## Notes

Attendance: George Bennett, Manager (TEB FSDO)-P Fred "Jazz" Armstrong, Aviation Safety, Manager, Flight Ops Group, flight Technologies and procedures division Eric Parker, Manager, Section D, Flight Technologies and Procedures Division, Flight Ops Group Lee A.., Allentown FSDO, P Steve Ferrare, Ops front line manager, Farmingdale FSDO, P Conrad Dipento, Farmingdale FSDO, PMI, P Joe Montello, Philly FSDO, GA ops Rick Williams, United Technologies

Bloomberg in attendance Tudor in attendance 1 other F50EX operator

## **George Bennett**

**Current LOA Approval Process** 

FAA 8900. Generic approval process, expectations from the agency to the industry 5 Phase process

- 1. Initial inquiry-can be done via meeting, phone, or email, no preference, dependent on the FSDO. They don't want you to ask them for the compliance guide. They want you to tell them your operation and have a background on what you want to accomplish.
- 2. Formal application-this is the part that is to include an official cover letter
- 3. Detailed review and analysis (document compliance phase)
  - i. Certain paragraphs require what used to be called NextGen coordination in parallel. POIs load up the paragraphs requiring review to the NextGen tracker. NextGen office POIs have a different level of expertise than the typical FSDO. NextGen is now AFS 400 Flight procedures and technologies.
- 4. Demonstration-not required for part 91 LOA
- 5. Approval

TEB FSDO has 18 PART 135, 5 PT 141, 180 PT 91, 12 PT 91 AIR TOUR, PT 61, + OTHERS

-competing demands for inspector action, all these things get in the way of approving LOAs

\*contractors do not interface with the FAA, only operators do.

Highly recommended that POI coordinate with the Flight Technologies group.

**Flight Standards Priorities** 

- 1. Surveillance
- 2. Investigation
- 3. Certification (Part 91 LoA)
- 4. Aviation Education

- Sometimes the FSDOs reach out to nearby POIs for assistance dealing with 450 applications at any time.
- The FSDOs are not currently fully staffed.
- Operator: Gulfstream provides a huge data package
- ACs are more helpful than the 8900.
- Greg Sparks, Mark Patterson, and Scott Bender joined on the call.
- United Technologies had issues with their package coming back because it was "too big". It is important to only issue the necessary pages, not the entire AFM.
- What level of discretion is used by the POIs? It depends on type of operation.
- Elevate conversation to front line manager of FSDO to resolve differences between different FSDOs.
- FAA working on removing B034.
- Gulfstream unable to obtain any info on the aircraft for the LOAs prior to delivery. FAA is currently working on initiative to streamline process, anticipated for late 2020, early 2021. The concern is that the operator might lose the transaction, and the FAA POI would have been working for nothing.
- Gulfstream provided data to FAA regarding statistics on fall-through rates.
- FAA also states that the aircraft Is not legally an aircraft for them to work with until the Certificate of Airworthiness is issued.
- Decision to rescind the need for an RVSM LOA when equipped with ADS-B took about 4 years.
- A153 has been removed. (ADS-B) FAA states that if you are going outside domestic airspace, you still have to get a B046.
- LOA Streamlining initiative --> aircraft OEMS expected to produce highly standardized product
- --> LOA equipment requirements are immediately met, no after-market STCs required
- FAA is working on initiative to not require information in application that is already certified and approved by the FAA as per the OEM and initial aircraft certification.
- OEMS implored to provide SOC document (Statement of Capability)
- Training providers to provide Statements of Compliance for the training.
- Example provided are pages from Gulfstream. A page that indicates "it meets requirements for these types of requirements", a page that includes which LOAs for which the requirements are met. Where in the AFM the information is located, etc. It is like a handout for the POIs, a summary.

- Committee has determined that adding language to 8900 to define new process is required. Inspector/operator education campaign to ensure proper application/safety levels.
- Is DFJ participating at all in this streamlining committee?
- Question: Is WebOps going to be required for the streamlining process? The answer is no.

New A056 mandatory revision?

- OAPS presentation-NAV Lean Plan, 21 tasks recommended, increase transparency and coordination between operators and the FAA.
- System objectives:
  - Reduce approval time
  - Allow fast-track bundling
  - Allow ability to track status of approval
- Single system use
  - Automates current application process
  - Allows FAA to track application
  - Allow applicants to track the status of their applications
  - Should be able to see live updates of comments, and which POI is working so that you can call them
- OAPS was first released to the FAR 121 operators in Dec 2018. It will be opened up to PT 135 operators in the coming weeks. The remaining roll out for Pt 91 will be by the end of 2019.
  - No training required for industry

NO part 91 operator will ever be asked to go on a validation flight.

D195: FAA is recommending that new operators apply for a D195 right away. There may be different approval processes for Pt 91/135. They are moving towards the D195 in a 3-5 yr time line. Make sure that, if you are using the MMEL, you at least have M&O procedures for it.