Questions and Answers Session

Subject	Reply
QUESTIONS RAISED BEFORE THE WORKSHOP	
Flight testing	
Please clarify EASA participation in test flights. I refer to the projects where EASA decide to send flight test crew to perform or participate in test flights. Examples to discuss/clarify: a) Who is responsible during the test flight? EASA or DOA? b) Who decide (and define) the qualification of the test crew? c) Who make (and approve) the test plans? d) Who make (and approve) Flight Conditions? e) Who issue the Permit to Fly? f) etc The reason for this proposal is that we have various experiences and it seems to be a little unclear how this topic is interpreted.	See good practices on the Agency website (Presentation - Flight test activity and Presentation - Flight test organisation) For Flight Test witnessed by EASA, the DOA is the operator of the aircraft.
Rotorcraft specific topics	
Please clarify certain issues around NVIS. Examples to discuss/clarify: a) Regulations – status and timeframe for the "new regulations & guidance material" which was indicated many years ago "to be soon ready"; b) Status regarding NVIS as a separate approval (privilege) for the Design Organisations; c) Competence requirements for personnel involved in NVIS; d) etc	See Presentation. Design Organisations Department Update

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QUESTIONS RAISED DURING THE WORKSHOP	
EASA new organisation	
Rulemaking activities for P21. Who is responsible in the new organization for this?	The Certification Policy and Safety Information department. They deal with the rulemaking activities in respect to P21, including DOA and POA. There is also a transversal coordination of P21 rulemaking activities with the rulemaking activities taking place in the Flight Standards Directorate. In general terms, the rulemaking activities related to programmatic issues are coordinated in a transversal way by the Strategy and Safety Management Directorate, keeping the execution task in the operational Directorates (Certification and Flight Standards).
Certification panels. Is there any intention to change the panel format?	No, the reorganization has not impacted the certification panels of experts and they continue to have the same structure and organization, to be formed by the same people. The only aspect that has changed with the reorganization is that the members of the panels have moved to different departments, being now distributed across different operational units. The new organization has also created new roles (chief engineer, chief experts, senior experts) which are part of a functional organization. They are tasked to manage the technical expertise of the Agency. They are not included in the organizational chart yet, but this will take place in the near future. Following an application, the PCM will be nominated and panels will be created as before the reorganization of the Agency. Information on created new roles (chief engineer, chief experts, senior experts) will be published soon.
Chief expert. Will he/she play a mediator/facilitator role between applicant and certification panels in respect to the	The panel of experts will continue having the same role. The purpose of establishing the new roles (chief engineer, chief experts, senior

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interpretation of the means of compliance or dispute resolution?	experts) has more to do with the internal allocation of tasks and the provision of continuity in the certification process than to act as mediator or facilitator.
The Agency's new Applicant Portal	
Registration process is difficult. Currently is easier to send the necessary documents related to the applicant by paper than to follow the registration process in the Applicant Portal. Why the registration process is not similar to any other registration in a web page?	The documents required are the same in both cases. The registration process needs to follow an administrative procedure that ensures that somebody is responsible. The Applicant Portal registration process is a one-off task, meaning that once it is completed there is no need to do it again.
Master user. Why do you give so much importance to a master user, instead of accepting that anyone in the organization could act as master user?	The reason for that is due to a legal constrain, as we need to have one person who is responsible for the applications submitted by the organization. Nevertheless, once registered, the master user can nominate other users within the organization. EASA legal department is currently looking on the Terms of Use of the portal to improve tools, and facilitate the situation, but the fact is that the master user has a lot of flexibility to use the portal, and some responsibility should be associated with that. Please continue to send your feedback
Master user. What happens if he/she leaves the company?	A new form 127 need to be submitted again and the registration process need to be done again (related to the new master user, contacts and management credentials).
Old applications. For some organisations there is a lot of data associated to an applicant number coming from past applications. Will this be migrated?	Yes, the Applicant Portal foresees the existence of DOAs having already an applicant number. The portal is an interface for an internal database. As soon as you register and have your old applicant number acknowledged, your previous applications will be displayed in the portal. Nevertheless, even if you already have an applicant number,

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	you will need to follow the registration process in the Applicant Portal as the rest of applicants.
Submission of applications in the old fashion. Is the word format application procedure no longer supported?	The previous way to submit applications (word document) will always be available. It is not foreseen that the Application Portal replaces the use of word documents for applications. We strongly recommend to use the Applicant Portal, but the other possibility will always be there.
Information about the status of the application. Will the Applicant Portal include this information?	At the moment this information is included up to the point when the application is accepted and forwarded to the applicable technical department. It is foreseen to include the status of the application from the beginning to the end (including progress of the technical investigation, involved persons and final approval no.) in a future update of the portal (2015).
Approval number and task number. Is the Applicant Portal providing the approval number and task number for each application?	The task number (identical to project number) yes. It is displayed in the portal as soon as eligibility is cleared and application accepted from administrative point of view. The approval number is not visible at the moment. It is foreseen to include the approval number in a future update of the portal, but anyway, it will only be displayed after the technical visa is signed, meaning at time of issuing the approval itself. This will mean that as soon as the project is approved you will get a notification (quicker than today). Fighting with 2 numbers is an issue taken – we are working on it.
On-going STC applications. Will they be migrated to the Applicant Portal?	No migration will be necessary. The portal is supposed to display full image of all the on-going projects for an applicant as soon as you are registered. The portal reflects the data base in a friendly manner.
Task number and project number. Does the task number replace the project number?	Task number and project number are the same. They are named different from a technical point of view. A task number is assigned to any incoming application before checking the eligibility. Once the

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	eligibility is checked and found satisfactory, the task number is called project number for the rest of the process.
Use of task number. Can the task number be used in the documents of the project?	No. This practice is not recommended. Once the eligibility is confirmed you will receive the usual acceptance e-mail which includes the project number. This is the reference to be used.
Use of task number. The display of the task number in the Applicant Portal can be confusing for other members of the organization authorized by the master user, as it seems to indicate that the application has been accepted by EASA and a number is allocated to it.	We take an action on this and will investigate how to address the issue.
Organisations with multiple approvals. The expansion of the Applicant Portal to other approvals can be confusing in the case of organization with multiple approvals (DOA, POA, MOA etc.) because currently there is only one master user, usually the Head of the DOA, who deals with certification applications. If a single master user is maintained, this person will not necessarily have the necessary involvement in applications not related to the DOA	We take an action on this and will investigate how to address the issue (to rethink the concept for the future development of the tool).
Minor changes to ETSO. Do we need to submit an application for minor changes to ETSO? Until now we are only forwarding the information of introduced minor changes to Parts and Appliances	If you currently are not submitting this kind of application, the existence of the Applicant Portal does not ask you to submit it. The Applicant Portal is a tool to submit applications, it does not introduce new requirements.
Rulemaking Activities Affecting Part 21: Update	
Flight testing activities: what will be the transition phase?	DOA's and POA's have 12 months to build their FTOM (March 2016); for the new Appendix XII (Competence and experience of pilots and LFTE) and for the national LFTE license the transition period is 3 years.

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Companies having DOA and POA. How the FTOM will be managed?	Flight testing activities done in design and in production are not the same. A single document can cover both if so decided by the organization, but it is important to highlight that in relation to the DOA, the FTOM is not approved by EASA (see next question). Flight testing activities for an organization having both DOA and POA should be treated as an interface topic, in a similar fashion as the approval of concessions for production deviations.
Approval of FTOM. How will the FTOM be approved in the case of organisations already having the privilege to approve flight conditions/ permits to fly?	The FTOM will not be approved by EASA. It will be necessary to submit the document to your TL. If there are no issues, the DOA approval will continue to be valid. In case the organization has flight testing activities in their scope and fails to submit the FTOM, the TL will raise a finding which if not corrected may lead to a suspension or limitation of the approval. The FTOM is a mean of compliance with the Part 21 requirements. It will be accepted in the context of the approval of a Significant Change to the Organisation or in the context of normal oversight activities.
New Part 26 requirements. Is there a transition phase following the entry into force?	Yes. 1 year after entry into force.
EASA Level of Involvement (LOI) project: Follow up	
New identified hazard. Will EASA make public the new kind of special conditions mentioned in the LOI draft to everybody on EASA website?	The special condition requirement is already in the present rule. The special conditions that are currently issued are addressing this concept, meaning that there is no new concept in the LOI proposal. The current way of working is to make available the special condition to the applicant only, as the information contained are project related. Nevertheless, there is a way to issue a generic special condition when required, which does not contain project related data, and this possibility is also used from time to time.

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Performance of the DOA. The feedback statements provided by PCMs on the performance of DOA are for the most of the cases subjective, and there is no requirement in the rules for that.	During the initial discussions on the LOI topic, the industry agreed on this approach. Nevertheless, it is true that the information on the performance of a DOA should be available to the organization. Transparency is a principle that we would like to introduce also in this area. We may need some time to organize the transfer of information, but it is envisaged. It is not the intention of the Agency to rate a company without sharing the information with the company.
Effect of new privilege to approve major changes on classification privilege. How the granting of the new privilege will affect the already existing privilege for classification?	No, it does not affect the existing privileges. The classification (and the related privilege) will still be needed even if the new privilege is granted. This is because not all the major changes could be approved with the new privilege (only certain major changes with a very well described history).
DO Update	
Certificate of conformity. Will it need to be signed by the DOA certifying staff?	No, the involvement of the Part 145 organisation's certifying staff is recommended from the beginning of the installation of the prototype, and the signature of the certificate of conformity should be done by the Part 145 organisation.
Harmonization with FAA for re-issuing of EASA Form1. When do you expect to happen?	No information on this. FAA still has not published the guidance on this topic.
Issuing of EASA Form1 by the Part 145 organisation. Is the involvement of a POA necessary? Can the Part 145 organisation issue an EASA Form1 for a modified component?	When you are modifying an aircraft, the Part 145 organisation with the proper scope can sign the EASA Form1. When you are modifying a component, the Part 145 organisation can sign the EASA Form1, provided that the component is in their capability list. Also when the component installed is new, the POA can issue the EASA Form1. The Part 145 organisation can always modify a component and issue a EASA Form1, provided that the component is in their capability list.

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	With regard to repair parts, a maintenance organisation may manufacture parts for its own repair purposes when expressly authorised by the competent authority of the Member State in accordance with the applicable implementing rules.
Stakeholder's feedback	
Does the Agency have records of DOA findings that could allow to identify whether some regulatory provisions are more often than others associated with findings? The intent is to focus rulemaking on areas which "create" problems for DOA to comply/ implement.	Yes. An analysis is performed on a regular basis.
EU and NON EU Industry DOA questions to EASA	
How do you ensure the consistency of the acceptance by the EASA DOA Team Leaders of the various means of compliance for a given subject proposed by the DOA applicants and holders (classification, concession, positioning of Independent Monitoring, surveillance, etc)?	There are various measures in place to ensure proper standardization of processes, including the standardization of the activities of the Team Leaders. The role of the Team Leader Manager is a technical role which is specifically tasked with this activity, making sure that the rules are applied in an homogenous manner. For example, at time of check point 4 there are 4 Team Leader Managers involved in the discussion. There are also other standardization elements, like the internal department meetings, the internal knowledge database, and the endorsement by Team Leader Managers and the approval of all the reports by the Head of Department, which also contribute to the homogeneity. The process is under control, we promote best practices. Should in limited occasions your Team Leader may give the impression that his interpretation on a specific topic is different please contact the department for further clarification.
Why the DOA holder cannot approve flight conditions not related to the safety of the design (privilege given to POA)?	It is believed to be a mistake that was introduced at time of the initial drafting of the Subpart P (2007) that has remained there because it is

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	not controversial. Nevertheless, it need to be clarified, and if necessary the rule need to be updated.
There is no guidance covering to subject non-conformance in production in EASA Part 21. What could be a way forward?	Although there are many references to non-conformances in production in Subpart G, there is not so many in Subpart J. In a simple way a concession is to a production deviation similar to what a repair is to a damage. It is useful to consider a concession process as being similar to a repair process but applicable before the issuance of a EASA Form52 or EASA Form1. Many DOAs use a kind of repair process for their concessions. An amendment of Part 21 does not seem to be appropriate, but additional guidance on the topic may be a good option.
Existing gap concerning 'concessions' understanding: What is necessary to ‚approve' concessions? Compliance demonstration : - as for a repairs, or - as for changes, or - with a ‚design intent'? What should ‚approved concession' mean for a Production Organisation? is ‚approved data'? Is part of Type Design?	A concession should not be treated as a change. A concession process should be a simpler process in comparison with the change process. A fast and quick process is necessary to manage concessions (similar to repairs), although the semantic of the EASA Form 1 or EASA Form52 (used following the removal of concession) may be a little misleading. We acknowledge the need of further guidance.
No common understanding of Independent System Monitoring: What ‚independency' means in terms of organisation and operation? Which function should own DOH or CCL? (Approval Manager, Airworthiness Office, Quality, …)	The answers to these questions are included in a presentation on ISM made 2 year ago in this workshop. The presentation is available on the EASA web site. ISM is not only auditing. There are other additional possibilities. It is much more than auditing. It is a system monitoring, something more complex than a quality organisation and its auditors.

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What are acceptable methods of monitoring the adequacy and compliance of DAS procedures? (is "audit" the only acceptable method of monitoring) Where is the need to show compliance with all elements of DAS within 3 years? (compared to 2 years' time frame given for POA)	There is a need to have independence at the top of the system, independence is relative to the level where the monitoring activity is performed. The top responsible should collect data from different sources and report what to have to be reported to the Head of DO (to be seen as well in light of SMS to come). In respect to the 3 years rules, it is not a requirement. It comes from the EASA internal procedure and seems a reasonable figure. Nothing prevent you to do the complete monitoring in less than 3 years, but more than 3 years doesn't seem reasonable.
Civil and Military (State aircraft) Is there any coordination between EASA and EDA / Military Authorities to ensure consistency in Part 21 and EMAR 21 requirements?	EASA and OCCAR started to work together on the A400M case. The military authority decided to take credit of EASA activity, accepted the civil certification as the basis for their own certification. Now they have decided to increase their involvement and we are communicating with them more frequently. Nevertheless, there is no plan to link Part 21 with EMAR21 (military rule identical to Part 21). Currently there is no activity for EASA in respect to EMAR21 review. EASA welcomes the cooperation with the military airworthiness authorities and is happy to support them if decision to follow Part 21 is taken.
Please could you clarify the scope of privilege of a subpart J 21.A.233(b) DOA holder (i.e. a non TC holder DOA) to approve minor changes. Does it include minor changes to in-service aircraft and/or production aircraft? Is there a need for an arrangement with the TC holder for Configuration Management or Integration or other aspects?	Most of the DOAs design minor changes to in service aircraft. In respect to aircraft that have not been produced yet, Part 21 is not against approving minor changes applicable to them, but the management of the configuration may be very challenging. If an organisation wants to go in that direction, there is a need to have an agreement with the TC holder to fully control the configuration.
AMC No.1 to 21.A.263(c)(1) includes identification of minor changes to type design requiring no further demonstration of	The concept is applicable to design solutions that are so similar to existing ones that the the validity of the original demonstration of compliance is not impacted. It is not envisaged to have a GM on this

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compliance. Please could you clarify the definition of minor changes requiring no further demonstration of compliance?	that includes a list of possible minor changes without further demonstration of compliance. It is much better that each DOA develop guidance material in their procedures that is applicable to their own design activities, and that can be reviewed by the EASA allocated Team Leader.
Part 21 Appendix I instruction for completion of EASA Form 1 requires to enter the justification for release of an item in conformity to non-approved design data in Block 12 (e.g. pending type-certificate, for test only, pending approved data). In such a case, why is there is no requirement on the DOA holder to advise the justification to the POA holder?	The key element here is the DO-PO arrangement, documenting the process and the control of the configuration tools, given the fact that for a new type there will be thousands of parts released before the type certificate is approved. In order to rely on mature processes and related procedures, there is the need to extend the DOA and POA scope with a reasonable period of time before the TC is issued.
Safety Management System (SMS) in Part 21: Update & Industry Input	
Coverage of SMS by ISO 9100. To which extent can it be credited?	There are some elements of SMS present in ISO 9100, but not all the safety related elements are included. area gap analysis should be performed.
Industry's Initiative: AeroSpace and Defence Industries Association of Europe (ASD): Update	
Small STC holders/applicants. Does the ASD initiative represent the needs of them? ASD has made a good coordination effort following an up-down approach which is more suitable for big organisations while the small side of the industry need to follow a bottom-up approach.	Small DOA holders are welcomed to discuss between them and provide their feedback about the ASD initiative and what aspects are not handled properly in respect to small organisations. The opinion of ASD on this topic is that it will be more effective if this part of the industry works together with ASD instead of working in parallel.

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New Regulation 376/2014 for Occurrence Reporting: Impact on Part 21	
Occurrences to be reported. A DOA is supposed to report all occurrences. Shall it only report the ones that are included in the list of the new Regulation?	The reporting obligation as required by P21 remains the same. A DOA has to go beyond of what is required by new Regulation in terms of reporting
AMC 20-8. Will this AMC no longer be valid? Will the definition of what is reportable be included in the new Regulation?	The definition of what is reportable will be included in the new Regulation, while AMC 20-8 will remain applicable as interpretative material.
Timeframe for reporting occurrences. Will it be 72 hours after establishing the unsafe condition, as it is now in P21, or 72 hours after being aware of the event?	This issue was detected after publication of the Regulation, and EASA is currently working with the Commission to introduce in the implementing Regulation the concept of potential unsafe condition. The intention is that the timeframe applicable to a DOA will be 72 hours following the assessment of the event.
Cabin Safety Topic – Follow-up	
Different classification of the same project by different DOAs. The integrity of some DOAs is being affected now, and the commercial implications are big. Will it be possible to publish in the EASA web a list of projects that have been classified as major by a DOA and for which the Agency has concurred on the classification? This will prevent other DOAs to classify minor the same projects.	This proposal was discussed in the internal working group and was considered as not being feasible. Such list will need to include a very detailed description of each change. While this is by definition quite challenging to be published by the Agency, it will not prevent in practical terms that other DOAs could always state that their change was similar but not exactly the same as one described in the list. Now we are working in the opposite direction, on a list which is very generic and which only includes the concept of the change. The right answer is at the level of each DOA – key issue is to improve internal procedures, discuss with the DOA Team Leader and with the involved expert). We acknowledge the commercial issue, but the good news is that safety

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	should not be affected by a wrong classification, as the demonstration of compliance is done anyway.
Cabin reconfigurations. Classification of major as minor based on past projects. Is there any possibility for a DOA that is doing many repetitive cabin reconfigurations per year to agree with the Agency a process to reclassify a major reconfiguration as minor based on past similar projects? Will the new LOI concept help on this?	This is about 2 different non linked aspects: LOI and new privilege to approve certain repetitive major changes (this should not be considered as reclassification to minor changes). The possibility is already there. It is based on the possibility for a DOA to extend an already existing STC for which they are holders to a new MSN, and after that to approve the delta as a minor change. LOI concept is not directly linked with the new privilege to approve some major changes, despite being proposed in the same NPA. A clarifying example is the following one: the Agency can decide for a given project to have no involvement at all, while the DOA have to apply for a major change, as they do not have the privilege, or the privilege will not cover the change proposed.
Industry issues: AEA DOAH presentation	
Approval of changes to ICA by airline DOA. Will it be possible for an airline DOA to change the ICA, e.g. AMM, for a technical field included in their scope? P145 allows the AMO to issue alternative maintenance instructions as per an agreed procedure with the Authority. Why this is not possible for a DOA? We would like to do this under the DOA because this changes are related to DOA activities.	Privileges to issue instructions are always granted in respect to the scope of the approval, mainly to the design of the DOAH, not to the design hold by another DOA. The principle behind is based on the fact that because the organization is doing design activities, it is allowed to have some privileges related to their design. In the proposal made by AEA, the DOA will be using a privilege to modify the documents related to a design done by other organization, e.g. TC holder, while no design activity will be supporting the use of such privilege. This activity is against a basic principle of Part 21.

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Capacity to write instruction within the scope: is it allowed to publish ICA to the modified system? "Repair approvals to cover: • alternate material or parts usage • changed overhaul processes • Similar or alternate repair procedures European PMA process : To keep a level playfield worldwide"	Yes, for a specific scope as privilege is associated to the scope of approval. The repair process can be used for the first 3 items In respect to the PMA topic, we intend to provide some post-workshop update on this, as it is being a controversial topic.
May a Part 145 organisation issue alternative maintenance instructions?	This is a question to be addressed to NAA's.
MRB PROCESS UNDER DOA: EASA & Industry Input	
Participation from operators in the working group. Operators input is very important for this topics to introduce the practical aspects in the discussion. Who was involved in the working group from operators side? In general, what is the participation to the WG?	A representative from Lufthansa (A380 MRB committee) was involved. Participation of operators in any discussion on MRB is a must. Nevertheless, the operators have expressed that they will be interested in taking part in some of the MRB discussions but not in all of them. To address this desire, we have developed the concept of LOP (level of participation) where the operators (together with the Authority and the TC holder) will establish their involvement in a given MRB project and will rely on the TC holder for the rest of tasks.
Criteria for routine vs non-routine. Will the criteria be generic and applicable to all projects or depend on the particularities of each application? Will there be a GM published on this topic?	There will be a generic list that need to be adapted to the particularities of the applicant because not all the applicants have the same experience. This means that a similar change can be classified as routine for an applicant and non-routine for another one. The working group decided at the beginning of their discussions that there was no need to modify Part 21 to address the MRB activities. It is envisaged to publish the list providing the taxonomy for routine and non-routine tasks by means of a Certification Memorandum.

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Implementation of OSD: Follow up	
Access to original OSD. A non-TC holder DOA will have the obligation to change the OSD, while the original OSD will be the property of the TC holder and it seems that there will be no obligation for the TC holder to make it available. How will the non-TC holder DOA gain access to the original OSD?	In a similar way as for the ICA, the TC holder must make available the OSD.
Classification and approval of changes to the OSD. Will the TOA be changed? What about the privileges? Will limitations be stablished in respect to OSD?	The TOA will be updated, adding the OSD capability in the first paragraph. There are already provisions for classification and approval of OSD changes in Part 21. The AMC/GM is still missing (task on-going). Limitations are possible, it will depend on the particular situation of the organization.
Non-EU manufacturers. Will the OSD be applicable to them?	Non-EU aircraft will need to comply with OSD requirements. Even if the non-EU manufacturers do not have a DOA, (meaning that the creation of the OSD by them is not oversight by EASA), they have to develop OSD as well. The EASA PCM/ experts only are looking into it.
MMEL grandfathering. We are aware about cases where the catch-up is not interesting from the economical point of view. How will EASA deal with such unbalance which may affect safety as well.	We are also aware about this. There are some MMELs approve by NAAs in the past for which a catch-up will mean a big effort. We are considering addressing them by means of an equivalent safety finding.
DOA competent as training organization. It cannot be expected that a DOA has expertise as a training organization. Could EASA clarify what are the expectations for a DOA in respect to flight crew and maintenance crew training?	We acknowledge the fact that a TC holder is not a training organization. There are on-going discussions on the process that need to be followed to extract the necessary information from the design to produce the training material. We would like to maintain compatibility with other Authorities and, at the same time, make the process simple for DOAs.
CVE for OSD. Will it be one person or various?	Not all the OSD elements are applicable to all the DOAs. It is up to each organization to nominate CVEs who will be competent for the review of

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OSD when STC under a Bilateral Agreement with EU	the OSD that is applicable to the organization. Not an easy answer; to be addressed in coming AMC/GM, (similar to non EU STCH)
Knowledge versus Competency	
	This discussion opens the door to an unchartered territory. The way in which competencies are visible in the system of a DOA could be improved. In the next months we will be discussing about how to measure the performance of a DOA, and an key element in the discussion is the competence of the people, as an organization is made out of individuals.
QUESTIONS RAISED AFTER THE WORKSHOP	
DOA procedures manual content Considering that 21.A.239 requires a DOA Holder to have describe on its manual a Design Assurance System, with responsibilities properly discharged within DO, including an independent checking function of the showings of compliance. Would be reasonable to have described on this manual how, and by who, the showings of compliance are produced? (even though it is not on the main interest of EASA)	Yes of course. We expect to find the description of the complete process and all associated tasks and roles.
Independent checking function Would be reasonable to settle the independent checking function solely on documents produced to really show compliance with certification basis standards? Having a CVE signing the technical documents produced by design and technical data production activities which occurs within the showing of compliance process doesn't means right since those documents are not registering the actual showing of	Yes, this is usually the case. Supporting documents can be signed only by so called "technical signatories".

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compliance, but intermediate steps that will lead to it.	