

**SENATE COMMITTEE ON COMMERCE, SCIENCE, AND TRANSPORTATION:
QUESTIONS FOR THE RECORD**

**HEARING ON
FAA REAUTHORIZATION: PERSPECTIVES ON IMPROVING AIRPORT
INFRASTRUCTURE AND AVIATION MANUFACTURING
MARCH 23, 2017**

**Written Question Submitted to Ms. Peggy Gilligan, Associate Administrator for Aviation
Safety, Federal Aviation Administration**

Submitted by Senator Fischer

Question. Duncan Aviation, located in Lincoln, Nebraska, is the largest family-owned maintenance, repair & overhaul (MRO) in the world. However, inconsistent interpretation of regulatory compliance by the FAA regional offices has placed serious burdens and delays on Duncan and other general aviation manufacturers. Last year, my office worked with Duncan, GAMA, and the Commerce Committee to include language in the Senate FAA bill.

How is the FAA working to ensure consistency in interpreting regulatory authorities across its regional offices?

Answer. The Flight Standards Service (AFS) and Aircraft Certification Service (AIR) launched the Regulatory Consistency Communication Board (RCCB) in March 2017. The RCCB is the result of recommendations made by the Consistency of Regulatory Interpretation Aviation Rulemaking Committee (ARC). The ARC recommended the FAA establish the RCCB to provide clarification to internal and external stakeholders on questions related to the application of regulations. The RCCB consists of members from AFS, AIR, and the FAA Office of Chief Counsel, who review and resolve the issues submitted to the RCCB. Issues related to lack of consistency across AFS and AIR offices would fall under the purview of the RCCB.

Order 8000.70, Regulatory Consistency Communication Board (RCCB), describes the roles and responsibilities of the RCCB, including how to submit issues. To assist external stakeholders in their submissions, the FAA created an online submission form that supports anonymous submission. More information on the RCCB, including the online form to submit topics to the RCCB, can be found at https://www.faa.gov/regulations_policies/faa_regulations/rccb/

To proactively help reduce the possibility of inconsistencies in the future, Order 8000.96, Flight Standards Guidance Document Development, was published January 2016. This order clearly describes the role of policy documents within a regulatory scheme and provides an outline for drafting policy documents that support existing regulations and are easy to understand.

Also, to reduce the possibility of inconsistency, AFS reviewed its existing policy documents in 2015. The intent of this review was to cancel documents that were redundant or out of date. As a result of this review nine percent of Advisory Circulars and orders were canceled.