

## EASA 7th AD Workshop

# Alternative Methods of Compliance (AMOC) to an Airworthiness Directive

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**Your safety is our mission.**

# AMOC to an AD

## Subjects in this presentation:

- What is an AMOC?
- What is not an AMOC?
- When is an FAA AMOC automatically accepted by EASA?
- When is an FAA AMOC not automatically accepted by EASA?
- When is an AMOC necessary for STC-modification?
- ADs for STC-modified products
- STC as AMOC to an AD

# What is an AMOC?

It is a different way, other than the one specified in an AD, to address an unsafe condition on products, parts and appliances. An AMOC must provide a level of safety equivalent to that required by the related AD. AMOCs may be issued in respect of, but are not necessarily limited to, the following:

- Alternative (approved) modification(s);
- Alternative (approved) inspection procedure(s);
- Alternative maintenance interval(s) and/or procedure(s);
- Specific (approved) operating procedures or limitations, etc.

***AN AMOC IS NOT A TECHNICAL APPROVAL;  
THE APPROVAL IS FOR 'EQUIVALENT SAFETY' OF THE METHOD***

# What is not an AMOC?

- Requests for extension of compliance time for individual cases ***without alternative compliance methods or risk-mitigating action(s)*** are in general not eligible for an AMOC application.
- The operator should contact the competent authority and apply for a temporary exemption in accordance with Article 71 of the [Basic Regulation](#).
- A justification document from the TC holder may be suitable to support such a time limited exemption on a case by case basis.

**UNLIKE THE FAA AMOC, EASA AMOC CANNOT BE USED FOR INDIVIDUAL COMPLIANCE TIME EXTENSION (=TEMPORARY EXEMPTION)**

# When is an FAA AMOC automatically accepted by EASA?

- Certain FAA AMOC approvals are automatically accepted (considered 'EASA approved') if these are within the criteria as specified in [the TIP](#), or in Article 4 of EASA Executive Director's [Decision 2004/04/CF](#) dated 10 December 2004.
- FAA [AD 2019-14-13](#) applies to Boeing 767 aircraft: any FAA AMOC approval granted to Boeing is automatically accepted by EASA.
- FAA [AD 2019-10-51](#) applies to MBB-BK 117 helicopters, if modified by Air Methods Corp. STC: only FAA AMOC approval granted to Air Methods is automatically accepted by EASA.

***IF AUTOMATIC AMOC ACCEPTANCE: NO FURTHER EASA APPROVAL NECESSARY***

## When is an FAA AMOC not automatically accepted by EASA?

- If the FAA AMOC approval is granted to any person or company **other** than the **design approval holder** of the products, parts or appliances as defined in the **Applicability of the affected FAA AD**, an AMOC application ([Form 42](#)) to EASA must be made.
- If an FAA STC has been approved as AMOC to an AD, the EASA validation of that STC should (to be checked) also cover the AMOC approval. If the AMOC was approved after EASA STC validation, an AMOC application must be made.
- If an STC holder is granted an FAA AMOC approval for aeroplanes modified by (US-designed) STC, such AMOC approval is NOT automatically accepted by EASA, **unless** the AD specifically applies ONLY to those STC-modified aeroplanes (see previous slide).

***PREFERRED METHOD (BENEFIT TO ALL OPERATORS):  
THE HOLDER OF THE FAA AMOC APPROVAL APPLIES TO EASA***



# When is an AMOC necessary for STC-modification?

- Most ADs apply to the products, irrespective of STC or not.
- STCs are approved to modify aircraft, engines or propellers.
- Equipment (parts & appliances) can only be modified by the design approval holder; however, an STC can be approved for (the installation of) modified equipment, assigned a new P/N, i.e. no longer the original equipment.
- An unsafe condition may require alternative instructions for STC-modified products; or the unsafe condition may be found not to exist on STC-modified products.
- If a part, subject to an AD, is not (no longer) installed on STC-modified products, no action may be necessary (e.g. unsafe condition cannot develop). This determination (exemption) can only be made through an AMOC approval.

***STC HOLDERS SHOULD REVIEW EACH AD APPLICABLE TO THE PRODUCT THAT IS SUBJECT TO THEIR STC: AN AMOC APPLICATION MAY BE NECESSARY***

# When is an AMOC necessary for STC-modification?

- AD compliance for STC-modified products is not always possible by using the instructions of the TC-holder.
- Owners and operators of STC-modified aircraft are expected to maintain contact with the STC holder, for the purpose of receiving (updates of) instructions for continued airworthiness (ICA) related to the STC modification.
- This ensures that, if an AMOC approval is granted to the STC-holder, making compliance with an AD possible, the owners/operators can be informed accordingly.

***OPERATOR TO MAINTAIN CONTACT WITH HOLDER(S) OF STC MODIFICATION(S) ON THEIR AIRCRAFT***





# ADs for STC-modified Products

EASA can issue or adopt “STC” ADs. These will be shown on our website as applicable to the STC holder and the affected TC holder(s) product(s). Examples on our website:

- [FAA AD 2016-14-10](#) CFM56 engines with STC SE00034EN
- [FAA AD 2015-15-12](#) Airbus SA with STC ST00788SE
- [EASA AD 2015-0179](#) Boeing 727 with STC SA4363NM
- [EASA AD 2015-0154](#) Robin DR400 with STC EASA.A.S.01266
- [FAA AD 2017-05-51](#) Bell 429 helicopters modified by STC SR00693DE
- [FAA AD 2015-24-51](#) EC120B with STC SR00491DE

***IF STC IS PART OF THE APPLICABILITY DEFINITION OF AN AD, NO ACTION REQUIRED FOR AIRCRAFT WITHOUT THAT STC INSTALLED; STC UPDATED TO AVOID EXPANSION OF AFFECTED FLEET; IF FAA AD IS ADOPTED, ALL AMOC GRANTED TO STC HOLDER ARE AUTOMATICALLY ACCEPTED BY EASA***



## STC as AMOC to an AD (1)

- Scenario 1: An AD applies to “all s/n” of a product type design, but part of the fleet has been modified by STC, which makes compliance difficult or impossible – the AD does not exclude those products from having to comply.
- Suggested Action: STC holder develops method to address the unsafe condition, taking into account the configuration difference(s), and applies to have that method recognized as AMOC to the related AD requirements.

## STC as AMOC to an AD (2)

- Scenario 2: An AD applies to “all s/n” of a product type design, but it is found that an (existing or new) STC modification actually solves the unsafe condition, providing equivalent safety, but by a different method than the one required by the AD.
- Suggested Action: STC holder/applicant applies for an AMOC approval, recognising the STC as AMOC to the AD required action(s).

## STC as AMOC to an AD (3)

- In both cases, the AMOC approval allows operators to demonstrate compliance with the AD, although not by using the method as specified in the AD.
- For a product already STC-modified, an AMOC approval (scenario 2) is effectively an 'exemption' from having to do what the AD requires.
- No exclusion from AD Applicability.

***APPLICABILITY ≠ ACTION REQUIRED***



# Thank you for your participation!

For any (further) questions,  
please provide these during the Q&A session at the end of the AD Workshop,  
or submit these in Slido during the Workshop.

If there is insufficient time during the Q&A for all questions,  
EASA will provide a written answer after the AD Workshop.

E-mail [ads@easa.europa.eu](mailto:ads@easa.europa.eu)

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