.	<p>The proposed order significantly increases the limitations for ELSA aircraft that have been formerly SLSA aircraft. Sufficient aircraft of this kind are in operation today that would allow for a proper judgment on the basis of real safety data. To my knowledge of these data there is no safety related evidence that would justify strengthening these data. Especially when considering that this would set the limitations for ELSA that have been factory built within a factory quality assurance environment to a higher level than those limitations valid for a homebuilt experimental</p>	<p>This is connected to comment no. 6, below: Remove the reference "to item c above" and make entry sentence to read: "Require all operations be conducted within a specified geographical area for aircraft— (1) ..."</p>	Partially adopted. Clarified the restriction is for the first issuance of an experimental certificate and the SLSA is not in compliance with 91.327(b).

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			aircraft that did not undergo any specific quality assurance procedures, which is highly questionable.		
4.	Page C-3, App. C, Item 5. e.	Requirement for all operations be conducted within a specified geographical area is inadequate for electric powered aircraft.	Imposing this limitation to all kinds of electric powered aircraft without any reference to certification or qualification level implies, that any certification requirement that might be imposed by the Authority, will in all cases be inadequate to provide adequate operational reliability for electric propulsion systems. This is denying all the attempts and efforts spent by the FAA in other sections to support generation of certification requirements that ensure comparable reliability to conventional propulsion systems.	Remove item (6) from the list of aircraft where this limitation applies to. This way do not apply this limitation to electric powered aircraft.	Adopted.
5.	Page C-4, Table C-1, Item 3	Usage of term Aircraft Operating Instruction (AOI) no more correct for new LSA aircraft.	This term Aircraft Operating Instruction (AOI) is outdated for new LSA aircraft and has been replaced by Pilot's Operating Handbook (POH) in the relevant ASTM standards that are mandated for LSA aircraft by the relevant NoA of FAA.	Change to read Pilot's Operating Handbook (POH), or clarify that the new term is PoH and is acceptable.	Non-concur. 21.190(c)(4)(i) refers to AOI
6.	Page C-3, App. C,	Double / redundant information	First sentence of this item refers to "aircraft described in	References are always the direct reason for later	Adopted.

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	Item 5. e.		paragraph c above” and then continues to provide the identical list as in c above once more, with exception of one item. This is redundant information.	inconsistencies. Remove the reference to “item c above” and make entry sentence to read: “Require all operations be conducted within a specified geographical area for aircraft— (1) ...”	
7.	Page 4-21, Item 2 on upper end of page	Uses only term AOI, instead of AOI/POH used on all other locations.	This term Aircraft Operating Instruction (AOI) is outdated for new LSA aircraft and has been replaced by Pilot’s Operating Handbook (POH) in the relevant ASTM standards that are mandated for LSA aircraft by the relevant NoA of FAA.	Change to read AOI/POH.	Non-concur. 21.190(c)(4)(i) refers to AOI
8.	Page 4-21, Item 5	Uses only term AOI, instead of AOI/POH used on all other locations.	This term Aircraft Operating Instruction (AOI) is outdated for new LSA aircraft and has been replaced by Pilot’s Operating Handbook (POH) in the relevant ASTM standards that are mandated for LSA aircraft by the relevant NoA of FAA.	Change to read AOI/POH.	Non-concur. 21.190(c)(4)(i) refers to AOI

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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: James Rezich	4. Date of Review: 2/12/14	5. Date of Disposition: 02/14/2014
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	4-73 469	No guidance for amending a certificate for registration number change	With no guidance for amending a certificate and operating limitations for a registration number change, it must be treated as an initial certification	Need an easier way to make a simple change in the registration number. No reason to impose new operating limitations when nothing has changed with the airplane, other than the registration number.	Paragraph 217a describes the procedure to follow for a registration number change.
2.	C-2 5.b.	Add additional instructions as to how to handle the limitation that do not apply or are not used	Without matrix chart is in -2G you could "re-number" the limitations and then they would not match the guidance	Add instructions to use ALL limitation paragraph numbers and indicate either Not Used or Does Not Apply	Adopted.
3.	C-8 #26	Missing the requirement for the 3 view of airplane per 21.193(d)(4)	Missing in many program letters I have seen	Have the Limitation match the regulation	Non-concur. The three view drawing is required for application and is not required to be included with the annual program letter.
4.	8-1 to 8-6 Tables	Great format! How about adding pages for import, export and 8130-3 export?	Nice to have one source, almost like a pre-filled 8100-1	Why not use the 8100-1 format, then everyone would be working from the same template?	Concur, but out of scope. Will consider this comment upon next revision.
5.					
6.					
7.					
8.					
9.					
10.					

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Aviation Designee Assoc. Reviewer's Name & Phone #: Susan Fournier		4. Date of Review: March 28, 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	Paragraph 201(a), Page 2-1	We suggest including language that the ASIs must be properly trained and qualified to issue airworthiness certificates. If they are not properly trained and qualified then the potential to issue information that is ambiguous greatly increases and could result in non-standard approaches to oversight of assigned designees.			Out of scope. This order does not set policy for ASI training.	
2.	Paragraph 202(e) page 2-2	If limitations are issued in the numerical order that they are presented in this Draft, and those limitations that don't apply are annotated as "N/A" with a brief reason, then why, except for discussions concerning the area of operations with an appropriate Operations Inspectors, should FAA resources be allocated to review limitations developed by fully vetted and qualified ASIs and designees; and in this case of working outside ones geographic locale, two levels of scrutiny?		We recommend removing review.	Partially adopted. Changed review to optional.	
3.	Paragraph 204(a) page 2-3	Who would conduct the telephone confirmation? We suggest removing this method unless that process is			Non-concur. The ASI may document the telephone confirmation however they choose.	

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		conducted by an ASI or designee and then properly annotated on FAA Form 8100 - 1 Conformity Inspection Record. If an ACA Form 8050 - 3 isn't present but the Registry database indicates a current registration date then a facsimile will be issued at the registered owners request, as a Temporary Certificate of Registration.			
4.	Paragraph 205(d)(2) page 2-5	Since Order 8130.2 is an "airworthiness certification guide," not an "enforcement action guide" we suggest removing the inspector mandate to issue an enforcement, which actually appears to be harsh since even the best Inspectors can err when deciphering § 45.29. It is interesting that the term appears in three places, paragraph 207(d)(2) in regard to data plates and paragraph 475(g) for PC holders.			Partially adopted. Changed enforcement to investigate.
5.	Paragraph 209(c) page 2-8	We suggest adding language to cover the all -important life limited components. There are instances where operators have been given extensions and a bridging inspection is important to ascertain whether			Adopted.

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		articles have surpassed the "manufacturers" recommendations.			
6.	Paragraph 210 "NOTE" page 2-8	We suggest adding the forwarding of limitations to Chapter 8.			Non-concur. This paragraph does not contain any instructions for processing an application for an airworthiness certificate.
7.	Paragraph 212(b) page 2-11	Null link.			Adopted. Removed link.
8.	Paragraph 218 "Note" page 2-14	According to § 21.335 it is the exporters responsibility, not the FAA representative. There is a reason for this; there are occasions where the export deal falls through and the aircraft remains under U.S. registry. We highly recommend removing this note.			Adopted.
9.	Paragraph 221 page 2-15	In regard to FAA Form 8100 - 1, it was obviously never meant to be used for airworthiness certification since the instructions for completion speak to manufacturing projects. The retention statement in paragraph "b" is interesting in that the form is typically a requirement driven by FAA Form 8120 -10 Request for Conformity and will remain with the certification project files. This is quite an off -			Concur. Deleted paragraph b.

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		handed statement. Who determines that it no longer serves a useful purpose and what is considered a "useful purpose?"			
10.	Paragraph 225(a) page 2-17	Suggest adding "or a certifying statement issued by the CAA of manufacture indicating conformance to U.S. type design and in a condition for safe operation at the time of build."			Non-concur. (1) and (2) clarify this.
11.	Paragraph 300(e) NOTE Page 3-1	Suggest moving the note to Chapter 2, Section 1 since it applies across the board and should be stated in the General Policies and Procedures.			Partially adopted. Deleted note.
12.	Paragraph 302 page 3-2	The term "notarized letter" appears in this section and also in Chapter 8, page 8-8, 8-18, figure 8-1, figure 8-2, figure 8-3, and Appendix D page D-6.	The language is inconsistent in that some sections speak to an agent having a "notarized letter" without clarification as to whether the original is to be submitted or if a copy suffices; other sections speak to the agent possessing a notarized letter and include the term "or a true copy."	We suggest that when the term "notarized letter" is used in the Order that it is consistent throughout. Either the original letter must be submitted or a verified true copy .	Non-concur. This information is in paragraph 807a(1)(a).
13.	Paragraph 304(c) page 3-3	The first sentence is contrary to maintenance and conformity practices, especially in regard to airworthiness. If a repair has been recorded in the maintenance records and a	The IPC for a specific aircraft is often referred to as well. What we have found on occasion is that the IPC will list for example a different part number then what has actually	We suggest changing the language to state "Parts and maintenance manuals can not always be relied on as a sole source of information and it may be necessary to contact	Adopted.

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		statement describes that the fix was performed in accordance with a certain section of the manufacturers maintenance manual, then what else could an ASI or DAR refer to if the repair doesn't look appropriate?	been installed. A call to the manufacturer is necessary to ensure that the revised part is authorized for installation and a letter confirming that fact is issued.	the TC Holder for clarification regarding the installation of parts and the validity of repairs."	
14.	Paragraph 305(b) page 3 -3	Suggest adding that any major repairs must conform to FAA approved data or performed in accordance with bilateral agreement procedures.			Adopted.
15.	Paragraph 306(d) page 3 -4	Suggest aligning the language contained in paragraph 204(a) as noted above in Chapter 2 comments.	This paragraph seems to indicate that all installed FAA approved STCs or field approvals will be documented on FAA Form 337 prior to the Standard being issued. Paragraph 323(d)(1)(e) speaks to this correctly.	We "highly suggest" to the maintenance facility completing the aircraft inspection that they in - turn complete a 337 verifying the installation. We also inform them that it is not necessary to complete one 337 for each alteration but that multiple STCs can be listed on the same form. If a 337 is required then this is going to present an issue especially for large transport category aircraft which may have had multiple alterations performed in accordance with FAA approved data while not under US registry.	Out of scope.
16.	Paragraph 321(d)	How is a "unique" (§21.183(d)(2)) example	Case in point: Last year several US manufactured	We suggest using the same method described in (c)(3) of	Non-concur. The paragraph directs the ASI to contact

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	page 3 -15	annotated on FAA Form 8130 -6?	aircraft were returned to US registry after accumulating very little time in service under a foreign country of registry to which they were exported. While out of the country the aircraft were maintained in accordance with § 91.409(f)(3).	this paragraph. We also suggest that the instructions be moved to the appropriate section of Chapter 8, to coincide with Form 8130 -6.	AIR-113 for instructions for handling unique situations.
17.	Paragraph 321(e) page 3 -15	This section speaks to "used" aircraft where it appears this paragraph speaks to "originals." It doesn't look like it belongs here.			Adopted.
18.	Paragraph 322 page 3 -16	We are assuming when this sections speaks to show compliance flight testing that it is referring to "surplus." It's very confusing.			Non-concur. There is no reference to surplus.
19.	Paragraph 323(d)(1)(a) page 3 -19	The requirement for an applicant to obtain the original or a copy of an Export C of A is almost impractical for older aircraft. Many times the best that can be provided is an Export Number from the FAA Registry.		We suggest that language be added to provide an out if all avenues are exhausted and a copy or the original cannot be located.	Adopted. Changed "d."
20.	Pages 3 -25 through 3 -44	These pages contain various examples of forms.		We suggest that the instructions in Chapter 8 for any airworthiness certificate and application contain the standard date format referenced (xx/xx/xxxx).	Adopted.
21.	Paragraph	Grammar suggestion:		Change "A program letter also	Adopted.

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
	401 page 4 -1			must be... to A program letter must also be .....	
22.	Paragraph 402(b)(5) page 4 -2	When issuing an FAA Form 8130 -7 with limitations, the alterations are typically in the approval process via STC; they aren't "FAA approved" at that point.		Suggest amending the language to cover this scenario.	Adopted.
23.	Paragraph 402(c)(4) page 4 -3	In regard to the "Note" we suggest the language speaking to verifying the registration with AFS - 750 be consistent with other references of the same in this Order.			Partially adopted. Deleted note. This information is in the previous paragraph.
24.	Paragraph 405(a) page 4 -5	Typo; should be "407a(2).			Partially adopted. Deleted sentence.
25.	Paragraph 411(b) page 4 -8	The first sentence in contradictory in that it states, "whether or not a data sheet exists," and by data sheet can we assume it refers to a TCDS? And if so it goes on to state that CAR/CAM 8 normally will be used to approve the TC change...			Partially adopted. Deleted paragraph because it was about the type certificate, which is in Order 8110.4.
26.	Paragraph 412(c) page 4 -8	Since a record of this briefing is required then we suggest that it be recorded on FAA Form 8100 - 1, Conformity Inspection Record.			Partially adopted. Deleted this portion of the paragraph. That section of the paragraph covers the regulatory requirements of part 91, which is covered by Order 8900.1.
27.	Paragraph	Refer to paragraph 428 for	consistency		Adopted.

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
	422 page 4 -11	Limited markings. Limited appears in parenthesis. While 422 leaves them out.			
28.	Paragraph 443(a) page 4 -32	Missed the period at the end of the paragraph.			Adopted.
29.	Paragraph 446(a) page 4 -37	Keeping in mind that this section pertains to processes in general, we suggest indicating that one set of limitations could be issued to define the original flight test area, and then a second expanded area could be specified in the same limitations once controllability is determined per § 91.319(b).	It is not unusual to issue one set of limitations containing two flight tests areas, the first to determine the controllability and safety, the second to cover an expanded area.		This is unchanged from revision G. There is no prohibition from the practice you describe in the reason for comment column.
30.	Paragraph 446(b) page 4 -38	A reference is made to Sections 7 through 11 when it should read Appendix C for limitations			Adopted.
31.	Paragraph 473(d) page 4 -75	The second sentence in this paragraph is incomplete.			Adopted.
32.	Paragraph 475(d)(3)(b) page 4 -76	This broad statement should be clarified. A general reference to Appendix C isn't helpful. Is the FAA stating that until controllability is demonstrated per § 91.319 that persons other than flight crewmembers may not be carried?			Adopted. Deleted requirement.

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33.	Paragraph 489(b) NOTE page 4 -81	The second sentence doesn't apply			Adopted.
34.	Paragraph 500(g) page 5 -2	Is it necessary to capitalize the intent of the FAA Form 8130 - 4? It's akin to being scolded. We understand that the -4 isn't an "airworthiness certificate" which is reiterated on the certificate itself and underlined.			Non-concur. The audience for this order is airworthiness and manufacturing ASIs. This paragraph emphasizes the restrictions to operations, which may not be obvious to non-operations ASIs.
35.	Paragraph 506(b) page 5 -3	The term "rubber stamp approval" is aimed at whom? What is the intent of this language that might be interpreted a myriad of ways?		We don't think language of this low caliber belongs in an official directive and recommend its removal.	Adopted.
36.	Paragraph 512(e) NOTE page 5 -7	There might be instances where the importing country requires a statement via a bilateral agreement or special requirements (AC 21 -2) to indicate that a used aircraft conform to their TCDS.		We suggest amending this paragraph to include that possibility.	Adopted.
37.	Paragraph 801(8)(g) Item I, page 8 -10	Suggest adding a note that if an aircraft is returning to U.S. registry after operating out of the country (§ 21.183(d)) that this block doesn't apply. The DART maintenance recurrent training has been informing attendees that we must check this block and dig up an obsolete copy of the Standard			Partially adopted. Changed "previous" to "last."

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		the aircraft was issued prior to export and provide a copy in the application package.			
38.	Paragraph 3, page C -1	Involving AIR -230 in any simple modifications to the predetermined language will create an untenable situation, which, more than likely, will lead to unintended consequences of bare minimum limitations being issued where stronger language might be required all in an effort to prevent delay. There are a myriad of situation that occur in regard to the issuance of limitations and the field offices and professional designees must continue to have the flexibility to modify the language to fit the need/scenario.		We highly recommend removing this step.	Partially adopted. Changed restriction to not apply to R&D or show compliance.
39.	Table C - 1(1) page C -4	If an aircraft will be operated locally in the U.S. airspace only then why would this apply?	Many times we issues limitations for R&D which require an hour or two of flight time and the aircraft will not be operating over any other country. This is one of the situations were we get specific in the language issued.		Non-concur. This limitation provides information to the operator. There is nothing for us to amend.
40.	Table C - 1(2) page C -4	The term "law" is not typically used when referring to FAA regulations.		We suggest removing the term or define it.	Non-concur. When not defined otherwise, the word take on the common meaning.
41.	Table C -	The term "night flight" is not		We suggest a differentiation	Non-concur. Night flight

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	1(3) page C -4	typically used but rather day or night VFR to coincide with part 91.		between day and night VFR much like the existing limitations indicate.	operations and IFR operations are common terms relating to the kinds of operations authorized.
42.	Table C - 1(19) page C -7	This section should be expanded into four different subjects; it's confusing lumping these into one limitation.	The restriction against flight over densely populated areas must be eased to allow for takeoff and landing of certain aircraft, which haven't been extensible aerodynamically modified. The aircraft may also require day/night VFR for certain situations yet the limitation is limited to day only.		Non-concur. The limitation requires compliance with certain maintenance requirement or restrictions to operations.
43.	Table C - 1(19) page C -7	Suggest changing VMC to VFR for consistency.			The limitation states VFR.
44.	Table C - 1(35) page C -11	This limitation presents and excellent example of why AIR - 230 involvement shouldn't be the path taken. There are three options presented and will most certainly have to be tailored to the situation presented in the Program Letter.			The order authorizes you to issue day, night and / or IFR in any combination you wish.

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Aircraft Owners and Pilots Association (AOPA) Robert Hackman VP Regulatory Affairs	4. Date of Review: Jan 16, 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	2-2, 201, c	As the FAA expands the use of ODA, will this Order need to be revised every time?	Statement seems to restrict considerations of expanding the use of the ODA	Rewrite to not be so specific and allow for expansion of the ODA functions.	Concur. Deleted second sentence.
2.	2-2, 202, e	If the FAA has oversight of the designee, and the designee is truly a delegated organization with functions authorized by the FAA, then why does the FAA need to review the operating limitations?	The designees should be capable of or authorized to issue the special airworthiness certificate or special flight permit including the operating limitations as part of the ODA function and authorization. If the FAA has reason to doubt the ability of the ODA holder, then the FAA has the ability to take action on the ODA Holder.	Clarify ODA authority.	Non-concur. The requirement was added in 2010 and is not exclusive to ODA. This ensures an assessment of the limitations by two people for quality control purposes. However it was also changed to an optional practice.
3.	2-6,207,b2	What guidance will the FAA use to determine if the request is valid?	Instructions or references should be given to FAA inspectors to improve the consistency.	Include criteria to help inspector make determination	Concur. Added "see misuse of data plates."
4.	2-6,207,c	What are those methods and techniques? Where can industry find them?	Both the inspector and industry should know what those methods are techniques are. Same comment as above.	Describe what the methods and techniques are.	Non-concur. Parts 45, 43 and 65 contain these requirements.
5.	2-7, 207,d,1	How does industry get written approval? Where is the guidance to the ASI to either give or deny the approval	The more information that can be provided to remove ambiguity the better it is for the FAA and industry.	Provide guidance on what FAA is looking for in the form of written approval	The information is in FAA order 8900.1
6.	2-9, 212 a-d	This appears to be an entirely new section to this order. Nowhere in this section it there a reference to the regulatory basis for these requirements. In paragraph 212 (b) there is a reference to a research paper	How are these aircraft handled today? What is the issue this section of the order is attempting to address? Why is a research paper the basis allowed to be considered as part of the certification process	Delete section. At a minimum remove the reference to the research paper if it cannot be determined the basis for allowing it to be part of the certification process.	Partially adopted. Deleted reference to research paper.

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		that "may be considered as part of the certification process at the discretion of the ASI."	for these aircraft? What type of peer or public review was the research paper scrutinized under prior to being published or considered as part of the certification process?		
7.	2-11, 213, a-e	This also appears to be an entirely new section. The beginning paragraph discusses the installation of explosive devices on former military aircraft and then also discusses the installation of ballistic parachute recovery systems on certified aircraft.	Why are certified aircraft discussed in the opening paragraph when paragraphs a-e appears to only apply to applications for experimental certificates?	Remove the sentences in paragraph 213 that read, "However, the installation of explosive devices in type-certificated aircraft is becoming more common. For example, ballistic parachute recovery systems rely on a solid-fuel rocket to deploy the parachute." As they do not appear to be relevant to this section.	Adopted. Moved to experimental section
8.	2-11, 213 a	Paragraph A adds a new requirement for applicants of experimental certificates to notify their airport manager for where they will be based of jettisonable stores and explosive devices.	This should exclude technology such as whole aircraft ballistic recovery systems so as to not discourage the addition of this technology.	Exclude whole aircraft ballistic recovery systems.	Adopted.
9.	2-11 213 c	Maintenance of ejection seat systems should also include a provision for the acceptance of industry developed programs in lieu of manufacturer's procedures.	Addition of acceptance of an industry program would accommodate those aircraft and seats no longer supported by the OEM.	Add the acceptance of an industry program as a means or maintaining ejection seats.	Non-concur. Ejection seats are too complicated to allow a third party to establish maintenance procedures.
10.	4-7 408 g	Paragraph g adds a specific list of purposes approved under 21.25 which did not exist	Concern that this sets a limit that did not previously exist and precludes any other types	Include a statement that clarifies that this list does not represent the only operations	Non-concur. The following paragraph explains how to add another purpose.

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		before. There is no provision for any additional operations to be approved on a case-by-case basis.	of operations.	the FAA will specify or allow.	
11.	4-36 444 c	C. Area: changes wording regarding operating limitations by changing from ...“establish boundaries of the flight test area, as well as takeoff, departure, and landing approach corridors that minimize hazards to persons and property in densely populated areas or congested airways.” To “...establish boundaries of the flight test area or area of operation, including takeoff, departure, and landing routes, to minimize hazards to persons, property, and other air traffic” to “	These changes appear to broaden the scope of the proposed limitation on the flight test area. In doing so, the interpretation of the Inspector issuing the limitation may become so broad as to effectively no longer allow any areas to be eligible for use for flight test.	Continue to utilize language in existing 8130.2G.	Non-concur. This is required by 21.193. Also, this is unchanged from revision G.
12.					
13.	Appendix C, Page C – 2, Paragraph (c)(1)	Paragraph reads, “c. Prohibit the carriage of passengers, flight over densely populated areas, and night or instrument flight rules (IFR) operations in the following: (1) Experimental LSA aircraft that formerly held a special LSA airworthiness certificate” These limitations for ELSA aircraft that formerly held an	These limitations are inappropriate for E-LSA aircraft and are not supported by current regulatory requirements or by existing safety data. ELSA aircraft that formerly held an SLSA airworthiness certificate were produced as factory aircraft built and assembled to ASTM consensus standards. It makes	Delete (c)(1) in its entirety and do not place these restrictions on ELSA aircraft that formerly held an SLSA airworthiness certificate.	Partially adopted. Clarified the restriction is for the first issuance of an experimental certificate and the SLSA is not in compliance with 91.327(b).

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		SLSA airworthiness certificate are new to this change.	no sense to add these limitations to this group of aircraft.		
14.	Appendix C, Page C-2 and 3, Paragraph (c)(1)(6) and (e)(5)	Both paragraphs add limitations based on propulsion systems including "Rocket-powered" and "Electric-powered aircraft".	Blanket limitations based on propulsion systems seems in appropriate and counter to the direction taken by the FAA with regards to other efforts such as the Part 23 rewrite. These blanket limitations, especially with respect to electric powered aircraft will only serve to stymie new technologies that could benefit the industry.	In lieu of these blanket limitations, the FAA should consider adding these to table C-1 and providing guidance with respect to how appropriate limitations can be set based on the design of the aircraft. These could also take into consideration the applicants use of industry developed standards in the design and construction of the propulsion system. This would serve to address potential safety concerns while still allowing and encouraging new technologies.	Partially adopted. Deleted electric.
15.	Appendix C, Page C-12, Table C-1 Limitation 40 ():	Currently, in 8130.2G, EAB aircraft have the following operating limitation affecting flight over densely populated areas: (6) This aircraft is prohibited from operating in congested airways or over densely populated areas unless directed by air traffic control, or unless sufficient altitude is maintained to effect a safe emergency landing in the	Under the new, common list of operating limitations in revision "H" found in Appendix C, this language is now missing, and instead all experimental aircraft are subject to a prohibition of flight over densely populated. Additionally, this limitation contains language that restrictively defines "takeoff and landing" operations.	The existing language in 8130.2 (G) is acceptable, understood, appropriate and should be maintained. The new wording introduced the potential for confusion in an area that has a long successful history of application by both the FAA and industry. The FAA should continue with the language in version (G) and not introduce the language proposed in (H).	Concur . Added limitation for AB / LTA and gliders.

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		<p>event of a power unit failure, without hazard to persons or property on the ground.</p> <p>Note: This limitation is applicable to the aircraft after it has satisfactorily completed all requirements for phase I flight testing, has the appropriate endorsement in the aircraft logbook and maintenance records, and is operating in phase II.</p>			

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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Boeing Reviewer's Name & Phone #: Jill DeMarco		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	2-3, 204	The proposed text of paragraph 204.a. states: "a. ... A Certificate of Aircraft Registration (Aeronautical Center Form 8050-3), query from an official FAA registry database, or email/telephone confirmation from the Flight Standards Service, Aircraft Registration Branch (AFS-750) are acceptable to verify registration."	Clarification or revision is needed as to the intent of this paragraph.	Pleased clarify if the listed items are the only acceptable means for verification, or if they are intended to be only examples.	The list states that these are acceptable, not the only way to verify registration.	
2.	4-33, 443a(3)	The proposed text states: "(3) If the applicant intends to operate in a specific country, the FAA should make the appropriate CAA aware of the aircraft, its experimental purpose, and the operating limitations that will be given to the aircraft. The FAA should also advise the CAA that it may choose to place additional operating limitations on the experimental aircraft"	(1) This procedure is impractical for testing that relies on weather-dependent conditions such as winds, humidity, temperature extremes, etc. For this type of testing, multiple contingency locations are normally considered and an applicant may decide to change test locations on short notice, depending on weather condition availability. (2) The foreign authority (CAA) will have already been made aware of the experimental purpose and operating limitations, due to the fact that an applicant will have acquired the necessary overflight and landing permits prior to	Clarification is needed as to the intent of this paragraph.	Clarified that this is about an aircraft located in a foreign country	

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			departure. The application process for those permits usually requires the applicant to submit a copy of the experimental CofA and associated operating limitations with the application.		
3.	4-36, 444c	The proposed text states: "c. Area. The program letter must indicate the specific area over which the aircraft will be operated (for example, a military operations area or other defined block of airspace). Routes in and out of specified airports should also be defined."	The proposed language is much more detailed and onerous than in the previous versions of the Order. For major experimental test programs, it is impractical to list all of the specific areas, airports, and routes in and out of those airports for the multitude of test locations, domestic and foreign, that are used in the course of testing. Many test locations may not be fully determined at the time that the program letter and application for CofA are submitted. This is especially true for testing that relies on weather-dependent conditions, such as winds, humidity, temperature extremes, etc. For this type of testing, an applicant often looks at multiple contingency locations and may decide to change test locations on short notice, depending on weather	Revise the text to allow for more generalized descriptions of geographic test areas.	Adopted.

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			<p>condition availability. Further, if additional airports are required to be identified after issuance of the CofA, we question whether a new CofA must be issued to cover those airports. What if the test location decision is made in less than the 10 M-days that the Certification Management Office (CMO) requires to process an application? The current flexibility must be retained to identify general geographic regions (with appropriate justification) and to not be tied to specific airports and/or test tracks. We also request specific clarification as to whether the phrase "should also be defined" is intended to be interpreted as equaling "must be defined," or whether it is intended as an optional action.</p>		
4.	4-36, 444e	<p>The proposed text states: "NOTE: ... In addition, the program letter should describe any configuration changes that will occur between each purpose, to include adding or removing external stores and enabling or disabling systems. These changes may</p>	<p>We request specific clarification as to whether the phrase "any configuration changes" will be interpreted to mean "all configuration changes." If so, this action would be unworkable for any major test program. Experimental CofAs are often</p>	<p>Clarify/revise the text to allow for generalized descriptions of airplane configuration.</p>	<p>Partially adopted. Deleted note, this is covered in Appendix B.</p>

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		<p>necessitate the issuance of additional operating limitations or modifications to operating limitations to accommodate the different uses. Configuration changes may also require adjustments to an aircraft inspection program.”</p>	<p>multipurpose -- issued for R&amp;D, Show Compliance, and, quite often, Market Survey and Crew Training. At Boeing, we encounter literally hundreds, if not thousands of configuration changes in the course of a program. For example, we might complete a flight on one system (R&amp;D) and load a software change overnight to conduct a certification test on a different system the next day (Show Compliance). We also routinely enable and disable systems to accomplish specific test conditions. Under a strict reading of the new proposed language, we would be required to identify all such configuration changes and system enabling/disabling in the program letter. Many such changes would not even be known at the time the program letter is submitted, as they are determined as the program progresses. Likewise, for the same reasons, we request clarification on the intent of the phrase “should describe” -- whether it will be interpreted as equaling “must describe,” or</p>		

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			whether it will be considered an optional action.		
5.	B-1	This Appendix contains many new, more detailed requirements for what must be included in the applicant's program letter. In general, this expanded level of detail is impractical and unworkable for an applicant who conducts detailed, dynamic, longer duration, experimental test programs, under multi-purpose experimental CofAs.		This Appendix needs to make allowance for more generalized descriptions of the program letter requirements to reflect the dynamic nature of the experimental test programs.	Adopted. Added additional information to opening paragraph.
6.	B-1, 2a	The proposed text of paragraph 2.a.(2) states: "2. Description of the Intended Operation(s) and How It Meets the Desired Purpose. a. Research & Development. For each research and development (R&D) project, the program letter should— ... (2) Include the number of aircraft required. ..."	This requirement is unclear. Under current practice (i.e., Boeing/CMO), each program letter is associated with the specific airplane for which the application is being submitted. Listing the total number of airplanes in the broader test program should have no impact on the specific CofA being requested; therefore, it should not be required.	We request specific clarification as to the intent of this paragraph.	Non-concur. Granted the application for the certificate is for a single aircraft. However including the number of aircraft anticipated needed to complete the project assists with determining the complexity of the project. For example you may need a tanker for testing in icing conditions.
7.	B-1, 2a	The proposed text of paragraph 2.a.(5) states: "2. Description of the Intended Operation(s) and How It Meets the Desired Purpose. a. Research & Development. For each research and development (R&D) project,	The proposed language is much more detailed and onerous than in the previous version of the Order. For major experimental test programs, it is impractical to list all of the specific airports for the multitude of test locations,	Clarify or revise the requirement to allow for generalized descriptions of geographic test areas.	Partially adopted. Added additional information to opening paragraph of the appendix.

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		<p>the program letter should— ... (5) Describe the area and airports in which the aircraft will be operated. ...”</p>	<p>domestic and foreign, that are used in the course of testing. Many test locations may not be fully determined at the time that the program letter and application for CofA are submitted. This is especially true for testing that relies on weather-dependent conditions, such as winds, humidity, temperature extremes, etc. For this type of testing, an applicant often looks at multiple contingency locations and may decide to change test locations on short notice, depending on weather condition availability. If additional airports are required to be identified after issuance of the CofA, we request more clarity on whether a new CofA must then be issued to cover those airports. Further, what if the test location decision is made in less than the 10 M-days that CMO requires to process an application? We maintain that the current flexibility must be retained to identify general geographic regions (with appropriate justification) and to not be tied only to specific</p>		

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			airports.		
8.	B-1, 2a	The proposed text of Note 2 of paragraph 2.a. states: "Note 2: The operating conditions and limitations should reflect only those projects for which information was submitted at the time of application. To add new projects to an existing certificate, the applicant should submit a new or amended program letter. This may necessitate a revision to the issued operating limitations." [emphasis added]	The use of the term "may" implies that it is possible for a revised program letter to be submitted to update selected information without a new CofA being issued. This is not the current practice, as the CMO normally issues a new CofA with each program letter update.	Clarification or revision needed as to the intent of this Note.	Non-concur. The note provides flexibility to the ASI to determine if a new CofA is required. As stated in your comment, your CMO usually issues a new certificate. The note does not make that mandatory.
9.	B-2, 2c	This paragraph requires that the crew training plan be specifically described in the program letter.	For major programs, the detailed requirements of this section are impractical for inclusion in the program letter. Due to the dynamic nature of test programs and pilot resources, the personnel involved in the training, airports, dates of training flights, etc., will likely not be known at the time the program letter is submitted.	Clarification or revision needed as to the specific intent of the paragraph.	Non-concur. The paragraph states "should," providing the requested flexibility.
10.	B-3, 2d	The proposed text states: "d. Market Survey. The program letter should— (1) Describe the market survey in detail. (2) Describe the area and	Paragraphs d.(2), (3), and (4) would be impractical to accomplish for much of the Market Survey operations that large companies, such as Boeing, conduct. For major	The requirement to identify specific airports, intended customers, and dates should be revised or clarified. This section needs to allow for generalized descriptions of	Non-concur. The paragraph states "should," providing the requested flexibility.

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		airports in which the aircraft will be operated. (3) Identify intended customers. (4) Specify dates for the market survey activity.”	test programs, we generally carry the Market Survey category on our multi-purpose experimental CofAs to have the flexibility of conducting customer demonstration flights as the need or opportunity arises. The details of these flights are usually not known at the time the program letter is submitted. For dedicated sales tours, the airports and intended customers can, and often do, change on short notice as the tour progresses. For these reasons, this section needs to make allowance for generalized descriptions of paragraphs d.(2), (3), and (4).	paragraphs d.(2), (3), and (4).	
11.	B-5, 2g	The proposed text states: g.(3) Multiple Purpose Use. If the applicant intends to use the aircraft for multiple purposes or roles, the program letter should— ... (b) Describe any configuration changes that will occur between each purpose to include adding or removing external stores and enabling or disabling systems. ...”	We request specific clarification as to whether the phrase “any configuration changes” will be interpreted to mean “all configuration changes.” If so, this action would be unworkable for any major test program. The experimental CofAs are many times multipurpose -- issued for R&D, Show Compliance, and, quite often, Market Survey and Crew Training. At Boeing, we encounter literally hundreds, if not thousands of	Revise the requirement to describe “any” configuration changes between purposes for a multi-purpose experimental CofA to allow for more generalized descriptions of airplane configuration.	Adopted.

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			<p>configuration changes in the course of a program. For example, we might complete a Boeing flight on one system (R&amp;D) and load a software change overnight to conduct a certification test on a different system the next day (Show Compliance). We also routinely enable and disable systems to accomplish specific test conditions.</p> <p>Under a strict reading of this new language, it appears that the applicant would be required to identify all such configuration changes and system enabling/disabling in the program letter. Many such changes would not even be known at the time the program letter is submitted, as they are determined as the program progresses.</p> <p>For these reasons, this section needs to be revised to make allowance for generalized descriptions of airplane configuration.</p>		
12.	C-5, #11	<p>The proposed text of Limitation No. 11 states:                      "If aircraft, engine, or propeller operating limitations are exceeded, an appropriate entry</p>	<p>Current CMO practice allows for this limitation to be modified to read:                      "If aircraft, engine, or propeller operating limitations are</p>	<p>Clarification or revision is needed to this section to ensure that existing practices are maintained and allowed</p>	<p>Adopted.</p>

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		will be made in the aircraft records.”	exceeded outside of planned test conditions, an appropriate entry will be made in the aircraft records.” [emphasis added]. This recognizes the fact that Temporary Operating Limitations (TOLs) may be issued as part of experimental test programs, and it is often necessary to exceed those TOLs (under a planned set of test conditions with associated risk assessment and alleviation analysis) in order to clear them. The existing CMO practice allows applicants, such as Boeing, to do so without having to make record entries each time for planned exceedences. We recommend that the FAA ensure that this existing practice is maintained and allowed under this new Revision H of the Order.		
13.	C-7, #21	The proposed text of Limitation No. 21 states: Applicability: “191 except R&D” Limit: “The geographically responsible FSDO where the aircraft is based must be notified, and its response	Although the first sentence of this limitation has not changed from the previous version of the Order, the applicability has changed significantly. All previous versions of this Order, back to the original issue, excluded both R&D and Show Compliance categories from	Change the applicability as follows: “191 except R&D and Show Compliance”	Adopted.

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		received in writing, before flying this aircraft after incorporation of a major change as defined by 14 CFR 21.93. The FSDO may require demonstrated compliance with 14 CFR 91.319(b)."	this requirement. Deleting Show Compliance from the exclusions will have a major adverse impact on applicants.		
14.	General comment	Will FAA be issuing a corresponding revision to Advisory Circular (AC) 21-12C, "Application for U.S. Airworthiness Certificate, FAA Form 8130-6"?			The AC will be revised when the automated application is available in FY 15 or 16.

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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #:		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.		Can we use the term POH and not AOI? POH is a common term in the industry and AOI could be referenced in the abbreviations as an equivalent to POH.				We used AOI to conform to 21.190(c)(4)(i)
2.	Appendix C table C-1	There appears to be no reference for the term 'All' in the second column. Is 'all' is intended, to mean 'issued with all operating limits' or 'issued with all operating limits unless column 3, Applicability, is specific to the aircraft'?				Adopted.
3.	Appendix C, Table C-1, Operating Limitations	The second column requirement for 14CFR part 21.191 aircraft would also include the following Limitation for 191(i) light sport aircraft:  Limitation 8, Supersonic flight				Adopted. Removed limitation because this is a part 91 requirement.
4.	Table C-1, Operating Limitation 11	aircraft, engine or propeller limitation exceeded: This item should be a manufacturer, or POH ordered issue. Appearance here is mixing good practice maintenance entry requirements with an FAA order				Non-concur. There is nothing to compel documenting an exceedance in an experimental aircraft.
5.	Table C-1, Operating Limitation	Life limited articles, third paragraph, last sentence: Define how an "equivalent				Out of scope. The operator must work with the FSDO to determine how to comply

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	19	level of safety" can be determined.			
6.	Appendix C, paragraph 5.c(1):	This restriction for an aircraft that has been manufactured to a specific standard should be deleted. There are no published safety trends that should restrict a 191(i) aircraft and yet not restrict an aircraft under 191(g) which have no quality control or conformance testing involved in construction. Should safety trends indicate a need for more restrictive operations at a later date they could be implemented within the current FAA authority.			Partially adopted. Clarified the restriction is for the first issuance of an experimental certificate and the SLSA is not in compliance with 91.327(b).
7.	Appendix C, paragraph 5.c(5):	This restriction for an aircraft that has been manufactured to a specific standard should be deleted. There are no published safety trends that should restrict a 190 or 191(i) electric powered aircraft and yet not restrict an aircraft under 191(g) which have no quality control or conformance testing involved in construction. Should safety trends indicate a need for more restrictive operations at a later date they could be implemented within the			Non-concur. 190 or 191(i) by regulation cannot be electric powered.

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		current FAA authority. Additionally this class of propulsion is only just beginning to be implemented. Since will likely begin in this category of aircraft, early restrictions will delay further implementation of this new technology to larger aircraft.			
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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Cessna Aircraft Company Reviewer's Name & Phone #:	4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	213 p. 2-11	Added section for "Aircraft Equipped With Explosive Devices or Jettisonable Stores." reviewed by experimental (Avery/Dolley). Cessna already meets the added requirements and has no objections.	Information	None.	
2.	224(c) p. 2-17	The added requirements for "properly manufactured" and "properly maintained" or vague and expose the applicant to excessively broad subjective interpretation by the FAA. "c. The FAA manufacturing ASI has primary responsibility for the issuance of original airworthiness certificates and approvals. Original certification requires determining that the aircraft was properly manufactured. The FAA airworthiness ASI has primary responsibility for the issuance of recurrent airworthiness certificates and approvals. Recurrent certification requires determining that the aircraft has been properly maintained or altered while in service."		Replace "... that the aircraft was properly manufactured." with "... that the aircraft was manufactured in accordance with the 14CFR21 Subpart F or G." Replace "... that the aircraft has been properly maintained or altered while in service." with "... that the aircraft has been properly maintained in accordance with approved Instructions for Continuing Airworthiness or altered, by a Designated Alteration Station per 14CFR21 subpart M, while in service."	Non-concur. This is merely a general statement to describe the differences in the roles of the manufacturing and airworthiness ASIs.
3.	306(f) p. 3-4	Multiple uses of section symbol "§" left in this section. That symbol has been repeatedly	Consistency	Remove all usage of "§" symbol for consistency.	Adopted.

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		removed from other sections for this revision.			
4.	473(c) p. 4-75	Requirement for issuance of a special airworthiness certificate for crew training has vague statement regarding aircraft with a standard airworthiness certificate.	Clarity	Change to: "Except for a manufacturer's first of an aircraft model, do not issue a special airworthiness certificate for crew training when an equivalent aircraft with a standard airworthiness certificate is available."	Adopted.
5.	800(a) p. 8-1	This section includes the requirement that: "Information entered on these documents should be typewritten when possible." FAA should clarify meaning of "typewritten" to encompass computer produced forms.		Add note after 800(a) stating: "NOTE: The terms 'typewritten', 'typed', etc. shall be interpreted to include documents electronically produced by word processing software."	Non-concur. From the Macmillan dictionary, "produced using a typewriter or computer, not written by hand."
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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Craig Williams		4. Date of Review: 02/07/2014	5. Date of Disposition: 03/05/2014
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	Numerous	There are numerous places within in the current order 8130.2G and this draft 8130.2F that state "Showing Compliance with Regulations". I believe that the word "Regulations" should be changed to "CFR" at these numerous locations to match what the instructions for completion of FAA Form 8130-7 Section a.(2) Purpose requires per the current order 8130.2G and this draft 8130.2F Para. 803 page 8-12 and FAA Form 8130-6 section II Block (B) "To Show Compliance with the CFR". This change would help elevate confusion. The term "Regulations" is something that was used in the past on the 8130-6 Form for "Show Compliance" Purpose.	Consistency	Change "Showing Compliance with Regulations" to "Showing Compliance with CFR"	Concur, out of scope.  The term "showing compliance with regulations" comes from 21.191(b). "Regulations" is used in the order to be consistent with the rule. When the developing the application "regulation" was shortened to "CFR" to make physical room on the form. This comment will be considered upon the next change to the application form. Showing compliance with regulations is the correct terminology.	
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Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: David Schober	4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	207	Should allow fabrication of a data plate	Replacement data plates commonly are not exact replicas of the original.	Allow fabrication of an exact replica data plate.	Non-concur
2.	208	FAA Order 8900.1 information on Public Aircraft Operations is out of date	AFS published a federal register notice that contains additional information.	Update order	Out of scope.
3.	212	Make use of research paper mandatory	Safety		Non-concur. The research paper is intended to communicate safety information to ASIs and the public. The use of this and any other safety information is at the discretion of the ASI.
4.	213	Suggest a revision to this paragraph or a new paragraph to include text that would require something similar to what is required with multiple certificates (Standard/Restricted paragraph 417(b) of this draft document)		Require written instructions/procedures for any aircraft that is operated in both civil Experimental (R&D, Market Survey, or Exhibition) and as Public, that would give specific information on how to remove/install equipment for the public mission and return the aircraft to a civil status	Non-concur. This information is in paragraph 208.
5.	408 (g)(3)	Suggest changing from "Target Towing" to "Target Towing, Electronic Target Presentation and Range Support Surveillance".	Clarity		Concur, but out of scope. "Target towing" is the terminology used in all other FAA orders.
6.	413	Add at the end of the sentence "unless qualified, operated, and marked in accordance	This ties the loop with paragraph 206(d).		Adopted.

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		with 14 CFR45.22.			
7.	422	Add at the end of the sentence "unless qualified, operated, and marked in accordance with 14 CFR45.22.	This ties the loop with paragraph 206(d).		Adopted.
8.	428	Add at the end of the sentence "unless qualified, operated, and marked in accordance with 14 CFR45.22.	This ties the loop with paragraph 206(d).		Adopted.
9.	465(c)	needs to address using Civil Airworthiness Certification Former Military High Performance Aircraft Research Report as part of the certification project and identify that the Operating Limitations presented in Appendix C should be considered the minimum and all the aspects identified in Section 2 of this Research Report (or appendix if the type aircraft is included in one of the appendices) needs to be added to the operating limitations for that aircraft if not covered in those listed in Appendix C of this publication.			Non-concur. The research paper is intended to communicate safety information to ASIs and the public. The use of this and any other safety information is at the discretion of the ASI.
10.	465(d)	needs to identify specifically where in 8900.1 (FSIMS) the relevant info can be located.			Concur, but out of scope. AIR has no control over where AFS may move this information in the order. Therefore, we rely upon the FSIMS search

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11.	Add new paragraph 519	added for "Denial of Export Airworthiness Certificate" In cases where an applicant has submitted an application for an Export Certificate, and upon inspection of the aircraft and/or records it was determined that the aircraft does not qualify for the certificate requested (and may not have a valid Airworthiness Certificate due to these deficiencies), there should be guidance on providing the applicant with a letter of denial with a list of discrepancies.			function. Non-concur. The form allows documentation of non-conformity.

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Document No.: 8130.2H		2. Project manager: Craig Holmes		3. Reviewing Office: EAA Reviewer's Name & Phone #:		4. Date of Review: 03/27/2014		5. Date of Disposition:	
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:				
1.	Paragraph 212(b) (page 2-9)	The language pertaining to the F7U Cutlass and the English Electric Lightning are subjective and we believe not appropriate for this Order. As with any aircraft, if legitimate safety concerns exist that cannot be resolved, an inspector or designee has the right to deny or restrict an airworthiness certificate, and the owner/operator has appropriate options for recourse.		EAA recommends the sentence "Some aircraft such as the English Electric Lightning or F7U Cutlass may have high-risk factors that cannot be mitigated, and consequently may not be eligible for an airworthiness certificate" be struck	Partially adopted. Removed the two example aircraft.				
2.	Paragraph 212(b) (page 2-9)	Additionally, the URL for the research papers found in this paragraph returns a "dead" link.		The link to the research papers be corrected in Paragraph 212(b).	Adopted.				
3.	Paragraph 213 (page 2-11)	Subsections (a), (b), (c), (d), and (e) have points that should be in the Approved Maintenance program and Training program required for an ejection seat, not spelled out in the Order. The scope and detail of these paragraphs are not detailed enough to be the program themselves but are an interpretation of those programs.		EAA recommends any specific language that would be better detailed in a specific maintenance program be removed from Paragraph 212(a), (b), (c), (d), and (e).	Non-concur. This is providing general information to persons inspecting an aircraft prior to issuing an airworthiness certificate.				
4.	Paragraphs 323 to 328,	We believe these sections will add major complexities to the		We believe this section is unacceptably impractical to	Non-concur. This policy has been in place				

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
	Figures 3-5 to 3-9 (pages 3-16 to 3-24, 3-29 to 3-43):	certification of former military aircraft that are unwarranted.		implement as written	since at least revision C, 6/13/94. These are the minimum requirements for issuance of a standard airworthiness certificate.
5.	Paragraph 403(c) and (d) (page 4-4)	The language on the duration of certificates in this part can cause confusion, because many E-AB aircraft are issued their phase I and phase II operating limitations concurrently. In this case, the duration is generally not limited, even though the limitations are in part for the purposes of flight testing.		EAA recommends "However, experimental certificates issued for the purpose of flight testing..." be replaced with "However, experimental certificates issued only for the purpose of flight testing..." in Paragraph 403(d).	Partially adopted. Deleted the conflicting information.
6.	Paragraph 467 (page 4-70)	We suggest this language be clarified to note that it is only applicable to aircraft with operable ejection seats, excluding aircraft that have had their seats uninstalled or deactivated.		EAA recommends "An aircraft with an ejection seat..." be replaced with "An aircraft with an operable ejection seat..." in Paragraph 467.	Adopted.
7.	Paragraph 468(b)(5) (page 4-70)	This section only addresses inspection programs for turbojet multiengine airplanes and omits turbine single engine airplanes.	Small single engine turbine airplanes have their own, appropriately-scaled inspection program requirements in the new revision, as outlined in Table C-1 Limitation 13, and to avoid confusion the language in this section should acknowledge Limitation 13 for small single engine turbines.	EAA recommends that a section be added to Paragraph 468(b) that paraphrases the inspection program requirements for small single engine turbine airplanes in a similar manner to those for large aircraft and multiengine turbine aircraft.	Adopted.
8.	Paragraph	This section makes reference	We believe it is referring to the	EAA recommends "Review the	Adopted.

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	468(b)(8)(b) (page 4-71)	to a "maintenance program."	required inspection program, and suggest the language be changed to avoid confusion	maintenance program" be replaced with "Review the inspection program" in Paragraph 468(b)(8)(b).	
9.	Paragraph 468(b)(8)(b) Note (page 4-71)		Consistency with AC 43-209A	EAA recommends the current language of Paragraph 468(b)(8)(b)'s note be replaced in its entirety with the following: "Items that have replacement times must be inspected to ensure that the equivalent level of safety still renders the product in a serviceable condition for safe operation."	Partially adopted. Changed note to: Items that have specified limits must be inspected to ensure that the equivalent level of safety still renders the product in a serviceable condition for safe operation.
10.	Appendix B, Paragraph 2(b) (pages B-1 and B-2)	we question the necessity of provisions (2) and (3), requiring applicants to provide their flight routing to and from events, their estimated proficiency flying hours, and the airports and geographic areas involving such flights.		EAA recommends that Appendix B Paragraph 2(b)(2) and (3) be struck from the Order.	Non-concur. This information is required by § 21.193(d).
11.	Appendix B, Paragraph 2(b) Note (page B-2)	The mere addition of an event to a program letter should not involve the revision of operating limitations. We are unsure why language to that effect is in this note.		EAA recommends that the second sentence of Appendix B Paragraph 2(b)'s note be struck.	Adopted.
12.	Appendix C Paragraph	Special Light-Sport Aircraft (S-LSA) that have		EAA recommends that Appendix C Paragraph 5(c)(5)	Partially adopted. Clarified the restriction is for the first

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	5(c)(5) and (6) and 5(e)(4) and (5) (pages C-2 and C-3)	been converted to Experimental Light-Sport Aircraft (E-LSA) and electric aircraft. In particular, they prohibit these aircraft from carrying passengers, flying over densely populated areas, flying at night or under IFR, and restrict these aircraft to a geographic area.		and (6) and 5(e)(4) and (5) be struck from the Order.	issuance of an experimental certificate and the SLSA is not in compliance with 91.327(b).
13.	Appendix C Table C-1 Limitation 5 (page C-4)	FAR 61.31(l) contains exceptions to category and class requirements. This should be clarified in the limitation.		EAA recommends that the first sentence of Limitation 5 be amended to read "If required, the pilot in command of this aircraft must hold the appropriate category and class rating or privilege."	Non-concur. This limitation is to ensure that the pilot has received sufficient training to safely fly the aircraft.
14.	Appendix C Table C-1 Limitation 19 (page C-7)	Although this limitation appears to be based upon guidance in AC 43-209A Paragraph 4(e)(1) and (2), certain language of the guidance is changed or modified in this limitation, affecting the intent of the guidance.		EAA recommends that Limitation 19 be brought into better alignment with existing guidance found in AC 43-209A Paragraph 4(e)(1) and (2).	Changed to use language from the AC.
15.	Appendix C Table C-1 Limitation 21 (page C-7)	While this limitation is similar to that currently in use for other experimental categories, current guidance for E-AB aircraft clearly lays out what is expected of the owner and the FSDO in the	We fear that this new, open-ended language requiring only a "response in writing" from the FSDO can lead to misunderstandings on the part of both parties. The present requirement for E-AB is	EAA recommends the text of Order 8130.2G Paragraph 4104(b)(19) be used as alternate text to Limitation 21 for experimental amateur-built aircraft.	Adopted.

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		event of a major change	reasonable and effective.		
16.	Appendix C Table C-1 Limitation 25 (page C-8)	This language is very prescriptive, and appears to at least in part paraphrase Part 135 requirements for takeoff and landing calculations.	Former military aircraft should be operated based upon the aircraft flight manual produced by the manufacturer. If there is a systemic safety problem concerning former military aircraft and appropriate runway requirements the problem should be addressed through pilot training, flight exams and proficiency checks.	EAA recommends that Limitation 25 be rewritten to omit any prescriptive requirement, referring the owner/operator instead to the aircraft flight manual, or struck and the subsequent items in Table C-1 renumbered accordingly.	Partially adopted. Simplified limitation.
17.	Appendix C Table C-1 Limitation 29 (page C-9)	Although this limitation may contain some valid safety-related points, the arbitrary 8000 foot runway length should be disregarded in deference to data from the aircraft flight manual produced by the manufacturer.		EAA recommends that the sentence "Minimum runway length 8000 feet, unless calculated greater" be struck from Limitation 29.	Adopted.
18.	Appendix C Table C-1 Limitation 30 (page C-9)	The arbitrary 5000 foot runway length should be disregarded in deference to data from the aircraft flight manual produced by the manufacturer.		EAA recommends Limitation 30 be struck and the other limitations in Table C-1 be renumbered accordingly.	Adopted.
19.	Appendix C Table C-1 Limitation 32 (page C-10)	Homebuilders are presently required to determine $V_x$ , $V_y$ , and $V_{so}$ at a given weight and CG and record it in their operating limitations at the conclusion of phase I flight	While we believe homebuilders should have every latitude possible in determining the best test program for their aircraft, we believe it is reasonable to ask the builder	EAA recommends that the language found in order 8130.2G Paragraph 4104(b)(4) pertaining to the establishment of $V_X$ , $V_Y$ , and $V_{so}$ at a given weight and CG be restored for	Adopted.

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		testing	to establish this fundamental and easily obtainable information in the interests of safety.	experimental amateur-built aircraft.	
20.	Appendix C Table C-1 Limitation 38 (page C-11)	This limitation has alternate language – it is either written to require the pilot to advise passengers of the experimental nature of the aircraft or to prohibit the carriage of passengers, as prescribed in the FARs and other parts of the Order.		EAA recommends a note be added to Limitation 38 advising the inspector/designee that carriage of passengers may be only prohibited pursuant to the Order and/or applicable FARs.	Non-concur. That information is in the instructions for issuing the limitations.
21.	Appendix C Table C-1 Limitation 40 (page C-12)	We have several concerns with this limitation as written and applied. Under the current format of Order 8130.2G, Experimental-Amateur Built aircraft have a dedicated list of operating limitations, applied as appropriate. Among these is the following operating limitation concerning flight over densely populated areas		EAA believes very strongly that the existing guidance is adequate, and requests that the language concerning this subject in this revision match that found in revision "G."	Concur. Added limitation specifically for AB / LTA and gliders.
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### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Michael Costello	4. Date of Review: January 15 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	2-1, 200	Reference to Title 49 of US Code §44704(c) is inaccurate	Para. 200 of this order references conditions necessary for an airworthiness certificate. Title 49 of US Code §44704(c) is for production certificates and does not give reference to conditions necessary for an airworthiness certificate	Suggest changing para. 200 of this order <b>from</b> referencing Title 49 of US Code §44704(c) <b>to</b> Title 49 of US Code §44704(d)  Suggest verifying all US Code and CFR reference for accuracy	Adopted.
2.	2-3, 204 a	Reference to Title 49 of US Code §44704(c) is inaccurate	Para. 204 a. of this order references aircraft presented for airworthiness certificates are properly registered. Title 49 of US Code §44704(c) is for production certificates and does not give reference to aircraft presented for airworthiness certificates are properly registered	Suggest changing para. 204 of this order <b>from</b> referencing Title 49 of US Code §44704(c) <b>to</b> Title 49 of US Code §44704(d)  Suggest verifying all US Code and CFR reference for accuracy	Adopted.
3.	2-3, 204 a	Para 204 a. lists Form 8050-3 as an acceptable object to verify registration. Can other Forms ( ie. 8050-6 ) be used	14 CFR §47.61(b) identifies Form 8050-6 as an alternate for FAA Form 8050-3	Suggest listing Form 8050-6 as an acceptable means of verifying registration	Adopted.
4.	3-3, 304 a. and b.	Para. 304 a., b., and d. do not fit with topic/title of para 304 "Use of Parts Catalogs and Maintenance Manuals	Para. 304 a., b., and d. have statements concerning general conformity inspection actions whereas the title of Para 304 is "Use of Parts Catalogs and Maintenance Manuals"	Suggest moving Para 304 a., b., and d. to Para 300 f.	Partially adopted. Changed title of paragraph.
5.	3-4, 306 d	Para. 306d. and its "Note" reference only 1 method of determining proper registration	As the only method referenced; AFS-750 may not be available at time of certification process. May	Suggest providing other means to determine an aircraft is properly registered.	Partially adopted. Deleted note. That information is in chapter 2.

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
			cause undue burden (time & Money) on the certification process	Suggest changing Note <b>from</b> "AFS-750 <i>should be</i> contacted..." <b>to</b> "AFS-750 <i>may be</i> contacted..."	
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**FIELD DOCUMENT REVIEW LOG**

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #:		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	¶ 448(d)(2)	The paragraph lists two reasons why an operator may elect to change the special airworthiness certificate from Special LSA to Experimental LSA.	We would like to suggest that there are many reasons why an operator may elect to do so. To list just two would create ambiguity for the inspectors as it may not be clear to them whether it is acceptable to issue an E-LSA ticket for reasons other than the two listed. For example, an operator may elect to carry out a modification which the manufacturer has not shown to be compliant to the standard.		Non-concur. This paragraph explains 21.191(i)(2) and 21.191(i)(3), the two provisions in the rule for issuing an experimental airworthiness certificate for operating light-sport aircraft.	
2.	Appendix C item 5(c)	This establishes severe restrictions on E-LSA aircraft, especially the fact that they may only carry one occupant.	The justification for this is difficult to understand as the safety record of E-LSA aircraft would not seem to warrant such a restriction			
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### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: SLC FSDO Maintenance DAR Reviewer's Name & Phone #: Gary Loyd	4. Date of Review: 28 Feb. 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	3-24; 329	Used aircraft are certified all the time under 21.183(d) however, there is no sample 8100-2 for a used aircraft.	This section has samples for aircraft built from surplus parts. Why not for used aircraft? That is much more common, yet there is no sample.	Include another Figure to show a sample 8100-2 for a used aircraft.	Concur. This is deferred to next revision.
2.	3-25, Fig.1	The DC-6A is a poor example of a new aircraft. The 8100-2 form was not even used when the DC-6A was being mfgd.	This is the chance to update the document and the samples presented should be more up-to-date.	Use a more recent aircraft in the 8100-2 sample for a new aircraft such as something that is still in production.	Concur. This is deferred to next revision.
3.	5-2. 500. g.	The last statement in para. g should be clarified.	The subject matter is export; not import.	Strike out "When the aircraft is imported back into the United States" and insert "When issued for all other aircraft," the certification is considered recurrent.	Partially adopted. Deleted last two sentences because that information is in chapter 2.
4.	5-2, 505.	A notarized letter of authorization from the owner is needed when a person is representing an exporter.	See FAA Memorandum dated Aug. 15, 2012, Subject: INFORMATION; 14 CFR Part 21, 21.327, prepared by Airworthiness Certification Branch, AIR-230.	Rewrite the first sentence to include the requirement for the notarized letter of authorization from the owner.	Non-concur. This is not a regulatory requirement.
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### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Griffin Air, LLC Reviewer's Name & Phone #: Eldon Griffin	4. Date of Review: Feb 06, 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	2-17, 224c	This para. addresses original airworthiness certificates and approvals; then states that a determination is required in regards to the "aircraft". Has it been properly manufactured?	The requirement addresses "airworthiness certificates and approvals" then only states "aircraft". You can issue airworthiness certificates for aircraft and airworthiness approvals for aircraft engines and propellers; these are "products".	Replace "aircraft" with "products and articles" to clarify the intent of the issuance of original airworthiness certificates and approvals.	Adopted.
2.	2-17, 224c	This para. addresses recurrent airworthiness certificates and approvals; then states that a determination is required in regards to the "aircraft". Has it been properly maintained or altered while in service.	The requirement addresses "airworthiness certificates and approvals" then only states "aircraft". You can issue airworthiness certificates for aircraft and airworthiness approvals for aircraft engines and propellers; these are "products".	Replace "aircraft" with "products" to clarify the intent of the issuance of recurrent airworthiness certificates and approvals.	Adopted.
3.	2-17, 224c	This para. does not address recurrent airworthiness approvals for "articles".	Clarify responsibility for the issuance of recurrent airworthiness approvals for articles. If an article has not been placed in service, but, has passed from the PAH, to an air carrier and then to a parts distributor, an FAA Manufacturing Inspector or their designee should be able to issue a recurrent airworthiness approval, either domestic or export for the article after verification of	Add verbiage to address recurrent airworthiness approval responsibilities for "articles". Provide verbiage/authorization for Manufacturing Inspector or their designee to issue domestic and export recurrent airworthiness approvals for articles that have not been placed in service.	Adopted.

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
			documentation back to the PAH.		
4.	2-17, 225b	This para. addresses recurrent airworthiness certificates and approvals for "aircraft".	Clarify intent of "approvals".	Change "aircraft" to "products and articles".	Adopted.
5.	G1 & G4, Appendix G	There's no definition of "article" and "product".	Definition required for clarification of terms.	Add "article" and "product" definitions to Appendix G	Non-concur. See 21.1(b)(2) & (5)
6.	Cover, Subj:	Subject is stated as "Airworthiness Certification of Aircraft and Related Products"	The purpose of the Order is to address procedures for accomplishing original and recurrent airworthiness certification of aircraft and related products and articles.  Per CFR part 21, §21.1 a product is an aircraft, aircraft engine or propeller.	Change Subj: to "Airworthiness Certification of Products and Articles"	Adopted.

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Jeff Winner	4. Date of Review: 02/06/2014	5. Date of Disposition: 02/12/2014
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	225 (a)(3)	<p>"Aircraft involved in a certification project such as TC or STC." could use more clarification.</p> <p>Does this mean only aircraft being used in the development of a TC or STC?</p>	<p>The issue, specifically, is that when adding a former military aircraft to a Restricted Category TC the current Order (8110.56A) requires that the aircraft first be placed in Experimental to perform a maintenance test flight prior to placing the aircraft into Restricted</p> <p>It is my opinion that the Restricted conformity should be considered a recurrent certification for two reasons 1) the aircraft will have previously had a U.S. Airworthiness Certificate (Experimental) and 2) the suggested conformity checklist items (8110.56A Appendix 2) are generally maintenance type items not manufacturing type items.</p>		Adopted.
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### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H	2. Project manager: Craig Holmes	3. Reviewing Office: Cubcrafters Reviewer's Name & Phone #: Jim Richmond	4. Date of Review:	5. Date of Disposition:	
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	Section 8, Paragraph 448. see a(2)(a)&(b).	This proposed wording would limit the DAR or ASI to only two acceptable reasons to convert an SLSA aircraft to an ELSA. The reasons to convert are not limited by regulation in FAR 21.191(i)(3), and in fact there are many reasons to do so.	This proposed wording imposes a restriction that does not now exist, It does not enforce current FARs, it adds to them. and should be eliminated.		Non-concur. This paragraph explains 21.191(i)(2) and 21.191(i)(3), the two provisions in the rule for issuing an experimental airworthiness certificate for operating light-sport aircraft.
2.	Appendix C	Limitations on the carrying of passengers for ELSA converted from SLSA should be eliminated. Any limitation of carrying passengers or not should be based on safety, not a category. The proposed change is not justified by any safety study that I am aware of, and unfairly takes a privilege away that currently is afforded in the FARs.			Partially adopted. Clarified that the limitation is issued to aircraft that the owner has not complied with an airworthiness or safety directive.
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### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Kerry Moore	4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	2-2, 202.e	Paragraph states "Special Airworthiness Certificate or Special Flight Permit". Paragraph 201.b speaks to "Standard and Special Airworthiness Certificates..." but does not address Special Flight Permits	A Special Flight Permit is not an "Airworthiness Certificate" but a "Permit". Paragraph 201.b bears this out by not mentioning Special Flight Permits.	Add Special Flight Permit to the listing of Certificates and Approvals in Paragraph 201.b	Non-concur. A SFP is an airworthiness certificate, see 21.175(b). Occasionally special flight permits are specifically called out for clarity.
2.	2-12, 216.b.(7)	Paragraph lists Special Flight Permit as Special Classification yet Paragraph 225 is silent to Permits.	If Permits are a classification of Special Airworthiness Certificates then should they be spoken to in Paragraph 225?	Add note to Paragraph 225 that a permit is neither "Original" nor "Recurrent" and may be issued by either by ASI's, Manufacturing or Maintenance Designees is so authorized.	Non-concur. See 21.175(b). Occasionally special flight permits are specifically called out for clarity.
3.	2-15, 219	When a model change occurs the Registry need not be updated per the paragraph. Yet 219.a specifically requires it. AFS-750 has, in the past, not updated the registration until such time the aircraft receives an updated Airworthiness Certificate. AFS-750 does not support the requirements Paragraph 219.a.	Conflict between stated requirements in Paragraphs 219.a and 219.d. 219.a requires the registration certificate be updated yet 219.d states if no ownership transfer, it does not.	Add "See Paragraph 219.d regarding registration if no ownership changes have occurred" to Paragraph 219.a	Non-concur. The paragraph "a" requirements do not happen simultaneously. Usually the data plate is attached, an airworthiness certificate is issued, then the registry sends a new registration upon receiving a copy of the airworthiness certificate. This is as described in the order.
4.	2-15, 221	8100-1 Forms for Conformity Inspections are Type Certification Records and should be part of the Project Certification File. This Paragraph leaves it up to the Managing Office.	Order 8110.4C, Para. 2-7.b.(4).(a) specifically states that the 8100-1 original is attached to the Type Inspection Report	Add note to Paragraph that 8100-1 Forms completed in support of Type and Supplemental Type Certification Conformity activity are to be made part of the TIR or STIR per Order 8110.4C	Partially adopted. Deleted paragraph b.

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
5.	3-1, 300.c	Paragraph refers to "aircraft certificated under 14 CFR 1.21 or 21.29"	Should be "14 CFR 21.21 or 21.29"	Correct typographical error and revise to state "21.21 or 21.29"	Adopted.
6.	3-1, 301.a	Paragraph refers to a "Standard Category"	Per Paragraph 216.a "Standard" is a classification, not a category. Category is Normal, Utility, Transport, etc.	Revise to state "Standard Classification"	Adopted.
7.	3-2, 303.b	Discusses 8130-9 Form. No examples are given in this Order. Maybe provide reference to Order that has examples.	No guidance on what to review the 8130-9 Form for completion against. Example is in FAA Order 8110.4.	Add "See FAA Order 8110.4C, Section 5 for further information on form completion"	Adopted.
8.	3-6, 309	Paragraph refers to new aircraft produced under TC, PC, ODA, or Bilateral Agreement. ODA and a Bilateral Agreement are not FAA Production Approvals.	Implies that an ODA or Bilateral Agreement is a Production Approval.	Changed wording to more accurately reflect the titles in the corresponding Paragraphs of 314 (ODA) and 316 (Foreign Manufacture)	Adopted.
9.	4-5, 405.c	Paragraph requires aircraft be certificated under 21.183(c). This requires the aircraft be new. Used aircraft are brought in under 21.183(d) per Section 6 of this Order.	Why can't an aircraft be imported under 21.183.(d) (Used Aircraft) be issued a Standard and subsequently modified to a Restricted Category by an STC? Is the intent to limit this to "New" Aircraft Only?	Change to read "21.183.(c) OR 21.183.(d)"	Partially adopted. This paragraph was changed based upon another comment, which addressed your issue.
10.	4-75, 473.d	Improper Grammar. States the "FAA Representative must that the..."	Sentence is missing something. Believe it should be "FAA Representative must ensure that the..."	Correct to add required word to make sentence complete.	Adopted.

## FIELD DOCUMENT REVIEW LOG

11.	4-76, 475.d.(3).(e)	Paragraph requires "Notice: This aircraft..." placard for EX Ticketed aircraft but only for PC Holders and modifiers who have submitted a procedure?	Is this placard truly limited to operation of EX Ticketed aircraft under PC Holders and Operators who have submitted a procedure? Shouldn't it apply to all multi place aircraft?	Move the requirement for the placard to a paragraph that applies to more than just PC Holders and Modifiers.	Partially adopted. Deleted paragraph because this is in the operating limitations.
12.	4-80, 488.a	Paragraph allows a permit to be issued to any US Registered aircraft covered by 21.197. Yet paragraphs 493 and 494 appear to limit issuance of permit to Production Flight Testing and Customer Demo for aircraft registered using a Dealers Aircraft Registration Certificate. Reference to Form 8050-6 only appears in these two paragraphs.	Form 8050-6 is an alternative to registration under Subpart B of 14 CFR 47 per 14 CFR 47.69. Permits should be allowed to be issued under a Dealers Aircraft Registration Certificate for 21.197 (a)(1), (2), and (4). As is currently written a Manufacturer could not get a permit to evacuate the aircraft from danger under a Dealers Certificate.	Add clarifying statement to Paragraph 488.a stating that US Registration includes Form 8050-6 when requirements of 14 CFR Part 47, Subpart C have been met.	Partially adopted. Made changes to paragraphs 493 & 494.
13.	4-104, Figure 4-10	Figure shows issue date and Expiry Date on Certificate are the same date.	Typographical Error	Revise Expiration Date to something more credible, not to exceed one year.	Adopted

## FIELD DOCUMENT REVIEW LOG

14.	5-3, 508.b	This paragraph requires a non US Manufactured aircraft to hold a Standard Airworthiness Certificate issued under 21.183.(c) prior to Export. 21.183.(c) applies to "New" aircraft imported to the US. This wording would not allow an aircraft certificated under 21.183.(d) to be eligible for Export. Section 6, Paragraph 600.e.(1) of this Order specifically states that the primary basis for import of New aircraft is 21.183.(c) and used aircraft are 21.183.(d).	This paragraph as worded would not allow an Airbus product originally Exported to Germany and then certificated with a Standard Airworthiness Certificate issued under 21.183.(d) to be re-exported to another country by the FAA. The current wording also conflict with Paragraph 600.a Note and 14 CFR 21.329, both of which specifically state "New or Used aircraft"	Revise Paragraph 508.b to reference both 21.183.(c) or 21.183.(d).	Partially adopted. This paragraph was rewritten.
15.	5-7, 512.e (Note)	Paragraph clearly states that conforming statement to approved design when requested by foreign authorities (Such as through a Bilateral Agreement or BASA) is not applicable to Used aircraft. Many BASA's that have been negotiated with these authorities by AIR-40 have that as a requirement for New or Used aircraft.	This paragraph results in not being able to comply with the Bilateral requirements which is also a requirement for Export. BASA's have been negotiated which conflict with the Order. An example is Brazil where the BASA/IPA, Section 3.2.2.3.(a).(5) specifically requires the statement of conformance to ANAC Type Design for used aircraft.	Perhaps revise note to state that it is not applicable to Used aircraft unless specifically required per a BAA or BASA/IPA.	Partially adopted. Deleted the note and changed the end of paragraph e.
16.	5-7, 5-12.f.(1)	Paragraph allows for Typed name "Adjacent to or Under" the signature yet Paragraph 512.c requires the signature "above the type name"	Apparent conflict within the Chapter regarding the placement of the Typed Name in relation to the signature.	Revise either paragraph to eliminate conflict and require signature above typed name or allow adjacent to or above the typed name.	Adopted.

## FIELD DOCUMENT REVIEW LOG

17.	5-13, Figure 5-3	Example of E Card, Form AC8050-72, on the "Identification Mark Displayed" Line, the word "Foreign" has been omitted from the example.	The example shown is not representative of the actual Form.	Revise example to include the missing word "Foreign" on the Identification Mark Displayed line of the form.	Adopted.
18.	6-2, 603.a	Paragraph requires a US Registration Application be completed and submitted and Registry marks applied before an Airworthiness Certificate can be issued. Merely completing and submitting an application for Registration does not fulfill the requirements of 21.173 of being a "US Registered Aircraft".	Paragraph 204.a of this Order specifically requires that an aircraft be "properly registered" prior to issuance of an Airworthiness Certificate. The same terminology should be used consistently throughout the order.	Change to revise the wording to state "the aircraft must be properly registered per Paragraph 204 of this order and registration marks must be applied..."	Adopted.
19.	8-1, 800.b	Paragraph currently requires placement of the word "END" below the last line of information on a certificate. On a Standard Airworthiness Certificate, in the Exceptions Block, Exemptions are listed or the word "NONE" is entered. This requires the placement of the word "END" as well. Many times there is insufficient room due to the number of exemptions to list on the certificate.	This paragraph makes sense when applied to attachments to certificates such as Operating Limitations of Attachments to Export C of A's. The paragraph should be more specific as to when apply this item instead of a global statement.	Revise the paragraph to state "Below the last line of information on any attachment (such as Operating Limitations or attachments to FAA Form 8130-4) type the word "END" in the center of the page."	Adopted.

## FIELD DOCUMENT REVIEW LOG

20.	8-9, 801.b.(7)	When filling out an application for a combination permit for Production Flight Testing and Customer Demonstration as allowed per Paragraph 493 and 494 of this Order no Form Completion Instructions are provided. Currently, Customer Demonstration Permits are "specific aircraft only" per the Form Instructions yet Production Permits are transferrable for PC Holders per Paragraph 493 (except LSA).	What guidance is there for Manufacturers filling out the form for combination permits. AC21-12 does not address this either.	Add information to Paragraph 810.b.(7) regarding completion of this section when a PC Holder is making application for Special Flight Permits for Production Flight Testing AND Customer Demonstration.	Concur, out of scope. This comment will be considered for the next revision of AC 21-12.
21.	8-10, 801.b.(8).(g)	Previous Airworthiness Certificate Issued Block. When issuing a certificate under Order 8130.29A this block is left blank as Standard is held in Abeyance and not surrendered to AFS-750. A note clarifying this would be helpful.	Many applications have been seen by myself where this block was checked even when the application had the "DO NOT CODE PER FAA Order 8130.29" Statement per the 8130.29A Order. A note clarifying this would be helpful.	Add statement "This block is not checked when issuing a certificate under FAA Order 8130.29."	Adopted.
22.	8-12, 803.a.(2)	Some abbreviations are allowed. Currently "Research and Development" and "To Show Compliance with CFR" are not listed. When processing certificates for multi-purpose under Paragraph 443.b of this Order all of these notations will not fit.	Paragraph 473.b lists this purpose as "Showing Compliance with Regulations" yet the application lists "To Show Compliance with CFR". Standard wording should be used throughout the order and allowable abbreviations for use on Experimental Certificates when issuing multi-purpose certificates should be allowed.	Add to paragraph "When issuing Multi-Purpose Experimental Certificates "Research and Development may be shown as "R&D" and To Show Compliance with CFR may be shown as "Show Compliance".	Adopted.

## FIELD DOCUMENT REVIEW LOG

23.	8-12, 803.c	When filling out a Special Flight Permit for Production Flight Testing and Customer Demonstration as allowed per Paragraph 494 of the Order this information is not filled in as the certificates are transferrable.	Permit includes Customer Demonstration as a purpose so a combination permit issued to a Manufacturer under Paragraph 493 and 494 would need to violate this entry requirement in order to have a transferrable permit as allowed per Paragraph 493.	Add to Paragraph 803.c.(1).(b) to include "or Production Flight Testing and Customer Demonstration Permits as allowed per Paragraph 494 of this Order" NOTE: Paragraph 803.d would also require the same wording.	Adopted.
24.	8-13, 803.e	The wording leads one to think that the "E" or "R" is placed after the issue date.	Standard wording should be used. Paragraph 802.f has similar wording except that the word "before this date" is missing from Paragraph 803.e	Insert the word "before this date" to the end of the statement in this paragraph. This maintains standard use of wording for this activity throughout the Order.	Adopted.
25.	8-17, 806.b.(2).(c)	Entry requires the "entry of the "Number of Operating Hours since the Annual Type Inspection". What is this value when the aircraft is under a Continuous Airworthiness maintenance Program under 91.409 (e) or other programs as allowed per 14 CFR 91.409.(c).(2) through (4).	Certain programs do not have "Annual Type" Inspections. What is used to meet the requirements of this paragraph? Time since last Heavy Check?	Add note to bottom of paragraph, "Hours since last annual type inspection entry not required for aircraft maintained under 14 CFR 91.409.(c)."	Partially adopted. Time since overhaul is not required for aircraft, only engines and propellers.

## FIELD DOCUMENT REVIEW LOG

26.	8-17, 806.b.(6)	Entry requires that documents required to be submitted per 14 CFR 21.335 be listed. There are no specific requirements listed in that regulation and it refers to the Bilateral Agreements. Is the intent to have the Exporter list all documents required per a Bilateral Agreement? For Transport Category that could be a very long list.	This requirement is a responsibility of the Exporter and the Importing Authority does not see the FAA Form 8130-1. What is the intent here? To list them all? This information is not carried over the FAA Form 8130-4.	Delete the last sentence from this particular item.	Adopted.
27.	8-1? Table	Page Number shows as 8-1, perhaps should be 8-21 as it follows Page 8-20. Also, FAA Form 8130-9 Statement of Conformity is showing as a required form for aircraft manufactured under a PC with a PC ODA. An FAA Form 8130-9 is not required to be submitted for aircraft manufactured under a PC regardless of the type of Delegation it holds. 21.130 is specific to production under Type Certificate.	The requirement for the submittal of a Statement of Conformity is in 14 CFR 21.130 for Production Under Type Certificate and 14 CFR 21.53. Table indicates this as a requirement for aircraft produced under PC with a PC ODA.	Remove the "R" in that column for that item.	Adopted.
28.	8-3? Table	Page Number shows as 8-3, perhaps it should be 8-23. Also, it shows Form 8100-2 held in suspension and being "Available" (A in the Table) for R&D, Show Compliance, Market Survey, Crew Training.	Standard Airworthiness Certificates may only be held in abeyance under the provisions of FAA Order 8130.29A. The use of this process is limited to R&D and Show Compliance ONLY.	Remove the "A" in those columns for Market Survey, and Crew Training.	Adopted

## FIELD DOCUMENT REVIEW LOG

29.	C-1, App. C, Item 3	This paragraph requires that any changes to the published Operating Limitations be coordinated with AIR-230. There are a multitude of variations within the Experimental Operating environment and these published limitations may not be sufficient. Is it really the intent to require the coordination with AIR-230 of every change or addition?	Experimental Operation is widely varied and the Limitations should be concise enough to prevent any confusion. The requirement to coordinate any and all changes or additions to the published limitations may prove cumbersome and not value added. The local office would be more familiar with the project. Item 3 clearly alludes to the varied environment in that "Limitations must be designed to fit the specific situation encountered".	Perhaps clarify when specific coordination with AIR-230 is needed by the local office.	Adopted. Removed requirement for R&D and show compliance.
30.	C-4, #2	Per C.3 it is required to "Issue the Limitations as shown". This limitation has notes and information and is quite lengthy.	Is it truly the intent to include the "Note that a clearance from ATC is not an authorization for a pilot to deviate from any rule..." Statement in the Operating Limitations associated to the Experimental Certificate.	Remove the 4 <sup>th</sup> Sentence from the Published Operating Limitation	Non-concur. This was intentionally inserted for clarity.
31.	C-4, #5	Blanks are listed for Category AND Class certificate or Privilege. Per 14 CFR 61.5 it appears that, for a Transport Category Aircraft, an ATP is no longer sufficient. Must you now call out Air Transport Pilot AND Multi Engine Land?	It would appear that an LOA issued by FSDO is no longer accepted? If the aircraft requires a type rating it is not mentioned. The Operating Limitation in the previous version of the Order merely referred to an "appropriate category/class rating" and, if required for the type of aircraft an appropriate type rating or LOA issued by FSDO.	Revert to the language of the previously published limitation in FAA Order 8130.2G, Change 1, Limitation #8.	Non-concur. Specifying the category and class was added for clarity.

## FIELD DOCUMENT REVIEW LOG

32.	C-5, #8	Limitation deals with Supersonic Flight and there are no notations in the Notes/Applicability section. Under the requirements this Limitation must now be prescribed for any aircraft being issued a certificate under 21.191 (Experimental). A Cessna 172 would require this limitation.	Operating Limitations are to be "Designed to fit the specific situation encountered (Ref App. C, Item 3. There should be something in the Notes / Applicability Section referring to "aircraft capable of speed greater than Mach 1 only" so that a Cessna 172 flying for R&D would not have to have this limitation listed.	Add a notation in the Notes / Applicability section that reads "Aircraft capable of speeds greater than Mach 1 only"	Partially adopted. Deleted the limitation.
33.	C-5, #11	Previous version of Order limited this limitation to aircraft that were temporarily in the Experimental Category and will be returned to the Standard Category. No information in the Notes / Applicability section to this affect. This makes it applicable to all EX Certificates issued. For Testing of new aircraft limitations may not necessarily have been established.	This limitation, if prescribed, would limit the ability of producers to expand the envelope. They normally issue Temporary Operating Limitations to allow for these exceedances as part of the testing environment.	Add a notation in the Notes / Applicability section reflecting the wording in the Note under the Limitation # 24 in Order 8130.2G, Chg 1.	Non-concur. Aircraft being return to standard category need this limitation. Aircraft testing for expanding the envelope will record the testing. Aircraft that currently are not issued this limitation such as exhibition should record any exceedance and properly return the aircraft to service.

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Michael Costello	4. Date of Review: January 15 2014	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	2-1, 200	Reference to Title 49 of US Code §44704(c) is inaccurate	Para. 200 of this order references conditions necessary for an airworthiness certificate. Title 49 of US Code §44704(c) is for production certificates and does not give reference to conditions necessary for an airworthiness certificate	Suggest changing para. 200 of this order <b>from</b> referencing Title 49 of US Code §44704(c) <b>to</b> Title 49 of US Code §44704(d)  Suggest verifying all US Code and CFR reference for accuracy	Adopted.
2.	2-3, 204 a	Reference to Title 49 of US Code §44704(c) is inaccurate	Para. 204 a. of this order references aircraft presented for airworthiness certificates are properly registered. Title 49 of US Code §44704(c) is for production certificates and does not give reference to aircraft presented for airworthiness certificates are properly registered	Suggest changing para. 204 of this order <b>from</b> referencing Title 49 of US Code §44704(c) <b>to</b> Title 49 of US Code §44704(d)  Suggest verifying all US Code and CFR reference for accuracy	Adopted.
3.	2-3, 204 a	Para 204 a. lists Form 8050-3 as an acceptable object to verify registration. Can other Forms ( ie. 8050-6 ) be used	14 CFR §47.61(b) identifies Form 8050-6 as an alternate for FAA Form 8050-3	Suggest listing Form 8050-6 as an acceptable means of verifying registration	Adopted.
4.	3-3, 304 a. and b.	Para. 304 a., b., and d. do not fit with topic/title of para 304 "Use of Parts Catalogs and Maintenance Manuals	Para. 304 a., b., and d. have statements concerning general conformity inspection actions whereas the title of Para 304 is "Use of Parts Catalogs and Maintenance Manuals"	Suggest moving Para 304 a., b., and d. to Para 300 f.	Partially adopted. Changed title of paragraph.
5.	3-4, 306 d	Para. 306d. and its "Note" reference only 1 method of determining proper registration	As the only method referenced; AFS-750 may not be available at time of certification process. May	Suggest providing other means to determine an aircraft is properly registered.	Concur, out of scope. This is the current policy from 8130.2G, change 1. Will consider this comment for next

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
			cause undue burden (time & Money) on the certification process	Suggest changing Note <b>from</b> "AFS-750 <i>should be</i> contacted..." <b>to</b> "AFS-750 <i>may be</i> contacted..."	revision.
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**FIELD DOCUMENT REVIEW LOG**

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #:		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
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RE: Draft 8130.2 'H'  
 Neil Emory  
 to:  
 Craig Holmes  
 03/31/2014 03:10 AM  
 Hide Details  
 From: "Neil Emory"  
 To: Craig Holmes/AWA/FAA@FAA,  
 Dear Mr. Holmes:

Please consider the following recommendations (in italics) for changes to Order 8130.2H:

221. Recording of Conformity Inspections. FAA Form 8100-1, Conformity Inspection Record, **must** be used to document conformity inspections during type, production, and airworthiness certification programs (refer to figure 2-4 of this order).

- a. Preparation. FAA Form 8100-1 must be prepared in accordance with the instructions shown on the back of the form.
- b. Retention. FAA Form 8100-1, original or copy, should be retained by the managing office until it has been determined that it would serve no useful purpose.

*Change "must" to "should" as in previous editions of this Order. The managing office can determine if this form is appropriate for the task being performed and can require its use. Mandating use of forms when they are unnecessary is contrary to paperwork reduction initiatives.*

## FIELD DOCUMENT REVIEW LOG

491. Special Operating Limitations. The FAA should establish limitations as deemed necessary for safe operation. Because individual circumstances may vary greatly, a list of limitations applicable in every case cannot be provided. The objective is to ensure safe operation of the aircraft. If necessary, solicit the technical assistance of other FAA offices or specialties. Limitations should be clear and concise so they can be easily understood. In addition to the limitations deemed necessary for the particular flight, the following items must be considered when establishing operating limitations:

n. When flight over another country is planned, the ASI or designee must emphasize to the applicant that special permission must be obtained from the country over which the aircraft will be operated. In addition, section C of FAA Form 8130-7 should contain the statement, "Subject to D(2) on reverse side." (figure 4-10 of this order).

*This is redundant and unnecessary. It can be written into the Operating Limitations for international flights. The Form 8130-7 already has a notation printed on the front to "see reverse side." Furthermore, ATC will not issue clearances for international flights if prior overflight/landing permission has not been received.*

Note: When required to fly over an ICAO member state, the operating limitations issued with the special flight permit should include, when appropriate, the following statement: "This aircraft does not comply with the international standards of Annex 8 to the Convention on International Civil Aviation as follows: [describe here the item(s) which do not comply with the airworthiness requirements for standard aircraft]."

*This is not an operating limitation and is redundant and unnecessary. The back of Form 8130-7 already has a notation on the front to "see reverse side" where the required ICAO statement is printed. See Figure 4-1 on Page 4-91.*

495. Special Flight Permit for Certain Large Aircraft for which 14 CFR Part 125, Certification and Operations: Airplanes Having a Seating Capacity of 20 or More Passengers or a Maximum Payload Capacity of 6,000 Pounds or More, Is Not Applicable.

a. Eligibility. A special flight permit may be issued for certain large aircraft for which 14 CFR part 125 is not applicable. In those cases, the provisions of paragraph 495b of this order must be met.

b. Application and Issue.

(1) Before issuance of a special flight permit, the applicant must select, identify in the aircraft maintenance records, and use one of the programs specified in 14 CFR 91.409(f). If the program selected contains provisions addressing situation-specific inspection of the aircraft, then those provisions may be used to ensure safe operation of the aircraft. If the program selected does not contain those provisions, the FAA will specify the appropriate inspections and/or tests required to ensure safe operation.

Note: Only Flight Standards ASIs can approve the inspection program

This note is misleading. Approval by a Flight Standards ASI is required if a 14 CFR 91.409(f)(4) program is selected. Approval by an ASI is not required if a (f)(2) or (f)(3) program is selected.

(2) In some cases the applicant may not intend to place the aircraft in service following the flight authorized by the special flight permit. In this case the applicant may wish to select, identify, and use the program specified in 14 CFR 91.409(f)(4). Unless provisions for additional flights are provided for in the FAA-approved program, no additional flights are permitted.

(3) The following examples illustrate how the above procedures may be applied:

## FIELD DOCUMENT REVIEW LOG

Example 1: ABC Airlines, operating a B-777 aircraft in air carrier service, wishes to lease another B-777 from XYZ Leasing. The subject aircraft has been in storage for 1 year. ABC Airlines wishes to operate the aircraft from the point of storage to a maintenance facility before placing the aircraft in service with the airline. ABC Airlines may choose to select, identify in the maintenance records, and use the inspection program that is part of ABC Airlines' Continuous Airworthiness Maintenance Program (CAMP) for its B-777, as provided in 14 CFR 91.409(f)(4). If the selected CAMP contains provisions for inspection before the flight of the aircraft being removed from storage, those provisions may be used to ensure safe operation of the aircraft. If the CAMP does not contain such provisions, the CAMP may still be selected; however, the FAA must require ABC Airlines to make appropriate inspections or tests necessary to ensure safe operation.

Example 2: XYZ Leasing wishes to operate its A-300 from one storage location to another. When applying for the special flight permit, XYZ submits a description of the inspections and tests it considers necessary to ensure safe operation of the aircraft. Upon review of the submitted description, the FAA issues the special flight permit with the conditions and limitations under which XYZ may operate its aircraft following the satisfactory completion of the inspections and tests described. XYZ may then select, identify, and use the description of inspections and tests approved by the Flight Standards ASI as the inspection program under which the aircraft is to be operated for the purpose of this flight only.

*These two paragraphs are poorly written and confusing. There should be three examples, a (f)(2), a (f)(3) and a (f)(4). Nowhere does the Order address use of a (f)(3) program, which is by far the most frequently used for Transport SFPs.*

Thank you for your consideration,  
R. Neil Emory  
Aviation Attorney

-----Original Message-----

From: Designee Training [mailto:no-reply@faa.gov]  
Sent: Thursday, February 6, 2014 12:40  
To:  
Subject: Draft 8130.2 'H'

This draft order is out for comment on the following link under the Aircraft Certification Service (AIR) Draft Orders Open for Comments section. The procedures contained in this order apply to Federal Aviation Administration (FAA) manufacturing aviation safety inspectors (ASI), to FAA airworthiness ASIs, and to private persons or organizations delegated authority to issue airworthiness certificates and related approvals. Therefore, please review and provide feedback, this is your opportunity to help us make positive changes to this directive.

[http://www.faa.gov/aircraft/draft\\_docs/orders/](http://www.faa.gov/aircraft/draft_docs/orders/)

Comment [AE1]: OK As is.

Non-concur. The examples provided are the two most complicated, (f)(2) and (f)(4). There is no reason to provide an (f)(3) example.

**FIELD DOCUMENT REVIEW LOG**

**FIELD DOCUMENT REVIEW LOG**

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #:		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	4-12, 428	Display of Marks (Limited) ignores FAR 45.22 which allows certain small A/C to utilize the addition of a Letter, in this case L, after the N and before the Registration number/numerals in lieu of marking the cockpit with the word Limited.	<p>FAR 45.22 (b) (ii) allows operation of older small A/C and allows markings different that 45.21, 45.23 – 45.33 to be used. If you specify only-</p> <p><b>The applicant should also be advised that it is the owner/operator's responsibility to display the word "LIMITED" in accordance with 14 CFR 45.23(b).</b></p> <p>Then you are ignoring FAR 45.22 (b) (ii) which is written in part-</p> <p><b><u>§45.22 Exhibition, antique, and other aircraft: Special rules.</u></b></p> <p><b><u>(b) A small U.S.- registered aircraft built at least 30 years ago</u></b> or a U.S.-registered aircraft for which an experimental certificate has been issued under §21.191(d) or 21.191(g) for operation as an exhibition aircraft or as an amateur-built aircraft and which has the same external configuration as an</p>	Include the reference to 45.22 (b) (ii) in addition to the 45.23(b) for those Aircraft in which it applies.	Partially adopted. Changed to part 45.	

**FIELD DOCUMENT REVIEW LOG**

			<p>aircraft built at least 30 years ago <u>may be operated without displaying marks in accordance with §§45.21 and 45.23 through 45.33 if:</u></p> <p align="center"><u>(1) It displays in accordance with §45.21(c) marks at least 2 inches high on each side of the fuselage or vertical tail surface consisting of the Roman capital letter "N" followed by:</u></p> <p align="center">(i) The U.S. registration number of the aircraft; or</p> <p align="center"><u>(ii) The symbol appropriate to the airworthiness certificate of the aircraft ("C", standard; "R", restricted; "L", limited; or "X", experimental) followed by the U.S.</u></p>		
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**FIELD DOCUMENT REVIEW LOG**

			<p><u>registration number of the aircraft; and</u></p> <p>(2) It displays no other mark that begins with the letter "N" anywhere on the aircraft, unless it is the same mark that is displayed under paragraph (b)(1) of this section.</p>		
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**FIELD DOCUMENT REVIEW LOG**

Document No.: 8130.2H		2. Project manager: Craig Holmes		3. Reviewing Office: Reviewer's Name & Phone #: Ron Sokoloski		4. Date of Review: 02/26/2014		5. Date of Disposition:	
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:				
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Thanks for allowing me the opportunity to comment on the above subject draft order and I will provide a brief explanation for this requested addition.

Background information:

Imported aircraft originally type certified in Canada under CFR 21.29 and exported to a third country are starting to make their way to the US for the first time. In many cases these aircraft are arriving from countries with whom the FAA doesn't have a "Bilateral Agreement" or the US importer receives an export airworthiness certificate from the exporting country void of any reference to the US type certificate data sheet. This leaves the importer with the only recourse but to try and obtain a certification statement from the CAA's state of manufacture, in this case Canada. Stating that at the time of export the aircraft did or did not conform to the US build standard. Draft order 8130.2H as is worded in the current version of 2G, under Section 2 "Import Aircraft" sub paragraphs 605 (h)&(i) speak to this fact.

Current situation:

Unlike the FAA, Transport Canada ASI's do not have the option of issuing Airworthiness and Export Airworthiness Certificates on Canadian aeronautical products, with these tasks having been delegated to certain designee's. Subsequently, because they were not involved in the original certificate process they are reluctant to get involved with any conformity statements on specific serial numbered aircraft that the FAA may require. They have delegated the job of providing the certifying statements as required by your Order.

Proposed amendment to Section 2. Imported Aircraft paragraph 605:

Include the following Note, possibly after sub para (i) to read as follows:

Note !

In this section entitled "**Airworthiness Determination**", the term Export C of A issued by the CAA of the State of Manufacture, refers to the CAA and that person's authorized designee's. Designee's will performed only the authorized tasks on behalf of their managing office.

Comment [CH1]: Out of scope

## **FIELD DOCUMENT REVIEW LOG**

This has been a problematic time consuming issue in getting some of the FAA FSDO ASI's to accept the certification statement from the Transport Canada (TC) delegates even though the letter is issued on TC branded, letterhead stationary, signed and ink stamped by the delegate. Les Sargent has been involved in the subject and we were waiting for the right opportunity to resolve this issue. Hoping you agree that this is the right opportunity.

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #:		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	Page 4-4, Paragraph 403	403c states that the duration of certain airworthiness certificates will be unlimited, but 403d states that certificates issued for flight testing will have limited duration. I realize that the operating limitations table provides for the combining of phase 1 and phase 2 operating limitations as we are accustomed to, and that the opening paragraph of Appendix C states that where there are conflicts between the body of the order and the appendix, the appendix takes precedence. However, it might be wise to clean up this paragraph of the order to eliminate the conflict			Adopted.	
2.	Page 4-70, Paragraph 468b(5):	This paragraph talks about the required inspection program, and mentions "turbojet multiengine airplanes" but does not include "turbojet single-engine airplanes". Again, there is an operating limitation in Appendix C that covers single engine turbojets, which would take precedence. However, the wording of this paragraph will lead to			Adopted.	

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		confusion for applicants, and possibly for FAA inspectors and DARs as well. This should be cleaned up.			
3.	Page 4-71, Paragraph 468b(8)(b)	This paragraph starts out "Review the maintenance program." Nowhere else is a "maintenance program" mentioned, either in regulation or the order. I would guess that the paragraph is referring to the inspection program, as later in the paragraph it mentions a reference for "additional information on aircraft inspection programs". This should be corrected so as to avoid confusion.			Adopted.
4.	Appendix B, Page B-1 and B-2	Regarding the program letter for exhibition aircraft, this is much more restrictive than any previous guidance. New requirements include listing of routing to and from exhibitions, and listing of estimated number of flight hours, area of operation and airports used for proficiency and maintenance flying. This, combined with the guidance now listed in this same appendix on page B-5 relating to description of operating areas is moving in the			Non-concur. The examples provided are regulatory requirements. "listing of routing to and from exhibitions" - 21.193(d)(3) "listing of estimated number of flight hours" - 21.193(d)(2) "area of operation and airports used for proficiency and maintenance flying" - 21.193(d)(3)

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		direction of returning to a more restrictive atmosphere for operation of exhibition aircraft.			
5.	Appendix C Limitation 5	This language is much the same for most experimental categories, but is more restrictive than the language included in the current guidance for amateur-built aircraft (except those aircraft with turbojet engines or max operating weight of over 12,500 lbs). The current limitation for most amateur-built aircraft is number 18, and reads as follows: "(18) The pilot in command of this aircraft must hold a pilot certificate or an authorized instructor's logbook endorsement. The pilot in command also must meet the requirements of 14 CFR § 61.31(e), (f), (g), (h), (i), and (j), as appropriate." No requirement for category/class is listed. This limitation falls back on 14 CFR 61.31(l)(2)(B), which is as it should be. Using the proposed language for amateur-built aircraft would take us back a couple of			AFS-800

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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		decades to what was required in Order 8130.2C			
6.	Limitation 13	This is the limitation I referred to in my above comment about confusion between the order and the appendix. This should be cleaned up.			Adopted.
7.	Limitation 21	This limitation, as it would apply to amateur-built aircraft, takes us back about three generations (I think to 8130.2C or D) with regard to approving major changes. Current guidance does not require written response from the FSDO, but only required concurrence of the FSDO with the requested flight-test area. This would be a a major setback to the amateur-built community if this operating limitation would revert to the previous level of restriction on major change compliance.			Adopted.
8.	Limitation 26	As per my comments above, these new requirement for exhibition program letters would be much more restrictive than what the current guidance requires.			
9.	Limitation 32	It appears that there would now be one generic sign-off for completion of phase 1			Adopted.

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
		<p>flight testing. The verbiage is quite different from what is currently required for amateur-built aircraft. Current guidance requires that the sign-off for amateur-built aircraft specifically include the demonstrated <math>V_x</math>, <math>V_y</math>, and <math>V_{so}</math>, and the weight at which those numbers were established. These requirements were originally put in place to encourage if not force the person to actually test the aircraft, rather than just flying around for 25 or 40 hours as required by their operating limitations. Removing this requirement for amateur-built aircraft would revert to the more relaxed flight-test atmosphere that used to exist, and would be a reduction in level of safety. I feel that there should still be a specific sign-off for amateur-built aircraft that includes the requirement for determination of <math>V_x</math>, <math>V_y</math>, and <math>V_{so}</math>, as it is now. The proposed sign-off would be appropriate for other categories, but not for amateur-built in my opinion.</p>			

## FIELD DOCUMENT REVIEW LOG

Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
10.	Limitation 38	This limitation is confusing as written. Does the issuing agent (ASI or DAR) have the choice of allowing or restricting carriage of passengers? (i.e., can he/she choose one "or" the other?) Or is this entire limitation supposed to be included in the operating limitations, leaving it up to the person operating the aircraft to try to figure out whether carriage of passengers is allowed or not? There needs to be clarification of what is supposed to be issued and when/why.			Non-concur. This information is in paragraph 5d
11.	Limitation 40	This language contradicts current guidance.			

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Soaring Society of America Reviewer's Name & Phone #: Stephen Northcraft	4. Date of Review: 01/30/2014	5. Date of Disposition: 03/05/2014
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.		The SSA is aware of cases where FSDO inspectors rejected the aircraft owner's Submitted annual Program Letter.	The requirements for the annual Program Letter are called out in the aircraft's Operating Limitations (OL). However in the cases we are aware of, the FSDO required additional information which was not called out in the OL, instead referring to parts of 8130 which were not applicable to that aircraft's group.	Clarify	Out of scope. Order 8130.2 prescribes the requirements for processing the application for an airworthiness certificate. How the FSDO handles the receipt of the annual program letter should be in the Flight Standards Service order.
2.		There is some confusion in the field and some FSDO inspectors may believe that they can require owners of aircraft licensed in the Ex/R&E category to update their Operating Limitations (OL) to meet the new guidance of this Order.	The SSA believes that the OL are part of the certification of the aircraft and should not be modified except as specifically noted in the OL.	It should be made clear in a revised Order that aircraft certified prior to release of this Order do not need to have their OL updated.	This information is in paragraph 217. A replacement certificate receives the same operating limitations as the certificate that it is replacing. An amended certificate receives the operating limitations from the current order.
3.		Ex/R&E gliders can no longer be operated over "densely populated" areas, limitation 40.	We oppose this change.		Partially adopted. Gliders must comply with 14 CFR 91.319. However, based upon this and other comments, a limitation was added for lighter-than-air, gliders, amateur built, primary kit built and experimental light sport aircraft.
4.		A Program Letter requirement to include "estimated time or number of flights" is not	A glider may make multiple flights to fly a racing task on a single day because of weather		Non-concur. The requirement is an estimate of the time or number of flights. We

## FIELD DOCUMENT REVIEW LOG

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		consistent with the operating characteristics of gliders.	conditions, or an intended task may take anywhere from 2 to 6 hours, for example. Since gliders are dependent on meteorological conditions to stay aloft, this should not be a Program Letter requirement for gliders.		anticipate a person owning a glider would provide an estimate of the number of flights.
5.		Regarding flight limitation 39, gliders do not have a "range"; a minimum should be specifically noted for gliders.		Since gliders have made flights in excess of 1000 nmi in the CONUS, a reasonable minimum for this limitation for gliders is 500 nmi radius from the home base, if it is necessary to impose a restriction.	Limitation 39 does not apply to gliders.

### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Reviewer's Name & Phone #: Ted Boss		4. Date of Review:	5. Date of Disposition:
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:	
1.	Pg. 2-3, Para. 204	<p>The aircraft registration process has changed and renewal is required every 3 years.</p> <p>Sometimes an aircraft sits for heavy overhaul and or modification for numerous years or a temporary certificate (R&amp;D) expires, in addition to the registration. If the current airworthiness certificate is still effective, the aircraft cannot be operated until it is properly registered. If the aircraft is presented for an original or recurrent airworthiness certificate, the certificate must be denied until the aircraft is properly registered.</p> <p>This is out of scope for the change. Ask for consideration at next change.</p>	<p>Unclear to operators and aircraft owners as to what happens if the Registration Certificate is Expired.</p> <p>Noting 2 scenarios. 1) Current and valid airworthiness certificate. 2) Aircraft down for long period of time (perhaps not) and last (i.e. experimental) airworthiness certificate expired and being presented for another airworthiness certificate.</p> <p>Need strong statement so options are clear.</p>	<p>Suggest a brief statement be made concerning if the Registration is Expired, the aircraft airworthiness certificate is invalid until documentation is received from the registry showing that the aircraft is properly registered and installed on the aircraft. Without a current registration certificate aircraft operation is unauthorized.</p> <p>Request clarification if the official denial process can be used for Expired registration. If not please state what process is.</p>	Adopted.	
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Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
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### FIELD DOCUMENT REVIEW LOG

Document No.: 8130.2H		2. Project manager: Craig Holmes	3. Reviewing Office: Aero Trader Chino, CA Reviewer's Name & Phone #: Tony Ritzman	4. Date of Review: 01/07/2014	5. Date of Disposition: 02/12/2014
Item No:	Page and Paragraph No:	Comment:	Reason for Comment:	Recommendation:	Disposition of Comment:
1.	8-4 Document Matrix	Limited Category aircraft should not need a program letter	All limited aircraft have a Type Certificate and must be operated IAW FAR 91.315	Delete program letter requirement.	Adopted
2.	C-4 Operating Limitations Paragraphs	Paragraph 1 is a repeat of Block D on the reverse side of FAA Form 8130-7	Unnecessary repetition of an existing requirement.	Delete Paragraph 1 as an Operating Limitation	Non-concur. You are correct that the limitation repeats block D, however the limitation also provides additional information to the operator.
3.	C-5 Operating Limitation Paragraphs	Paragraph 11 is a repeat of existing Part 91 and Part 43 requirements.	Unnecessary repetition of an existing requirement.	Delete Paragraph 11 as an Operating Limitation	Partially adopted. Changed the certification basis from "All" to "191."
4.	8-19 PP (n)	Misleading sentence	Not all certification applications require a program letter.	add: ", if required."	Adopted
5.	C-5 Operating Limitation Paragraphs	Paragraph 6 is excessively restrictive by requiring required flight crew members to be certificated airmen.	Large aircraft may require a crew chief (not a flight engineer) or observers for safe operation.	Delete airman certificate requirement. Edit <b>Limit</b> paragraph to reference an aircraft specific crew member training program.	Non-concur. This limitation applies to aircraft that require a flight engineer, e.g. B-727.
6.	C-5 Operating Limitation Paragraphs	Paragraph 12 includes unnecessary wording already covered in Part 43	Maintenance personnel are already tasked with making sure instruments are properly marked and controls function properly.	Delete wording: "As part of the condition inspection, cockpit instruments must be appropriately marked and needed placards installed in accordance with 14 CFR 91.9. In addition, system-essential controls must be in good condition, securely mounted, clearly marked, and provide for ease of operation."	Partially adopted. Removed two sentences that are covered in part 43.

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7.	C-9 Operating Limitation Paragraphs	Paragraph 27 requires an ejection seat training program for un-armed seats	If the seat is inoperative, it is just a crew seat, poses no danger and should not require any training.	Edit: "Pilots operating aircraft and passengers of aircraft equipped with an armed ejection propellant system must satisfactorily complete an FAA approved ejection seat training program for the pilot and the passenger."	Non-concur. The limitation states that it applies to "aircraft equipped with an ejection propellant system." Anybody that is near an ejection seat needs to be trained, even if the safety pins are in place.
8.	C-1 Appendix C	No guidance for numbering paragraphs when some paragraphs are not applicable.	Does the ASI, DAR, etc. number paragraphs in consecutive order after omitting un-used paragraphs or reference all paragraph numbers and indicate N/A.	Add a guidance paragraph to standardize limitations format.	Concur. Added instruction in paragraph 5b.
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1.	General	In the opinion of this submitter there should be a specific section of this order directed to and addressing the reduced risk of Avionics installations and modifications. One such example would be in the proposed requirements of Market Survey, as seen in this document at Appendix B, Page B-3, Para 2 d.	A major portion of the guidance in this order is directed toward aircraft manufacturers, airframe and engine modifiers, LSA's, and civilian use of military aircraft. All of these categories have an inherent safety of flight risk. Most avionics modifications would not have the same or equivalent safety aspect. The issue is that the lesser risk of avionics carries the same administrative and regulatory burden as the greater risk.			
2.	Pg. 4-75 ¶473(d)	<i>"The FAA representative must _____ that the provisions of 14 CFR 21.195 are met before issuing the experimental certificate."</i>	Missing word or phrase		Adopted.	
3.	Pg. 4-1 ¶402 (4)	<i>"(4) Review available aircraft type <u>club</u> information."</i> Define the word "club" in this paragraph.	The word "club" is used twice in this document and is not defined. It is also not defined in 14 CFR.		Non-concur. If a word is not defined in 14 CFR the common use of the word is assumed. Club: a formal association of people with similar interests "he joined the American Bonanza Society" or "she joined the Luscombe Association"	
4.	Pg. 4-33 ¶443 (b)	<i>"This may be extended to <u>modifiers</u> only..."</i> Define the word "modifier" in this paragraph.	The word "modifier" is used six times in this document and is not defined. It is also not defined in 14 CFR.		Adopted. Added 21.195(c)	

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5.	Pg. 4-35 ¶444 (a)(2) Note	<i>"Note: A new program letter will be required when <b>significant changes</b> to the aircraft configuration and program objectives are planned."</i> Define the phrase "significant changes" in this paragraph.	The phrase "significant change" is used four times in this document and is not defined. It is also not defined in 14 CFR.		Partially adopted. In the context of the note, a new program letter is not appropriate. The operator would need to apply for a new certificate.
6.	Pg. 4-34 ¶443 b (2) Note	<i>"In addition, the program letter should describe any <b>configuration changes</b> that will occur between each purpose, to include adding or removing external stores and enabling or disabling systems."</i> Define the phrase "significant changes" in this paragraph.	The phrase "configuration changes" is used five times in this document and is not defined. As used in 14CFR ¶25.143, this phrase is used in context of Controllability and Maneuverability. Is that what is meant here?		When the word is not defined, the common use of the word is assumed.
7.	Pg. B-3 ¶Appendix B- 2 d (1)	<i>"(1) Describe the market survey in detail."</i>	When applying for Market Survey for a period of one year, customers, airports, routes and dates are often not known until just previous to the trip. It is impossible to know to whom you will need to show your product to, let alone when it would take place. As written, this information could only be handled on a case by case basis with an addendum to the limitations. An addendum to the		Non-concur. The applicant must supply the information required by 14 CFR 21.193(d)(1).

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			<p>limitations requires a new program letter, issuance of new limitations, and airworthiness certificate. This is an undue burden on the applicant.</p>		
8.	Pg. B-3 ¶Appendix B- 2 d (2)	<i>"(2) Describe the area and airports in which the aircraft will be operated."</i>	<p>When applying for Market Survey for a period of one year, customers, airports, routes and dates are often not known until just previous to the trip. It is impossible to know to whom you will need to show your product to, let alone when it would take place. As written, this information could only be handled on a case by case basis with an addendum to the limitations. An addendum to the limitations requires a new program letter, issuance of new limitations, and airworthiness certificate. This is an undue burden on the applicant.</p>		Non-concur. The applicant must supply the information required by 14 CFR 21.193(d)(3)
9.	Pg. B-3 ¶Appendix B- 2 d (3)	<i>"(3) Identify intended customers."</i>	<p>When applying for Market Survey for a period of one year, customers, airports, routes and dates are often not known until just previous to the trip. It is impossible to know to</p>		If an intended customer cannot be identified it may be difficult to demonstrate the need for a certificate for the purpose of market survey.

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			<p>whom you will need to show your product to, let alone when it would take place.</p> <p>As written, this information could only be handled on a case by case basis with an addendum to the limitations. An addendum to the limitations requires a new program letter, issuance of new limitations, and airworthiness certificate.</p> <p>This is an undue burden on the applicant.</p>		
10.	Pg. B-3 ¶Appendix B- 2 d (4)	<p>“(4) <i>Specify dates for the market survey activity.</i>”</p> <p>It is virtually impossible to describe in detail this information for an entire year. Customers, airports, routes and dates are often not known until just previously to the trip.</p>	<p>When applying for Market Survey for a period of one year, customers, airports, routes and dates are often not known until just previous to the trip.</p> <p>It is impossible to know to whom you will need to show your product to, let alone when it would take place.</p> <p>As written, this information could only be handled on a case by case basis with an addendum to the limitations. An addendum to the limitations requires a new program letter, issuance of new limitations, and airworthiness certificate.</p> <p>This is an undue burden on</p>		<p>Non-concur. The certificate may be issued for a period of time up to a year. The applicant should request the dates needed to accomplish the activity, which can be from 1 day to 1 year.</p>

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11.	Pg. B-5 ¶Appendix B- g(1)	<p><i>"g. Additional Information. (1) Operating Area. A written description or annotated map is acceptable. Specifically describe the area. Stating "the 48 States," "North America," or "worldwide" is not acceptable."</i></p> <p>If these are not acceptable phrases to use in the limitations section for area of operation, then specific suggestions should be made in this document to convey Continental United States.</p>	<p>the applicant.</p> <p>Some research and development, show compliance, and market survey flight operations routinely require an experimental aircraft to make use of the entire United States.</p> <p>Some examples are; flight in natural icing conditions, high field elevation testing, extreme temperature testing and avionics testing of the innumerable different instrument procedure geometries accessible around the country.</p> <p>All of these and many more require an aircraft on an experimental certificate to be able to successfully navigate without hindrance of geographical limitation.</p>		<p>Adopted. Clarified the statement to allow a larger geographical area for low risk operations.</p>

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1.	Section 3	Somewhere in Section 3, of the draft Order, (or wherever appropriate), it should be clearly articulated that an aircraft can be restored/repared by utilizing parts from salvaged aircraft to produce an airworthy aircraft provided the restored aircraft conforms to its type certificate.	Numerous FAA Flight Standards Service Aviation Safety Inspectors are taking the position that an aircraft cannot be restored/repared by producing a serviceable, airworthy aircraft from salvaged aircraft/parts. Additionally, a recent DOT Administrative Law Judge decision held that an aircraft cannot be restored/repared utilizing salvaged aircraft/parts based on the reading of the Final Rule to 14 CFR 45.13. The ALJ felt that this was "rebuilding" as described in the final rule and agreed with the FAA Flight Standards District Office position. This does not appear to be the current position, nor the past position, of AFS-300 and AIR-200. It has been the past position of FAA Headquarters (AFS-300 and AIR-200) that parts of an aircraft can be replaced and an airworthiness certificate removed from the previous part and placed on the replacement part in accordance with 14 CFR parts 45 and 43. There is no	Remove any ambiguity regarding the described practice and clearly articulate/describe the current FAA position regarding this practice in FAA Order 8130.2 and what is required by 14 CFR §§ 43.2 (b) and 43.3 (j). Clearly describe the FAA position to eliminate confusion and misunderstanding in the "field".	Out of scope.	

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			<p>established limit on the number of aircraft parts that may be replaced/restored/repared or what constitutes a "rebuild" vs. "restoration". (i.e. how many parts can be replaced before someone determines that the practice is a "rebuild" vs. "repair", "restoration", etc.) "Rebuild" is only addressed in 14 CFR §§ 43.3(j) and 43.2(b) and there is no basis for making a determination based on the number of parts replaced as opposed to the criteria described in 14 CFR §§ 43.2(b) and 43.3(j).</p>		
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1.	2-14, Paragraph 217.b.(6)	This paragraph requires updating all previously issued operating limitations to the new revision H requirements.	However, Experimental certificates for the purposes of R&D, Show Compliance, Crew Training, and Market Survey are issued for 1 year or less so they will be expiring soon anyway.	The requirement to reissue these certificates would create needless work and should be eliminated.	Non-concur. This paragraph applies to amending a certificate. The paragraph does not require reexamination or reissuance of an existing, valid certificate.	
2.	4-1, Paragraph 402.a.(3) and (4)	These requirements seem irrelevant to experimental airworthiness certificate issuance for R&D, Show Compliance, Crew Training and Market Survey.	These two requirements hold little value for R&D, Show Compliance, Crew Training and Market Survey.	Since the requirements hold little value for R&D, Show Compliance, Crew Training and Market Survey, they should be eliminated for these areas.	Non-concur. The information provided are examples of what "the FAA representative <b>should</b> become familiar with..." Review of all listed sources is not mandatory.	
3.	4-2, Paragraph 402.b.(5)	Contains the statement "Records should be complete and reflect no unapproved design changes."	Special Airworthiness Certifications may in fact have unapproved design changes (experimental).	Revise sentence to state "Records should be in accordance with applicable regulatory requirements."	Partially adopted. Changed unapproved to unsafe.	
4.	Appendix B, B-1, Paragraph 2.a	Garmin is a company that develops and certifies avionics equipment for aircraft, and owns some aircraft that are always experimental. These airplanes are used to support development of multiple avionics systems at different times throughout the year. This business uses fast moving technology, and the requests for development flight testing sometimes come on a random basis, with not a lot of advance notice. It is desirable to have these aircraft available for testing when the need arises, without having to go through the process of making a new application with a new program	For companies that have aircraft that are always experimental, which are used for testing avionics equipment in many different development projects, it is not always possible to provide a detailed description of every project the aircraft will be used in a year in advance.  In addition, it is not possible to know a year in advance which airports will be operated from. The proposed guidelines are too narrow, asking for greater detail than can be provided a year in advance and will not allow changing requests for general	Guidelines for writing program letters should be relaxed to allow companies with aircraft that are dedicated for these purposes to submit program letters with general descriptions of projects that may be expected to be encountered in the coming one year period.  As long as the requested flight activity is for avionics development, no further detail should be required in the program letter.	Non-concur. The program letter must contain the information required by 14 CFR 21.193(a) through (d.) The complexity of the project determines the complexity of the program letter. A simple program such as in this example does not require an extensive program letter.	

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		letter every time a request is received to test a piece of avionics equipment in development.	avionics development activities.		
5.	Appendix B, B-2, Paragraph 2.c	This section requires detail well in excess of what is required by regulation.	The requirements of this section are not justified by 14 CFR 21.193. There is no regulatory requirement to provide any of this detail regarding the crew training activity. The scope or content of the crew training program is outside the scope of the airworthiness certificate issuance.	Replace all of the content in section c with a reference to the requirements of 14 CFR 21.193.	Non-concur. As stated in paragraph 1, the agency needs sufficient information to ensure safe operation of the aircraft. Training programs leading to an experimental authorization certainly require this level of detail. Training programs such as for familiarization training would not require as great of detail.
6.	Appendix B, B-3, Paragraph 2.d	This section requires detail well in excess of what is required by regulation.	Neither 14 CFR 21.193 nor 14 CFR 21.195 requires the detail specified in this section. The requirements of 14 CFR 21.193 and 14 CFR 21.195 are applicable.	Replace all of the content in section d with a reference to the requirements of 14 CFR 21.193 and 14 CFR 21.195.	Non-concur. See remark above.
7.	Appendix B, B-3, Paragraph 2.d	<p>These requirements seem irrelevant to experimental airworthiness certificate issuance for R&amp;D, Show Compliance, Crew Training and Market Survey.</p> <p>In the case of Market Survey, it is not always possible to identify all intended customers, dates, and details that will be encountered when application is made for experimental.</p>	Market Survey flights can come with no advance notice. It is advantageous for an avionics company to be available for a flight to demonstrate the product to a prospective customer at any time. The proposed guidelines are too narrow to allow this.	Relax the guidelines to allow for a multi-purpose experimental certificate that will allow the company to provide a demonstration flight to a prospective customer, without the requirement to provide detailed information about these potential flights in advance.	Non-concur. The applicant needs to provide sufficient detail about the project.
8.	Appendix B, B-5, Paragraph	Specifically states that the "48 states" is not an acceptable operating area.	Operations throughout the continental US are appropriate for some applicants.	Allowing the continental U.S. as the geographic operating area makes all of these	Partially adopted. Clarified the statement to apply to aircraft other than modified type

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	2.g.(1)		<p>Often Garmin has a need for use of specific navigation facilities required for development testing of certain avionics equipment, which are available only at limited geographic locations. Development of other equipment requires flying over varying terrain or large open water surfaces. Finally, sometimes specific weather conditions must be sought out in order to accomplish needed testing.</p> <p>Regarding the issue of safeguarding the safety of the public, safeguarding the safety of the public is not at risk on any of these development flights.</p>	flights possible, without the need application and issuance of a new certificate for each need encountered.	certificated aircraft.
9.	Appendix C in general	There is no Limitation to reference the Program Letter and date of the letter as before.	Order 8130.2G had a limitation that would tie the date of the Program Letter to the issued Operating Limitations.	Leave that reference to the Program Letter in the Limitation for 8130.2H.	Non-concur. The program letter is not part of the operating limitations.
10.	Appendix C in general	Many of the previous limitations were separated as individual limitations. Now many of the limitations are linked together under one item number.	This may become confusing in writing the Limitations. Combining the limitations into the limitation chart may not be the best way to organize the	Keep the limitations separate from each other. The way limitations were written and organized in Order 8130.2G, it was easy to identify which	Grouping the limitations reduces workload.

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			limitations.	limitation may apply to your particular airworthiness situation.	
11.	Appendix C, C-4 to C-13, Table C-1 in general	Paragraphs 443 b and 475 in the body of this draft order refer to PC holders and modifiers' approved experimental aircraft operating procedures, and state that they may be listed in operating limitations as indicated in Appendix C of the order.	However, limitation 45 of this draft is the only one that refers to an approved procedure. All the others that were listed in 8130.2G are missing. It seems that the table is incomplete as currently written.	By including the provision for PC holders and modifiers to operate under an approved Experimental aircraft operating procedure document, a solution can be provided for many of the points raised here concerning companies that are engaged in development and certification of avionics products.	Adopted.
12.	Appendix C, C-4, Table C-1, #5	Asking the inspector to specify the category and class ratings (Airplane – Multi-engine – Land) for the pilot in command seems unnecessary.	The following sentence covers the requirement. "The pilot in command must hold all required ratings or authorizations and endorsements required by 14 CFR part 61."	This new limitation is not needed and could easily be removed.	Non-concur. Part 61 may not require category and class ratings for an experimental aircraft. See 14 CFR 61.31(l)(2)(B).
13.	Appendix C, C-5 Table C-1, #13	Requires approved inspection program for small single-engine turbine aircraft.	This imposes a burden well beyond what is required under FAR 91.409(a) for aircraft that were previously issued a standard airworthiness certificate. It is common for small, single-engine turbine aircraft that were previously issued a standard airworthiness certificate to be used for the purposes defined in 14 CFR 21.191. There is no reason that such modified aircraft should be subject to additional inspection	Small, single-engine aircraft that were previously issued a standard airworthiness certificate should be permitted to use the inspection requirements of row #12. This is equivalent to the inspection requirement of FAR 91.409(a) that would be applicable to these aircraft when issued a standard airworthiness certificate.	Non-concur. The operation of an experimental single-engine airplane may have greater risk than the operation of a multiengine airplane. To provide an adequate level of safety the FSDO will approve the inspection program for these types of airplanes.

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			requirements beyond what would normally be required when under standard airworthiness. This requirement would impose a significant burden that is not appropriate for implementation via order.		
14.	Appendix C, C-5, Table C-1, #14	This limitation is redundant with 91.409(e).	Experimental aircraft are not exempted from 91.409(e) by regulation, although they are exempted from 91.409(a) and (b). Therefore, this operating limitation is redundant with 91.409(e) and is unnecessary.	Delete row #14 or replace with a reference to comply with 14 CFR 91.409(e).	Non-concur. The limitation also provides additional information to the operator.
15.	Appendix C, C-7, Table C-1, #20	This item is redundant with item 19.	91.409(e) requires compliance with life-limits, even for experimental aircraft. A monitoring system is a means of complying with this requirement. This item is redundant with the previous item 19 and should be deleted.	Delete row #20.	Non-concur. Limitation 20 is about the fatigue life recording system. Limitation 19 is about life-limited articles.
16.	Appendix C, C-7, Table C-1, #21	Needs exception for holders of approved operating procedure.	Holders of an approved operating procedure should not be issued this limitation.	Add exception for holders of approved operating procedure.	Non-concur. An approved procedure with the geographical FSDO is one method of complying with the limitation.
17.	Appendix C, C-7, Table C-1, #21	Regarding notification of FSDO for Major change. This was previously not applicable for show compliance and crew training.	Just as in R&D, passengers are not allowed under either of these purposes, so it does not seem like the change is necessary.	This new limitation is not needed and could easily be removed.	Non-concur. This limitation does not apply to R&D or show compliance.
18.	Appendix C, C-11, Table C-1,	Weight, CG and airspeed limits apply to everything except R&D.	However, if operation outside of these limits is needed for flight testing in R&D, then it seems to	Add "Show Compliance" to the exception. The phrase would read "Except R&D and	Adopted

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	#36		follow that it will be needed also in Show Compliance.	Show Compliance".	
19.	Appendix C, C-11, Table C-1, #38	Needs exception for holders of approved operating procedure.	Holders of an approved operating procedure should not be issued this limitation.	Add exception for holders of approved operating procedure.	Non-concur. Holders of an approved operating procedure must comply with 14 CFR 91.319(d)(1).
20.	Appendix C, C-11, Table C-1, #39	Item 39 states: "Must issue for R&D". However, this is not needed for all R&D tickets, but only for those that need to show compliance with 14 CFR 91.319b.	For example, a production aircraft placed in R&D for development of a product that does not change the outside configuration or alter the flight characteristics of the aircraft is not required to show compliance with 14 CFR 91.319b.	This should be made to apply only to those aircraft that need to show compliance to 14 CFR 91.319b. Remove the phrase, "Must issue for R&D".	Adopted.
21.	Appendix C, C-11, Table C-1, #39	Needs exception for holders of approved operating procedure.	Holders of an approved operating procedure should not be issued this limitation.	Add exception for holders of approved operating procedure.	Adopted.
22.	Appendix C, C-12, Table C-1, #40	Item 40 states "Flight over a densely populated area or in a congested airway is prohibited." Revision G of this order made this applicable only to aircraft that need to show compliance with 14 CFR 91.319b, but this requires it of all experimental tickets. Being an avionics development company, Garmin uses certificated aircraft for development of avionics equipment. There are no external configuration changes that affect performance or controllability beyond what would	Being an avionics development company, Garmin uses certificated aircraft for development of avionics equipment. There are no external configuration changes that affect performance or controllability beyond what would be experienced by any standard certificated aircraft. Garmin's flight crews are highly trained professional pilots, and therefore more qualified than most G.A. pilots. Safeguarding the safety of the public is not at	The prohibition of flight over a densely populated area or in a congested airway is not needed for these operations, and should not be required. Safeguarding the safety of the public is not at risk on any of these development flights, over and above that of a standard certificated aircraft.	Non-concur. This is not a change in policy. Order 8130.2G allows operation over densely populated areas for takeoff and landing. Routine operations over densely populated areas is prohibited by 14 CFR 91.319 and the current version of Order 8130.2.  See the note under limitation three on page 4-100, 8230.2G, change 1.

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		be experienced by any standard certificated aircraft. Garmin's flight crews are highly trained professional pilots, and therefore more qualified than most G.A. pilots.	risk on any of these development flights.		
23.	Appendix C, C-12, Table C-1, #40	Needs exception for holders of approved operating procedure.	Holders of an approved operating procedure should not be issued this limitation.	Add exception for holders of approved operating procedure.	Non-concur. See above.