

116TH CONGRESS
2D SESSION

S. 3337

To amend title 49, United States Code, to require more accountability in the airline industry, and for other purposes.

IN THE SENATE OF THE UNITED STATES

FEBRUARY 25, 2020

Mr. BLUMENTHAL (for himself, Mr. MARKEY, and Mr. UDALL) introduced the following bill; which was read twice and referred to the Committee on Commerce, Science, and Transportation

A BILL

To amend title 49, United States Code, to require more accountability in the airline industry, and for other purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE; TABLE OF CONTENTS; DEFINI-**
4 **TION.**

5 (a) **SHORT TITLE.**—This Act may be cited as the
6 “Restoring Aviation Accountability Act of 2020”.

7 (b) **TABLE OF CONTENTS.**—The table of contents for
8 this Act is as follows:

- Sec. 1. Short title; table of contents; definition.
- Sec. 2. Compensation and bonus accountability.
- Sec. 3. Independent aircraft type certificate review panel.

- Sec. 4. Increased and targeted oversight of organization designation authorizations.
- Sec. 5. Domestic and international aircraft sales.
- Sec. 6. Whistleblower incentives and protections.
- Sec. 7. Additional requirements for organization designation authorizations.
- Sec. 8. Preserving FAA control of delegation oversight authority.
- Sec. 9. Operational suitability of the design.
- Sec. 10. Flight simulator training.
- Sec. 11. Commission on improving the Organization Designation Authorization program.
- Sec. 12. Implementation of recommendations of the Boeing 737 MAX Flight Control System Joint Authorities Technical Review (JATR).

1 (c) DEFINITION.—In this Act, the term “Adminis-
 2 trator” means the Administrator of the Federal Aviation
 3 Administration.

4 **SEC. 2. COMPENSATION AND BONUS ACCOUNTABILITY.**

5 (a) FAA APPOINTEES, EXECUTIVES, AND SENIOR
 6 PROFESSIONALS.—Section 40122(c) of title 49, United
 7 States Code, is amended—

8 (1) in the subsection heading, by striking “RE-
 9 STRICTION” and inserting “RESTRICTIONS”;

10 (2) by striking “No officer” and inserting the
 11 following:

12 “(1) IN GENERAL.—No officer”; and

13 (3) by adding at the end the following:

14 “(2) EXECUTIVE COMPENSATION.—Not later
 15 than 180 days after the date of enactment of this
 16 paragraph, the Administrator shall revise the Execu-
 17 tive Compensation Plan to ensure that no pay,
 18 bonus, or other compensation for an officer or em-
 19 ployee of the Administration subject to such Plan is
 20 contingent on delivery of airplanes, the number of

1 aircraft certified, or the number of audits com-
2 pleted.”.

3 (b) ODA UNIT MEMBERS.—Section 44736(a) of title
4 49, United States Code, is amended—

5 (1) in paragraph (1), in the matter preceding
6 subparagraph (A), by striking “paragraph (3)” and
7 inserting “paragraphs (3) and (4)”; and

8 (2) by adding at the end the following:

9 “(4) ODA UNIT PERFORMANCE STANDARDS.—
10 The procedures manual for any ODA holder, wheth-
11 er approved by the Administrator before, on, or after
12 the date of enactment of the Restoring Aviation Ac-
13 countability Act of 2020, shall be deemed to be not
14 approved, unless, not later than 180 days after the
15 date of enactment of this paragraph, the ODA hold-
16 er certifies to the Administrator that the procedures
17 manual the ODA holder operates under prohibits de-
18 livery of airplanes from being a performance stand-
19 ard for any individual who is a member of an ODA
20 unit.”.

21 **SEC. 3. INDEPENDENT AIRCRAFT TYPE CERTIFICATE RE-**
22 **VIEW PANEL.**

23 (a) ESTABLISHMENT.—Not later than 180 days after
24 the date of enactment of this Act, the Administrator shall
25 issue interim final regulations under title 14, Code of Fed-

1 eral Regulations, establishing an independent aircraft type
2 certificate review panel (in this section referred to as the
3 “panel”) that meets the requirements of this section.

4 (b) MEMBERSHIP.—The panel membership shall in-
5 clude 18 representatives, including—

6 (1) 5 members who are aviation safety profes-
7 sionals, at least 2 of whom are members of a non-
8 profit pilot labor organization (which may include a
9 labor organization representing pilots for cargo and
10 passenger air carriers operating under part 121 of
11 title 14, Code of Federal Regulations) and at least
12 1 of whom is a member of a nonprofit flight attend-
13 ant labor organization (which may include an au-
14 thorized representative for flight attendants of pas-
15 senger air carriers operating under part 121 of title
16 14, Code of Federal Regulations);

17 (2) 4 members who are Federal Aviation Ad-
18 ministration Aviation Safety Inspectors or collective
19 bargaining representatives of such inspectors;

20 (3) 3 members who are pilots responsible for
21 setting training standards and flight operational pro-
22 cedures at the airlines intending to operate the air-
23 craft being reviewed and that employ them;

1 (4) 3 members who are frontline maintenance
2 aviation inspector professionals from a nonprofit
3 labor organization; and

4 (5) 3 members who represent the covered man-
5 ufacturers.

6 (c) DUTIES.—The panel shall—

7 (1) review each aircraft type certificate issued
8 after the date of enactment of this Act by the Ad-
9 ministrator every 5 years after the date of the
10 issuance or review of the certificate, as applicable;

11 (2) review any amendment to an existing type
12 certificate made after the date of enactment of this
13 Act; and

14 (3) not later than 6 months after each such re-
15 view, issue a recommendation regarding whether an
16 application for a new aircraft type certificate should
17 be submitted to the Administrator as a result of
18 changes or proposed changes in the design, power,
19 thrust, or weight of the aircraft (regardless of how
20 extensive).

21 (d) NEW APPLICATION REQUIRED.—If, after review
22 of a type certificate application for a covered aircraft, the
23 panel recommends to the Administrator that the covered
24 manufacturer of the covered aircraft should apply for a
25 new type certificate, and the Administrator accepts the

1 recommendation, the type certificate so reviewed shall no
2 longer be considered airworthy as of the date the Adminis-
3 trator accepts the recommendation and any further oper-
4 ation of the covered aircraft shall be unlawful until a new
5 type certificate is issued for the covered aircraft.

6 (e) PUBLICATION OF RECOMMENDATION RESULTS.—
7 The Administrator shall make the recommendations pro-
8 duced under this section available to the public in a
9 searchable, sortable, and downloadable format through the
10 internet website of the Federal Aviation Administration or
11 other appropriate methods and shall ensure that the data
12 are made available in a manner that—

13 (1) does not provide identifying information re-
14 garding an individual or entity; and

15 (2) prevents inappropriate disclosure of propri-
16 etary information.

17 (f) DEFINITIONS.—In this section:

18 (1) COVERED AIRCRAFT.—The term “covered
19 aircraft” means a transport-category aircraft oper-
20 ating under a type certificate issued under part 121
21 or 135, or both, of title 14, Code of Federal Regula-
22 tions.

23 (2) COVERED MANUFACTURER.—The term
24 “covered manufacturer” means an entity that manu-
25 factures or otherwise produces aircraft and holds a

1 production certificate under section 44704(c) of title
2 49, United States Code.

3 **SEC. 4. INCREASED AND TARGETED OVERSIGHT OF ORGA-**
4 **NIZATION DESIGNATION AUTHORIZATIONS.**

5 (a) IN GENERAL.—Section 44736(b)(3)(C) of title
6 49, United States Code, is amended by inserting “that in-
7 cludes a comprehensive, independent audit of ODA prac-
8 tices, as well as a review of recommendations and actions
9 of the organization management team responsible for
10 overseeing the ODA holder and of safety management ini-
11 tiatives, at least once every 3 years, regardless of the
12 length of time an entity has been an authorized ODA hold-
13 er” before the semicolon.

14 (b) PUBLIC AVAILABILITY OF AUDITS AND RE-
15 VIEWS.—Section 44736(b) of title 49, United States Code,
16 is amended by adding at the end the following:

17 “(4) PUBLICATION OF AUDIT AND REVIEW RE-
18 SULTS.—Not later than 30 days after the completion
19 of each audit and review conducted in accordance
20 with paragraph (3)(C), the Administrator shall sub-
21 mit the results of the audit and review to the Com-
22 mittee on Commerce, Science, and Transportation of
23 the Senate and the Committee on Transportation
24 and Infrastructure of the House of Representa-
25 tives.”.

1 **SEC. 5. DOMESTIC AND INTERNATIONAL AIRCRAFT SALES.**

2 (a) AIRCRAFT CERTIFICATION.—

3 (1) REQUIREMENT.—As part of the aircraft
4 certification process for any aircraft sold after the
5 date of enactment of this Act, the Administrator—

6 (A) shall require covered manufacturers to
7 submit information regarding whether an air-
8 craft is going to be sold to a domestic or for-
9 eign air carrier, including the potential need for
10 additional training materials, operating and
11 maintenance procedures, simulator training,
12 minimum flight experience requirements in a
13 transport category aircraft, or modifications to
14 the airplane manual as a result of the sale to
15 the air carrier, the countries in which the air-
16 craft is expected to be operated during the first
17 5 years after such sale, or both; and

18 (B) shall not deem sellable any aircraft
19 sold after the date of enactment of this Act
20 until the Administrator has determined, based
21 on the information submitted in accordance
22 with subparagraph (A), that all necessary addi-
23 tional training materials, operating and mainte-
24 nance procedures, simulator training, minimum
25 flight experience requirements in a transport
26 category aircraft, or modifications to the air-

1 plane manual will be provided by the covered
2 manufacturer as part of the sale of the aircraft
3 to the air carrier.

4 (2) RULEMAKING.—Not later than 6 months
5 after the date of enactment of this Act, the Adminis-
6 trator shall issue interim final regulations that im-
7 plement the requirements of this section.

8 (b) FLIGHT STANDARDIZATION BOARD STAND-
9 ARDS.—Not later than 180 days after the date of enact-
10 ment of this Act, the Administrator shall petition the
11 International Civil Aviation Organization to require that
12 the country in which an aircraft is granted an initial flight
13 certificate shall be the lead country for purposes of setting
14 the Flight Standardization Board standards for the air-
15 craft.

16 (c) REQUIRED COMPLIANCE WITH APPLICABLE
17 INTERNATIONAL SAFETY STANDARDS.—An aircraft that
18 is manufactured in the United States may not be sold
19 after the date of enactment of this Act to a foreign air
20 carrier unless the Administrator has determined, through
21 an assessment under the International Aviation Safety As-
22 sessment (IASA) program, that such country is in compli-
23 ance with safety standards established by the Inter-
24 national Civil Aviation Organization (ICAO).

25 (d) DEFINITIONS.—In this section:

1 (1) AIR CARRIER.—The term has the meaning
2 given that term in paragraph (2) of section 40102
3 of title 49, United States Code, and includes a for-
4 eign air carrier, as defined in paragraph (21) of
5 such section.

6 (2) AIRCRAFT.—The term “aircraft” has the
7 meaning given that term in paragraph (6) of section
8 40102 of title 49, United States Code.

9 (3) COVERED MANUFACTURER.—The term
10 “covered manufacturer” means an entity that manu-
11 factures or otherwise produces aircraft and holds a
12 production certificate under section 44704(c) of title
13 49, United States Code.

14 **SEC. 6. WHISTLEBLOWER INCENTIVES AND PROTECTIONS.**

15 Section 42121 of title 49, United States Code, is
16 amended—

17 (1) in subsection (b)(2), by adding at the end
18 the following:

19 “(C) JUDICIAL CAUSE OF ACTION.—If the
20 Secretary has not issued a final decision within
21 180 days of the filing of the complaint and
22 there is no showing that such delay is due to
23 the bad faith of the complainant, a person may
24 seek relief by bringing an action at law or eq-
25 uity for de novo review in the appropriate dis-

1 trict court of the United States, which shall
2 have jurisdiction over such an action without
3 regard to the amount in controversy. Such an
4 action shall, at the request of either party to
5 the action, be tried by the court with a jury.”;
6 and

7 (2) by adding at the end the following:

8 “(f) APPLICATION TO OTHER INDIVIDUALS.—The
9 whistleblower protections afforded under the preceding
10 subsections of this section shall apply to the following indi-
11 viduals in the same manner and to the same extent as
12 such protections apply to an employee described in sub-
13 section (a):

14 “(1) Employees, contractors, and subcontractors of any entity that manufactures or otherwise
15 produces aircraft and holds a production certificate
16 under section 44704(e) of title 49, United States
17 Code.

18 “(2) Employees, contractors, and subcontractors of any repair station operating under part 145
19 of title 14, United States Code.

20 “(3) Employees, contractors, and subcontractors of the Federal Aviation Administration.

21 “(g) APPLICATION OF MOTOR VEHICLE SAFETY IN-
22 CENTIVES AND PROTECTIONS.—The incentives and pro-
23 centives and protections.

1 tectations afforded under section 30172 to an employee or
 2 contractor of a motor vehicle manufacturer, part supplier,
 3 or dealership shall apply in the same manner and to the
 4 same extent to individuals described in subsections (a) and
 5 (f) of this section.

6 “(h) RIGHTS RETAINED BY EMPLOYEE.—Nothing in
 7 this section shall be deemed to diminish the rights, privi-
 8 leges, or remedies of any employee under any Federal or
 9 State law, or under any collective bargaining agreement.

10 “(i) NONENFORCEABILITY OF CERTAIN PROVISIONS
 11 WAIVING RIGHTS AND REMEDIES OR REQUIRING ARBI-
 12 TRATION OF DISPUTES.—

13 “(1) WAIVER OF RIGHTS AND REMEDIES.—The
 14 rights and remedies provided for in this section may
 15 not be waived by any agreement, policy form, or con-
 16 dition of employment, including by a predispute ar-
 17 bitration agreement.

18 “(2) PREDISPUTE ARBITRATION AGREE-
 19 MENTS.—No predispute arbitration agreement shall
 20 be valid or enforceable, if the agreement requires ar-
 21 bitration of a dispute arising under this section.”.

22 **SEC. 7. ADDITIONAL REQUIREMENTS FOR ORGANIZATION**
 23 **DESIGNATION AUTHORIZATIONS.**

24 (a) ISSUANCE OF CERTIFICATES.—

1 (1) IN GENERAL.—Section 44702(d) of title 49,
2 United States Code, is amended—

3 (A) in paragraph (1), by striking subpara-
4 graph (B) and by inserting the following:

5 “(B) any other matter relating to issuing
6 the certificate other than the final authority for
7 approving the issuing of the certificate.”; and

8 (B) by adding at the end the following:

9 “(4) An employee of a qualified private person may
10 not be provided a delegation under paragraph (1) unless
11 that employee has first been approved by the Adminis-
12 trator (under a process determined appropriate by the Ad-
13 ministrator).

14 “(5) A qualified private person or a delegated em-
15 ployee of a qualified private person (as applicable) shall
16 sign, under penalty of perjury, each certificate issued
17 under paragraph (1)(B) by that person or employee.”.

18 (2) CLARIFICATION.—The amendments made
19 by paragraph (1) shall have no effect on any certifi-
20 cate issued prior to the date of the enactment of this
21 Act by a private person, or an employee under the
22 supervision of that person, pursuant to such section
23 44702(d).

1 (b) OTHER FUNCTIONS.—Section 44736(a) of title
2 49, United States Code, as amended by section 2(b), is
3 amended—

4 (1) in paragraph (1), in the matter preceding
5 subparagraph (A), by striking “and (4)” and insert-
6 ing “, (4), and (5)”; and

7 (2) by adding at the end the following:

8 “(5) ADDITIONAL REQUIREMENTS.—In over-
9 seeing any ODA holder, regardless of whether the
10 ODA holder operates under a procedures manual ap-
11 proved by the Administrator before, on, or after the
12 date of enactment of the Restoring Aviation Ac-
13 countability Act of 2020, the Administrator shall—

14 “(A) identify and establish prerequisites,
15 such as minimum work experience, education,
16 and license requirements, for members of ODA
17 units for each delegated function;

18 “(B) require that, in order to be approved
19 to be a member of an ODA unit, an individual
20 must be nominated by the individual’s employer
21 to serve as a delegated representative of the
22 FAA and under the direction of the FAA in a
23 specific field or skill code and the nomination
24 must identify the unique skill, education, and
25 work experience that the employer believes

1 uniquely qualifies the individual to serve as a
2 delegated FAA representative for that field or
3 skill code;

4 “(C) not approve any individual as a dele-
5 gated FAA representative for a function unless
6 the individual meets the prerequisites estab-
7 lished by the Administrator for that function;

8 “(D) provide specific training to the indi-
9 viduals approved to serve as a delegated rep-
10 resentative of the FAA in a specific field or skill
11 code that explains the individual’s role and re-
12 sponsibility and limits of authority when acting
13 as a delegated FAA representative;

14 “(E) be the final authority for any type
15 certificate issuance; and

16 “(F) not delegate final authority for any
17 type certificate issuance.”.

18 (c) COST RECOVERY MATRIX.—

19 (1) IN GENERAL.—Not later than 180 days
20 after the date of enactment of this Act, the Sec-
21 retary of Transportation shall study, develop, and
22 submit to the Committee on Commerce, Science, and
23 Transportation of the Senate and the Committee on
24 Transportation and Infrastructure of the House of
25 Representatives a proposed cost recovery matrix that

1 may be applied to any company or organization
2 seeking product type certification from the Adminis-
3 trator.

4 (2) PUBLIC COMMENT PERIOD REQUIRED.—Be-
5 fore developing the proposed cost recovery matrix re-
6 quired under paragraph (1), the Secretary of Trans-
7 portation shall provide a 90-day period for public
8 comment on the proposed development of such a ma-
9 trix.

10 **SEC. 8. PRESERVING FAA CONTROL OF DELEGATION OVER-**
11 **SIGHT AUTHORITY.**

12 Section 44736(a) of title 49, United States Code, is
13 amended—

14 (1) in paragraph (1)—

15 (A) by striking subparagraph (B) and in-
16 serting the following:

17 “(B) delegate to the ODA holder the func-
18 tions to be performed as specified in the proce-
19 dures manual, unless the Administrator deter-
20 mines that the public interest and safety of air
21 commerce requires a limitation with respect to
22 1 or more of the functions; and”;

23 (B) in subparagraph (C), by striking “;
24 and” and inserting a period; and

25 (C) by striking subparagraph (D); and

1 (2) in paragraph (3)—

2 (A) by striking subparagraph (B) and in-
3 serting the following:

4 “(B) delegate to the ODA holder the func-
5 tions to be performed as specified in the proce-
6 dures manual, unless the Administrator deter-
7 mines that the public interest and safety of air
8 commerce requires a limitation with respect to
9 1 or more of the functions; and”;

10 (B) in subparagraph (C), by striking “;
11 and” and inserting a period; and

12 (C) by striking subparagraph (D).

13 **SEC. 9. OPERATIONAL SUITABILITY OF THE DESIGN.**

14 Not later than 12 months after the date of enactment
15 of this Act, the Administrator shall—

16 (1) evaluate and compare the efficacy of inter-
17 national aircraft certification systems that include
18 approval of operational requirements in the certifi-
19 cation basis for the issuance of an aircraft type cer-
20 tificate, including the approval process for such re-
21 quirements under the aircraft certification system of
22 the European Union Aviation Safety Agency, with
23 the approval process for such requirements under
24 the aircraft certification system adhered to in the
25 United States; and

1 (2) revise applicable regulations to the extent
2 necessary so as—

3 (A) to make the process for approval of
4 operational requirements in the certification
5 basis for the issuance of an aircraft type certifi-
6 cate in the United States as consistent as prac-
7 ticable with the process and requirements of
8 international aircraft certification systems; and

9 (B) to require approval of operational re-
10 quirements part of the certification basis for
11 the issuance of an aircraft type certificate for
12 any U.S. State of Design aircraft.

13 **SEC. 10. FLIGHT SIMULATOR TRAINING.**

14 Effective on the date that is 180 days after enact-
15 ment of this Act, the Administrator shall be prohibited
16 from granting an exemption for the use of a non-motion
17 training device to replace a full motion simulator for vali-
18 dation, qualification, checking, or evaluation events, and
19 significant training leading up these events, under part 60
20 of title 14, Code of Federal Regulations.

21 **SEC. 11. COMMISSION ON IMPROVING THE ORGANIZATION**
22 **DESIGNATION AUTHORIZATION PROGRAM.**

23 (a) IN GENERAL.—No later than 180 days after the
24 date of enactment of this Act, the Secretary of Transpor-
25 tation (in this section referred to as the “Secretary”) shall

1 establish a commission that shall study and make rec-
2 ommendations to the Secretary regarding the organization
3 designation authorization program authorized under sec-
4 tions 44702(d) and 44736 of title 49, United States Code,
5 and regulations promulgated thereunder (in this section
6 referred to as the “ODA program”).

7 (b) MEMBERSHIP.—The commission shall be made
8 up of representatives of the following organizations:

9 (1) Nonprofit pilot labor organizations, includ-
10 ing labor organizations representing pilots for cargo
11 and passenger air carriers operating under part 121
12 of title 14, Code of Federal Regulations.

13 (2) Nonprofit flight attendant labor organiza-
14 tions, including an authorized representative for
15 flight attendants of passenger air carriers operating
16 under part 121 of title 14, Code of Federal Regula-
17 tions.

18 (3) Federal Aviation Administration Aviation
19 Safety Inspectors or collective bargaining representa-
20 tives of such inspectors.

21 (4) Air carriers operating under part 121 of
22 title 14, Code of Federal Regulations.

23 (5) Frontline maintenance aviation inspector
24 professionals from a nonprofit labor organization.

1 (c) DUTIES.—The commission established under this
2 section shall—

3 (1) study all aspects of the ODA program, in-
4 cluding with respect to the effectiveness of the ODA
5 program in prioritizing passenger safety;

6 (2) identify and consider options for targeted
7 improvements to the ODA program or for
8 transitioning the ODA program to an alternative
9 certification program with a more robust system of
10 oversight;

11 (3) identify barriers to, and the feasibility of,
12 implementing the options identified under paragraph
13 (2); and

14 (4) develop recommendations for the Secretary
15 based on the results of the issues examined by the
16 commission.

17 (d) REPORT.—Not later than 1 year after the date
18 on which the commission is established under this section,
19 the commission shall submit to the Secretary, the Com-
20 mittee on Commerce, Science, and Transportation of the
21 Senate, and the Committee on Transportation and Infra-
22 structure of the House of Representatives, a report on the
23 issues examined by the commission that includes the rec-
24 ommendations developed under subsection (c)(4).

1 **SEC. 12. IMPLEMENTATION OF RECOMMENDATIONS OF**
2 **THE BOEING 737 MAX FLIGHT CONTROL SYS-**
3 **TEM JOINT AUTHORITIES TECHNICAL RE-**
4 **VIEW (JATR).**

5 (a) DEADLINES.—The Administrator—

6 (1) not later than 180 days after the date of
7 enactment of this Act, shall begin implementing each
8 of the recommendations specified in subsection (b)
9 in accordance with the description of, and expla-
10 nation for, each such recommendation set forth in
11 the Boeing 737 MAX Flight Control System Obser-
12 vations, Findings, and Recommendations of the
13 Joint Authorities Technical Review submitted to the
14 Associate Administrator for Aviation Safety, U.S.
15 Federal Aviation Administration on October 11,
16 2019; and

17 (2) not later than every 60 days thereafter until
18 every such recommendation is fully implemented,
19 shall submit a progress report to the Committee on
20 Commerce, Science, and Transportation of the Sen-
21 ate and the Committee on Transportation and Infra-
22 structure of the House of Representatives detailing
23 the progress made in implementing each such rec-
24 ommendation.

1 (b) RECOMMENDATIONS SPECIFIED.—The rec-
2 ommendations specified in this subsection are the fol-
3 lowing:

4 (1) Recommendation R2, relating to the devel-
5 opment and use of up-to-date requirements and
6 practices, including but not limited to each of the
7 supporting recommendations R2.1 through R2.10.

8 (2) Recommendation R3, relating to the con-
9 sistent interpretation and application of require-
10 ments, including but not limited to each of the sup-
11 porting recommendations R3.1 through R3.17.

12 (3) Recommendation R4, relating to changes
13 during the certification process, including but not
14 limited to each of the supporting recommendations
15 R4.1 through R4.6.

16 (4) Recommendation R5, relating to the delega-
17 tion of certification authority, including but not lim-
18 ited to each of the supporting recommendations
19 R5.1 through R5.7.

20 (5) Recommendation R10, relating to the im-
21 pact of product design changes on flight crew train-
22 ing, including but not limited to each of the sup-
23 porting recommendations R10.1 through R10.5.

24 (6) Recommendation R11, relating to the im-
25 pact of product design changes on maintenance

1 training, including but not limited to each of the
2 supporting recommendations R11.1 through R11.2.

3 (7) Recommendation R12, relating to post-cer-
4 tification corrective actions and data sharing, includ-
5 ing but not limited to each of the supporting rec-
6 ommendations R12.1 through R12.4.

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