



DEFENSE CONTRACT MANAGEMENT AGENCY

AIRCRAFT OPERATIONS
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RICHMOND, VA 23237

March 2, 2023

MEMORANDUM FOR RECORD

SUBJECT: DCMA-INST 8210-1D Clarifications and Errata

With the release of the new Combined Instruction, DCMA-INST 8210-1D, "Contractor's Flight and Ground Operations," (as know as AFI 10-220, AR 95-20, NAVAIRINST 3710.1H, COMDINST M130220.3B), there are several areas that require some clarification and some administrative items to note. This memorandum was coordinated with the Service waiver authorities. However, the clarifications made are general in nature. For questions on specific contract situations, follow the request for interpretation process in paragraph 3.3.

The first clarification is understanding the nuances of Aircraft Damage Reporting and Mishap Reporting Procedures. The second concerns the terms short-duration and limited-scope.

In paragraph 6.4.2 Aircraft Damage Reporting Procedures, it states that the contractor "must track all damage (does not include fair wear and tear or workmanship) to contract aircraft "in the open" and notify the GFR within 7 calendar days of damage greater than or equal to \$5,000 and less than \$25,000." While the contractor does not have to track "*fair wear and tear or workmanship*", the contractor is not the entity to make that determination. That is ultimately a Government call by the contracting officer (ACO/PCO) based on investigation and recommendations from the Property Administrator and/or Quality and the GFR. If a 'production' aircraft not 'in the open' or 'covered aircraft' when damaged, the incident will be addressed through the appropriate material review board (MRB) processes unless the damaged component was Government-furnished (e.g., an engine). If the aircraft is Government-furnished, the contractor is required to report *all damage* in the property loss function in the Government-Furnished Property (GFP) module of the Procurement Integrated Enterprise Environment (PIEE) for reporting loss of Government property. Since the GFR is only notified of damage above \$5000, there will be instances where the GFR may first be notified by Property. If the contractor suspects the damage is due to fair wear and tear or workmanship error, recommend notifying the GFR so that determination can be made by the contracting officer. If determined to be fair wear and tear or workmanship error, the contractor no longer has to track the incident as damage.

In paragraph 6.4.3 Aircraft Mishap Procedures, it states that the contractor "must notify the GFR of any incident involving aircraft "in the open" meeting the injury or mishap damage (does not include fair wear and tear or workmanship) classification criteria defined in DoDI 6055.07, "Mishap Notification, Investigation, Reporting, and Record Keeping" (or applicable agency reporting criteria for non-DoD aircraft) as soon as practical." The same situation applies as with 6.4.2. If the contractor suspects the damage is due to fair wear and tear or workmanship error, recommend notifying the GFR so that determination can be made by the contracting officer and mishap determination by the CSSO. If determined to be fair wear and tear or workmanship error, the contractor no longer has to track the incident as a mishap.

In paragraph 9.7 Short-Duration/Limited-Scope Operations, the terms short-duration and limited-scope are not defined and may generate the questions of intent. To answer the expected questions the following definitions have been coordinated with the Service waiver authorities.

Short-Duration. Short duration is when contractors perform flight or ground operations at a location for less than 6-months (collectively). Contractor personnel working at the same site several times (or several weeks) each month on a continuous basis beyond 6 months is not considered short-duration.

Limited-Scope. Limited-scope is considered localized repairs/modifications that do not require movement (lifting/jacking/towing) of the aircraft by the contractor personnel. Examples of limited-scope operations are remove/replace components, making structural repairs (not requiring jacking, at least by the contractor personnel), adding new 'black boxes', etc.

The following is a list of the known errata in the Combined Instruction.

- DD Form 1821 title has changed from 'Contractor Crewmember Record' to 'Contractor Crewmember Flight Summary'
- The note at the bottom of 4.9.3 is not required due to DD Form 1821 update
- Use Service forms and directives in paragraph 4.15.2 in lieu of the DD Form 1821 due to its update
- G.1.12, change 'GGFR/G-GFR' to 'GFR/G-GFR and GGR'
- Glossary 2 and References sections do not have the date in the header (pages 108-114) and should read 'February 6, 2023' vice 'date'.

The DCMA-AO POC for this clarification is Mr. Michael Fludovich, 804-279-4318, michael.a.fludovich2.civ@mail.mil.

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Attachment(s): None

Link(s):

1. <https://www.dcms.mil/Customers/Aircraft-Operations-Resource-Page/>