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## Aviation Safety

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### Memorandum

Date: February 11, 2021

To: Steve Fortenberry, Manager, South Florida CMO, AFC-MIA-SO-FL-CMO-29  
Steven J. Rogers, Acting Manager, Air Carrier Division E, AFC-500

From: Thomas F. Malone, Manager, Air Transportation Division, AFS-200

Prepared by: Eric Friedman, Aviation Safety Inspector, AFS-280

Subject: Request for Deviation from the Annual Observation Requirement Policy  
for Training Center Evaluators without Certification Authority

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We received your memorandum dated October 15, 2020 in which you requested a deviation from the policy requirement that a representative of the Administrator must conduct an observation of each training center evaluators (TCE) each 12 calendar months. You requested this deviation only for TCEs without certification authority who are employed by Boeing U.S. Training and Flight Services, designator F7NX (Boeing), a Part 142 certificate holder.

Your memorandum states:

“The current guidance per FAA Order 8900.1, Volume 6, Chapter 8, Section 1 and Volume 13, Chapter 1, Section 1 requires that each TCE be observed a minimum of once a year by an appropriately rated ASI. This guidance applies to both TCEs who have been authorized to conduct certification events as well as those TCEs whose authorization is limited to conducting proficiency checks only.”

Order 8900.1 Volume 13, Chapter 1, Section 1 is applicable only to “examiners;” that is, TCEs with certification authority. We therefore consider your memorandum a request to deviate from Order 8900.1 Volume 6, Chapter 8, Section 1, paragraph 6-1603F4, which requires a satisfactory annual observation of all TCEs, including those whose authority is limited to conducting recurrent proficiency checks. We grant your request in accordance with the procedures in Order 8900.1 Volume 1, Chapter 1, Section 1, paragraph 1-3A, Deviations From This Order.

The transition to the Aviation Safety Designee Management System (DMS) is currently underway. Once that transition is complete at a particular office, Order 8000.95, Designee Management Policy, will supersede at that office the current TCE management policies contained in Order 8900.1.<sup>1</sup> Order 8000.95 Volume 7, Chapter 6, Paragraph 6a requires that all TCEs must receive a “direct observation” at least once during the first 12 calendar months after initial designation. After that, TCEs without certification authority must be observed at least once during each 24 calendar month period (rather than each 12 calendar months).

We have considered the risk-based justifications in your memo in light of the soon-to-be effective policy in Order 8000.95. We find it appropriate to provide a deviation from Order 8900.1 Volume 6, Chapter 8, Section 1, paragraph 6-1603F4, in order to allow you to conduct observations of some Boeing TCEs at least every 24 calendar months. This deviation is applicable only to TCEs without certification authority who have been observed at least once since initial designation. This deviation authority expires July 30, 2021.

We have coordinated this response with the Delegation Program Branch, AFS-650. In accordance with Order 8900.1 paragraph 1-3, we will publish this memorandum in FSIMS. If you have questions about the contents of this memorandum, contact the Air Transportation Division, AFS-200, at (202) 267-8166.

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<sup>1</sup> AFS-650 has advised that the South Florida CMO will be transitioned to DMS in June 2021.