



Working With the FAA through Delegated Authority



The Wencor Group

The Wencor Group Experience

- 1985 – 2000
 - Standard FAA submittals on Identity and T&C
- 2000 – 2009
 - MOA submittals on T&C projects
- Since 2009
 - ODA submittals on T&C projects



Types of Cert Paths

- Standard submittal process
 - ACO reviews and issues design approval
 - MIDO reviews and issues the PMA supplement
 - Priority and timing of reviews is up to the FAA, and according to manpower and resources
 - PMA is generally considered low priority at the ACO
- MOA and Streamlined options
 - Same as standard process except with a working agreement with your regional FAA office
 - Typically provides an simplified path for the type of parts that you already have experience with
 - Can be limited to only parts with no safety effect on the product



The “Question”

What does delegated authority mean for PMA holders?

Organization Designation Authorization

The ODA Process

The Washington View

ACO Manager’s Perspective

Company Stance



ODA Unit Members

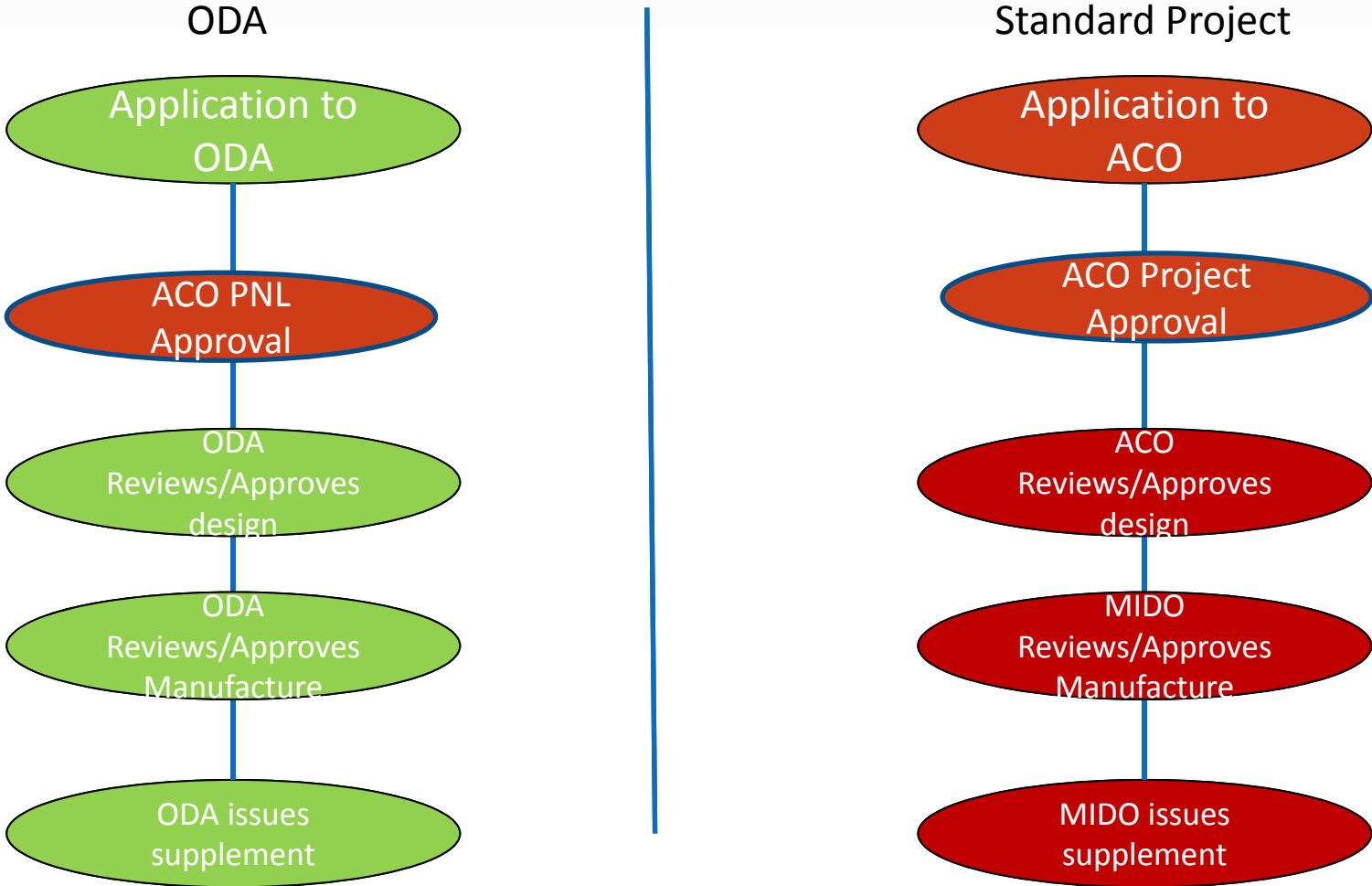
- **ODA Administrator**
Person able to obtain a management type delegation from the FAA
- **Engineering Unit member**
Typically DER or suitable qualified and experienced engineer
- **Manufacturing Unit Member**
Typically DAR, DMIR or suitable qualified and experienced inspection staff

FAA OMT

- **Group of FAA personnel responsible for oversight of the ODA holder**
Personnel are assigned according to the ODA unit functions



The ODA Process



Overview

“The Washington View”

The ODA program:

- Allows the FAA to delegate any statutorily authorized functions to qualified organizations
- Improves FAA’s ability to respond to increasing workload
- Expands the scope of authorized functions of FAA organizational designees

FAA Order 8100.15:

- Outline the specifics of the ODA program
- Provide guidance for FAA personnel and organizations that obtain ODA
- Describe authorized functions for approvals
- Allow for flexibility to expand or revise the details of the ODA program without further rulemaking.



Overview

“The ACO Perspective”

- The Administrator may delegate any function determined appropriate under 49 USC 44702(d)
- ODA Unit may perform only those functions and is subjected to the limitations as listed in the ODA Holder’s procedures manual
- The ACO may impose any limitations on an ODA holders authority as warranted by the ODA holders staffing and experience
- The ACO must limit the authority based upon the qualifications and capabilities of the ODA unit



Overview

“The Company Stance”

- Control of your own destiny
 - ACO driving for 30 day PNL review commitment
 - Once PNL is approved, all activities are within the companies boundaries
 - Issue your own PMA supplements



Obligations on the ODA

- Staff appropriately in Unit Member and all support areas
- Ensure all submissials to the FAA are in a “camera ready” state
FAA oversight should NOT be a spell check function!
- Effective and timely response to comments
FAA has put time/effort in, they don’t want to see wasted effort
- Be pro-active on manual updates and UM training
- Act as the FAA in all respects even though located in the company
Separate business function completely



ODA Company Concerns

- Additional overhead expense of having ODA staff
- Interpretation differences still exist even within an OMT
 - What does the term “simple” mean?
- DER’s not routinely getting credit with their advisors for ODA activities
- PNL reviews extending almost to a full certification review
- Ability of FAA to flex work load up and down is still restricted due to manpower issues
- ODA Administrator potential pool is limited



The Pros of ODA

- Time to market for PMA can be reduced by moving approvals in house
- Allows grooming of staff to achieve delegations (Eng UM and Mfg UM)
- FAA contact point within company organization
- Allows FAA management to plan/justify engineers
- Dedicated team of individuals assigned at the FAA
- Consistency of personnel
- Facilitates controlled/effective extension of capabilities
- ODA and FAA understanding of each other is typically excellent
- Working with OMT allows standardization of reviews



Recent FAA Initiatives

“No PNL Process”

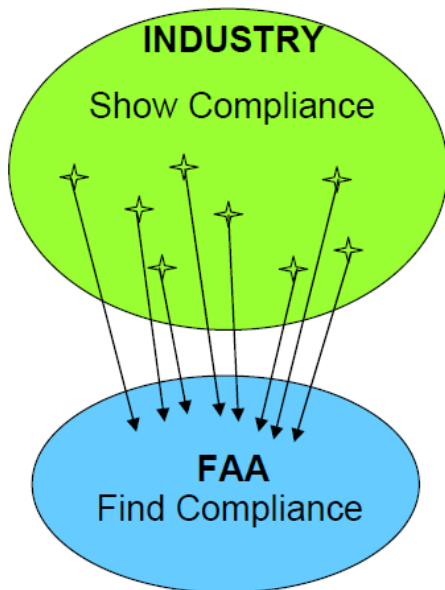
Order 8100.15B Chg 2 in September 2016 introduced an option to authorize an ODA holder to issue PMAs based on test and computations without submitting a PNL

- Scope and limitations must be defined in ODA procedures manual
- Only applicable for types of PMA projects and activity that the ODA holder has previous experience with
- One of the initiatives that are part of the foundation to move to CDO

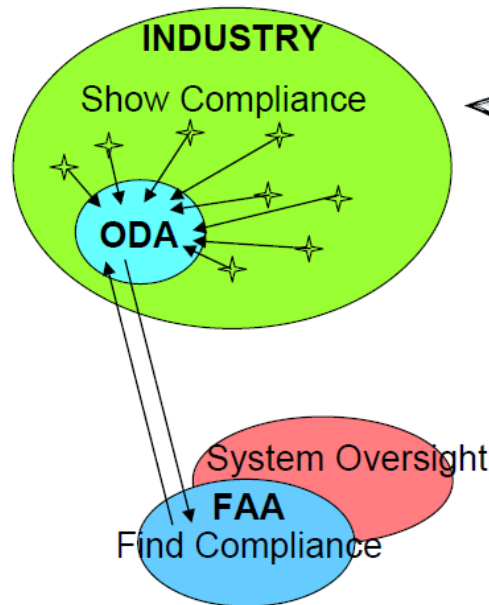


Evolution of FAA Certification Paths

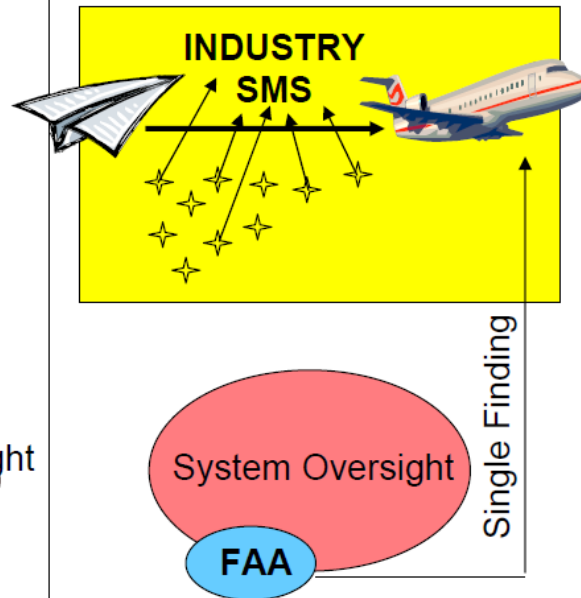
Without Organizational Delegation



With Organizational Delegation (ODA)



Certified Design and Prod Organization (CDPO)



2012 ODA Seminar – Use of Applicant Showings
August 28, 2012



Federal Aviation Administration

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Conclusions

- ODA concept is mature and working
- There are still challenges to be met
 - By FAA
 - By ODA holder
- FAA is continuing to modify the ODA order as needed
- ODA offers sustained benefits if done effectively
 - Control over delegated resource priority
 - Reducing time to approval
- Like all relationships it has to be worked at!!!



Questions?

