1) As a manufacturer, I am unsure of how to determine if I am in compliance. What can I do to obtain assistance with this determination?

> A manufacturer must meet the requirements stated in answer 6 below. If you are unsure if you comply, you may contact a member of the FAA, Airworthiness Certification Branch, AIR-230 at 202-385-6346 for assistance. AIR-230 can help you with questions regarding compliance and provide assistance as to how you can become compliant.

2) I am a distributor for brand X LSA. The aircraft are built in a country that has a bilateral agreement that includes fixed-wing aircraft not exceeding 12,500 lbs. I receive the aircraft in a crate with a signed copy of the manufacturer's statement of compliance. I assemble the aircraft, using the manufacturer's instructions. I perform a production flight test and deliver it to the customer. Do I comply with the new policy?

> Yes, assuming that the aircraft is eligible for flight authorization in its country of origin and the aircraft has not been previously issued an airworthiness certificate under 21.190(b)(2). (Reference: Title 14, Code of Federal Regulations (14 CFR) § 21.190)

3) I'm a dealer for an imported composite S-LSA. I looked up the bilateral agreement on the FAA's web site (http://www.faa.gov/aircraft/air_cert/international/bilateral_agreements/baa_basa_listing/) and the scope of acceptance includes all metal airplanes up to 9 passengers with a maximum certificated takeoff weight of 12,500 lbs. Am I in compliance with the new policy?

> Yes. The bilateral agreement must cover airplanes. There is no need for the bilateral agreement to cover the specific manufacturing method. (Reference: 14 CFR § 21.190(d))

4) I'm a dealer for an imported S-LSA. The web site also says there is an agreement for Implementation Procedures for Airworthiness. I looked up the applicable bilateral agreement on the FAA's web site and the scope of acceptance for import only includes Technical Standard Order appliances. Can I continue to sell a LSA made in that country?

> No. The bilateral agreement must allow for the import of airplanes. (Reference: 14 CFR § 21.190(d))

5) I import an S-LSA. The scope of acceptance for import in the applicable bilateral agreement includes all rotorcraft, engines, appliances and Supplemental Type Certificates for rotorcraft and engines. The rule requires a bilateral agreement relating to airplanes. Am I in compliance with the new policy?

> No. The bilateral agreement must include airplanes, regardless of the category of LSA that you import. (Reference: 14 CFR § 21.190(d)(1))

6) I consider myself to be a manufacturer of brand Z LSA. It is built in a country that has a bilateral agreement that includes airplanes. I receive the aircraft in a crate. I uncrate it and then perform a production test flight. I then complete the manufacturer's statement of compliance. Am I in line with the new policy?

No. You are not considered a manufacturer of a light sport aircraft if you do not manage the design, manufacturing, quality, and continued airworthiness system. (Reference: 14 CFR § 21.190(c))

7) I am a manufacturer of LSA. I designed the aircraft to meet the consensus standard and documented the required maintenance and inspection procedures along with the aircraft's flight training supplement. I have a quality assurance system that meets the consensus standard. I also have a method to monitor and correct safety-of-flight issues. I have a contract with a company in a foreign country, which does not have a bilateral agreement with the FAA, to build the airplane. The company is required to follow my procedures for building the airplane, and I have a quality assurance system in place to monitor them. I'm responsible for the finished product and sign the manufacturer's statement of compliance. Do I comply with the policy stated in the regulation?

Yes. (Reference: 14 CFR § 21.190(c))

8) I own a light sport airplane. The manufacturer issued a safety directive. Do I need to comply with the directive?

Yes, you must comply with the directive, but you have three ways to comply. One, comply with the directive as written. Two, use an alternative method of compliance, provided the person issuing the directive approves the action. Three, obtain a waiver from the FAA. The FAA will only grant a waiver if the directive does not follow the applicable consensus standard. (Reference: 14 CFR § 91.327)

9) The manufacturer of my light sport airplane issued a safety directive. I do not wish to comply with the directive. Could I surrender the S-LSA airworthiness certificate and get an E-LSA airworthiness certificate issued under § 21.191(i)(3)?

Yes, however certain operating limitations will apply to the ELSA airworthiness certificate as allowed in 14 CFR § 91.319(i). (Reference: Volume 69 Federal Register, page 44855 and 14 CFR § 91.327)

10) I own a flight school and use a LSA for instruction. The aircraft manufacturer went out of business. I need to perform a major repair, but the procedures are not in the manual for that specific task. Now what do I do?

14 CFR § 91.327(b)(1) requires the aircraft be maintained in accordance with maintenance and inspection procedures developed by the aircraft manufacturer or a person acceptable to the FAA. Perhaps another company or "type club" will acquire the aircraft design data and be able to provide the necessary procedures for a repair that is compliant with the consensus standard. If this option is not available, you will need to

request an experimental airworthiness certificate issued under § 21.191(i)(3). Repair the aircraft and return it to a condition for safe operation. Keep in mind that § 91.319 prohibits using an experimental aircraft to provide instruction for hire.

11) I manufacture a LSA. I can fully comply with 21.190(c) except for monitoring and correcting safety-of-flight issues. Can I contract that out?

14 CFR § 21.190(c)(5) requires you to monitor and correct safety-of-flight issues through the issuance of safety directives and a continued airworthiness system that meets the consensus standard. It is up to you to determine how to comply with the rule and consensus standard. For example, the consensus standard for airplanes and gliders allows assignment of continued airworthiness support to other entities. Even if contracted, you are still responsible for all aspects of § 21.190(c).

12) Why did the FAA "accept" my Manufacturer's Statement of Compliance (Form 8130-15) before, and not now?

Previously, we relied upon the manufacturer's statement of compliance to help determine that the manufacturer met 14 CFR part 21 and the accepted industry consensus standards. After conducting an audit of the LSA industry, we concluded that reliance on the statement of compliance is inadequate for certification purposes. Now, prior to accepting a manufacturer's statement of compliance, we are going validate the appropriate consensus standards identified and determine if the person signing the statement can meet the terms of the regulations.

13) How does the FAA anticipate that it will handle any "undue burden" associated with the examination of foreign manufacturers (and/or its legitimate suppliers, satellite manufacturers, etc., if necessary) to perform these activities? Will the FAA perform examinations in a timely manner?

We require an existing bilateral agreement in § 21.190, in part, to receive assistance from local civil aviation authorities. We do not anticipate long delays associated with examining foreign manufacturers.

14) The notice in the Federal Register said the poorest compliance was in the area of continued airworthiness. What does the FAA expect?

- Develop and identify the system used for monitoring and correcting safety-of-flight issues in accordance with the consensus standards
- When necessary issue safety directives
- Actively notify every owner of any safety-of-flight issues

15) One of the recommendations of the LSA Assessment was to issue a Federal Register Notice (FRN) to clarify the definition of a "manufacturer." Why was there such a significant delay in publishing the FRN?

The LSA Assessment occurred between September 2008 and March 2009. The LSA Assessment Report was not published until May 2010. Work on the FRN did not begin until late 2010. Additionally, the FAA was involved with developing a number of policy and guidance products that were drafted prior to the FRN.

16) Do we have any idea how many companies may be unapproved or converted to experimental certificates?

No. We do not have information to quantify the number of companies that are unable to meet the applicable regulations and standards. The FAA has audited a small number of manufacturers and found both compliance and noncompliance. Some manufacturers we worked with that were noncompliant were able to become compliant. Others were not.

17) Some manufacturers are in foreign countries that may not be approved. Does the public have a sense of how many companies may be unapproved and the names of the companies?

LSA can be manufactured in any country. If they are produced in a country with a bilateral agreement that includes airplanes, the manufacturer can sign the statement of compliance. The manufacturer is expected to control the design, manufacturing, quality, and continued operational safety of the LSA. The U.S. company is viewed as a distributor or dealer.

If a U.S. company is the manufacturer, aircraft may be produced in a country with or without a bilateral agreement provided the U.S. company attests they are the manufacturer and can demonstrate to the satisfaction of the FAA that they control the design, manufacturing, quality, and continued operational safety of the LSA.

Information on active LSA manufactures may be available from the Light Aircraft Manufacturers Association at (http://www.lama.bz/).