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RE: Advisory Circular (AC) 120-78A Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals

The National Air Transportation Association (NATA) is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state and local governments. NATA's nearly 2,300 member companies are a vital prerequisite for a vibrant general aviation sector providing fuel, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, and fractional aircraft program management. Our members are directly impacted by the FAA's revision to advisory circular (AC) 120-78A Electronic Signatures, Electronic Recordkeeping, and Electronic Manuals and we therefore appreciate the opportunity to submit comments.

NATA applauds the FAA for updating and rewriting the AC. In today's environment of electronic document management systems and electronic signature capability, it is important that our members be afforded every opportunity to increase operating efficiencies. To that end, NATA is pleased to submit the following comments and recommendations for your consideration:

1-7. DEFINITIONS

f. Electronic Manuals.

The term "Electronic Manuals" is defined as "Certificate holder manuals that may be electronically signed, stored, and retrieved by a computer system via CD-ROM, Internet/Intranet-based, or various other forms of electronic media, to include commercial off-the-shelf portable electronic device (PED) hardware (e.g., laptop, tablet, phone, etc.)." This statement is followed by a NOTE.

NOTE: The electronic equivalent of certificate holder manuals for the purpose of this AC does not include electronic manuals created under a manufacturing authority (e.g., type certificate (TC), Supplemental Type Certificate (STC), Parts Manufacturer Approval (PMA), etc.), such as Original Equipment Manufacturer (OEM) flight manuals, maintenance manuals, overhaul manuals, etc.

NATA questions the reason for the NOTE and why manuals developed under manufacturing authority are excluded?

3-3. ELECTRONIC RECORDKEEPING SYSTEM

b. Procedures – 10 and 11.

Regarding acceptance/continuity of approved records and signatures between certificate holders, the current language in the AC is very vague on guidance about continuity between legacy and electronic systems as well as outsourced maintenance systems. Our members request clarification and specific guidance that allow document acceptance between two entities both having FAA approval for electronic signature and recordkeeping.

5-1. VOLUNTARY DISCONTINUANCE

a. Discontinue Electronic Signatures.

NATA suggest that guidance be included to specifically state a printed paper copy of electronically signed documents is acceptable should someone choose to depart from the electronic version and go back to hard copy.

As part of the continuing effort to ensure consistency and standardization, NATA request that the contents of the AC and FAA Inspector policy in FAA Order 8900.1 be aligned to the extent possible.

Sincerely,



John McGraw

Director, Regulatory Affairs