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Regulatory Consistency Communication Board (RCCB) Work Instructions (WI)

Purpose: This document describes how the Regulatory Consistency Communication Board (RCCB) will accept, evaluate, assign, track, and close issues. The RCCB provides a way for stakeholders to report inconsistencies in regulatory application and for clarification and resolution of those inconsistencies. Issues submitted to the RCCB must involve regulations within Flight Standards Service (AFS) and / or the Aircraft Certification Service (AIR).

Scope: These work instructions apply to AIR, AFS, and the Office of the Chief Counsel's (AGC) Regulations Division (AGC-200) employees. FAA Order 8000.70, Regulatory Consistency Communication Board, (as amended) describes and contains guidance on the RCCB.

Approval: *John J. Hickey*
John J. Hickey, Acting Associate Administrator, Aviation Safety (AVS-1)



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REVISION HISTORY		
Rev	Description of Change	Effective Date
0	Original	5/15/17



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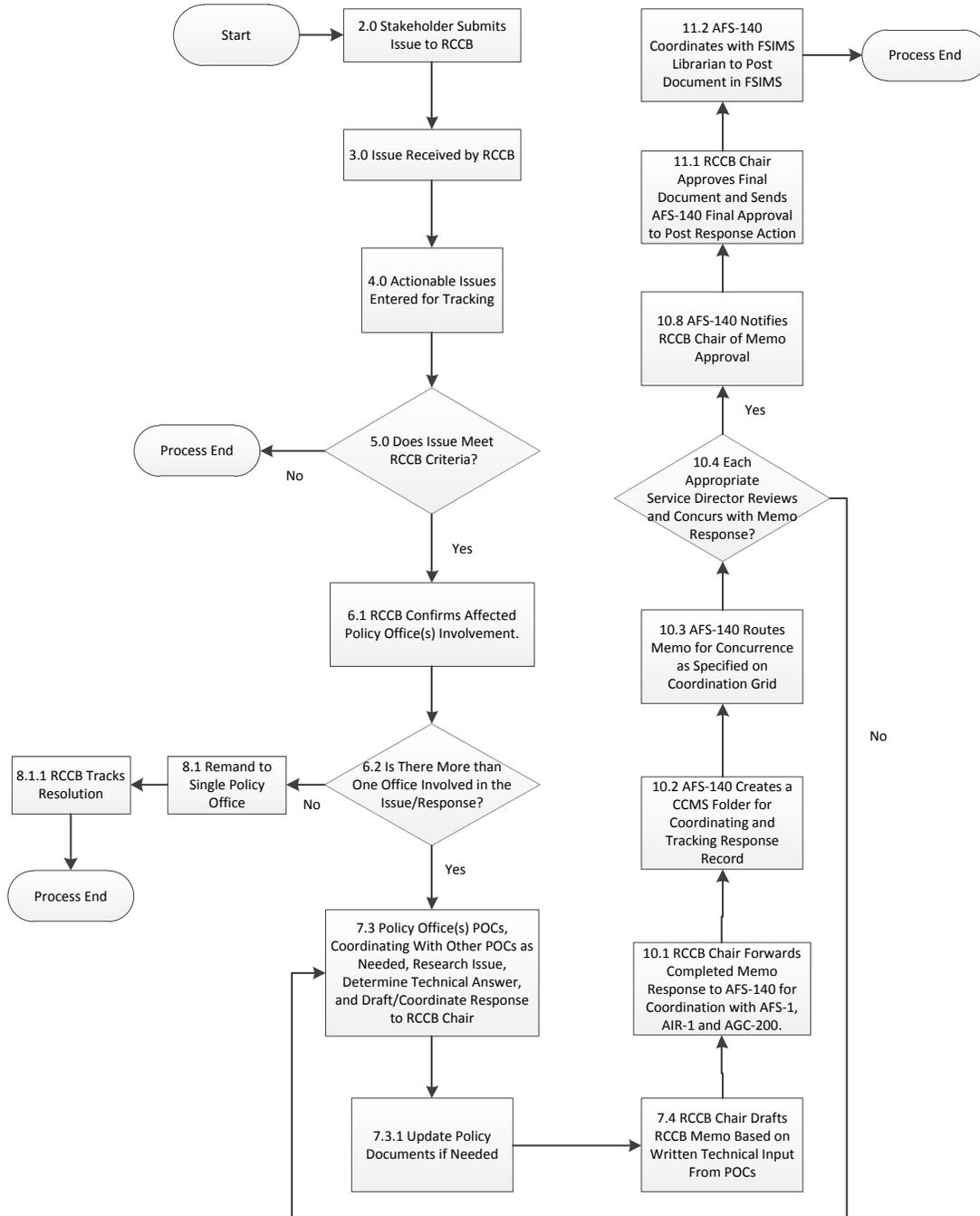
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Process Flow



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1. **Introduction.** The RCCB provides a process for internal and external stakeholders to request clarification and resolution on issues of inconsistent regulatory application. Issues submitted to the RCCB must:

1. Involve regulations or policies within AIR or AFS; and
2. Outline an inconsistency in how regulatory requirements are described or applied.

These WIs outline the procedures for submitting issues to the RCCB, how the RCCB determines if submissions fall within the program's scope, and how RCCB issues are handled.

1.1 **Roles and Responsibilities.** In addition to the participants that make up the RCCB, there are additional roles that support the RCCB process. Refer to FAA Order 8000.70, Regulatory Consistency Communication Board (RCCB), for detailed information on the responsibilities of the individuals and groups that make up the RCCB.

1.1.1 **RCCB Chair.** The facilitator for the RCCB, appointed by the Directors of the Flight Standards Service (AFS-1) and Aircraft Certification Service (AIR-1). The chair monitors the RCCB email box, makes a preliminary determination (with input from the liaison, AGC, and RCCB points of contact (POC)) as to whether the RCCB will accept an issue, routes accepted items to the appropriate POCs, facilitates meetings, coordinates the documentation of the outcome of the issues, provides direction on policy decisions, and facilitates the assignment of work to the RCCB POCs.

1.1.2 **The Liaison.** Functionally, the liaison is very similar to a vice chair. The liaison brings organizational knowledge of their service to help assign RCCB issues to the correct area within their service. The liaison may also act as the main interface with the director of the service, keeping the director informed of issues brought to the RCCB and relaying key policy decisions to the RCCB. The liaison also facilitates the assignment of work to the RCCB POCs within their service. The liaison will not be from the same service as the chair.

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1.1.3 Points of Contact (POC). In addition to the chair and liaison, the RCCB consists of POCs from each AFS and AIR policy office at the deputy assistant manager level or above, each AEG at the assistant manager level or above, and AGC-200. POCs at this level within the organization are necessary to ensure the RCCB is comprised of individuals with decision-making authority for their respective areas. POCs will be responsible for identifying and tasking any Subject Matter Expert (SMEs) within their divisions who are needed to fully address the regulatory and policy questions raised, attending RCCB meetings, producing the content to document resolution of issues, and assisting in the coordination of RCCB documents within their respective office.

1.1.4 SMEs. Individuals within each office who are experts on the regulatory or policy issues in question. Provide information or answer questions related to the issue(s).

1.1.5 Technical Information and Communications Program Branch (AFS-140). Reviews and coordinates the RCCB memo to all service directors involved in resolution of the issue(s).

1.1.6 FSIMS Librarian. Posts the RCCB memos in the Flight Standards Information System (FSIMS).

1.1.7 AFS-1. Co-sponsor of the RCCB and a required signatory on RCCB memos, as appropriate.

1.1.8 AIR-1. Co-sponsor of the RCCB and a required signatory on RCCB memos, as appropriate.

1.1.9 AGC-200. Reviews all RCCB responses and actions to issues accepted by the full RCCB process. In most cases, AGC will concur on the response memo grid but may not be a signatory.

2. Stakeholder Submits Issue to the RCCB. Submission options vary based on the submitter's relationship to the FAA.

2.1 External Stakeholder Submissions. Initial submissions from external stakeholders must be made through the online information collection tool (hereafter referred to as "the form"). See Appendix B, Administrative

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Information, for the location of the form. The online form is the only way external stakeholders may initially submit an issue to the RCCB.

The online form asks the submitter to identify the type(s) of document(s) involved in the inconsistency, and to provide a description of the issue, and contact information.

Issues may be submitted anonymously. However, if no contact information is provided, the RCCB will be unable to request further information, acknowledge acceptance, or to advise the status of the issue.

The online form does not allow attachments for security reasons.

According to Order 8000.70, external stakeholders must use the online form to make submissions to the RCCB. If the submitter does not use the form the chair can reject the submission. Use of the form helps ensure that the RCCB obtains all the necessary information from the initial submission and decreases the need for lengthy follow-on questions. Additionally, the online form has automated features that help the FAA provide information to the submitter, decrease workload for the FAA, and directly meet some of the timelines for the RCCB as prescribed in Order 8000.70.

2.2 Internal Stakeholder Submissions. Internal stakeholders can submit issues to the RCCB via the form or through an email to the RCCB email box. See Appendix B for the email address. The email must include the following information:

1. Contact information: Submitter name, FAA email address, and FAA phone number.
2. Details about the inconsistency, including:
 - A clear statement or description of the inconsistency (including specific reference to any Code of Federal Regulations (CFR) or guidance documents involved);
 - Background information on the issue to include the type of certificate holders involved (e.g., Title 14 CFR part 145 certificate holders), the Flight Standards District Office (FSDO), regional office, and policy office involved to date (if any);

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- A chronology of major events leading up to the RCCB submission including any action the FAA has already taken;
- How you became aware of the issue; and
- Current issues caused by the inconsistency.

Email submissions to the RCCB must be sent from an FAA.gov email address. If an internal stakeholder wants to submit an issue anonymously, they must use the online form.

The chair does not need to respond to emails that do not meet the definition of an RCCB issue. In addition to the definition of an RCCB issue provided in the introduction of these work instructions, the flowchart in Appendix A, Checks for the RCCB Acceptance of Tracking, provides additional assistance on determining what meets the definition.

- 3. Issue Received by the RCCB.** Submissions made through the online form are automatically forwarded to the RCCB email box. The chair and liaison have access to this email box. The chair, liaison, or their representative, must check the RCCB email box at least twice a week to ensure timely review of incoming RCCB items. Access to the RCCB email box is granted by the chair or liaison.

Stakeholders using the online form will receive a confirmation in their web browser immediately after submission of the inquiry. Additionally, once the inquiry is received by the RCCB email box a confirmation email will automatically be sent to the submitter if they provided an email address. See Appendix C, Response Templates, for a copy of the email text. This email notifies the submitter that they will be notified within 15 working days if their submission falls within the scope of the RCCB. The email also states that if the issue falls outside the scope of the RCCB, the chair may elect to provide no response. This email satisfies the 5 working day response requirement outlined in Order 8000.70.

- 3.1** Internal stakeholders submitting issues via email will receive an email acknowledging receipt of the issue within 5 working days of submission. As with the online form submissions, the email will tell the submitter that they will be notified if their submission falls within the scope of the RCCB.

Unlike with the online form, this email is not automatically sent to internal stakeholders who email the RCCB email box directly. The chair, liaison,

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or their representative should use the template email in Appendix C to notify the submitter that the email was received and is being reviewed. This email must be manually sent within 5 working days of receipt of the issue to meet the metric described in Order 8000.70.

4. **Issue Entered into the RCCB SharePoint.** Issues accepted by the full RCCB or remanded to a single Office of Primary Responsibility (OPR) will be entered into a SharePoint site. The SharePoint site will be used for tracking and reporting purposes only. Transfer of the issue and the submitter’s contact information will be done through the RCCB email box. See Appendix B for the location of the SharePoint site. Access to the site is by permission only. Access can be granted through either the chair or liaison.

The SharePoint site includes a title and summary of the issue, whether the submitter is an internal or external stakeholder, key dates to ensure compliance with the timeframes discussed in chapter 4 of FAA Order 8000.70, whether the issue was accepted or remanded to a single OPR, the policy office(s) involved, issue status, and any notes.

The SharePoint should not include any of the submitter’s personally identifiable information (PII). PII includes name and contact information.

Issues that are submitted to the RCCB but require no action (e.g., do not meet the definition of an RCCB issue or fall under the scope of another FAA program or initiative) will not be recorded on the SharePoint site. These emails will be moved into a folder within the RCCB email box titled “No Action Required (insert fiscal year)”. For general tracking purposes, all that is required of this group of submissions is a total count.

5. **RCCB Issue Criteria.** The RCCB evaluates if it will accept the issue. Acceptance means that the RCCB is required to act as a facilitator between multiple points in the FAA to get the issue addressed. As stated in Order 8000.70, the RCCB will accept issues that meet specific criteria. The issue or question must:

- Pertain to CFRs or policy documents overseen by AFS or AIR; and
- Outline an inconsistency in how regulatory requirements are described or applied; and

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- Require input from more than one policy office or one policy office and AGC. (Examples of multiple policy offices include AFS-200 and AFS-400, AFS-300 and AIR-100 or AFS-800 and AGC.)

In cases where only a single OPR is required to address the inconsistency the RCCB will act as a pass through and remand the issue to the OPR.

5.1 Preliminary Review of RCCB Submissions. The chair, liaison, or a representative will review issues submitted to the RCCB email box to determine if they meet the criteria of the RCCB.

5.1.1 When determining if an issue should be accepted by the RCCB, the RCCB chair or liaison should vet the submission using the flowchart in Appendix A.

5.1.2 There are three possible outcomes for issues or questions submitted to the RCCB: They can be accepted as full RCCB issues; remanded to a single OPR and tracked by the RCCB; or receive no response.

5.1.3 Once a preliminary determination is made, the chair, liaison, and AGC POC will consult to validate the decision.

Note: The RCCB does not accept or respond to personnel issues or questions from entities that are involved in a current investigation concerning regulatory noncompliance.

6. Assess Preliminary Determination with Potential RCCB POCs. Once the chair, liaison, and AGC POC have completed the preliminary determination, the potentially affected policy offices will review the determination.

6.1 Contacting the Policy Offices. The chair and/or the liaison will contact the potentially affected policy offices via email, telephone, or meeting to determine if they have responsibility/ownership in the issue or resolution. POCs must respond and confirm whether their office would be involved in the resolution of the issue (e.g., whether they own the policy being discussed in the submission). The potential POCs must respond within 3 working days to allow time for the chair to meet the 15-working day deadline for responding to the submitter. This includes inquiries that may

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be remanded to a single OPR for resolution. A template for confirming OPR involvement is available in Appendix C.

6.2 Additional Information. The chair and/or liaison will also ask these POCs if the question has already been answered and if they are aware of any enforcement actions (if a certificate holder is named in the submission). The POCs will also advise the chair if they need more information to determine the responsible OPR(s) and address the issue. If more information is required, the POCs are responsible for detailing the missing information in writing to the chair.

- If more than one policy office agrees that they are the policy owners of the issue (or resolution) and that the question has not already been answered, the chair will continue with the RCCB acceptance process. Proceed to paragraph 7.
- If only one policy office agrees that they are the policy owner or the question has already been answered, it will be tracked by the RCCB. Proceed to paragraph 8.

7. Issue Accepted by the RCCB. All issues accepted by the RCCB follow a process to ensure an appropriate and durable resolution. The process is designed to ensure that the RCCB periodically informs the submitter about the progress of issue resolution and that the RCCB has the information it needs to involve the correct offices. The process also ensures that offices involved in resolving issues are actively engaged in working the issue and the resolution is formally documented by a detailed memo that will be available to the public.

7.1 Notification of Acceptance by the RCCB and Request for Additional Information. The chair advises the submitter via email if the issue will be worked by the full RCCB for resolution. This will be done within 15 working days of receipt of the submission per Order 8000.70. See Appendix C for a template that may be used by the chair for this notification.

As discussed above, in some cases the RCCB may need more information before a determination can be made. In these cases, the chair, liaison, or their representative will send an email to the submitter requesting additional details on the issue. In this case, the 15-working day timeframe begins once the RCCB has received all of the requested information. If the submitter fails to provide the additional information within 10 working

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days after the RCCB requested the information, the RCCB will administratively close the issue.

Notification of whether the RCCB accepted the issue or requests for additional information is not possible for anonymous submissions if no email address was provided.

7.1.1 The RCCB will log the submission into the SharePoint site. The SharePoint record will include the following:

- Title and summary of the issue;
- If the submitter is an internal or external stakeholder;
- Dates to ensure compliance with chapter 4 of Order 8000.70;
- Policy office(s) involved; and
- Whether the issue was accepted or remanded.

Note: For tracking purposes all communication between the RCCB and the submitter should be made via the RCCB email box and not the individual FAA email boxes of the chair, liaison, or their representative.

7.2 Identification of Offices Involved in the Issue. The chair identifies the offices (policy offices, services, lines of business) involved in the issue.

7.2.1 The chair will again contact the identified RCCB POCs to ensure that all of the necessary offices are involved in the review and disposition of the issue. The chair contacts the RCCB POCs by email, telephone, or meeting.

7.3 Issue Worked by the POCs. The POCs will work the issue in collaboration with each other. To facilitate resolution of RCCB items the chair will facilitate meetings attended by the relevant RCCB POCs and liaison. Attendance at these meetings is mandatory (see Order 8000.70 for more details).

7.3.1 One of the first steps for the RCCB will be to determine an estimated date of resolution of the issue that can be communicated to the submitter. This date will include the time needed to review the issue and identify any inconsistencies and to research the issue and determine a technical answer. It also includes the time to identify, amend, and publish policy documents (if required) and

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draft and coordinate the RCCB memo. The chair will communicate this estimated time for resolution to the submitter within 45 working days of submission.

- 7.3.2 Each POC is responsible for identifying and tasking any SME support required to research and resolve the issue.
 - 7.3.3 POCs will collaborate with the other POCs (and other internal or external stakeholders, when required) involved in the inconsistency in order to identify the problem and determine how to resolve the issue.
 - 7.3.4 The POCs will determine if any policy documents need to be updated to resolve the issue. The RCCB will meet to come to agreement on the proposed resolution.
 - 7.3.5 POCs will update any required policy documents and follow their office and service’s process for publication.
 - 7.3.6 The POCs within the identified OPRs are responsible for providing the chair with written technical responses to the question or issue. This written input will be the basis for the RCCB memo. The chair may direct this input to be in memo format.
- 7.4 **The RCCB Chair Drafts the Memo.** The chair uses the written technical input from the RCCB POCs to draft the RCCB memo. Per Order 8000.70, POCs are responsible for producing the content that the RCCB will use to document resolution of issues. In addition to the content, the memo should include a background section, explicitly state the question that was asked of the RCCB, and list the action taken by the RCCB to address the issue. The memos will be available to the public online. See Appendix B for the location of the RCCB memos. Memos will be signed by the applicable service/office directors (e.g., AFS-1, AIR-1, and AGC-200, as appropriate). Details on the coordination process for the memo are in paragraph 10.

RCCB memos are not policy documents. These memos will serve only to document the actions taken by the RCCB to address an issue. To ensure this is clear, RCCB memos should include the text, “This is not a policy document. Please refer to current guidance and regulations for decision-making support.”

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Note: PII such as name, phone number, and email address will only be included in the memo if it is pertinent to the response.

- 7.5 RCCB Labor Distribution Reporting (LDR).** Individuals working RCCB issues should use LDR code of 12XXFAAVRCCB, RC0100. The use of this LDR code by AFS and AIR will record activities associated in the RCCB inquiries, research, and response actions.
- 8. Issues Not Accepted by the RCCB.** There are four types of issues the RCCB will not accept. These include:
1. Issues that can be addressed by a single policy division or office.
 2. Issues for which there is a more appropriate FAA program or process for submission.
 3. Submissions that do not ask a question or describe an inconsistency (e.g., advertisements, comments or observations on policy, etc.).
 4. Submissions that are categorically excluded from the RCCB such as personnel issues or questions from entities that are involved in an investigation concerning regulatory noncompliance.

Note: The RCCB will only track accepted RCCB issues or issues that can be addressed by a single OPR (remanded to a single OPR) in the SharePoint site.

- 8.1 Issues That Can Be Addressed by a Single OPR.** Issues that can be addressed by a single policy division (e.g., AFS-300), or office (e.g., Phoenix Certificate Management Office), may be remanded to a single OPR and not accepted by the RCCB. The chair will advise the submitter via email if the issue will be remanded to a single OPR for resolution.
- 8.1.1** The OPR is responsible for responding to the submitter. The RCCB will log the submission into the SharePoint site and forward the submission to the appropriate policy division or office. The RCCB will notify the submitter that the issue has been forwarded to a single OPR for action. The RCCB will provide the submitter with the name of the policy division or office and their contact information via email. See Appendix C for a template email that the RCCB may send to the submitter.
- 8.1.2** The OPR must address and respond to issues remanded to them by the RCCB. The OPR must send an initial response to the submitter and the RCCB within 15 working days of receipt of the issue. The

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date the initial response is sent will be recorded in the SharePoint site by the chair, liaison, or their representative. If the issue was submitted anonymously without an email address, no initial response is required.

8.1.3 The OPR must provide a copy of the final disposition of each issue to the RCCB via the RCCB email box. The date the final disposition was received will be recorded in the SharePoint site by the chair, liaison, or their representative.

8.1.4 The RCCB will run a query every 6 months on open items that were remanded to single OPRs. Reminders will go to the RCCB POCs assigned to the OPRs with open items.

8.2 Issues for Which There is a More Appropriate FAA Program/Process.

The RCCB will not accept issues for which there is a more appropriate FAA program or process for resolution. Examples of items that would be referred to another FAA program include a request for a legal interpretation, a petition for exemption, or use of Suspected Unapproved Parts (SUP).

8.2.1 The RCCB is not required to send any response to submissions that fall into this category. However, on a time permitting basis, the RCCB may respond via email to the submitter recommending use of the correct FAA program. Template responses directing a submitter to a more appropriate FAA program or process are available in Appendix C.

8.2.2 Submissions that fall into this category are not tracked in the SharePoint site. These submissions will be moved into a folder within the RCCB email box titled “No Action Required (insert fiscal year)” by the chair, liaison, or their representative. For general tracking purposes, all that is required of this group of submissions is a total count.

Note: The chair is not responsible for knowing the definitions and existence of all other FAA programs and initiatives. It is likely that the RCCB will easily identify some submissions that should fall to other FAA programs. However, in some cases, these submissions may not be recognized and may be forwarded to an OPR for

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response. In these cases it is up to the OPR to identify a more appropriate process for resolution and communicate that to the submitter. In these cases, the OPR must also forward the response to the RCCB as a final resolution.

8.3 Issues for Which No Response is Required. Submissions to the RCCB that do not ask a question or describe an inconsistency or are categorically excluded from the RCCB are not tracked in the SharePoint site and require no response.

8.3.1 If a submission does not require a response from the FAA, the chair, liaison, or their representative will move the email to a folder labeled “No Response Required (insert fiscal year)” within the RCCB mailbox. (e.g., advertisements, submissions that are solely expressions of personal opinions or reports of low flying aircraft).

9. Timetable for RCCB Responses. Order 8000.70 outlines the timeframes and types of responses/updates provided to individuals who submit RCCB issues and reporting intervals.

9.1 Within 5 Working Days of Submission. Provide an acknowledgement of receipt of the issue. For individuals using the online form this step is done automatically. For internal stakeholders submitting directly to the RCCB email box, the chair, liaison, or their representative will send an email acknowledging receipt of the submission.

9.2 Within 15 Working Days of Receipt of a Submission. Respond to the submitter only if the issue was accepted by the RCCB or was remanded to a single OPR for action. Responses to direct the submitter to a more appropriate FAA program or office for issues that do not meet the definition of an RCCB item are at the discretion of the chair.

9.2.1 To support this 15-working day timeframe, OPRs must confirm their involvement/ownership in issues within 3 working days for an RCCB request. A template for confirming OPR involvement is available in Appendix C.

9.2.2 Each OPR must address and respond to issues remanded to them by the RCCB. Each OPR will provide an initial response to the submitter within 15 working days of receipt of the issue. Each

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OPR must also provide a copy of the initial response and the disposition of each issue to the RCCB via the RCCB email box. If the issue was submitted anonymously without an email address, no initial response is required.

- 9.3 **Within 45 Working Days of Receipt of a Submission.** For issues being worked by the full RCCB, the chair will provide an update on the status of the issue to the submitter, including the estimated time for resolution.
- 9.4 **Every 60 Working Days.** The chair will provide an update to AFS-1, AIR-1, and AGC-200 on the status of issues. This will include the status and disposition of all issues being worked by the full RCCB and those remanded to a single OPR, along with any other items submitted. The intent of this briefing is to assist standardization across offices to promote broader consistency.

Note: The preferred method of communicating with individuals after the initial submission to the RCCB is email. Updates to AFS-1, AIR-1, and AGC-200 can be done via email or briefings.

- 10. **Coordination of the RCCB Memo.** Coordination of the memo is necessary to ensure all the divisions, offices, or services involved in resolving an issue concur on the documented response.
 - 10.1 The chair, liaison, or their representative assembles the RCCB memo and any supporting documents, reviews for completeness, and completes the grid coordination requirements. The grid should initially be signed off by the RCCB chair followed by a list of OPRs or names of reviewers that need to sign the grid during coordination. If the service represented by the liaison was part of resolution, then the liaison will also be a required signatory. This package is then emailed to the AFS-140 email box. See Appendix B for the AFS-140 email address.
 - 10.1.1 If coordination is required between two lines of business (AFS and AIR) the package must be routed to both organizations for review and approval.
 - 10.1.2 If the RCCB actions were limited between two policy divisions in the same service, then coordination and routing is limited to just that one service for review and approval.



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- 10.2** AFS-140 creates the Correspondence Control Management System (CCMS) folder and attaches the submitted documents for coordination, tracking and the response record. Coordination within AFS and AIR will be handled solely through CCMS. Coordination with AGC will be done via hard copy. AFS-140 will deliver the hard copy to AGC-200 or their representative.
- 10.3** AFS-140 then routes the memo for concurrence on the grid.
- 10.4** AFS-140 then routes the memo to the appropriate service/office signatories (this will generally be AFS-1, AIR-1, and AGC-200) for approval/disapproval within 8 working days. If the memo is disapproved, the package is returned to the chair for corrective action.
- 10.5** AFS-140 will use AFS as the originating service. If AFS coordination is not required, AFS-140 will upload any signed documents and then transfer the folder to AIR via CCMS. The POC for this transfer will be the AIR RCCB liaison or chair, as appropriate, for initial review and approval.
- 10.6** If concurrence from AIR is required, AIR-100 will accept the transfer folder within 1 working day and route it to AIR-1 for review and approval/disapproval within 5 working days. If disapproved, the package is returned to the chair for corrective action.
- 10.7** Upon AIR-1 approval, the signed document is uploaded into the CCMS folder and AFS-140 is notified automatically via CCMS on the action.
- 10.8** AFS-140 notifies the chair via email of approval status and attaches the signed document for reference.
- 11. Online Posting of the RCCB Memo.** The chair, liaison, or representative fills out AFS 002-104-F1, FSIMS Publication Index Card (PIC) Data Sheet (DS), which is located in FSIMS. See Appendix B for the location of the PIC DS.

 - 11.1** The chair, liaison, or representative emails the approved final document and PIC DS to the AFS-140 directives email box for publication. See Appendix B for the email address of the AFS-140 directives email box.

To support the legal case file, the chair will send the document with any original signatures or initials along with any critical support documents, if not already provided to AFS-140, for records retention.

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11.2 The FSIMS Librarian enters the PIC data information on the RCCB memo and posts the memo online.

12. Process Measures. The process measures below will be tracked for Quality Management System (QMS) purposes.

Measure Type	Paragraph Reference	Measure
Process Record	3.0	How many issues received by the RCCB in the current month were remanded?
Process Record	4.0	How many issues received by the RCCB in the current month were accepted to be worked by the full RCCB?
Process Performance	9.2	RCCB will respond via email to the submitter within 15 working days of receipt of a submission on course of action. Acceptable performance = 80%.
Process Performance	9.3	For issues being worked by the full RCCB, the RCCB will provide an update on the status of the issue to the submitter within 45 working days. Acceptable performance = 80%.
Process Performance	11.1	Effectiveness of given responses. To ensure the RCCB's response to submissions is effective at addressing issues of application inconsistency in the regulations overseen by AFS and AIR. Acceptable performance => 3.2 rating on a scale of 1 to 4.

12.1 Within 15 Working Days of Receipt of a Submission. The RCCB will respond via email to the submitter if their issue will be worked by the full RCCB or will be remanded to a single program office for action. If the submission falls outside the scope of the RCCB, the RCCB chair may direct the submitter to a more appropriate process for resolution, on a time permitting basis.

12.1.1 In cases where the RCCB has to request additional information before making a decision on whether to accept an issue, the 15-working day timeframe begins once the RCCB has received all the additional information.

12.2 Within 45 Working Days of Receipt of a Submission. For issues being worked by the full RCCB, the RCCB will provide an update on the status of the issue to the submitter. Due to the anticipated complexity of the RCCB issues, a resolution within this 45-day timeframe may not be possible.

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12.3 Performance Monitoring and Measurement. The Office of Aviation Safety (AVS) will follow its QMS guidelines to monitor both the effectiveness and efficiency of this WI and [Order 8000.70](#). The performance of the RCCB will be assessed through the collection of various QMS metrics based on the requirements contained within the order.



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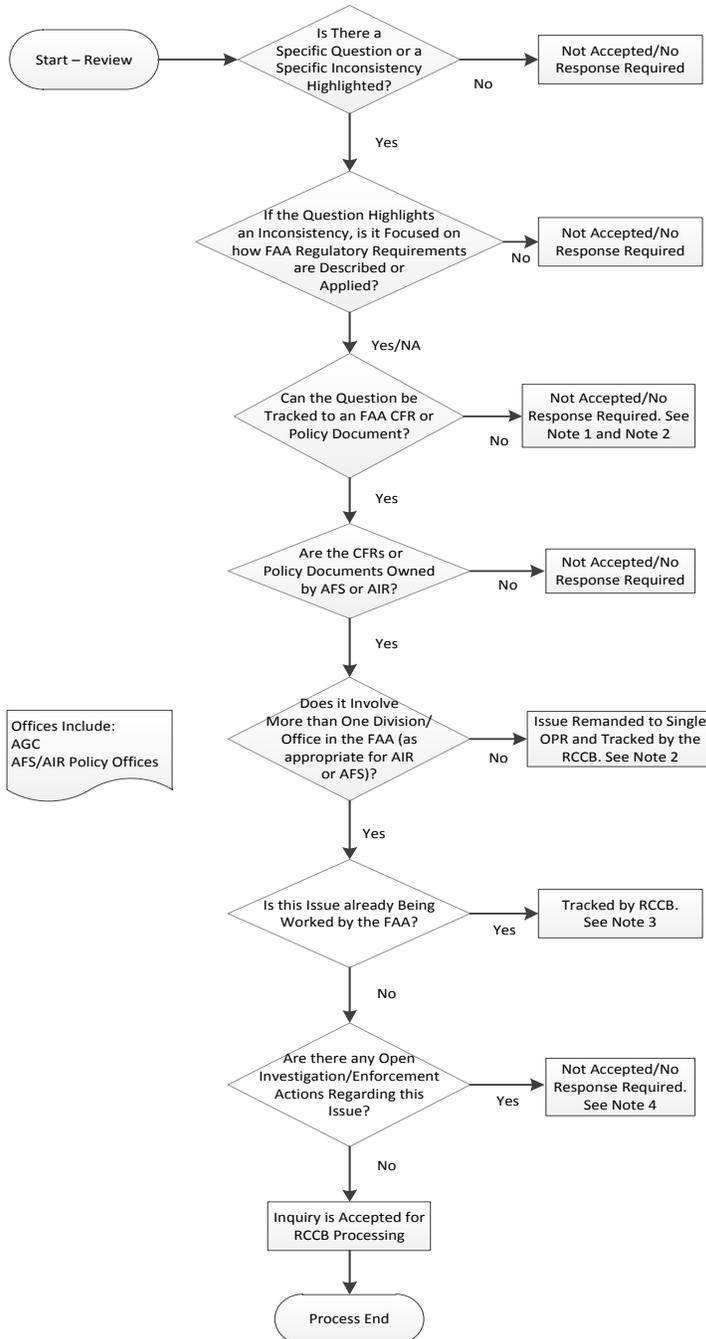
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Appendix A

Checks for the RCCB Acceptance of Tracking



Offices Include:
AGC
AFS/AIR Policy Offices

NOTE 1:The RCCB may apply this question liberally. For example, questions on basic certification requirements, applying for alternate means of compliance, finding a designated examiner, etc., should be viewed as based in a CFR.

NOTE 2: If the issue can be handled or clarified by another FAA program or initiative, or if it asked a question on a general topic not handled by the RCCB, then no response is required. Redirects to other FAA programs and initiatives may be done on a time permitting basis. Examples of other FAA programs or initiatives include:

- Petition for Rulemaking or Exemption
- Request for a Legal Interpretation
- Consistency and Standardization Initiative
- Safety Complaint
- Whistleblower Protection Program
- Aviation Consumer Protection
- Freedom of Information Act Request

NOTE 3: If this is an AFS only issue and involves a question from the field and multiple policy offices or a single policy office and AGC are required for a response, it must be worked by the RCCB.

NOTE 4: If other AVS LOB/SOs may be investigating the matter, or may have interest in the outcome, the RCCB will provide an opportunity for the appropriate office to provide feedback prior to final resolution.

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Appendix B

Administrative Information

- B1. Electronic Submission Form.** The electronic submission form is available at https://www.faa.gov/regulations_policies/faa_regulations/rccb/.
- B2. RCCB Email Address.** The RCCB email address is 9-AVS-RCCB@faa.gov (only for internal stakeholder submissions from an FAA.gov email address).
- B3. Location of the RCCB SharePoint.** The location of the SharePoint site is [RCCB Tracking](#). This site is used to track issues that were accepted to the full RCCB or remanded to a single program office. Information input into the SharePoint site does not include any of the submitter's personally identifiable information.
- B4. Location of Internal RCCB Memos.** Final RCCB memos are located in FSIMS under Publications/Other Documents/RCCB. You may also use this link: [RCCB Memos](#).
- B5. AFS-140 Email Address.** The AFS-140 directives email address is 9-AWA-AFS-140-Directives@faa.gov. This address is used to begin the formal coordination process for RCCB memos that will be signed by AFS-1, AIR-1, and/or AGC-200.
- B6. PIC Data Sheet.** The PIC Data Sheet can be located by going to the URL: [PIC Data Sheet](#). Once on this page, select "Business Processes", "AFS-002 Processes" and then click on the document titled "AFS 002-104-F1 – FSIMS Publication Index Card Data Sheet."
- B7. Location of the External RCCB Memos.** The RCCB memos are located in FSIMS under "Publications", "Other", "RCCB" and are available to the public. To access the memos go to [FSIMS RCCB Memos File Location](#) and click "Accept" on the permission page. Then go to "Publications", "Other", "RCCB" and select a memo.



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Appendix C Response Templates

Attachment 1	Initial Inquiry by the RCCB Chair to an OPR to Confirm Single OPR Status. (Prior to responding to the submitter)
Attachment 2	Initial Inquiry by the RCCB Chair to Multiple OPRs to Determine the Appropriate OPR. (Prior to responding to the submitter)
Attachment 3	Response to Submitter of an RCCB Issue. (Accepted for Resolution by RCCB)
Attachment 4	Response to Submitter of an RCCB Issue. (Single Office)
Attachment 5	Forwarding a Single Office Issue to the OPR for Action.
Attachment 6	60-Working Day Reminder to the OPR Regarding Action/Response to the RCCB Issues.
Attachment 7	Response to an RCCB Submission. (Petition for Rulemaking)
Attachment 8	Response to an RCCB Submission. (Petition for Exemption)
Attachment 9	Response to an RCCB Submission-External Stakeholder. (Request for a Legal Interpretation)
Attachment 10	Response to an RCCB Submission-Internal Stakeholder. (Request for a Legal Interpretation)
Attachment 11	Response to an RCCB Submission. (Consistency and Standardization Initiative)
Attachment 12	Response to an RCCB Submission. (Hotline Complaint)
Attachment 13	Response to an RCCB Submission. (Whistleblower Complaint)
Attachment 14	Response to an RCCB Submission. (UAS)
Attachment 15	Automatic Confirmation of Receipt of an RCCB Submission.

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Attachment 1

Initial Inquiry by the RCCB Chair to an OPR to Confirm Single OPR Status (Prior to responding to the submitter)

The Regulatory Consistency Communication Board (RCCB) accepts issues from internal and external stakeholders that involve inconsistencies in how regulations are described or applied within the Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR).

The full RCCB will only address issues that require input from more than one office. Issues that can be addressed by a single office are remanded to the appropriate office for action. In these cases, that office is responsible for responding to the submitter.

This is an initial inquiry by the RCCB to your office to confirm that the following issue meets the criteria for “Single OPR Status” with your office. Please respond within 3 working days to confirm whether your office owns the policy being discussed in the attached submission.

The submission is below. If you need additional information to determine if your office is the sole policy owner, please provide the RCCB with your specific questions within 3 working days. Please note that follow-up questions at this stage are to determine office ownership only, not a response to the submission.

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Attachment 2
Initial Inquiry by the RCCB Chair to Multiple OPRs to Determine the
Appropriate OPR
(Prior to responding to the submitter)

The Regulatory Consistency Communication Board (RCCB) accepts issues from internal and external stakeholders that involve inconsistencies in how regulations are described or applied within the Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR).

The full RCCB will only address issues that require input from more than one office. Issues that can be addressed by a single office are remanded to the appropriate office for action. In these cases, that office is responsible for responding to the submitter.

This is an initial inquiry by the RCCB to your office to determine if the following issue meets the criteria for “Single OPR Status” with your office or if it involves multiple offices.

Please respond within 3 working days to confirm whether or not your office owns the policy being discussed in the attached submission. It is critical that your office respond within 3 working days to allow time for the RCCB to meet the 15 day deadline for responding to the submitter.

The submission is attached to this email. If you need additional information to determine if your office owns any portion of the policy or regulations discussed in the submission please provide the RCCB with your specific questions within 3 working days. Please note that follow-up questions at this stage are to determine office ownership only, not a response to the submission.

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Attachment 3

Response to the Submitter of an RCCB Issue (Accepted for Resolution by the RCCB)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

The RCCB accepts issues that involve inconsistencies in how regulations are described or applied within the Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR).

The RCCB has carefully evaluated your issue and determined that it will be accepted by the RCCB for resolution. If we need any additional information, we contact you via email.

We will provide you with an update on the status of your issue, including the estimated time for resolution, within 45 working days of receiving all requested information.

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Attachment 4
Response to the Submitter of an RCCB Issue (Single Office)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

The RCCB accepts issues that involve inconsistencies in how regulations are described or applied within the Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR).

Issues that can be addressed by a single policy division or office are remanded to the appropriate office for action. In these cases, that office is responsible for responding to the submitter.

The RCCB has carefully evaluated your issue and determined that it can be addressed by a single office.

The RCCB has forwarded your issue to the following office for action:

Name of Office:

Phone Number:

The **(Name of Office)** has been provided your complete electronic submission to the RCCB, including any contact information you provided. You will receive a response from this office regarding your issue.

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Attachment 5
Forwarding a Single Office Issue to the OPR for Action

The Regulatory Consistency Communication Board (RCCB) accepts issues from internal and external stakeholders that involve inconsistencies in how regulations are described or applied within the Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR).

The full RCCB will only address issues that require input from more than one office. Issues that can be addressed by a single policy division or office are remanded to the appropriate office for action. In these cases, that office is responsible for responding to the submitter and addressing their concern.

The RCCB has carefully evaluated the following issue and determined that **(Name of Office)** is the appropriate office for action.

Below is the submission as it was received by the RCCB, including any contact information the submitter provided. The RCCB has also notified the submitter that this issue has been forwarded to your office for action and provided your office's contact information. Please address this issue and respond directly to the submitter regarding this issue.

Each office must provide an initial response to the submitter within 15 working days of receipt of the issue. Each office must also provide the RCCB with a copy of its initial response via the RCCB email box at 9-AVS-RCCB@faa.gov. If the issue was submitted anonymously without an email address, no initial response is required.

Your office must also provide the final disposition of each issue to the submitter and a copy to the RCCB email box at 9-AVS-RCCB@faa.gov. A final disposition is required to the RCCB even if the submission was anonymous.

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Attachment 6

60-Working Day Reminder to the OPR Regarding Action/Response to the RCCB Issues

The Regulatory Consistency Communication Board (RCCB) accepts issues from internal and external stakeholders that involve inconsistencies in how regulations are described or applied within the Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR).

With input and concurrence from your office, the RCCB determined that (**Name of Office**) is the Office of Primary Responsibility (OPR) for the issue indicated below. On (Date), the RCCB provided your office with information regarding the issue for review and response. The RCCB also notified the submitter that this issue was forwarded to your office for action and provided your office's contact information.

Issue:

As per FAA Order 8000.70, every 60 working days the RCCB chair must provide an update to AFS-1, AIR-1, and AGC-200 on the status of issues. This will include the status and disposition of all issues being worked by the full RCCB, as well as those remanded to a single office. The intent of this briefing is to assist standardization across offices to promote broader consistency.

To assist in this briefing, please provide an update to the RCCB regarding your actions or the final disposition of this issue to the RCCB email box at 9-AVS-RCCB@faa.gov.

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Attachment 7
Response to an RCCB Submission (Petition for Rulemaking)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA’s Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate, and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

A Petition for Rulemaking is a more appropriate process for resolution of your issue. Instructions regarding how to submit a petition for rulemaking may be accessed at [FAA regulations and policies site concerning petitions](#).

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Attachment 8
Response to an RCCB Submission (Petition for Exemption)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA's Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

A Petition for Exemption is a more appropriate process for resolution of your issue. Instructions regarding how to submit a petition for rulemaking may be accessed at: [Petition for Exemption instructions](#).

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Attachment 9
Response to an RCCB Submission-External Stakeholder
(Request for a Legal Interpretation)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA's Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

A Request for a Legal Interpretation is a more appropriate process for resolution of your issue. A request for a legal interpretation may be mailed to:

Federal Aviation Administration
 Office of the Chief Counsel
 800 Independence Avenue, SW
 Washington, DC 20591

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Attachment 10
Response to an RCCB Submission-Internal Stakeholder
(Request for a Legal Interpretation)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA’s Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

A Request for a Legal Interpretation is a more appropriate process for resolution of your issue. A request for a legal interpretation may be mailed to:

Federal Aviation Administration
Office of the Chief Counsel
800 Independence Avenue, SW
Washington, DC 20591

Additionally, instructions regarding the submission of a request for a legal interpretation by AFS internal stakeholders are contained in the AVS Quality Management System, QPM # AFS 001-000-S2 – Flight Standards Service Handling of Request for Legal Interpretation to AGC, Effective 07/12/2016.

This document can be accessed via the Flight Standards Information Management System (FSIMS) processes at: [Instructions regarding the submission of a request for legal interpretations](#). Once on this page, select “Business Processes”, “AFS-001 Processes” and then click on the document titled “AFS 001-000-S2 – Flight Standards Service Handling of Request for Legal Interpretation to AGC”.

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Attachment 11
Response to an RCCB Submission (Consistency and Standardization Initiative)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA’s Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

The Consistency and Standardization Initiative is a more appropriate process for resolution of your issue. Information regarding the Consistency and Standardization Initiative may be accessed at: [Consistency and Standardization Initiative background information](#).

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Attachment 12
Response to an RCCB Submission (Hotline Complaint)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA’s Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

The FAA Hotline is a more appropriate process for resolution of your issue. Information regarding the FAA Hotline may be accessed at: [FAA Hotline](#).

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Attachment 13
Response to an RCCB Submission (Whistleblower Complaint)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA’s Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process for resolution.

The FAA Whistleblower Protection Program is a more appropriate process for resolution of your issue. Information regarding the FAA Whistleblower Protection Program may be accessed at: [FAA Whistleblower Protection Program](#).

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Attachment 14
Response to an RCCB Submission (UAS)

Thank you for your submission to the Regulatory Consistency Communication Board (RCCB).

Issues brought to the RCCB must involve regulations and policies overseen by the FAA’s Flight Standards Service (AFS) and/or the Aircraft Certification Service (AIR) and involve an inconsistency in how regulatory requirements are described or applied.

In order to provide thorough and collaborative resolution of complex issues brought forward by both internal and external stakeholders and to address those issues in a timely, appropriate and consistent manner, the RCCB must concentrate on issues for which there is not already an established process or program for resolution.

The FAA program regarding Unmanned Aircraft Systems (UAS) is a more appropriate program for resolution of your issue. Information regarding UAS may be accessed at: [FAA Unmanned Aircraft Systems Information](#).

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Attachment 15
Automatic Confirmation of Receipt of an RCCB Submission

This email is to confirm receipt of your submission to the Regulatory Consistency Communication Board (RCCB). We will review your submission thoroughly. The first step in our review is to determine if the issue you described meets the criteria for issues addressed by the RCCB.

Issues brought to the RCCB must:

- 1) Involve regulations or policies within AIR and/or AFS; and
- 2) Outline an inconsistency in how regulatory requirements are described or applied.

We intend to inform you within 15 working days if the issue you describe falls within the scope of the RCCB. Issues that fall outside the scope of the RCCB may receive no response.

Please note that the RCCB does not accept or provide a response regarding certain issues, such as those listed below:

- Aviation safety, accidents or incidents: ([Aviation safety, accidents or incidents site](#)).
- Low flying aircraft, unknown aircraft registration number: ([Low flying aircraft, unknown aircraft registration number report site](#)).
- UAS operations: ([UAS Operations](#)).
- Customer service, disability complaints or delays on commercial airlines: ([Customer service, disability complaints or delays on commercial airlines report site](#)).
- Hazardous materials violations: ([Hazardous materials violations report site](#)).
- Airmen certification (licensing) for pilots, mechanics, repairmen, dispatchers, and parachute riggers: ([Airmen certification \(licensing\) for pilots, mechanics, repairmen, dispatchers and parachute riggers site](#)).
- Aircraft certification and modification issues: ([Aircraft certification and modification issues site](#)).

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For more information on the RCCB please see FAA [Order 8000.70, Regulatory Consistency Communication Board \(RCCB\)](#).