



EASA
European Aviation Safety Agency

General matters on ETSO

Michael Singer
Parts & Appliances Section Manager
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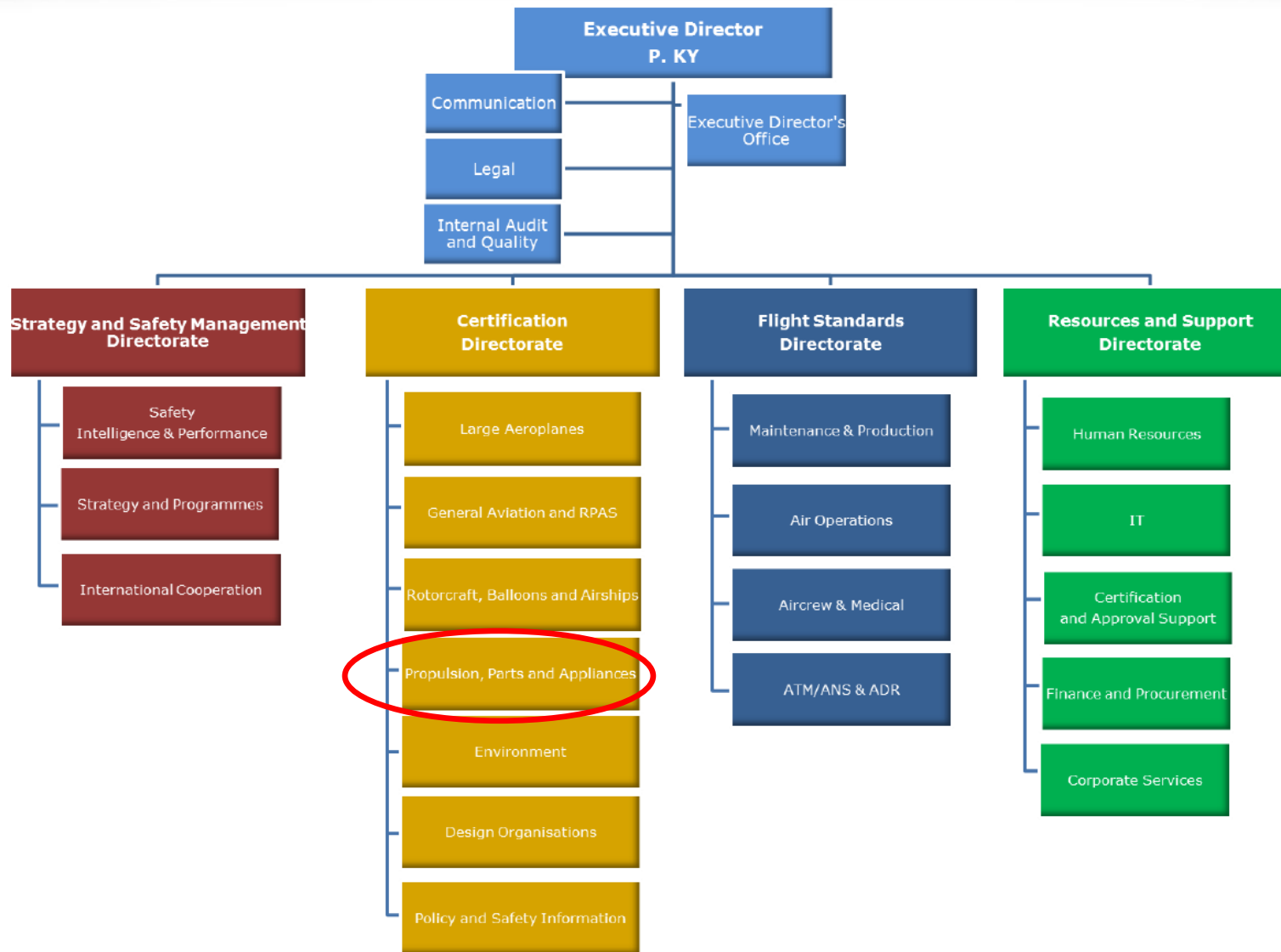


Overview

- New EASA Organization
- ETSO process amendments
- ETSO authorization vs Installation
- Certification Memoranda
- Potential future ETSO process amendment



The New Agency Structure





Certification Directorate

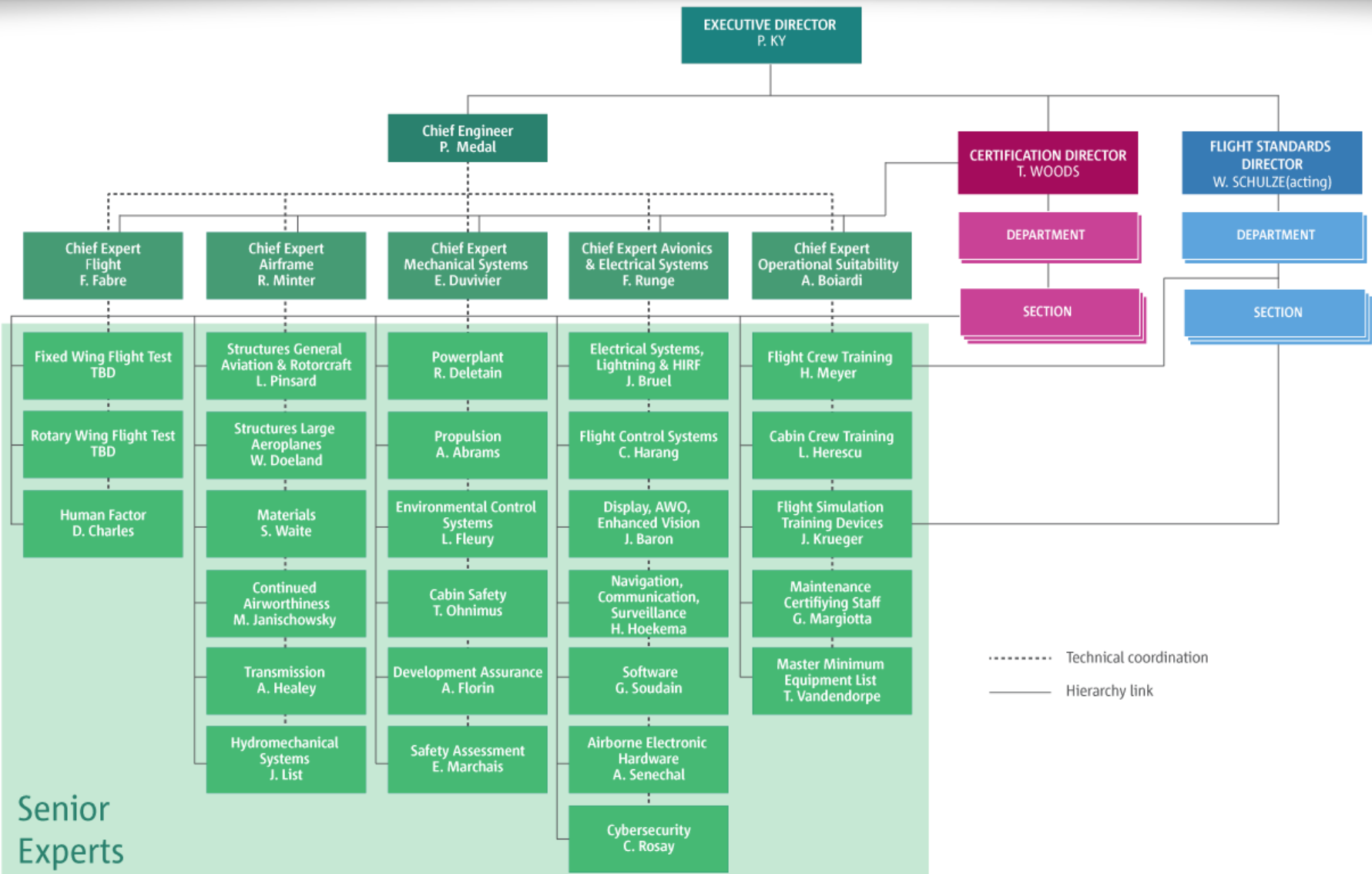


The four Product Departments comprises of:

- PCMs
- Rulemaking Officers
- Certification Experts
- Senior Experts



Experts Organization





Parts & Appliances Section

Parts and Appliances

Michael Singer

Secretary

Natalia Russimova

Avionics & Electrical Equipment

- Communication
- Navigation
- Surveillance
- Indicators
- Electrical Systems

PCM:

Anne Senechal (Sen. Expert AEH)
Hans Trautenberg
Xavier Audouze

Cabin/Cargo/Rescue Equipment

- Life Vests/Rafts -
- Oxygen Systems -
- Fire Protection -
- Galley Equipment -
- Emergency Parachutes -
- Seats
- Safety Belts
- Containers
- Pallets/Nets
- Tires/Wheels

Experts:

Thomas Rathmann-Ramlow
(Cabin Safety)
Dietmar Freese
(Safety, SW & AEH)
Duncan Jones
(Hydromechanical Systems)
Hans Trautenberg
(ATM/ANS)

PCM:

Antonio Foti
Pasquale Conte
Duncan Jones
Michael Singer



ETSO process amendments

Removal of EASA Form 35

- 21.A.605, 21.A.608 require a „statement of compliance“ with Subpart O and the applicable ETSO-standard(s)
- In the DDP the applicant shall make a declaration/statement that:
 - the article complies with relevant ETSO,
 - the article had been designed/qualified in accordance with EASA approved procedures (ADOA, Part21 Subpart O)

Form 35 is no longer required after September 2014!



ETSO process amendments

A number of recent projects created difficulties based on the fact that no Certification Plan was agreed:

- misunderstandings on requirements/applicability
- unclear if deviations would be necessary
- requalification efforts
- excessive amount of PCM hours
- frustration on industry- and EASA side

A well defined Cert Plan provides an agreed basis for both parties and allows a smooth qualification process with less risk on schedules and costs for industry



Current Part 21, Subpart O

- a Certification Plan for ETSO projects is not required
- Per NPA 2015-03: Level of Involvement (LoI)
 - (consultation period: March 2015 – June 2015)
 - revised 21.A.605 will mandate a Certification Plan
 - revised AMC 21.A.605 will define content of Cert plan



ETSO authorization vs Installation

Industry frequently complains about intransparency regarding different EASA interpretations of regulations or FAA policies

- Frequent cases for seat qualification/installation
- Most subjects cannot be isolated to ETSOA as they originate from installation requirements / interpretations
- Sometimes novel/unusual design comes with ETSO project which may later require a Special Condition (CRI) for installation
- ETSO is a Minimum Standard which may not address (all) installation requirements



ETSO authorization vs Installation

ETSO articles have no value if non-compliant with installation requirements (CS, Special Cond.)

- P&A PCM, Aircraft PCM, Experts coordinate at an early stage to make sure that the article can be installed:
 - Additional requirements may be imposed on ETSO project
 - Difficult if no standard exists (Ex.: composite seat structure)
 - CRI process (Special Condition) cannot be used for ETSO
 - Deviation process is not suitable for such cases
- Such projects are processed on an individual basis in close coordination with the applicant



Certification Memoranda

For clarification of frequently occurring issues EASA may publish Certification Memoranda

- CM must not introduce new or modify regulatory requirements
- CM material is non-binding
- CM should not include mandatory language
- CM must not invalidate a method of compliance the EASA previously agreed to
- CM may be called up in specific projects, if they are not in conflict with Guidance Material (AMC, GM) published in CS



Certification Memoranda

- Proposed CM are published for public comments and a Comment Response Document (CRD) is released with the final CM.
 - Examples:
 - EASA CM - CS – 001: Use of the Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12
 - EASA CM - SWCEH – 001: Development Assurance of Airborne Electronic Hardware
- => There is a number of potential subjects for a future CM on seat related issues**



Potential future ETSO process amendment

About 50 organizations have DOA (Part 21, Subpart J) and ADOA (Part 21, Subpart O) in parallel

Present discussion:

- Only keep 21J DOA (if the scope is correct)
 - Add ETSO specific procedures
 - Change classification (21.A.611) etc.

Benefit:

- Company would have privileges under DOA
- ETSO process could be assessed in annual DOA audit



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Any Questions?

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