



U.S. Department
of Transportation
**Federal Aviation
Administration**

800 Independence Ave., SW.
Washington, DC 20591

Ms. Melissa K. Bailey
Vice President
Air Traffic, Regulatory and Certification Policy
Aircraft Owners and Pilots Association
Frederick, MD 21701

Dear Ms. Bailey:

Thank you for your letter concerning change 15 to the Airworthiness Inspector's Handbook addressing field approvals. Our purpose in updating the guidance was to standardize the field approval process to create a "level playing field" for industry throughout all Federal Aviation Administration (FAA) regions. The field approval process has lacked a standardized application between field offices. Often times, identical field approvals were obtained in one office while denied in another. The change in policy, while more restrictive in some areas, is equally more permissive in others, such as the use of data approved by FAA designees.


The FAA recently suspended, on a temporary basis, its implementation of this guidance for our Alaskan Region. A team of six FAA personnel traveled to Alaska in November to meet with FAA inspectors, managers, and industry representatives. Its goal was to articulate the intent of the new policy and to emphasize that there was never an intent to stop the field approval process. This delay is permissible because of a statutory requirement that Alaska's unique operating circumstances be considered when developing and implementing FAA policy.

On November 26, 2002, a teleconference was conducted with all nine FAA regions to clarify the policy and to reaffirm our commitment to perform field approvals. The regional offices have, in turn, provided this guidance and direction to the field office inspectors. We are confident that this policy will be followed. Currently, the Aircraft Maintenance Division is aggressively pursuing a revision to FAA Order 8300.10, volume 2, chapter 1. The revision will incorporate much of the information contained in FAA Order 8110.46, Major Alterations that Require Supplemental Type Certificates, and will provide further clarification regarding policy contained in Order 8300.10.

Due to the rationale stated in the first paragraph of this letter, we are unable to honor your request to rescind change 15 in all regions and issue guidance that pre-change 15 interpretation remain in effect.

If you have any further questions, please contact Wayne Fry at (202) 493-5228.

Sincerely,



James J. Ballough
Director, Flight Standards
Service