



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

Aviation Safety

800 Independence Ave., S.W.
Washington, D.C. 20591

July 12, 2019

Mr. Ric Peri
Vice President, Government and Industry Affairs
Aircraft Electronics Association
601 Pennsylvania Ave., NW
Suite 900, South Building
Washington, D.C. 20004

Dear Mr. Peri

In reference to your letter on classifying alterations for in-service aircraft, the Aircraft Maintenance Division, Avionics Branch, has reviewed your request for information (and/or comments) and has attempted to identify the issue(s) and provides the following response(s):

QUESTION: Your request was, “In an effort to promote consistency and standardization, we would like to promote this standard to our membership as an FAA recognized Acceptable Means of Compliance (AMC) in classifying alterations for In-Service aircraft.” The standard referenced in your request is ASTM standard F3361, *Classifying Alterations for In-Service Aircraft Under FAA Authority Oversight*, and you requested our review of and concurrence with the Standard.

RESPONSE: After thorough review by the Aircraft Maintenance Division, we find use of ASTM standard F3361, *Classifying Alterations for In-Service Aircraft Under FAA Authority Oversight* to be an acceptable means of compliance in classifying alterations. Given the nature of classifying alterations, unique circumstances present themselves from time to time. In those circumstances, an installer may be asked for additional information beyond that contained in the Standard, or simply to explain their thought process in following the Standard. In those instances, the FAA appreciates the full cooperation of the installer in explaining their classification determination as we work together to ensure safety.

We appreciate the opportunity to assist you. If you have any additional questions regarding this letter, please contact the Aircraft Maintenance Division, AFS-300, at (202) 267-1675.

Sincerely,

Christopher D. Parfitt,
Manager, Avionics Branch for

Jackie L. Black, Manager, Aircraft Maintenance Division