



Federal Aviation Administration

Memorandum

Date: December 27, 2007 Memo No. PS-AIR-100-2007-12-27
To: See Distribution
From: David Hempe, Aircraft Engineering Division, AIR-100 *D Hempe*
Subject: Enhanced Airworthiness Program for Airplane Systems (EAPAS)
Supplemental Type Certificate (STC) Limitation

Background

The Enhanced Airworthiness Program for Airplane Systems (EAPAS) final rule became effective on December 10, 2007. Certain design approval holders, including certain supplemental type certificate (STC) applicants, will need to meet the requirements outlined in § 26.11. It allows an STC to be issued even though the STC applicant has not yet met these requirements. In this case a limitation should be added to the STC. This policy memorandum describes how and when this will be done.

The part 26 portion of the EAPAS final rule, § 26.11, requires certain STC applicants to evaluate whether electrical wiring interconnection system (EWIS) instructions for continued airworthiness (ICA) developed by the TC holder are adequate for their proposed modification. If the TC holder's EWIS ICA are not adequate, the STC applicant must develop and submit revised EWIS ICA to the FAA for approval. In accordance with the timeline set out by § 26.11, the STC applicant has until June 7, 2010, to meet these requirements. An STC can be issued prior to the applicant meeting these requirements, provided issuance is not after June 7, 2010.

Since the STC can be issued prior to meeting the applicable § 26.11 requirements, it has been determined that a limitation should be added to the STC when the requirements have not been met. This is not to be confused with the limitation on incomplete ICAs imposed by FAA Order 8110.54, "Instructions for Continued Airworthiness" which provides instructions to add a limitation if there is a need to issue a design approval without complete ICA coverage (reference paragraph 5-1(i)(3)). In Order 8110.54, the design may be approved without completed ICAs, but the first airworthiness certificate may not be issued until the ICAs are completed and approved. For the purposes of

EPAS, the limitation specified in Order 8110.54 should be modified, because the STC applicant has until June 10, 2010 to submit revised EWIS ICA, if they need to be revised. After that date, the STC is not allowed to be installed. The modified limitation wording is shown below.

The intent of this limitation for EAPAS would be to prevent installations after June 7, 2010, if the STC holder had not met the § 26.11 requirements. In addition, the limitation would provide visibility to the STC holder and the FAA that the holder still needs to provide the EWIS ICA.

Statement to be added in Limitation Section of the STC

The following statement should be added to the limitation section of the STC when the EWIS ICA evaluation has not been completed at the time of the STC issuance (provided it is issued prior to June 7, 2010). The goal of the limitation is (1) to not allow any installations after June 7, 2010, if an STC applicant has not met the § 26.11 EWIS requirements, and (2) to not ground any airplanes that already have the STC installed.

“This modification may not be installed after June 7, 2010 unless (1) previously approved electrical wiring interconnection system (EWIS) instructions for continued airworthiness (ICA) have been evaluated and determined to be adequate for this installation by the FAA, or (2) revised EWIS ICA have been approved by the FAA Oversight Office. (Refer to § 26.11).”

In order for the STC to be installed after June 7, 2010, the STC installer will need to have one of the following:

1. An FAA letter stating that the previously approved EWIS ICA have been evaluated and shown to be adequate for the modification, or
2. Revised EWIS ICA that have been approved by the FAA Oversight Office for the STC modification.

Once the STC holder has met the § 26.11 requirements, the STC does not need to be revised to remove the statement. However, if the STC needs to be updated/amended, the limitation may be removed at that time.

STC Cover Letter

In addition, the following wording (or similar) should be included in the FAA letter that transmits the STC:

“In accordance with § 26.11(c), you must evaluate whether this STC installation necessitates a revision to the ICA required by § 26.11(b), and if so, you must develop and submit the necessary revisions for review and approval to this office. You must also ensure that any revised EWIS ICA remain compatible with any fuel

tank system ICA previously developed to comply with SFAR 88 and any redundant requirements between them minimized. These requirements must be met no later than June 7, 2010. [If the STC applicant has not yet submitted a compliance plan, and the application date was prior to December 10, 2007, add the following two sentences]. In addition, you must submit a compliance plan in accordance with § 26.11(e) to this office by March 10, 2008. This compliance plan must provide a plan for how you intend to comply with the above requirements. If you have any questions regarding these requirements, please contact [ACO focal] at [phone number].”

For questions regarding the information in this memo, please contact Chris Carter at (202) 493-4835, or via email at chris.carter@faa.gov or Meghan Gordon at (425) 227-2138, or via email at meghan.gordon@faa.gov.

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