

ODA CONSULTANTS, LLC

April 2008 Deadline Approaches

Deadline for DDS Organizations approaches

April brings tax deadlines. More importantly, a deadline exists for DDS Organizations to apply for an ODA, before April 2008, in accordance with 14 CFR Part 183 and FAA Order 8100.15. This ensures organizations will receive their authorizations before their current authority terminates on November 14, 2009. This deadline impacts Organization Designation Authorization (ODA), Designated Alteration Station (DAS), SFAR36, and Organization Designated Airworthiness Representatives (ODAR).

What does an ODA application include?

- FAA Form 8110-13, Statement of Qualifications
- Cover letter describing authority and limitations requested. Including a description of applicants eligibility
- ODA Organizational structure and facilities
- Proposed ODA administrator's name and experience to demonstrate that he/she meets the qualification requirements
- ODA Unit Member listing with an outline detailing unit members' experience and qualifications
- Draft Procedures Manual

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Special points of interest:

◆ *April 2008 deadline approaches*

◆ *First ODA issued with assistance from ODA Consultants*

◆ *ODA Consultants conducting self-audits*

◆ *Eliminate field approvals by obtaining a MRA ODA*

◆ *Existing DDS Organizations will terminate on November 14, 2009*

Understanding MRA ODA

Major repair, alteration and airworthiness ODA

It is important to understand the benefits of having an MRA ODA in your organization. Many aviation organizations do major repairs and/or major alterations on a daily basis, but find the most difficult part of this process is obtaining an FAA approval. Approval methods are: using manufacturers accepted data; obtaining FAA approved data; employing Designated Engineering Representatives (DERs); or obtaining a FAA Field Approval. These approvals, if not done in a timely manner, will impact aircraft delivery.

Existing DAR-T or ODAR-T delegations with airworthiness functions may qualify for a MRA ODA with Function Codes to Issue Airworthiness Certificates and Approvals.

MRA ODA is a SFAR36 replacement delegation for approval of major repairs. This type of ODA may be authorized to approve functions such as: operational information; airworthiness limitations information; airworthiness certificates; data for major repairs; and performing aging aircraft inspections and records review. Can field approvals be eliminated?

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ODA Holder—ODA Unit Relationship

The relationship of an ODA Holder and ODA Unit is critical; and must be adequately addressed in the procedures manual. This is an area that is difficult to put ones hands around and is often misunderstood .

“TO BE ELIGIBLE FOR AN ODA, AN ORGANIZATION MUST CONSIST OF TWO OR MORE INDIVIDUALS”

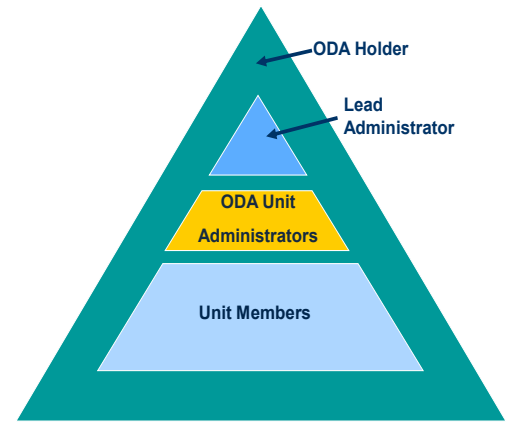
The chart illustrates the relationship of the ODA Holder and ODA Unit.

The ODA Holder is the parent organization. It is the corporate structure that has responsibility and authority for the ODA Unit. It is the recipient of a FAA ODA Letter of Designation. The ODA Holder must be located in the United States. There is not a requirement that the ODA Holder and ODA Unit be collocated.

The ODA Unit is the group of two or more individuals within the ODA Holder’s organization that performs authorized functions. The ODA administrator and unit members are within the ODA Unit.

An ODA Holder may have multiple ODA Units, i.e. STC ODA Unit, PMA ODA Unit and MRA ODA Unit. An administrator will provide certificate management for each unit.

Unit administrators may report to a Lead administrator. Each ODA unit administrator must ensure that their unit performs all authorized functions in accordance with the regulations, FAA Policy and approved Procedures Manual.



The ODA Holder must take an active role in identifying and resolving deficiencies, including non-compliances. The ODA Unit proposes solutions or corrective actions to ensure compliance with the regulations.

The ODA Holder must not interfere with the certification responsibilities of the ODA unit. Each ODA unit member must have enough time and authority to perform their duties without pressure or influence from other parts of the organization.

The procedures manual defines the ODA Holder’s organizational structure and corporate hierarchy. It identifies how the ODA unit is integrated into that structure. The manual must describe the reporting paths of ODA unit members and the reporting paths for any non-ODA responsibilities. Several organizational charts might be required to adequately define the corporate structure.

“THE ODA HOLDER MUST NOT INTERFERE WITH THE CERTIFICATION RESPONSIBILITIES OF THE ODA UNIT”

MRA ODA (continued from page 1)

A repair station or individuals who perform major alterations and have a MRA ODA (with the appropriate functions) will no longer need to obtain DER approved data or receive a field approval from the local FSDO inspector. This MRA ODA would be authorized to approve data; including flight manual supplements and instructions for continued airworthiness, for a major alteration.

With MRA ODA approvals, the aircraft may be approved for return to service based on MRA ODA approved data and an appropriately completed FAA Form 337. A field approval will

not be required for this type of approval.

A MRA ODA unit must classify the design change as a major or minor change in type design in accordance with 14 CFR Section 21.93. A MRA ODA are only authorized to approve major alterations that are classified as minor changes in type design.

Major alterations classified as a major change in type design require approval by an STC. FAA Order 8300.10 identifies those types of alterations which require an STC.

“MRA ODA MAY ONLY APPROVE MAJOR ALTERATIONS THAT ARE CLASSIFIED AS MINOR CHANGES IN TYPE DESIGN”

Developing a Procedures Manual

The sample Procedures Manual in appendix 2 of FAA Order 8100.15 is a great starting point and should only be used as an outline and guide. Detailed procedures must be developed and inserted into your procedures manual in order for it to be acceptable.

When developing Section 15, *Procedures*, the applicable sections of the Order should be used to assure all applicable functions and procedures have been addressed for that ODA type. Identify, who will perform and how the authorized functions will be accomplished. Procedures should follow a typical certification project in a chronological format, including procedures for issuing an STC (STC ODA).

We have seen manuals that do not adequately address the requirements of Section 7, ODA Unit Selection Procedures.

Referring to FAA Order 8100.8 is not acceptable. FAA Order 8100.8 describes the FAA processes to select and appoint a designee. It was never intended to be used by a delegated organization. Section 7 must address at least the following:

- Initial administrative processing and prescreening of an applicant
- Appointment of an advisor and evaluator and their roles in the selection process
- Evaluation Panel review
- Administrative requirements

Appendix F of the manual must contain forms. Existing FAA forms may be acceptable but the ODA unit must make up their own forms such as: Training Record; Unit Member Performance Review; Self-Audit Discrepancy Record; and Unit Member Appointment Tracking Record.

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“EXISTING DDS ORGANIZATIONS WILL TERMINATE ON NOVEMBER 14, 2009”

Developing a Procedures Manual (continued from page 3)

The selection and appointment area must differentiate the processes used for a unit member applicant who is an FAA designee from an applicant without any FAA delegation.

There must be procedures regarding the development and maintenance of an ODA Unit Listing. Here are some questions that need to be answered in your procedures. What are the procedures to identify unit members in the ODA unit listing? How and who are authorized to make revisions? Who approves the unit listing and when is it submitted to the OMT? How and when does OMT provide concurrence? How and by whom is the unit listing maintained and controlled?

What Services Are Available from ODA Consultants, LLC

David Grossman, who retired from the FAA Aircraft Certification Service in September 2006, was on the FAA DDS and ODA teams that developed FAA Orders 8100.9 and 8100.15.

ODA Consultants can develop a procedures manual for your organization. Already have a manual prepared, have ODA Consultants review it prior to FAA submittal. We know what's required to be in a manual as evidenced by our assistance in the development of the first FAA approved ODA Procedures Manual.

The Training Section must describe the qualification requirements of the trainer. It must also include: topics covered; trainer identification and frequency of training sessions.

Use descriptors and adverbs to describe how a task will be conducted. Use active voice, avoid passive voice, in writing procedures.

In summary, this newsletter cannot cover all the aspects of what should be in a procedures manual, but most importantly the procedures manual must contain adverbs that indicates manner, time, place, cause, or degree and answers questions such as "how", "when", "where", "how much".

ODA Consultants has experience working with aviation facilities in developing an ODA Organizational Model. We have experience in knowing the requirements to obtain an ODA; including developing procedures manuals and conducting self-audits.

Contact ODA Consultants for more information. References available upon request. Visit our website at www.odaconsultants.com

"THE SAMPLE PROCEDURES MANUAL IN APPENDIX 2 OF FAA ORDER 8100.15 IS A GREAT STARTING POINT, HOWEVER,"

"AN ADVERB INDICATES MANNER, TIME, PLACE, CAUSE, OR DEGREE AND ANSWERS QUESTIONS SUCH AS "HOW," "WHEN," "WHERE," "HOW MUCH!"."

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