



FAA DER APPROVED MODIFICATIONS Repairs & Alterations & New EASA TIP

March 13th 2013
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FAA DERT / RS-DER /
DARF



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ABOUT THE PRESENTER

DOMINICK P DACOSTA

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Delegated Areas: Chart A [Structures[, Chart B [Powerplant], Chart C1 [Mechanical Systems], and Chart E [Engines]

Special Delegated Areas: Major Repairs Multiple Use, Major Alterations, PMA Identicality, Repair Specifications authority Chart B, C1, E.

Education & Training: BSE, AGS, SET, NDE

- •California Coast University [MFG. Engineering]
- Ohio State University [Welding Engineering & NDE]
- •Indiana University AGS Physics
- •Kings Aeronautical Institute Aeronautical Powerplant
- •ICET-NSPE Senior Engineering Technologist Former Assignments: GEAE, Lycoming, Bendix, Teledyne



What is a DER?

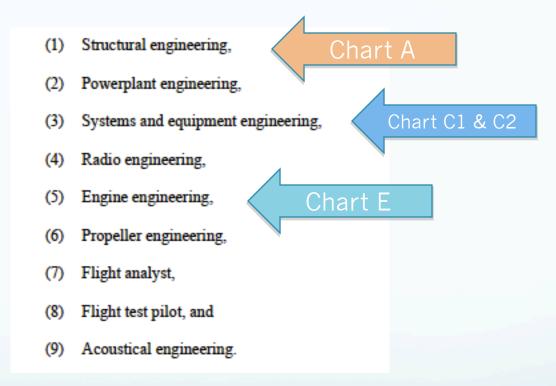
- A DER [Designated Engineering Representative] are individuals who meet the requirements of 14 CFR Part 183, and order 8100.8.
- The **DER** designation covers discipline specialties as defined in Order's 8100.8, and 8110.37.

These DER delegations are defined by charts

Chart A, DER Structural
Chart B, DER Powerplant Installations
Chart C1, DER Systems and Equipment
Chart C2, DER Systems and Equipment (Electrical Equipment)
Chart D, DER Radio
Chart E, DER Engines
Chart F, DER Propellers
Chart G, DER Flight Analyst
Chart H, DER Flight Test Pilot
Chart I, DER Acoustical



Delegated DER Disciplines





DER CHART A

2-5. DER Designations.

- a. <u>Structural DERs</u> may approve, within the limits of their appointment, the following items that comply with pertinent regulation(s):
 - Engineering reports,

Mtrls & Process

- Drawings,
- (3) Material and process specifications used in structural applications, and
- (4) Other data relating to structural considerations.

Let's look at the DER Chart A layout



Appendix B. Delegated Functions and Authorized Areas

Figure 1. Chart A, DER Structural

Functions and areas that can be authorized are defined by white squares. Each DER's authority may be different, and is identified in their letter of appointment.

Authorized	AUTHORIZED AREAS	Structural-General (1)	Structural-Wing Group	Structural-Fuselage Group	Structural-Emperoage Group	Structural Landing Genr	Structural-Flight Controls	Structural-Rotor	Loading Control Documents	Metallic Materials (2)	Nonmetallic Materials (3)	Interior Armagements	Interior Materials	Fire Protection	Evacuation Systems	Door Systems	Special (Specify)
DELEGATED FUNCTIONS	Щ	a.	В	o.	D	E	3	G	H	1	3		L	м	N	0	D
1 STATIC ANALYSIS		_	_	~	-	-	•	•	-	•	_	•	-	~	•	Ŭ	-
2 DYNAMIC ANALYSIS								\vdash									\vdash
3 FATIGUE ANALYSIS																	\Box
4 DESIGN AND CONSTRUCTION	Į.				\Box												\Box
5 FLUTTER/GROUND VIBRATIO	NI.																
6 SAFETY ANALYSIS																	
7 FLOTATION & DITCHING ANALYSIS																	
8 STRUCTURAL LOADING																	\dashv
LIMITATIONS																	
9 SERVICE DOCUMENTS																	
10 MATERIAL & PROCESS SPEC.																	Ш
11 FLAMMABILITY																	Ш
12 DAMAGE TOLERANCE EVALUATIONS																	
												_	_				-

Note (1): Includes all airframe components: wing, fuselage, empennage, landing gear, flight controls, engine mounts, and special components. Does not apply to rotors.

Notes (2) and (3): Select Specialty by Note number and sub-letter from lists below. General applies to all processes listed.

(2) Metallic Materials/Processes

- A Materials & Processes General
- B Non-Destructive Inspection/Testing
- C Metallurgy
- D Metal Joining Processes
- E Structural Adhesives
- F Mechanical Fasteners
- G Surface Treatment/Coatings
- H Bearings

(3) Nonmetallic Materials/Processes

- A Material & Processes General
- B Transparent (Glazed) Material
- C Polymeric Materials
- D Structural Adhesives
- E Mechanical Fasteners
- F Composites
- G Non-Destructive Inspection/Testing
- H Surface Treatment & Coatings
- I Structural Joining Methods



Figure 2. Chart B, DER Powerplant Installations

Functions and areas that can be authorized are defined by white squares. Each DER's authority may be different, and is identified in their letter of appointment.

		AUTHORIZED AREAS	Airplane Turbine Engine	Airplane Piston Engine	Recovered Turbine Engine	Recordent Piston Engine	Auxiliary Power Unit (APU)	Special (Specify)	
	DELEGATED FUNCTIONS		A	В	0	D	E	F	
1	ENGINE INSTALLATION								ı
2	FUEL & OIL		Щ		_	Щ			
3	INDUCTION/EXHAUST SYSTEMS		Щ						ı
4	THRUST REVERSERS		Ш						
5	FIRE PROTECTION								
6	ICE PROTECTION								
7	COOLING								
00	ENGINE PERFORMANCE/OPERATION	S							
9	INDICATING SYSTEMS								
10	LIGHTNING/HIRF PROTECTION								ı
11	SOFTWARE								ı
12	CONTROL SYSTEM - ELECTRONIC								
13	CONTROL SYSTEM - MECHANICAL								ı
14	EMISSIONS								
15	VIBRATION - ENGINE, PROPELLER, O	R.							ı
	DRIVE SYSTEM								ı
16	PROPELLER								
17	DRIVE SYSTEM								ı
18	TRANSMISSIONS								ı
19	SAFETY ANALYSIS								ı
20	SERVICE DOCUMENTS								l
									١



Figure 3. Chart C1, DER Systems and Equipment (Mechanical Equipment)

Functions and areas that can be authorized are defined by white squares. Each DER's authority may be different, and is identified in their letter of appointment.

Mech	anical Systems C1	AUTHORIZED AREAS	Air Conditioning	Hydraulic	Ice Protection	Rain Protection	Oxygen	Poemstics	Wheels, Tires, and Brakes	Interior Arrangements	Interior Materials	Mothermona	Fire Protection	Water System, Potable and Waste	Evacuation Systems	Special (Specify)	
	DELEGATED FUNCTIONS		4	В	¢	D	E	r	0	Ħ	I	5	ĸ	L	×	Ħ	
	DETAIL DESIGN AND INSTALLATION	ON															
	2 EQUIPMENT QUALIFICATION TEST	S															
	3 SOFTWARE																
	4 SAFETY ANALYSIS																
	5 FLAMMABILITY																
	6 LIGHTNING/HIRF PROTECTION																
	7 SERVICE DOCUMENTS			Щ		Ц										\Box	



Figure 4. Chart C2, DER Systems and Equipment (Electrical Equipment)

Functions and areas that can be authorized are defined by white squares. Each DER's authority may be different, and is identified in their letter of appointment.

Electric	al Systems C2	AUTHORIZED AREAS	Electrical Equipment/Systems	Electronic Equipment/Systems	Communications Systems/Antennas	Automatic Flight Controls/Augmentation	Instruments	Navigation Systems/Antennas	Air Data/Pitct Static	Warming Systems	Interior/Exterior Lighting	Flight Data/Voice Recording	Passenger Address/Entertainment	Special (Specify)
	DELEGATED	FUNCTIONS	A	В	¢	D	E	F	8	H	I	J	ĸ	L
	DETAIL DESIGN AND IT	NSTALLATION												
	2 EQUIPMENT QUALIFIC	ATION TESTS		Ш	Ш					Ш		Ш		Ш
	3 SOFTWARE			Ш	Ш					Ш		Ш	Щ	\blacksquare
	4 SERVICE DOCUMENTS			Щ	Ш					Ш			Щ	\blacksquare
	5 ELECTRICAL LOAD AN	ALYSIS		Щ	Щ	Щ	Щ	Щ		Щ	Щ	Щ	Щ	\blacksquare
	6 SAFETY ANALYSIS			Н	\vdash	\vdash	-	\vdash	\vdash	Н				\mathbf{H}
	7 LIGHTNING/HIRF PROT	ECTION	\Box	ш	Щ	Щ	Щ	Щ	$oxed{oxed}$	ш				



Figure 6. Chart E, DER Engines

Functions and areas that can be authorized are defined by white squares. Each DER's authority may be different, and is identified in their letter of appointment.

1 DETAIL DESIGN 2 BLOCK TESTS 3 PERFORMANCE CHARACTERISTICS 4 VIBRATION ANALYSIS 5 OPERATION MANUALS 6 OVERHAUL MANUALS 7 SERVICE DOCUMENTS 8 EXHAUST EMISSIONS EVALUATION 9 SOFTWARE 10 SAFETY ANALYSIS 11 LIGHTNING/HIRF PROTECTION			AUTHORIZED AREAS	Turbine Engines	Piston Engines	Special (Specify)
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9 SOFTWARE 10 SAFETY ANALYSIS	7	SERVICE DOCUMENTS				
10 SAFETY ANALYSIS	8	EXHAUST EMISSIONS EVALUATION				
	_	SOFTWARE				
11 LIGHTNING/HIRF PROTECTION	10	SAFETY ANALYSIS				
	11	LIGHTNING/HIRF PROTECTION				



What is a DER? [Cont]

 DER's can also be granted additional special delegations that are identified in Order 8110.37 [DER Handbook]. These special delegations are not part of the DER <u>basic authority areas</u>. These are:

Approval of Service Documents. -----DER International Operating Procedures. ----PMA Identicality Procedures. ----Repairs and Alterations. ------Repair Specifications (RS). -----Flammability Testing of Interior Materials. ------



Which FAA branch appoints DER's

- Aircraft Certification Office which is has primary responsibility for engineering and design aspects of any airworthiness data.
- Additional shared responsibilities with Organizational Designees [A/R's] are shared with FAA MIDO for new ODA-TC/PMA designs. And with FAA FSDO for ODA-M/R.



What types of data can the DER approve?

- Repairs, Alterations and other data approved by a Designated Engineering Representative (DER or RS-DER) of the FAA ACO.
- Alternate means of compliance (AMOC) {Ref 14 CFR Part 39}
- Evaluation of repair design data against the same FAA regulations used to issue the aircraft TC (i.e., Part, 23, 25, 33)
- DER issues FAA Form 8110-3 which defines applicability, limitations and supplemental ICA for the repair.
- Repair is executed to FAA Approved Data [ACO/DER] under the oversight of the cognizant FSDO of the applicant.



The Modifications must be as good as or better than the TC design! [14 CFR 1.1]



FAA Organizational Structure

FAA Headquarters

AEG

MIDO

Manufacturing

Inspection

District Office

NEW PARTS

• TC

-unctions

- PMA
- TSO

ACO

<u>Aircraft</u>

Certification

Office

All Engineering

- TC
- STC
- PMA
- AMOC

FSDO

Flight Standards

District Office

Maintenance

- FAR 121, 125
- FAR 129/135
- FAR 145
- FAR 65

Simplified for clarity

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15



FAA ACO

- ALL Engineering Aspects
 - ➤ Design Approvals for all 14 CFR Part 21 Products/ Articles
 - → TC /Amended TC
 - ♦ STC
 - ♦ PMA
 - ♦ TSO
 - → Repairs / Alterations
- Designee & Organizational Oversight
 - > DERT, DERY, RS-DER
 - > ODA /TC/STC/TSO/PMA & MR



FAA FSDO

Maintenance Aspects

- > Repairs
- > Alterations
- > Rebuilds
- > Overhauls

Airworthiness Rules

- ➤ FAR 65 Repairmen/Mechanics/Inspection Authorization
- > FAR 43 Performance Rules
- FAR 145 Repair Stations / ODA MR
- > FAR 121, 125, 129, 135 operators
- ➤ ODA MR Oversight & DART Designees



FAA MIDO

- New Manufacturing & Conformity Inspections Aspects
 - > Oversight of Production Approval Holders [PAH]
 - ♦ TC Holders
 - ♦ PC Holders
 - ♦ PMA PAH
 - → TSO PAH
 - Oversight & Designees
 - > ODA TC/PC/PMA/TSO, & DARF/DMIR



Basic Regulatory Framework

New Aircraft

TC

 ACO approves design data showing compliance to FAA requirements (i.e., Part 21, and 23, or 25, 27, 29 etc)

Aircraft Production System MIDO approves the Fabrication Inspection System to ensure manufacturing compliance to approved design data

▼ Continued Airworthiness FSDO ensures Instructions for Continued Airworthiness (ICA) are properly implemented and executed (e.g., SRM's; , SB, AMM, ESM, CMM's)

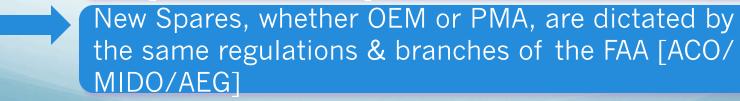
Alternate Means of Compliance 14 CFR Part 39 (AMOC) can be used, BUT, must meet the FAA mandated AD requirements or show ELOS.



FAA Delegation & Oversight Summary

Areas	MIDO	ACO	FSD0	AEG
DER Approval	X	X	X	*
TC/OEM Repairs		X	X	X
PMA/TSO/TC Parts	X	X		X*
PAH Alterations		X	X	×
New AWL		Х	Х	Х





^{*} May be req'd



Why are DER Repairs of Interest?

- Improved part availability
- Lower Part Replacement cost
- Using service experience, design improvements can be implemented to improve part performance (e.g., reliability, weight reduction)
- On Wing Service is extended

Avoid scrapping hard to replace and/or expensive parts



DER Repair – V2500 Ducting



Engine Anti-Ice & Starter Ducts
Courtesy Exotic Metals

- Typical defects:
 - Chafing, Dents, Cracking
- Problem:
 - CMM has limited repairs
 - Ducts are \$25K-\$90K to replace and have long lead times
- Solution:
 - FAA DER Approved Repair



Example of a DER Alternative Repair with a Locally Mfg Part – Non-Book Repair

- 1. A Nozzle SPAD is locally produced, by the repair facility.
- 2. The damaged area is cut out
- 3. The new SPAD is welded in place
- 4. The SPAD & weld is blended
- 5. The weld repair is NDT Inspected
- 6. The new SPAD is laser drilled for air cooling holes.
- 7. The Combustor dome is air flowed and re-inspected to OEM Stds.
- 8. Repair data is FAA DER approved, in accordance to AC 43-18 Chg 1

A Non-book repair of a Combustor



SPAD

REPAIR



Duct DER Approval Process

Create Repair Plan

- Section replacement
- Dent removal
- Weld repair

Identify Applicable Part Design Chapters

25.301 [Loads]; 25.303 [Factor of Safety];
 25.305 [Strength]; 25.307 [Structure] and others...

Substantiate Proposed Repair

- Stress Analysis
- Weld samples & Elongation Testing
- Comparative Analyses
- Inspection criteria (weld x-ray)

Need for Supplemental ICA/AWL?

Use existing CMM, SRM, or AMM



Submitted to FAA (DER & RS-DER)



FAA Approved Data

IDENTIFICATION DER REPAIR No: 092806-1 Rev. E Dated November 24, V2500 Ducts P/N 740-5121-511 740-5121-505 740-5121-507 740-5121-509 740-5122-501 745-5122-503 740-5172-505 740-5173-507 740-5151-513 745-5151-501 745-5151-503 740-5183-501 740-5183-503 740-5166-501 740-5152-507 745-5152-501 745-5152-503 740-5169-501 740-5153-507 745-5153-501 745-5153-503 740-5060-505 740-5051-503 740-5051-505 740-5059-503 740-5059-505 740-3101-501 740-3101-507 ***END***

8110-3 Form	STATEMENT OF COMPLIANCE WITH THE FEDERAL AVIATION REGULATIONS
25.1 [Applicabil 25.605[Fabricat	Name of Mark. Tapper of Hank.
FFLX MEA EXCINIDATED or exply a most process of the Control of the	contract data
Section State Stat	ATION - Under authority vested by direction of the Administrator and in accordance with conditions and limitations of appointment under Part 183 of the Federal Aviation Regulations, data listed above and on attached sheets numbered. Page 2, have been examined in accordance with established procedures and found to comply with applicable requirements of the Federal Aviation Regulations.
Decared / Ottoh I (Me) I p	Recommend approval of these data* refore Approve these data**
C attended the total and the	E (S) OF DESIGNATED ENGINEERING REPRESENTATIVE (S) DESIGNATION NUMBERS (S) CLASSIFICATION (S) P. DaCosta
	MERICAL DERT-410000-CE ENGINES, STRUCTURES, C1 SYSTEMS, & POWERPLANT
	The renair is now approved and shown to

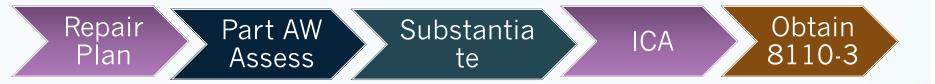
LLS DEPARTMENT OF TRANSPORTATION

The repair is now approved and shown to be as good as or better than the original TC product



DER Approval Process

Essentially the same as for the duct example



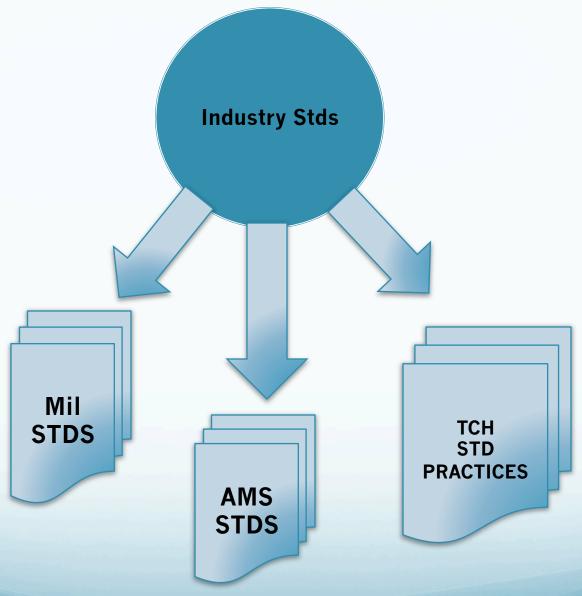
 In this case design improvements were made to address service difficulties (frequent removals due to cracking)



DEVELOPING A NON-BOOK REPAIR



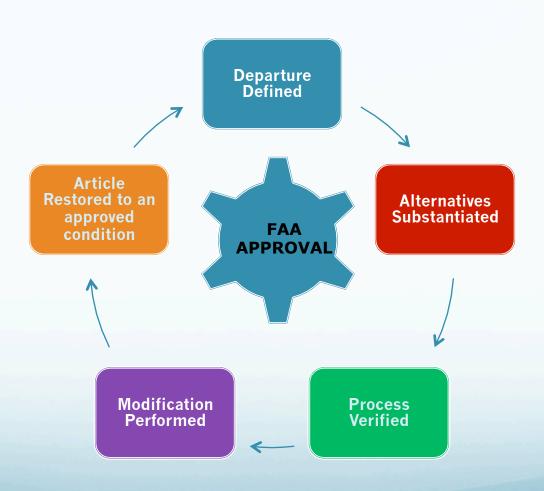




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Modification Process Flow



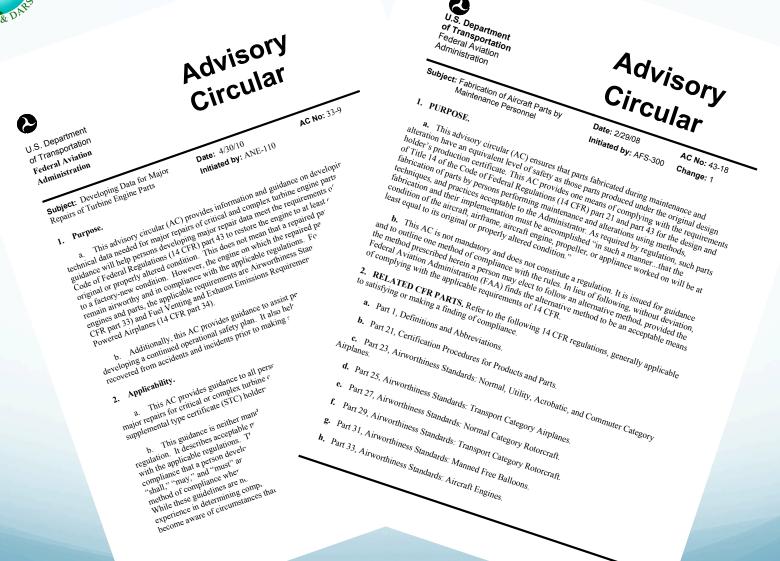


What Rules Apply to MRP's?

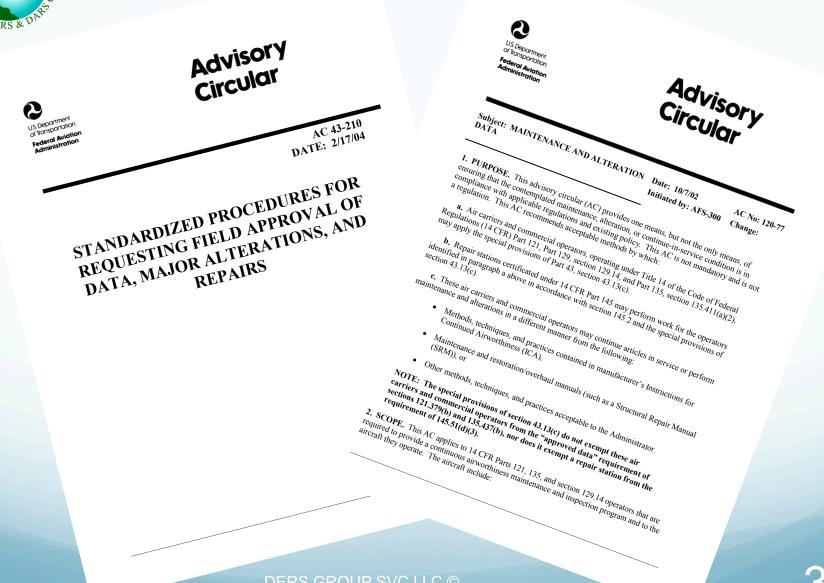
Much depends on WHO is accomplishing the Modification Replacement Part tasks!

• Repair Stations: 14 CFR Part(s) 43.13, CFR Part(s) 21.303, 21.8, and the specific product design rules [i.e. Part 25, Part 33 etc.], Order(s) 8110.4C, 8110.42C, 8110.37E, 8900.1, 8100.13, 8110.54, AC 33.2b, AC 43 –18 Chg 1, AC 33 -9 Repair, AC 23.1309-1C, AC 25.1309-1A, AC 25.571, AC 33.75-1, AC 20-62D, & AC 120-77]













AC 33-9-Major Repair.pdf

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What is the Status of DER acceptance in EASA member states

FAA and EASA Reciprocal Acceptance of Repair Data within the United States and European Union

Presented to: Workshop on the Implementation of Annex 2 (Maintenance) to the Agreement between USA and EU



FAA & EASA RECIPROCAL AGRREMENT

- The FAA and EASA have agreed to reciprocal acceptance of repair data.
 - Implemented through the new US/EU Aviation Safety Agreement, effective May 1, 2011
 - Annex 1, paragraph 3.2.7
 - Technical Implementation Procedures, paragraph 3.3
 - Implemented prior to May 2011 through Bilateral Aviation Safety Agreements Implementation Procedures for Airworthiness with 6 EU member states.



REPAIR ACCEPTANCE BY EASA & FAA

 FAA and EASA will accept each others approved repair design data regardless of State of Design of the component/product.

Two processes established:

- Streamlined Reciprocal Acceptance of repair data for non-critical components and critical components developed by the TC/STC holder
- Formal approval of critical component repair data developed by a third party



Process 1: Streamlined acceptance of repair data

US to EUROPE:

- EASA has certificated/validated the product or appliance, i.e. the product has an EASA TC/STC or ETSO approval.
- FAA is the authority of the State of Design for the repair design data.
- Data approved using the FAA system, major repair data approval via an FAA letter, FAA Form 8110-3, 8100-9 or 337



Process 1: Streamlined acceptance of repair data (continued)



EUROPE to US:

- FAA has certificated/validated the product, part, appliance or component (i.e. the product has an FAA TC/STC or TSO approval).
- EASA is acting on behalf of the State of Design for the repair design data.



Process 1: Streamlined acceptance of repair data (continued)

EUROPE to **US** continued:

- EASA repair design data approval is substantiated via an EASA repair design approval letter or a repair design approval issued under a Design Organisation Approval (DOA), and
- The repair is not in an area that is subject to an FAA AD, unless the AD allows for acceptance of an EASA repair design approval



Acceptance of repair data

FAA and EASA have agreed to accept each other's <u>systems</u> for the classification and approval of repair data.

- Data must have a local approval.
 - FAA approval for repairs designed in the US system;
 - EASA approval for repairs designed in the EU system



Remember, FAA or EASA must approve/accept the repair design data under its own system before the other bilateral partner can accept it.



Process 2: CRITICAL COMPONENTS

Formal Approval of Critical Component Repair Data (by other than the TC/STC holder)

- ➤ Make application through FAA/EASA:
 - Fast track process when the FAA or EASA can confirm that the applicant has entered into an arrangement with the TC/STC holder for this data.
 - Validation process is required when there is no arrangement with the TC/STC holder.
 - FAA or EASA will issue its own approval of the critical component repair.



EASA & FAA AGREEMENT SUMMARY

- ➤ FAA and EASA will accept each others approved repair design data regardless of State of Design of the component/product.
- ➤ Critical components will require additional review.



Summary

- Benefits of DER Approved Repairs
 - Often deliver benefit of reduced maintenance costs
 - Many times improve availability of parts, getting your aircraft back into revenue sooner
 - Offer the potential for design improvements that enhance aircraft utilization and lower operating cost