



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

Aviation Safety

10101 Hillwood Parkway
Fort Worth, TX 76177

AIR-730-21-207

June 29, 2021

Elias Shamos
ATTN: Henry D. Dimalanta – Product Support
1915 Voyager Avenue
Simi Valley, California 93063

Subject: Global Alternative Method of Compliance (AMOC) to Airworthiness Directive (AD) 2021-07-13, Docket Number 2009-SW-44-AD

Dear Mr. Shamos,

The Federal Aviation Administration (FAA) has received your letter dated May 30, 2021 requesting FAA approval of a global AMOC to AD 2021-07-13. AD 2021-07-13 requires operators inspect Pacific Scientific Company (now Meggitt Services) rotary buckle assembly part numbers (P/N) 1111430 and 1111475 for cracking and to measure the buckle handle vane thickness. Depending on the results of these inspections, the AD requires removing the buckles from service and installing an airworthy buckle.

You are proposing an AMOC to the Required Actions in paragraph (e) of AD 2021-07-13, which requires inspecting each buckle for cracks and its buckle handle vane thickness, removing suspect buckles, and also prohibits installing an affected part with a handle vane thickness of 0.125 inch or greater on any airplane or helicopter.

You request an AMOC to paragraph (e)(1) to first inspect the buckle for a blue logo or if the buckle is a metal configuration. If it has a blue logo or is a metal configuration, no further inspections per (e)(1) and (e)(2) are required. Assemblies with a blue logo or made of a metal buckle configuration demonstrate an acceptable level of safety to comply with AD 2021-07-13.

You request an AMOC to change paragraph (e)(3) to, as of the effective date of this AD, do not install a buckle or a restraint system with a buckle, P/N 1111430 or 1111475, all dash numbers, unless it has a blue logo, is made from a metal assembly, or has a handle vane thickness of less than 0.125 inch on any airplane or helicopter.

You also request the FAA acknowledge that suspect buckle assemblies would not be installed onto post 2007 Restraint Assemblies. Additionally, you request that the FAA use and recognize Meggitt Service Bulletin (SB) 25-1111432 Revision 001 dated May 20, 2021 to identify post 2007 Restraint Assemblies to eliminate the unsafe condition of units in the field.

Your request is based on reports that the unsafe condition was the result of a quality issue in two batches of plastic buckle assembly handles. Pacific Scientific Company contained the issue by purging the inventory of the affected batches, and releasing a design change to create a visual identification method for identifying suspect buckles. In this case, the logo was changed from a yellow logo (suspect buckle) to a blue logo (acceptable buckle) on the buckle assembly drawings. Since the time of this design change, you stated there have been no further reports of cracking in buckles having the blue logo or made of a metal buckle configuration.

The International Validation Branch partially approves your AMOC proposal. The International Validation Branch approves your proposed AMOC to paragraph (e) of AD 2021-07-13 as described above to demonstrate an acceptable level of safety to the AD based on the buckle having a blue logo or being made of a metal buckle configuration. The FAA denies your request to demonstrate compliance based on which restraint assembly it is installed on as described in Meggitt SB 25-1111432 Revision 001. AD 2021-07-13 is an appliance AD against the buckle and not the restraint assembly, and the unsafe condition is independent of the higher-level product it is installed on.

In accordance with FAA Order 8110.103B, the following conditions apply:

- This AMOC applies to aircraft which install Pacific Scientific Company rotary buckle assembly, P/N1111430 and 1111475, all dash numbers.
- This AMOC is transferable with the aircraft to an operator who operates the aircraft under U.S. registry.
- Before using this AMOC, notify your appropriate principal inspector, or lacking a principal inspector, the manager of the local Flight Standards District Office/Certificate Holding District Office. The preceding paragraph also applies to any applicable foreign-registered aircraft upon transfer of the aircraft to the U.S. registry if compliance with the AMOC has not been accomplished.
- All provisions of AD 2021-07-13 that are not specifically referenced above remain fully applicable and must be complied with accordingly.
- This AMOC only applies to the FAA AD listed above. The FAA does not have the authority to approve this as an AMOC to any AD issued by another civil aviation authority (CAA). Approval of an AMOC to another CAA's AD must come from that CAA. A copy of this response will be forwarded to the CAA where these aircraft are registered for their consideration.

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If you have any questions or need additional information, please contact Kristin Bradley by telephone at (817)222-5485 or by email at kristin.bradley@faa.gov.

Sincerely,

For Anthony E. Gallo
Manager, International Validation Branch (AIR-730)
Compliance and Airworthiness Division
Aircraft Certification Service