ATEC Annual Conference 2023

Federal Aviation Administration

Breakout Session 7: FAA Safety Standards-Inspector Surveillance

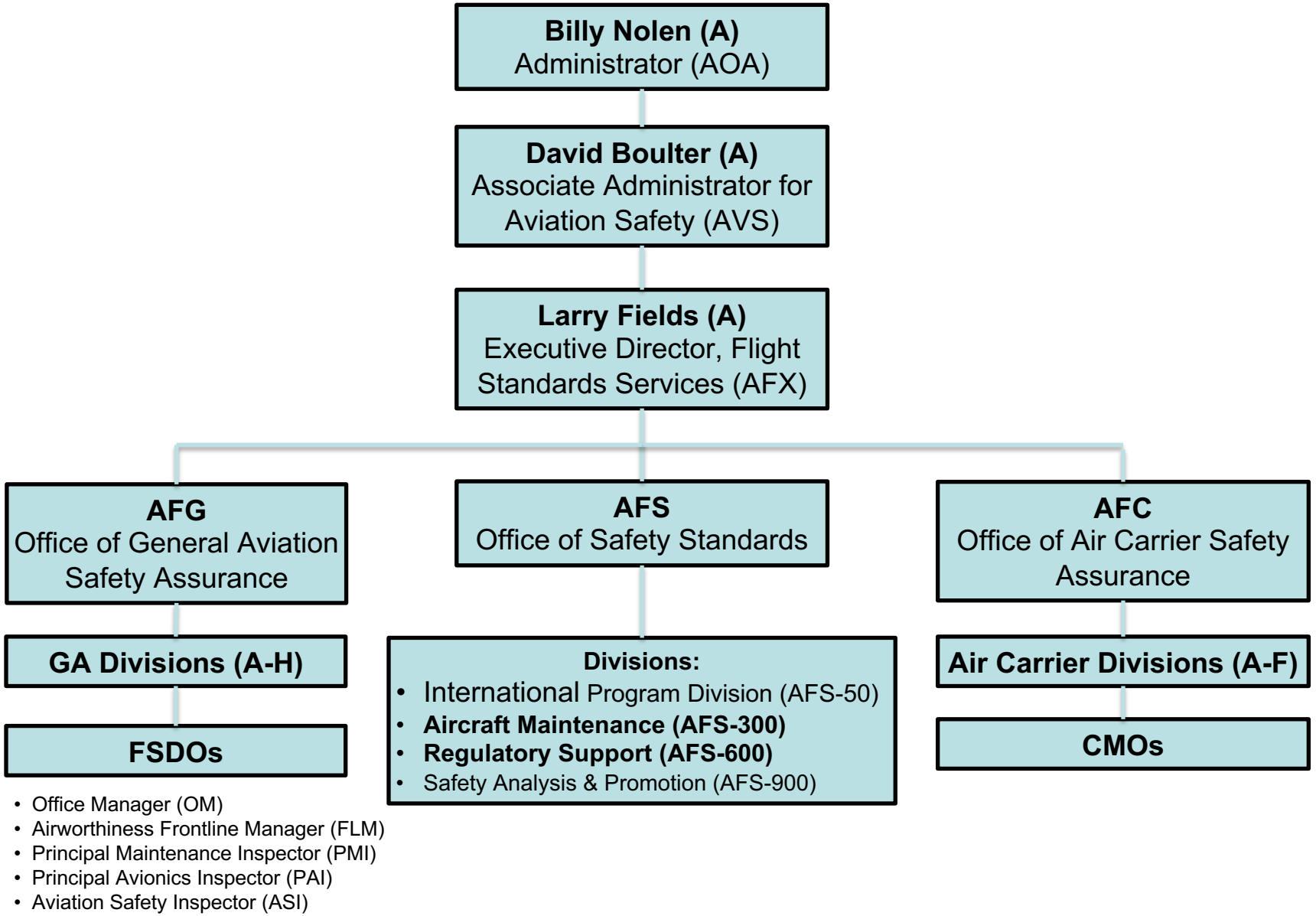
Date: March 28, 2023

Agenda

- FAA Organization
- FAA Regulations, Policy, Guidance
- System Safety
- Safety Assurance System
- 147 Surveillance
- 147 Certificate Management
  - Amendment of the certificate
  - Adding training locations
  - Communication with your Flight Standards Office

FAA Organization

- https://www.faa.gov/sites/faa.gov/files/FAA_Org_Chart_1.pdf
- CMO – Certificate Management Office
- FSDO – Flight Standards District Office



FAA Regulations, Policies, Guidance

Dynamic Regulatory System (DRS) drs.faa.gov

- A comprehensive knowledge center of Regulatory and Guidance material from the office of Aviation Safety and other Services and Offices.

Regulations

- Title 14 Code of Federal Regulations (14 CFR) https://www.ecfr.gov/current/title-14
- Includes Airworthiness Directives (ADs) https://www.faa.gov/regulations_policies/airworthiness_directives

Directives (Find in DRS or www.faa.gov)

- Directed at FAA personnel - FAA personnel are required to follow directives. When the directive cannot be followed, a deviation may be requested from the policy office.
- **Orders –** are permanent directives and stay in effect until canceled/superseded
  - FAA Order 8900.1 FSIMS (Flight Standards Information Management System)
- **Notices –** are temporary directives and expire one year from their effective date or have a cancellation date before one year.

FAA Regulations, Policies, Guidance - continued

FAA Advisories

- Directed at the public/stakeholders
- **Advisory Circulars**
  - Provide guidance for compliance with a regulation(s) – is one way, but not the only way.
  - The term “must” should only be used in an AC with respect to a regulatory requirement.
  - Example: AC 147-3
  - Draft ACs - https://www.faa.gov/aircraft/draft_docs
- **Other examples:** NOTAMs – Notices to Airmen; TFRs – Temporary Flight Restrictions; InFOs – Information for Operators; SAFO – Safety Alerts for Operators, and many more.

FAA Forms (www.faa.gov/forms)

- **FAA form 8310-6,** *Aviation Maintenance Technician School Certificate and Ratings Application*
- **FAA form 8610-2,** *AMTS Certificate and Ratings Application – Mechanic and Parachute Rigger*

FAA Regulations, Policies, Guidance - continued

Handbooks and Manuals (https://www.faa.gov/regulations_policies/handbooks_manuals)

- Handbooks are intended to be a supplemental resource to prepare for FAA certification tests and improve knowledge
  - Aviation Maintenance Technician Handbook – General
  - FAA-H-8083-31A, Aviation Maintenance Technician Handbook-Airframe Volume 1
  - FAA-H-8083-31A, Aviation Maintenance Technician Handbook-Airframe Volume 2
  - FAA-H-8083-32A, Aviation Maintenance Technician Handbook-Powerplant Volume 1
  - FAA-H-8083-32A, Aviation Maintenance Technician Handbook-Powerplant Volume 2

Testing Standards (PTS, ACS) (https://www.faa.gov/training_testing/testing)

- Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standards (FAA-S-ACS-1)
- Companion Guide to the Aviation Mechanic General, Airframe, and Powerplant Airman Certification Standards (FAA-G-ACS-1)
- Aviation Mechanic General, Airframe, and Powerplant Practical Test Standards (FAA-S-8081-26B)

System Safety

FAA eLMS Course 27100299, ***System Safety Concepts and Principles for the General Aviation Community***

What is a system?

- a group of interacting, interrelated, or interdependent elements forming a complete whole.

What is safety?

- the freedom from those conditions that can cause death, injury, occupational illness, or damage to or loss of equipment or property, or damage to the environment.

What is System Safety?

- **WHAT:** The application of engineering and management principles, criteria, and techniques…
- **WHY:** To optimize all aspects of safety within the constraints of operational effectiveness, time, and cost…
- **WHEN:** Throughout all phases of the system life cycle
- **HOW:** by identifying the hazards within an environment and eliminating or controlling their associated risk.

Summary: Managing the system to optimize safety by identifying hazards and eliminating or controlling risk.

System Safety – Hazard vs Risk

A hazard is an observable condition, whereas risk is a concept.

Hazard:

- a present condition, event, object, or circumstance that could lead to or contribute to an unplanned or undesired event such as an accident. It is a source of danger.
- a condition that could foreseeably cause or contribute to an aircraft accident.

Risk:

- Is the potential future effect/impact of a hazard that is not controlled or eliminated. It can be viewed as future uncertainty created by the hazard.
- Is the composite of predicted severity and likelihood of the potential effect of a hazard.
  - What is the likelihood or probability that an outcome will occur?
  - How severe will the consequences be if the outcome does occur?

Risk Management:

- a formalized way of dealing with hazards, is the logical process of weighing the potential costs of risks against the possible benefits of allowing those risks to stand uncontrolled
- is a process of describing the system; identifying the hazards; and analyzing, assessing, and controlling safety risk

System Safety – Safety Attributes

7 system safety attributes - the qualities of a system...that should be present in a well-designed...system and process.

- **Responsibility**
- **Authority**
- **Safety Ownership**
- **Procedures**
- **Controls**
- **Interfaces**
- **Process Measurement**

Important Note:
The safety attributes, which are the good characteristics that should be embedded in any process or system when it is designed:

- Do **NOT** mean that there are new regulatory requirements for certificate holders
- Should **NOT** be confused with the existing regulatory requirements

Safety Assurance System (SAS)

SAS includes policy, processes, and associated software that FS, AXH, and other AVS Offices use to capture data when conducting oversight.

- SAS is not a separate safety standard and does not impose additional requirements
- SAS helps accomplish the following objectives:
  - **Standardizes** the work being accomplished across FS and AXH
  - **Improves** consistency and collaboration between FAA and industry
  - **Helps** FAA aviation safety inspectors (ASIs) determine risk-based, data-supported oversight decisions
  - **Provides** the standardized protocols to evaluate whether CH operations are in compliance with regulations
  - **Assists** with reducing risk and increasing aviation safety

SAS Automation:

- Track initial certification requests and resources needs (CSOP)
- Plan surveillance, record surveillance results
- Record Identified hazards and risk
- Record other ASI/Office activities

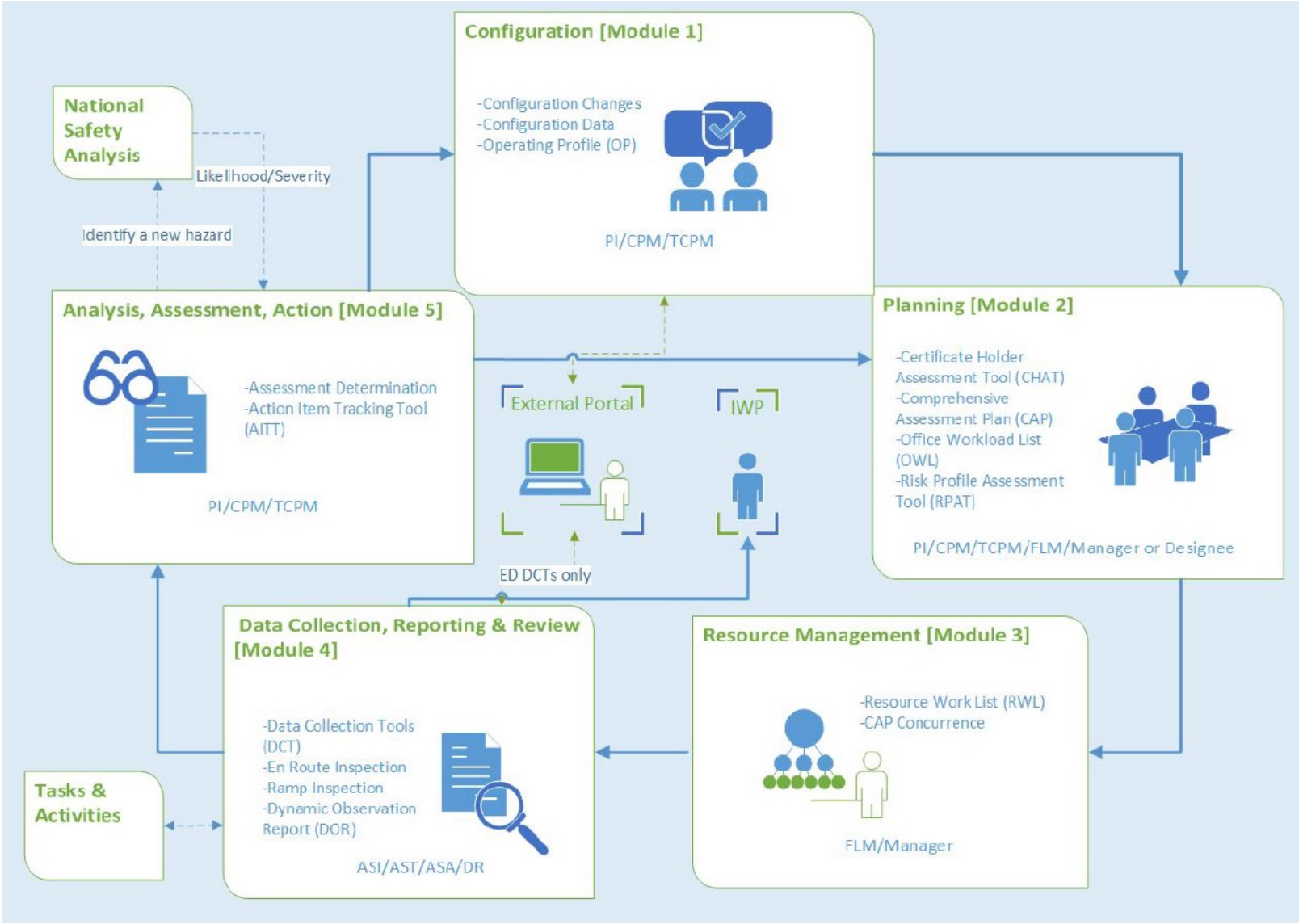
SAS Oversight Model

Internal Portal – FAA only

- 5 business process modules and the functions within those business modules,
- National Safety Analysis (NSA), and the

External Portal

- Configuration Data
- Configuration Changes
- https://sas.faa.gov/sas.external.portal/ext/accounts



Safety Assurance System (SAS) – SAS Terms

Master List of Functions (MLF) - SAS uses a common structured process to analyze how systems/subsystems and elements interface.

- There is an MLF for each peer group.
- Each peer group MLF is defined by its:
  - *Systems – Part 147 includes System 1.0 and 4.0*
  - *Subsystems*
  - *Elements*

Peer Group - Peer groups are categorized by 14 CFR part and operational description. Each certificate holder or applicant is placed into one or more peer groups as determined by their type of operations.

- Part 147 is peer group K

Criticality – *Determines baseline surveillance interval of the system.*

- For part 147 MLF – System 1.0 is low criticality, System 4.0 is medium criticality
  - *Low criticality – 24 months*
  - *Medium criticality – 12 months*
  - *High criticality – 6 months*

Safety Assurance System (SAS) – MLF Peer Group K (Part 147)

1.0 Organizational Management (L)	2.0 Flight Operations (M)	3.0 Operations Management	4.0 Technical Operations (M)	5.0 Onboard Operations	6.0 Ground Operations
1.1 Safety & Performance Monitoring 1.1.6 (AW) Safety Program **1.3 Airworthiness Management** 1.3.1 (AW) Required Personnel 1.3.4 (AW) Electronic Signatures, Recordkeeping and/or Manuals 1.3.5 (AW) AMTS Certificate Requirements			**4.1 Training & Qualification** 4.1.5 (AW) AMTS Training of Mechanics **4.5 Maintenance Facilities/Providers** 4.5.4 (AW) Housing and Facilities		

System (1.0)

Criticality (L)

Sub-system (1.1)

Element (1.1.6)

System Criticality: High–(H), Medium–(M), Low–(L)

Title 14 CFR Part 121 (Peer Group A)

1.0 Organizational Management	2.0 Flight Operations	3.0 Operations Management	4.0 Technical Operations	5.0 Onboard Operations	6.0 Ground Operations
1.1 Safety & Performance Monitoring (H) 1.1.2 (OP) Safety Program (Ground and Flight) 1.1.3 (AW) CASS 1.1.4 (AW) Reliability Program 1.1.6 (AW) Safety Program **1.2 Operations Management (L)** 1.2.1 (OP) Required Personnel 1.2.2 (OP) Manual Management 1.2.3 (OP) Electronic Signatures, Recordkeeping and/or Manuals **1.3 Airworthiness Management (L)** 1.3.1 (AW) Required Personnel 1.3.2 (AW) Manual Management 1.3.3 (AW) CASE **1.5 Safety Management (M)** 1.5.1 (OP/AW) Accountable Executive 1.5.2 (OP/AW) Emergency Response 1.5.3 (OP/AW) SMS Recordkeeping	**2.1 Training & Qualification (M)** 2.1.1 (OP) Training of Flight Crewmembers 2.1.2 (OP) Training of Check Pilots/Instructors 2.1.3 (OP) Simulators/ Training Devices 2.1.4 (OP) Outsource Crewmember Training 2.1.5 (OP) Appropriate Airmen/Crewmember Checks & Quals 2.1.7 (OP) Flight Crewmember Flight/Duty/Rest Time **2.2 Aircraft Operations (H)** 2.2.1 (OP) Airmen Duties/Flight Deck Procedures 2.2.2 (OP) Category II & III Ops 2.2.3 (OP) Flightcrew Member Operating Limitations/Recent Experience **2.3 Aircraft Equipment (M)** 2.3.1 (OP) Appropriate Operational Equipment	**3.1 Training & Qualification (M)** 3.1.1 (OP) Training and Qualification of Dispatchers and Flight Followers 3.1.2 (OP) Dispatcher Duty/Rest Time **3.2 Flight Operations Engineering (M)** 3.2.1 (OP) Aircraft Performance Operating Limitations 3.2.2 (OP) Use of Approved Areas, Routes, and Airports 3.2.3 (OP) Special Navigation Areas of Operation 3.2.4 (OP) RVSM Authorization **3.3 Flight Planning & Monitoring (H)** 3.3.1 (OP) Operational Control 3.3.2 (OP) Dispatch/Flight Release 3.3.3 (OP) Flight/Load Manifest/Weight & Balance Control 3.3.4 (OP) MEL/CDL/NEF Procedures 3.3.5 (OP) Extended Operations (ETOPS)	**4.1 Training & Qualification (L)** 4.1.1 (AW) RII Personnel 4.1.2 (AW) Maintenance Certificate Requirements 4.1.3 (AW) Maintenance Training Programs **4.2 Maintenance Planning and Monitoring (H)** 4.2.1 (AW) Maintenance/ Inspection Requirements 4.2.2 (AW) Maintenance/ Inspection Schedule 4.2.3 (AW) AD Management 4.2.4 (AW) Recordkeeping 4.2.5 (AW) Maintenance Control Functions **4.3 Maintenance Operations (H)** 4.3.1 (AW) Airworthiness Release/Maintenance Log Requirements 4.3.2 (AW) RII 4.3.3 (AW) MEL/CDL/NEF and Other Deferred Maintenance 4.3.4 (AW) Major Repairs & Alterations 4.3.5 (AW) ETOPS **4.4 Technical Administration (L)** 4.4.1 (AW) Special Flight Permits 4.4.2 (AW) MIS/SDR 4.4.3 (AW) Short-Term Escalations 4.4.4 (AW) Aircraft Requirements/Acceptance Process 4.4.5 (AW) Weight & Balance Program **4.5 Maintenance Facilities/Providers (M)** 4.5.1 (AW) Maintenance Facility/Main Maintenance Base 4.5.2 (AW) Maintenance Providers **4.6 Maintenance Special Requirements (M)** 4.6.1 (AW) Avionic Systems/Programs 4.6.2 (AW) Continued Airworthiness & Safety Programs **4.7 Maintenance Tools & Parts Control (M)** 4.7.1 (AW) Control of Calibrated Tools & Test Equipment 4.7.2 (AW) Aircraft Parts/Material Control	**5.1 Training & Qualification (M)** 5.1.1 (OP) Training of Flight Attendants 5.1.2 (OP) Flight Attendant Duty/Rest Time **5.2 Cabin Operations (M)** 5.2.1 (OP) Crewmember Duties/Cabin Procedures 5.2.2 (OP) Carry-on Baggage 5.2.3 (OP) Exit Seating Program 5.2.4 (OP) Passenger Handling	**6.1 Training & Qualification (M)** 6.1.1 (OP) Training of Station Personnel 6.1.2 (OP) Hazardous Material Training Program **6.2 Ground Handling (M)** 6.2.1 (AW) Fueling 6.2.4 (OP) Line Station Operations/Ground Personnel Duties **6.3 Cargo Acceptance & Handling (H)** 6.3.1 (OP) Carriage of Cargo 6.3.2 (OP) Hazardous Materials 6.3.3 (AW) Cargo Handling Equipment Systems & Appliances 6.3.4 (AW) Carriage of Cargo **6.4 Operations in Ground Icing Conditions (M)** 6.4.1 (AW) Operations in Ground Icing 6.4.2 (OP) Operations in Ground Icing

Part	Peer Group	Certificate Holder Peer Groups
121	A	Part 121 Certificate Holders
135	B	Part 135 (10 or more seats)
	C	Part 135 (9 or less seats)
	D	Part 135 (9 or less seats—single pilot only)
	E	Part 135 (HAA)
145	F	Part 145 Within U.S.
	G	Part 145 Outside U.S. Without Aviation Safety Agreement
	H	Part 145 Outside U.S. With Aviation Safety Agreement
141	I	Part 141 Pilot Schools
142	J	Part 142 Training Centers
147	K	Part 147 Aviation Maintenance Technician Schools

Federal Aviation Administration

Safety Assurance System (SAS) – Data Collection

Assessment

Design Assessment (DA)

- DA is used to validate that the CH/A's operating systems are designed to comply with the intent of regulations and system safety.
- Also known as element design assessment (EDA) because questions are asked at the element level.
- The EDA is done at initial certification, or is planned or a result of risk, previous findings, or as determined by the certificate management team (CMT).
- Uses ED DCTs (Element Design DCTs)

- **Performance Assessment (PA)**
  - A PA is used to determine if the CH/A's operating systems are producing the intended results, including meeting regulatory requirements and system safety attributes.
  - System or Subsystem Performance Assessment (SPA) – questions at system/subsystem level
    - SP DCTs (System/Subsystem Performance DCTs) – Scheduled in SAS based on criticality
  - Element Performance Assessments (EPA) – questions asked at the element level.
    - EP DCTs (Element Performance DCTs) – planned or a result of risk, previous findings, or as determined by the certificate management team (CMT).

Safety Assurance System (SAS) – Data Collection

Data Collection – Data Collection Tools

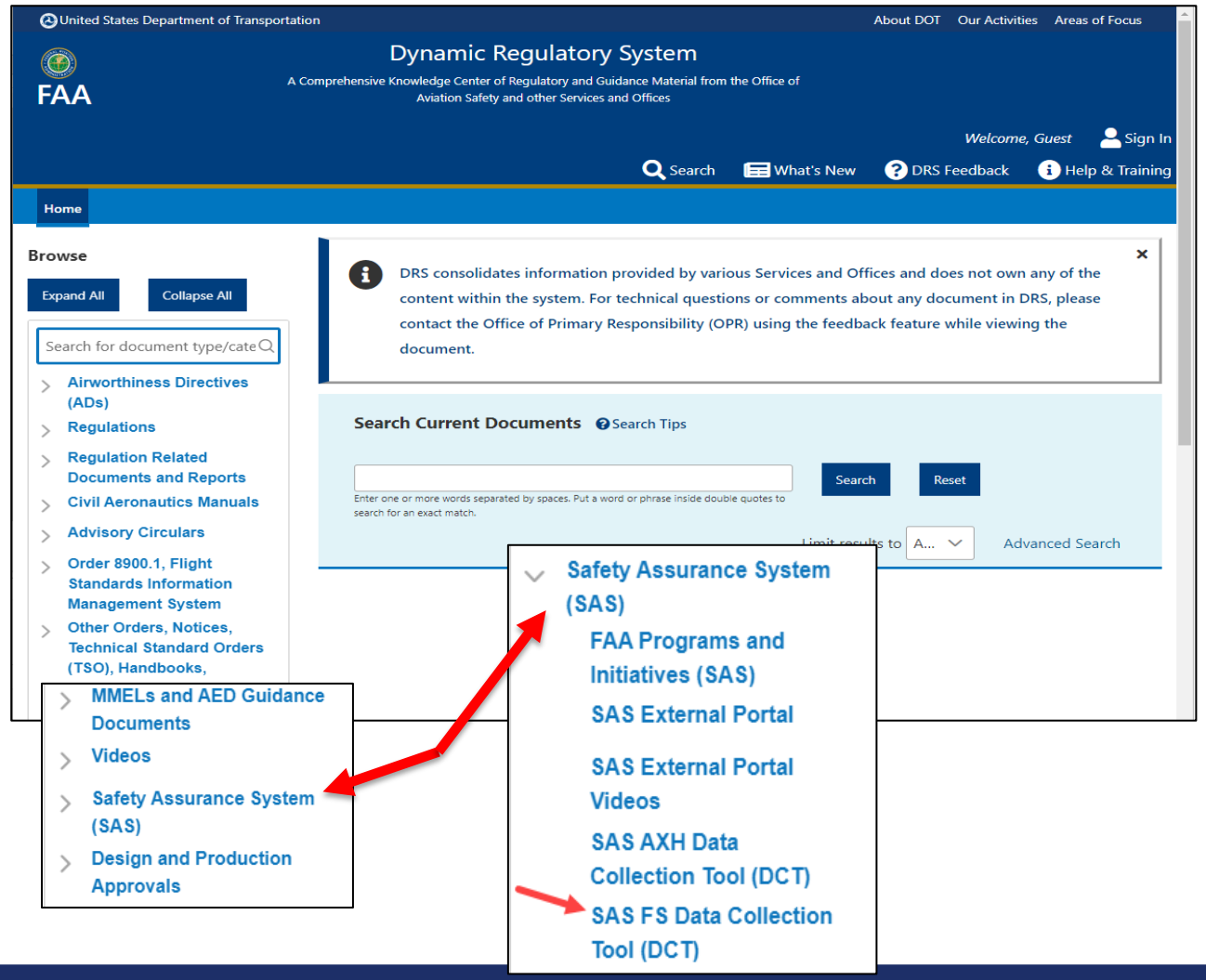
- **Where do DCT questions come from?**
  - Regulations
  - Guidance

  } *These are referenced under each question in the DCT*
  - System Safety Attributes

- **SCOPING**
  - Using information in SAS Configuration Module (vitals and OpSpecs information) DCTs are “scoped” to remove questions not applicable to the CH
    - e.g., If the 147 AMTS is not issued A008, Additional Training Locations, questions on additional training location would not show in the DCT.
  - This minimizes the need to answer DCT questions as “Not Applicable (N/A)”

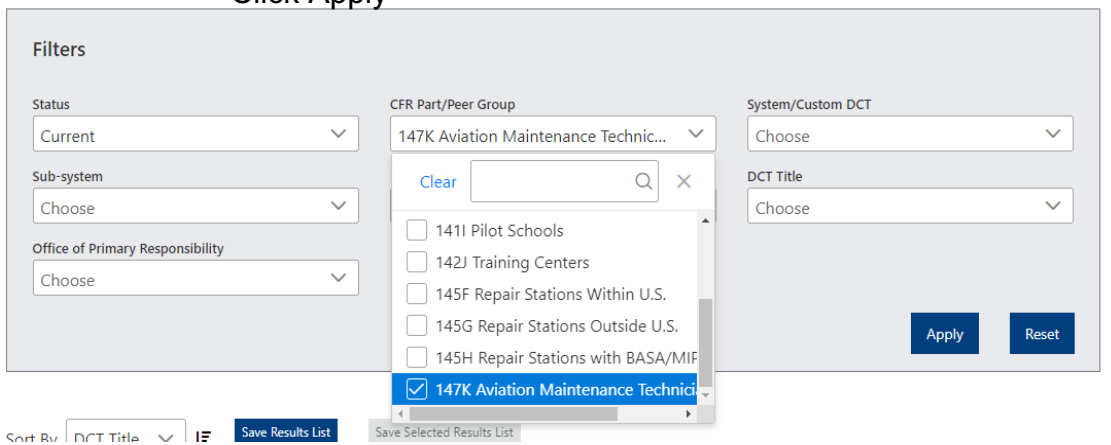
- **Where can I find SAS DCTs?**
  - DRS (drs.faa.gov)

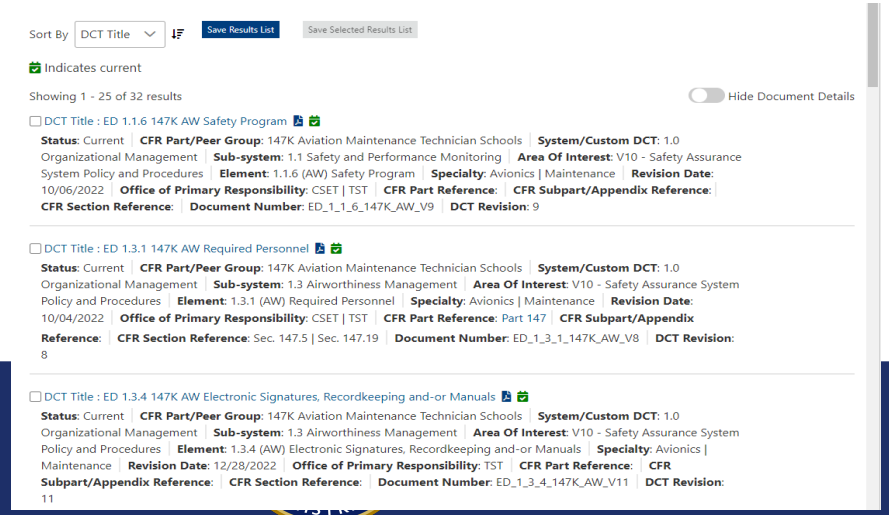
Safety Assurance System (SAS) – Data Collection



Filters for searching SAS FS DCTs -

- Only need to select Peer Group K from the CFR Part/Peer Group Filter.
- Click Apply





Safety Assurance System (SAS) – Data Collection

- SP DCT Question Format
  - High level question regarding the entire system (or subsystem for certain CFR parts)
  - Response is based on what the inspector was able to observe during the inspection.

System (1.0)

Sub-system (1.1)

MLF Label: 1.0 Organizational Management

The Organizational Management System includes the following Subsystem(s) and Element(s)

1.1 Safety and Performance Monitoring	
1.1.6	(AW) Safety Program
1.3 Airworthiness Management	
1.3.1	(AW) Required Personnel
1.3.4	(AW) Electronic Signatures, Recordkeeping and/or Manuals
1.3.5	(AW) AMTS Certificate Requirements
1.3.6	(AW) AMTS Quality Control System
1.5 Safety Management	
1.5.1	(OP/AW) Accountable Executive
1.5.2	(OP/AW) Emergency Response
1.5.3	(OP/AW) SMS Recordkeeping

Questions	Answers	Comments
1.1 Safety Programs		
1 Did the certificate holder meet its regulatory and guidance requirements for Safety Program? **REFERENCES:** AC-00-58, AC-120-66, 8900.1 Vol 11 Ch 1 Sec 1, 8900.1 Vol 11 Ch 2 Sec 1, 8900.1 Vol 6 Ch 10 Sec 2 **Safety Attribute:** Procedures, **Question Type:** Process Observation, **Scoping Attribute:** (FAR PART = "147") AND (SAFETY PROGRAMS = "ASAP" OR "VDRP") , **Rev.** 2 10/3/2022 4:59:08 PM, **QID:** 00058349, **Response Details:** Procedures SP DCTs (Both OP and AW), **Status:** Released	○ Met regulatory and guidance requirements ○ Isolated instance(s) when guidance requirements were not met ○ Several instances when guidance requirements were not met ○ Regulatory noncompliance ○ Not Observable	
1.3 Airworthiness Management		
2 Did the certificate holder meet its regulatory and guidance requirements for Required Personnel? **RENCES:** A013, 8900.1 Vol 6 Ch 10 Sec 3, 8900.1 Vol 6 Ch 10 Sec 2, 147.19, 147.5 **fety Attribute:** Procedures, **Question Type:** Process Observation, **Attribute:** FAR PART = "147" , **Rev.** 6 10/4/2022 3:36:02 PM, 54601, **Response Details:** Procedures SP DCTs (Both OP and AW), **Status:** Released	○ Met regulatory and guidance requirements ○ Isolated instance(s) when guidance requirements were not met ○ Several instances when guidance requirements were not met ○ Regulatory noncompliance ○ Not Observable	

UNSCOPED
when downloaded
from DRS

Safety Assurance System (SAS) – Data Collection

- System Safety Attribute questions
  - Questions asked relative to the entire System (e.g. 1.0 Organizational Management)

Safety Attributes		
9 Did the certificate holder's controls effectively mitigate unacceptable levels of risk(s) for the Organizational Management processes? **REFERENCES:** AC-120-92 **NOTE:** This question applies to all Elements within this System. **Safety Attribute:** Controls, **Question Type:** Process Observation, **Scoping Attribute:** FAR PART = "147" , **Rev.** 4 6/29/2022 7:52:18 AM, **QID:** 00054606, **Response Details:** Controls ED/EP/SP DCTs (Both OP and AW), **Status:** Released	○ Controls were effective ○ Isolated instance(s) when controls were not effective ○ Several instances when controls were not effective ○ Systemic or significant issues ○ Not Observable	
10 Did the certificate holder's Organizational Management process ensure consistency of related processes between departments and employees (interfaces)? **NOTE:** This question applies to all Elements within this System.	○ Interfaces were effective ○ Isolated instance(s) when interfaces were ineffective ○ Several instances when interfaces were ineffective	

Printed: 10/07/2022 04:02:05 Page 2 of 5

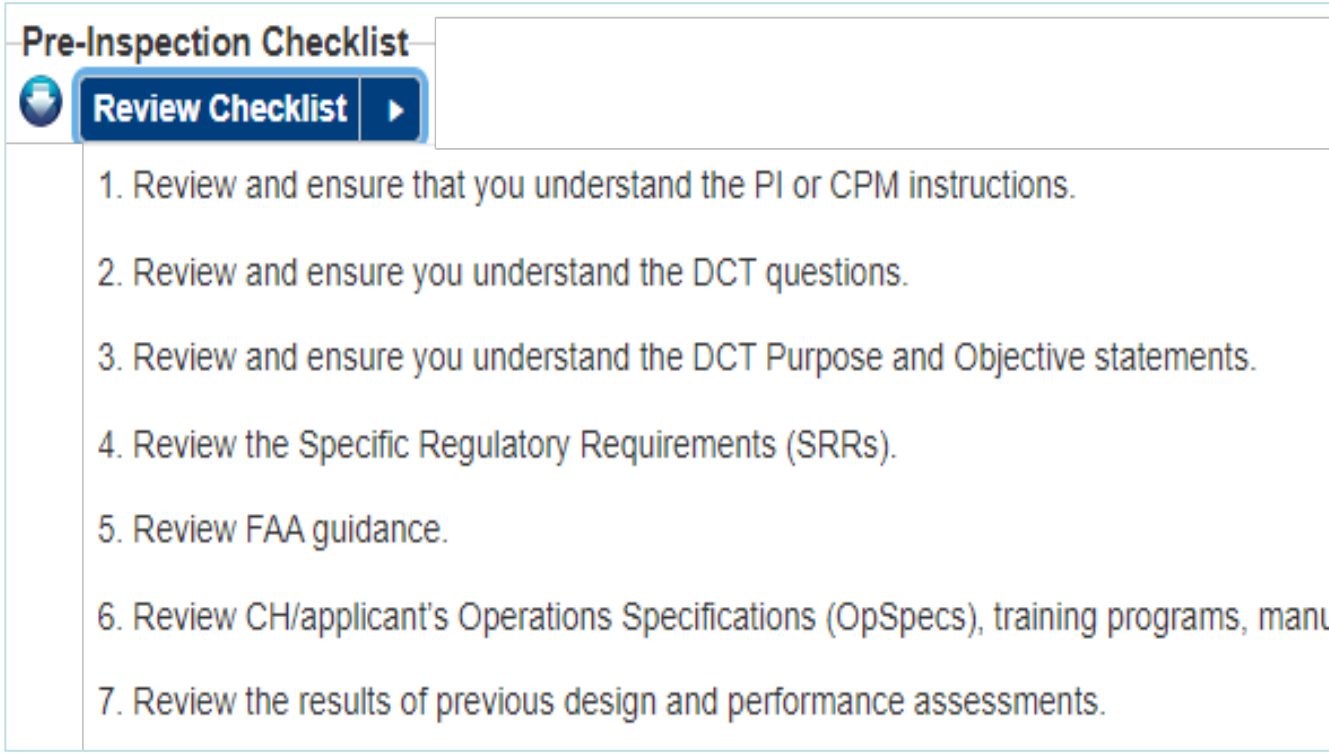
14 CFR Part 147 Surveillance

- **How often will surveillance be conducted?**
  - every 12 months (4.0), 24 months (1.0)
  - or a result of risk, previous findings, or as determined by the certificate management team (CMT).
  - scheduled or unannounced
- **Inspector Prep for Inspection**
  - 8900.1, Volume 6, Surveillance
  - Chapter 10. Part 147 Surveillance
  - Section 1, Introduction to AMTS Surveillance
    - **Paragraph 6-2145 PROCEDURES**

A. Prepare for the AMTS Inspection

1. Review AMTS File
2. Review Surveillance History
3. Review CHAT & RPAT
4. Review AMTS Curriculum & Procedures
5. Review AMTS OpSpecs

B. Review AMTS Minimum Passage Rate



14 CFR Part 147 Surveillance

What will an FAA Inspectors do during surveillance? If conducting performance assessment (PA):

Order 8900.1	Section Title	Procedures	Contents
V6, C10, S2	Inspect AMTS Organizational Management	Paragraph 6-10-1-11	• Inspect AMTS Safety Programs (VDRP) • Inspect AMTS Required Personnel • Inspect System for electronic signatures/manuals • Review certificate requirements (certificate, opspecs)
V6, C10, S3	Inspect AMTS Training Operations	Paragraph 6-10-3-11	• Observe Training – facilities, equipment, materials used during training, curriculum content and delivery, instructors, safety • Observe Training documentation – training records, certificate of completion (graduation), early testing documentation.
V6, C10, S4	Inspect AMTS Facilities	Paragraph 6-10-4-11	• Review AMTS ratings, curriculum, and 147.5 required descriptions. • Inspect AMTS facilities • Inspect AMTS equipment • Inspect AMTS materials
V6, C10, S7	Inspect an AMTS Quality Control System	Paragraph 6-10-4-11	<u>Accredited AMTS</u> • Verify accreditation (Still held, changed, dropped)
			<u>FAA Approved QC System</u> • following procedures & producing intended results • recordkeeping, assessment, Issuing credit, Issuing final course grades, attendance, ensuring sufficient number of instructors, granting of graduation/completion documentation, corrective action for addressing deficiencies

14 CFR Part 147 Surveillance

What will an FAA Inspectors do during surveillance? If conducting design assessment (DA):

Order 8900.1	Section Title	Procedures	Contents
V6, C10, S5	Evaluate and AMTS Initial Curriculum or Curriculum Revision	Paragraph 6-10-1-11	• Review 147.5 required curriculum description ○ Curriculum basis ○ Curriculum delivery ○ Curriculum focus ○ Review curriculum document(s) – Verify curriculum aligns with the current Mechanic ACS (listed in § 147.17(b))
V6, C10, S3	Evaluate/Approve and AMTS Quality Control System/Procedures	Paragraph 6-10-3-11	• Observe Training – facilities, equipment, materials used during training, curriculum content and delivery, instructors, safety • Observe Training documentation – training records, certificate of completion (graduation), early testing documentation.

Other AMTS Procedures

- Safety Procedures
- AMTS Safety Programs
- Student testing under § 65.80
- Procedures for FAA Certification

14 CFR Part 147 Surveillance

- **What is different from the past?**
  - Focus on curriculum content, delivery, facilities, equipment, materials instead of focusing on curriculum hours.
  - Accredited schools – student and school records are required by the accrediting body, not by 14 CFR. Therefore the FAA will not typically be looking at student and school records.

- **When is the inspection completed?**

6-10-2-13 TASK OUTCOMES.

A. Conduct Debriefing. Brief the CH on the inspection results. Discuss all deficiencies, CH corrective actions, and FAA actions. The aviation safety inspector (ASI) can find instructions for conducting briefings in Volume 1, Chapter 3, Section 1.

B. Compliance and Enforcement Action. If safety issues and/or regulatory noncompliance are identified, follow the process contained in Volume 14, Chapter 1, Section 2 to determine the appropriate FAA compliance or enforcement action.

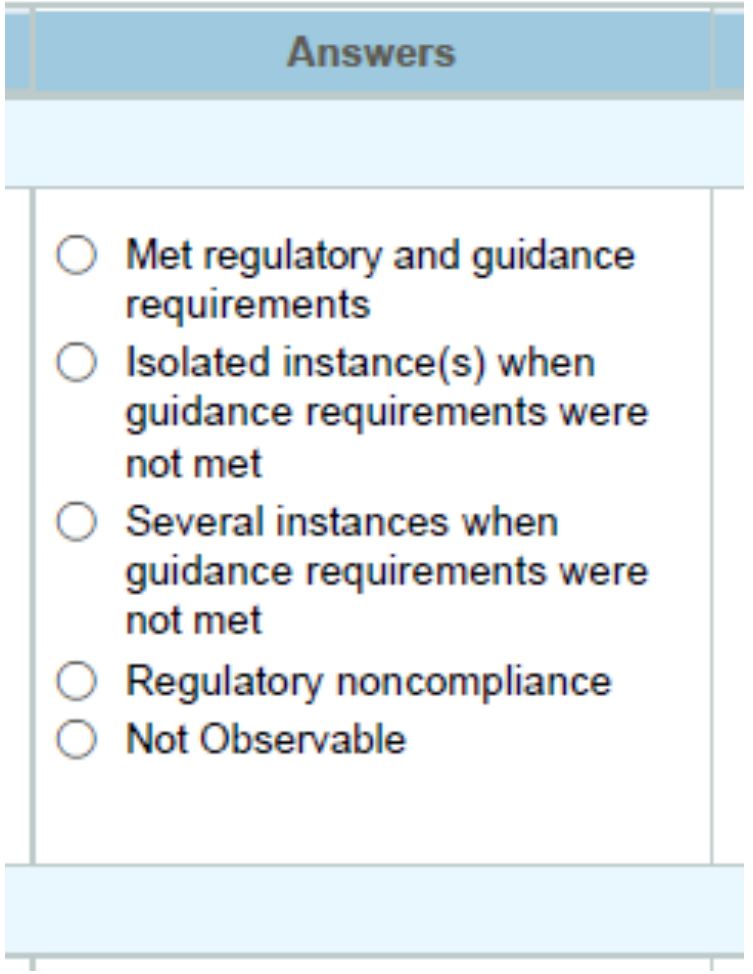
C. Complete the Task. Follow Volume 10 when processing CH change requests and for completion of SAS DCTs. Update the Certificate Holder Assessment Tool (CHAT), as necessary, to record identified hazards or risk.

14 CFR Part 147 Surveillance

- **Recording Surveillance**
  - SAS answer sets

- **Recording Action Taken**
  - Action Item Tracking Tool in SAS
  - Only “met…” and “Not observable” allow no action to be taken by the ASI/PI

- **Regulatory Noncompliance**
  - Volume 14, Chapter 1, Section 2 –
    - Compliance Action Decision Procedure (flowchart)
    - Compliance Action (CA) vs: Enforcement Action



14 CFR Part 147 Certificate Management

Amendment of the certificate

- 147.5(c) *An application for an additional rating or amended certificate must include only the information required by paragraph (b) of this section that is necessary to substantiate the reason for the additional rating or change sought.*
- Air Agency Certificate – includes the following information:
  - Certificate holders name
  - FAA Certificate number
  - Address of the AMTS primary location
  - Ratings issued to the AMTS (OpSpec A003)
  - Additional business names (i.e. dba) of the AMTS (not listed on AMTS OpSpecs)
- FAA Form 8310-6

B. PURPOSE OF APPLICATION

1. ☐ **ORIGINAL CERTIFICATE**	a. RATINGS REQUESTED *(Specify)*: ☐ AIRFRAME ☐ POWERPLANT ☐ AIRFRAME AND POWERPLANT	b. ADDITIONAL TRAINING LOCATIONS REQUESTED *(during initial certification)*: ☐ NO ☐ YES *(Enter address information in section C below)*
2. ☐ **AMENDED CERTIFICATE** *(Indicate only those items that are additions/changes to what is currently approved.)*	a. ☐ ADDED RATING *(Specify)*: ☐ AIRFRAME ☐ POWERPLANT ☐ AIRFRAME AND POWERPLANT	
	b. ☐ REMOVED RATING *(Specify)*: ☐ AIRFRAME ☐ POWERPLANT ☐ AIRFRAME AND POWERPLANT	
	c. ☐ CHANGE OF LOCATION (Primary Location) *(Enter new physical and/or mailing address in section C below)*	
	d. ☐ CHANGE OF NAME: *(Enter new name or changes to DBA)*	
3. ☐ **OTHER**	a. IDENTIFY REASON FOR SUBMISSION:	

14 CFR Part 147 Certificate Management

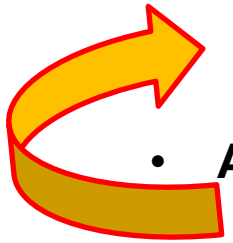
Adding training locations

- Is not an amended certificate
- Added to OpSpec A008
- Make request in writing to your responsible FAA office (i.e. certificate holding office)
- If additional location is located:
  - Within the US – responsible FAA office will conduct inspections OR work with another office to conduct needed inspections
  - Outside of the US – responsible office will coordinate with IFOs to conduct needed inspections
    - Fees for international work (AC 187-1)

14 CFR Part 147 Certificate Management

- **Communication with your Flight Standards Office**
  - Office Manager (OM)
  - Airworthiness Frontline Manager (FLM)
  - Principal Maintenance Inspector (PMI)
  - Principal Avionics Inspector (PAI)
  - Aviation Safety Inspector (ASI)

- **Flight Standards Stakeholder Feedback**
  - **https://www.faa.gov/about/office_org/headquarters_offices/avs/stakeholder_feedback/afx**



- **Aviation Safety (ACS) Consistency and Standardization Initiative (CSI)**
  - CSI principles: csi_brochure.pdf (faa.gov)

(https://www.faa.gov/sites/faa.gov/files/about/office_org/headquarters_offices/avs/csi_brochure.pdf)

Questions/Feedback

- **The policy office for part 147 rulemaking, policy, and guidance is:**
  - **Office of Safety Standards, Aircraft Maintenance Division** (AFS-300). Acting Division Manager: Rebecca Hoover
    - **Airman and Special Projects Group** (AFS-320). Manager: John “Jay” Hiles
      - **Airmen Section**. Section Manager: Kevin Morgan

- **Division Email: 9-AWA-AFS-300-Maintenance@faa.gov**