

# Harmonizing EASA and FAA ADs

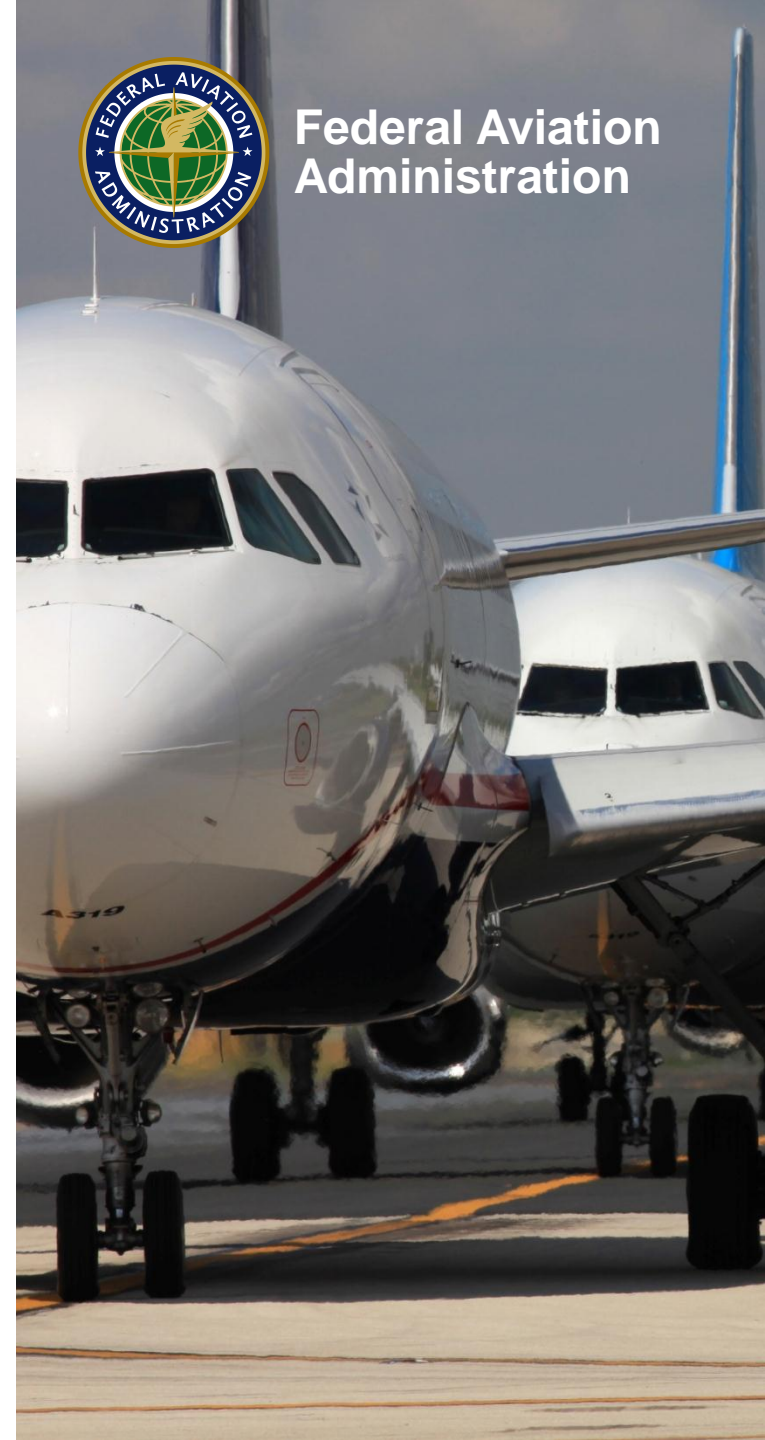
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By: FAA Transport Airplane Directorate

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Federal Aviation  
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# Background

- **In 2000, we met with major U.S. air carriers to get feedback on FAA transport ADs:**
  - Are our ADs easy to read, and easy to understand?
  - How could we simplify our ADs?
  - What other suggestions did the operators have for ADs?
- **The air carriers' response was: “Just tell us to do the service bulletin (SB).”**



# **“AD-Friendly” Service Bulletins**

- **In 2000, we began meeting with Boeing as the first “AD-Friendly (ADF) SB” team.**
- **Our goal was to streamline the transport AD process by:**
  - Identifying and implementing improvements to the format and usability of SBs.
  - Ensuring legally enforceable, “AD-friendly” language is used in SBs (i.e., it would be easier to adopt the SB language into the FAA AD).



# ADF SBs, cont.

- **(Goals, cont.)**

- Referencing (relying on) the SB as the primary source of information for compliance times and actions in an AD in lieu of interpreting and re-keying the SB information.
- Minimizing differences between SBs and ADs.
- Changing policies and procedures to increase both SB and AD usability.



# ADF with other countries

- **After establishing goals and guidelines for ADF with Boeing, we expanded it to other countries:**
  - EASA/Airbus in 2004
  - TCCA/Bombardier in 2005
  - ANAC/Embraer in 2005



# Examples of ADF Elements

- **Give clear explanations of the precipitating event, cause, unsafe condition, and end-level effect on the airplane.**
- **Use common and consistent descriptions and terminology throughout the SB.**
- **Use precise and enforceable compliance terminology (e.g., definitive compliance times, inclusion of grace periods).**



# Examples of ADF Elements, cont.

- **Always provide corrective actions to address conditions that are found (e.g., a fix is given if cracking is found).**
- **Include reporting requirements only when essential.**
- **Provide repetitive inspections when appropriate (e.g., when the root cause is not yet identified).**



# Benefits of ADF SBs

- **For the airlines:**

- Customer-oriented effort that supports FAA AD drafting.
- Reduced paperwork and resources for airlines, i.e., no need to correlate between SB and AD if the AD simply references SB for compliance = less time preparing work cards.
- Easier to determine compliance.
- Less need for questions to authorities/manufacturers.





# Benefits of ADF SBs, cont.

- **For the manufacturer and the FAA:**
  - Improved SB usability through commonality and consistency.
  - Decreased delay and rework to develop ADs.
  - Fewer questions among the manufacturer, authority, and operators.
  - Fewer AMOC requests.
- **Visited 10 U.S. airlines and received positive feedback.**



# Requirements of the U.S. AD Process

- **There is no current legal authority for the FAA to automatically adopt foreign ADs (MCAI).**
- **The FAA must comply with the Administrative Procedure Act (APA):**
  - Requires notice and opportunity for comment; the AD preamble is “the heart of compliance with the Administrative Procedure Act.”
  - Allows for no notice *only* if “good cause” exists.



# U.S. AD Process, cont.

- **(The APA, cont.)**

- Requires reasonable responses to public comments.
- Requires publication of ADs in the *Federal Register*.
- Requires “just enough detail”—
  - In the AD preamble to provide notice and opportunity for comment.
  - In the AD “body” to ensure legal enforceability (so FAA to take appropriate action if operators fail to comply).
- Must meet not only the APA requirements, but also the Office of the Federal Register and FAA policies and requirements.



# U.S. Transport ADs

- **Transport ADs are unique:**
  - Have the foremost impact on the flying public.
  - Command a higher public awareness and attention.
  - Are the subject of considerable media interest.
  - Must be able to withstand legal challenges in U.S. courts (as with all U.S. ADs).



# Harmonizing EASA & FAA ADs

- **In addition to ADF with other countries, we collaborated with EASA, ANAC, and TCCA on terminology used in transport ADs—for example:**
  - Consistent and precise general terminology.
  - AD applicability.
  - Enforceable compliance times.
  - Required actions.



# Advisory Circular (AC) 20-176

- **Background:**

- An AD Aviation Rulemaking Committee (ARC) was chartered in 2009 to evaluate and address recommendations from two reviews following a compliance issue with a particular AD and a subsequent AD audit.

- **One key objective of the AD ARC:**

- Revise the way SBs are written to avoid mandating actions that are not required to meet the safety intent of the AD; done by separating critical from non-critical tasks.



# AC 20-176, cont.

- **Design Approval Holder Best Practices for SBs related to ADs:**
  - Making SBs more user-friendly (e.g., differentiating critical tasks)
  - Allowing later-approved parts
  - Promoting global AMOCs
  - Avoiding overlapping and conflicting SBs

[http://rgl.faa.gov/Regulatory\\_and\\_Guidance\\_Library/rgAdvisoryCircular.nsf/0/A78CC91A47B192278625796B0075F419?OpenDocument&Highlight=service bulletins](http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/A78CC91A47B192278625796B0075F419?OpenDocument&Highlight=service%20bulletins)



# Questions?

