



Federal Aviation Administration

Memorandum

Date: March 17, 2017

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AIR-100

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Subject: INFORMATION: Deviation to Federal Aviation Administration (FAA)
Order 8120.23, Chapter 3, Figure 3-1. Certificate Management (CM)
Responsibilities (Ongoing) Minimum Requirements

Memo No.: AIR100-15-140-DM41

This deviation memorandum grants a deviation to FAA Order 8120.23, chapter 3, figure 3-1, as requested by the Manufacturing Inspection Management Team.

The deviation request asked to extend the frequency interval between principal inspector (PI) audits performed at low-risk production approval holders (PAHs) that manufacture products, articles, or parts as determined through the Risk-Based Resource Targeting (RBRT) process. The deviation request is to extend the audit interval between PI audits at low-risk PAHs from 24-36 months to no more than 60 months.

The deviation request was made to allow for the best possible use of limited FAA resources and to improve resource management. In granting this deviation, AIR-100 requires that managing offices verify that the following conditions are met for each low-risk PAH candidate:

1. All of the PAH's active projects have a unit criticality of "Level 1 – Lowest Criticality."
2. The answer to question 12 ("Has the applicant's/PAH's workforce changed within the last 12 months as a result of staff reductions, growth, or employee turnover?") of the latest RBRT assessment is "<5% of workforce."

3. The answer to question 15 (“Has there been a company merger or takeover in the last 12 months?”) of the latest RBRT assessment is “No merger or takeover.”
4. The answer to question 19 (“In the past 3 years, has the FAA identified noncompliances with regulations and/or quality procedures?”) of the latest RBRT assessment is “Never.”
5. The answer to question 27 (“How complex is the part, product, assembly, design change, including integration with product, or modification/alteration?”) of the latest RBRT assessment is “Not Complex.”
6. The answer to question 28 (“How complex is the manufacturing process?”) of the latest RBRT assessment is “Not Complex.”
7. The answer to question 32 (“Have similar designs been the subject of SUP reports or SDRs?”) of the latest RBRT assessment is “None.”
8. The answer to question 34 (“To what extent does the applicant/PAH propose to use new or emerging technology/techniques in design, manufacturing, and/or testing such that the different technology may affect the airworthiness of the product (i.e., aircraft, aircraft engine, or propeller) or article?”) of the latest RBRT assessment is “No Extent.”

This deviation memorandum authorizes extending the frequency interval between PI audits from 24-36 months to no more than 60 months, provided that the PAH meets the eight conditions listed above. The initial extension of this interval is not to exceed 48 months. If the PAH still meets all eight conditions after the initial interval extension, then the interval can be extended for a period not to exceed 60 months.

If you have any questions, please contact the Surveillance and Oversight Policy Section at (202) 267-1628.