FAA Regulatory Updates

Changes to FAA Sequencing Guidance Dictating a new FAA Project Priority process that will impact STC, PMA, Special, and TSO applicants

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FAA New Project Priority Process

- Project Priority Process vs Sequencing
  - What's the difference?

    - Sequencing was a process by which the FAA was trying to utilize its limited resources and prioritize which projects would be initiated, and distributed throughout the FAA ACO geographic offices. This was done by have a threshold trigger at +40 hours. Meaning that they allowed some local ACO discretional decision to accepting 40 hours or less certification processes without submission to sequencing process.
    - If +40 hours is anticipated then a CPN and assignment was issued by FAA HQ [AIR100].

Sequencing Explained

- If Sequencing is initiated by the FAA then the following could result.
  - The FAA could issue a “Hold” on project start and assignment of project ACO [PACO].
  - The FAA HQ could re-assign the PACO to another region, i.e. Applicant applies in New York ACO, and FAA HQ assigns the project to Anchorage ACO.
  - CPN delay could be from 30 days to 180 days.
  - Applicants and their FAA designees would be dealing with ACO staff who were unfamiliar with articles, or designees capability and expertise.

Project Prioritization Process

In General:

Projects will be assigned or provided FAA resources based on ***a Safety Index***, This index consists of either an Applicant Showing or Designee Finding "(ASDF)" value,[Yet another acronym] and a ***project priority*** which will be calculated from the first two values. Anyone who plans to seek FAA approval from the Aircraft Certification Service needs to understand this Standard Operating Procedure (SOP) [AIR 100-ALL-005] in order to know how to best formulate their project to get the highest[SI] score (and the highest priority) when seeking FAA data approval resources.

Next lets explain the FAA "SI" [Safety Index] !

Project Prioritization Process

Safety Index (SI)

The first value the FAA will calculate will be the **Safety Index** (SI). This new Prioritization program's SI calculation puts a tremendous emphasis on **safety-related** projects needed to prevent an accident (described as "very high/immediate safety benefit"). This is good to the extent that it prioritizes to lower airworthiness directives (ADs). When you look at the numbers, an AD that only affects five small general aviation aircraft will get a safety index of 450, while a national/strategic priority for a typical airline aircraft would be given a safety index of 350. This shows that ADs will always take priority over other projects in other categories.

Unfortunately, this categorization which weights emphasizes ADs is broader than just ADs. The descriptive language of "**very high/immediate safety benefit**" might be interpreted to mean other projects as well. This category could undermine the system if it is misused or understood to describe projects as having "*very high/immediate safety benefit"* when they don't really meet the normal parameters for an AD.

The Prioritization program also **prioritizes large aircraft over small, and large fleets over small.** This will put projects designed to support general aviation aircraft or rare aircraft (small fleets) at a distinct disadvantage.

Project Prioritization Process

Other Factors affecting SI:

Applicant Showing or Designee Finding (ASDF)

The ASDF is a function of the complexity of the project and the amount of the project that will be approved by one or more designees. You take the total number of findings of compliance that will be performed by the FAA (0, 1-5, 6-15 or more than 16 - any amount that is more than sixteen findings will be capped in the table). Then you identify the percentage of findings of compliance that will be handled by one or more designees (so the finding of compliance does not need to be performed by an FAA employee). These percentages will fit into one of these categories: 100%, 90-99%, 75-89%, 50-74%, or <50%. You cross reference these two values in a table to obtain the ASDF, which will be low, medium or high. A High ADF will be reserved to those projects with nearly all of the findings performed by a designee (or findings based on applicant-only showing which is basically theoretical and is being developed by an aviation rulemaking committee). For these projects, the FAA will have very little interaction with the application's approvals.

In projects where the FAA has a high number of retained findings and/or the percentage of FAA-retained findings exceeds a metric established by the FAA (a 50-75% threshold) depending on the circumstances), the FAA would assign a low ASDF rating to these kinds of projects.

Project Prioritization Process

Lets talk about Project Priority

The SI & ASDF now being established we move to determine the overall **project priority.** This is done by cross referencing SI and ASDF. Remember an AD-level safety index will always lead to a priority one ranking, even when ASDF is low. Everything else will fit into priority status two through four. The FAA will break ties among priorities by using SI, which you have the greatest impact so this means that **SI [Safety Index]** is the applicants most important metric.

Those performing projects with negligible safety impact (Index)(which includes ***interiors projects like passenger entertainment systems and cabin modifications)*** get a zero value for safety impact. This will mean that the safety index for these projects is always zero, which will place them in the lowest possible project priorities.

Why is project priority so important? Because a project with a priority level one gets processed according to the office's normal project flow times, but a priority level four project can be processed according to the office's normal project flow times **PLUS 90 DAYS**! So (for example) the FAA may delay the response to your application (and thus the start of your project) by an additional 90 days if your project falls into priority level four; and then after that, additional 90 day response delays are permitted for each 'resource-limited' response.
These 90-day-delays are on top of office flow times (OFT), which are the amount of time allocated to a response by the local office – this time is set by the local office at the local office's discretion based on staffing and workload. OFTs will apply to responses to discrete elements like test plans or test reports etc.

Project Prioritization Process

Project Prioritization Process

	AIR-100 Standard Operating Procedure	SOP # AIR-100-ALL-005	Revision 0
Title: AIR Project Prioritization and Resource Management		Effective Date: 9/15/2014	Page 1 of 23

Standard Operating Procedure
Aircraft Certification Service Project Prioritization and Resource Management

Purpose

This standard operating procedure (SOP) describes the Federal Aviation Administration (FAA) Aircraft Certification Service (AIR) process for prioritizing certification projects and managing certification project resources when local resources are not available or are working on higher priority projects such as continued operational safety. The process for managing certification resources will henceforth be referred to as the AIR Project Prioritization Process.

Scope

This SOP applies to AIR personnel involved in aircraft certification in the Aircraft Certification Offices (ACO) and the AIR oversight offices, and to all activities AIR personnel perform in support of certification project prioritization and resource management. This SOP establishes the requirements and best practices for: 1) prioritizing aircraft certification projects, 2) determining individual project task response times, and 3) obtaining resources for certification projects when local resources are not available.

This document provides requirements and best practices for prioritization of certification projects including type certificates (TC), amended type certificates (ATC), supplemental type certificates (STC), amended supplemental type certificates (ASTC), and test and computation parts manufacturer approvals (PMA). This process does not include technical standard order authorization (TSOA) projects and changes to TSOA approvals.

Note: This SOP does not apply to validation projects or projects managed by the Military Certification Office (MCO). For projects managed by the MCO refer to FAA Order 8110.101, Type Certification Procedures for Military Commercial Derivative Aircraft.

The following documents are used in this process and are available on the AIR Quality Management System (QMS) website or Regulatory Guidance Library (RGL):

- FAA Order 8110.4, Type Certification
- FAA Order 8100.15, Organization Designation Authorization Procedures
- FAA Order 8110.42, Parts Manufacturer Approval Procedures
- QMS Procedure AIR-002-050, AIR Type Certification
- QMS Procedure AIR-001-080, AIR Parts Manufacturer Approval

Project Prioritization Process

SUGGESTED SOLUTIONS & ALTERNATIVES:

- Utilize FAA Order 8110.119 Fast Track PMA's where ever possible.
- Develop a Partnership for Safety Plan [PSP] with your geographic ACO/MIDO.
- Become very expert in AIR100-ALL-005

FAA Contact

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