

AFMC WAIVER AND APPROVAL REQUEST

FLIGHT OPERATIONS, STAN / EVAL, TRAINING, AVIATION MANAGEMENT, AND AIRCREW EQUIPMENT

SECTION I. TO BE COMPLETED BY REQUESTING ORGANIZATION

FROM: AFMC/A3V	TO: DCMA-AO	SUBJECT: Provided ARFF Services	DATE: 2019-10-01
ACTION OFFICER (Name, Rank, Phone): Hogg, Gary W, GS-15, 850-882-7885		GOVERNING DIRECTIVE (Title, Date, Supplement, and Paragraph): NAS 3306 Rev 3 Para 5.6.3 (DCMA Inst 8210.1C Ch1)	DOCUMENTS ATTACHED: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>

NARRATIVE (What is being requested): Narrative continued on Page Two: NO
 Request recurring training programs and frequencies for ARFF services provided by an FAA Certificated Airport Fire Department to be in accordance with FAA policies and guidance (specifically 14 CFR Part 139.319 and FAA AC 150/5210-17, current version) in lieu of NAS 3306 Rev 3 recurring training program and frequency requirements.

JUSTIFICATION AND MITIGATION (Discuss alternatives, impact if not approved, risk mitigation plan, etc.): Justification continued on Page Two: YES
 IAW NAS 3306 Rev 3, a comprehensive and recurring training program must be established to ensure ARFF personnel are qualified to effectively perform ARFF activities. When ARFF services are provided by an FAA Certificated Airport Fire Department, the contractor may be unable to direct the supporting organization to alter their training program to meet the specific NAS 3306 requirements. However, 14 CFR Part 139.319 (i) requires that each holder of an airport operating certificate ensure that firefighting personnel are properly trained to perform their duties. Per FAA AC 150/5210-17C, recurrent training is that training provided as

GROUP COMMANDER OR EQUIVALENT (Name, Rank, Title): MATTHEW M. BERGGREN, NH-04, AFMC/A3V	SIGNATURE:	DATE: 2019-10-02
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SECTION II. TO BE COMPLETED BY AFMC/A3V

APPROVAL AUTHORITY	<input type="checkbox"/> AFMC / A3V	<input checked="" type="checkbox"/> AFMC / A3	<input type="checkbox"/> OTHER:
AFMC / A3V ACTION	<input type="checkbox"/> APPROVED	<input type="checkbox"/> DISAPPROVED	<input checked="" type="checkbox"/> CONCUR <input type="checkbox"/> NON-CONCUR

AFMC / A3V TRACKING NUMBER: 19-136	EXPIRATION DATE: Indef
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COMMENTS / RESTRICTIONS: Comments continued on Page Two: NO
 Neither this waiver nor an airport providing ARFF response (or a portion thereof) relieves the contractor of the contractual obligation of ensuring all other requirements of NAS 3306 (e.g., equipment, vehicles, agent, number of ARFF personnel, certification of personnel, response times, standby coverage, availability) are met. The contractor must develop specific procedures stating how they ensure requirements are met, to include methods for verification by the contractor and the Government.

 Where there are multiple or mixed ARFF response services, the portions of ARFF not provided by an airport certificated under Title 14 Code of Federal Regulations, Part 139 (14 CFR part 139) must meet NAS 3306 Rev 3 and/or other contractual requirements.

AFMC / A3V (Name, Rank, Title): H. WARREN ROHLFS, Col, USAF, AFMC/A3V	SIGNATURE:	DATE: 2019-10-02
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SECTION III. TO BE COMPLETED BY AFMC/A3 (If applicable)

AFMC / A3 ACTION	<input type="checkbox"/> APPROVED	<input type="checkbox"/> DISAPPROVED	<input type="checkbox"/> CONCUR	<input type="checkbox"/> NON-CONCUR
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COMMENTS / RESTRICTIONS:
 This waiver may remain in effect until incorporation into NAS 3306 Rev 4 and is included on the contract.

AFMC / A3 (Name, Rank, Title): MARK A. MEHALIC, SES, AFMC/A3/6	SIGNATURE:	DATE: 2019-10-04
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NARRATIVE (Continued):

JUSTIFICATION AND MITIGATION (Continued):

often as necessary but at least once every twelve CCM to enable ARFF firefighters to maintain a satisfactory level of proficiency. This is the minimum requirement for a recurrent training program and meets the intent of the NAS 3306 Rev 3 training requirements. The ARFF fire chief is responsible to ensure adequacy of training. A comprehensive, continuous, and robust training program should encompass not only the listed subjects in FAA AC150/5210-17, but also those additional areas of special interest (e.g., local conditions/operations, Standard Operating Procedures and Guidelines, Memorandums of Agreement).

While the contractor is not expected to evaluate a certificated airport's ARFF training program, they must ensure compliance. This may be accomplished in various ways (e.g., review of FAA audit documentation, review of ARFF department training records).

Per FAA AC 150/5210-17 C, paragraph 1.6, firefighters are expected to receive hands-on training on the aircraft that frequent the airport. The contractor must ensure training for contract aircraft is offered to the airport firefighters. Where such hands-on training is not feasible, the ARFF crews must have access to aircraft diagrams.

COMMENTS / RESTRICTIONS (Continued):