



EASA
European Aviation Safety Agency

Changes to OSD

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Content

- Principles
- Rule
- Further rulemaking
- NPA 2015-12 proposals
- Other issues



Principles

- OSD is included in TC
Therefore: changes to OSD need approval

- Main questions:
 - When does a design change require changing OSD
 - How to classify OSD changes in minor/major
 - How to apply 21.A.101 Changed Product Rule
 - How to combine design change + OSD change approval



Principles

- Two kinds of OSD changes
 - Linked to a design change
 - Stand-alone change

- Special case: MMEL
 - Alleviative document
 - Design change does not necessarily require MMEL change



Rule

- Subparts D and E of Part-21 made consistent: 'change to design' replaced by 'change to TC'
- Changes to OSD have to be approved as any other change
- When design change affects OSD, the OSD must be changed
- Similar to TC: possibility to postpone OSD until Entry into Service



Further rulemaking

- Discussions during OSD rulemaking on changes were difficult
- Finally agreement on principles as reflected in rule
- However no agreement on details:
no AMC/GM
- Implementation of rule postponed till 19-12-2016
- Dedicated RMT ongoing to develop AMC/GM
 - NPA 2015-12 issued 20 August 2015
 - Comment deadline: 30 October 2015

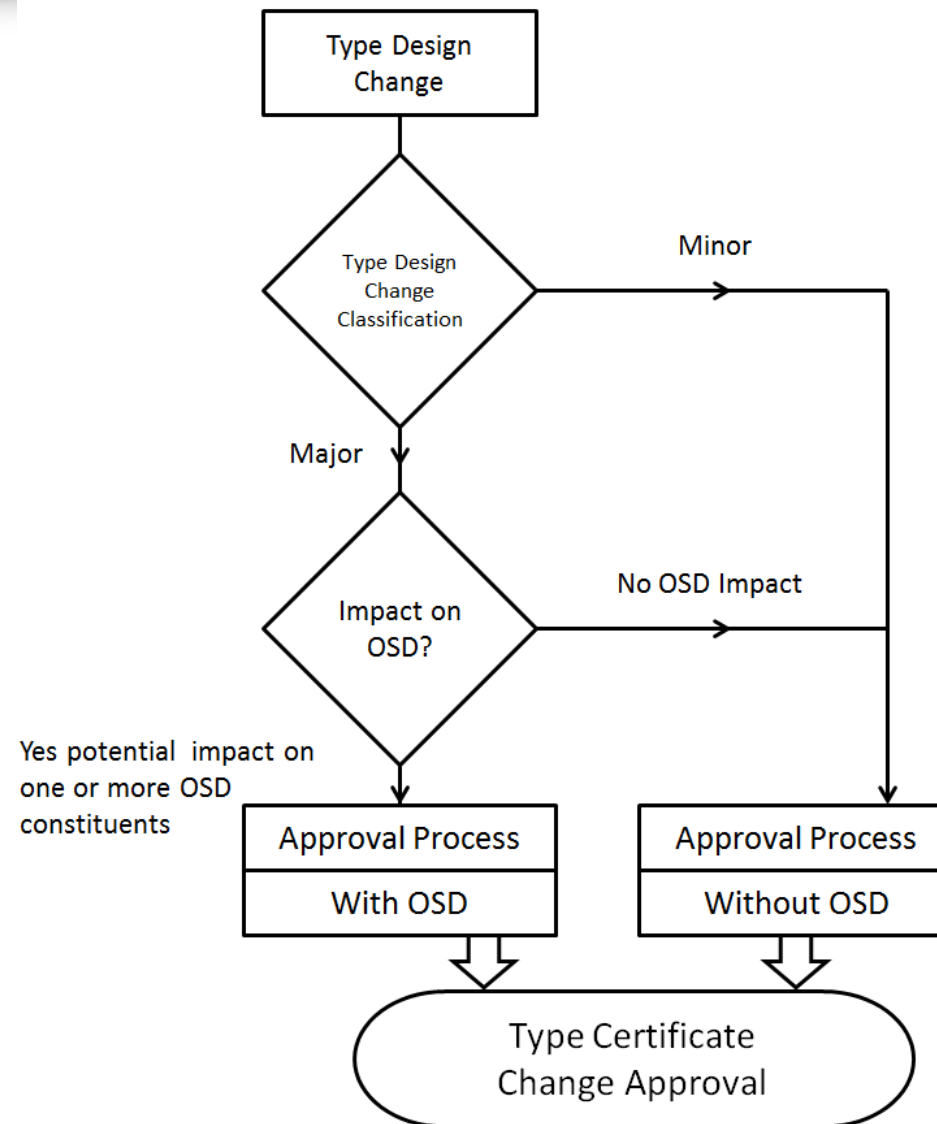


Design changes requiring OSD change

- When does a design change trigger the need to change OSD? (other than MMEL)
 - Majority of changes does not affect OSD
 - Minor design changes do not affect OSD
 - Design changes do not affect OSD if similar changes had no affect
 - Examples
- If certain constituent not included in catch-up OSD: change cannot require OSD unless applicability threshold is passed
 - E.g. > 19 pax for CCD



Design changes requiring OSD change



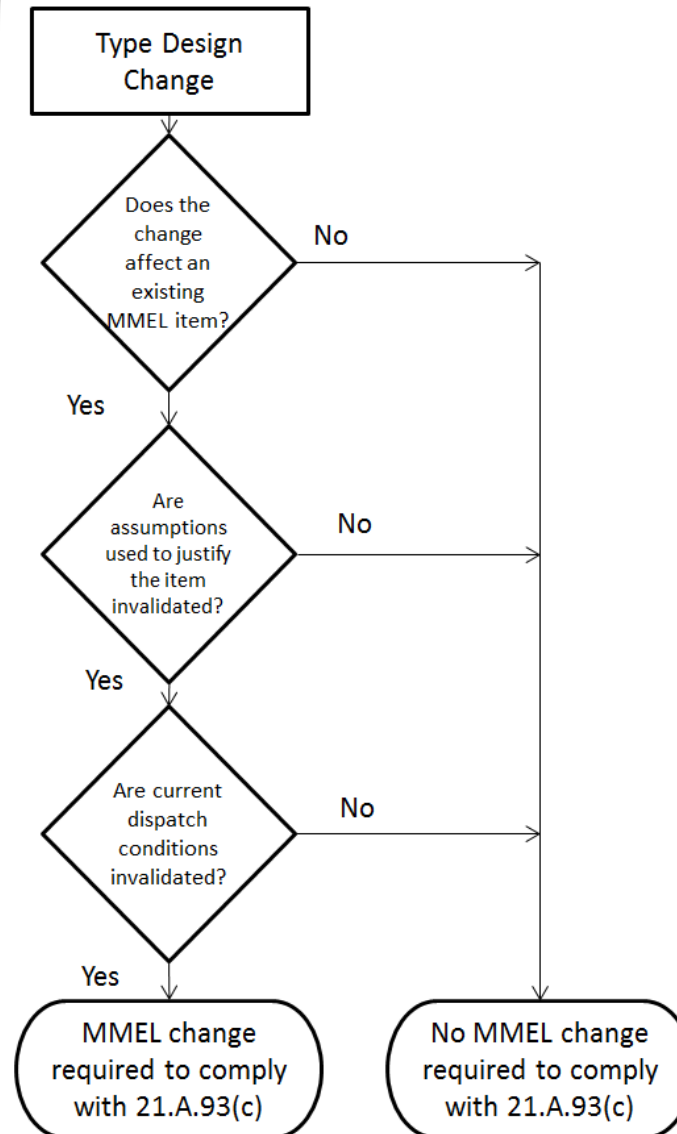


Design changes requiring MMEL change

- When does a design change trigger the need to change MMEL
 - Due to alleviative nature of MMEL: not required to add MMEL relief for new equipment
 - Design change can have affect on existing MMEL item: see graph



Design changes requiring MMEL change





Classification minor/major

- Classification can be done separately from design change classification
 - However: in the end the whole change (design + OSD) has only one classification
- General criteria for minor OSD changes
 - 'documentary changes'
- Specific criteria for each OSD constituent
 - Except MCSD > RMT.0106 (21.039(e)), which will also produce CS-MCSD



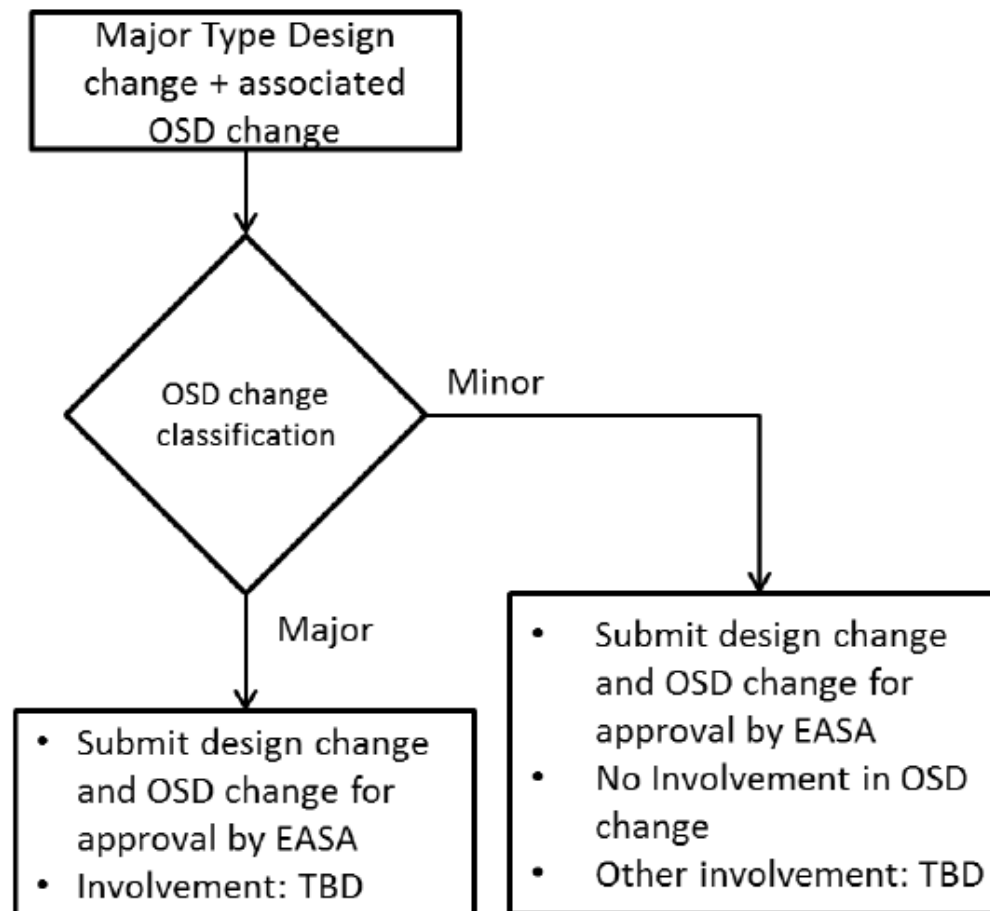
Certification Basis; CPR

- 21.A.101 CPR also applicable to OSD changes
- However less important due to short history
- Simple criteria proposed:
 - If associated design change is significant; then OSD change should comply with latest CS
 - Minor OSD change = not significant
 - Stand-alone OSD = not significant
 - Adding new OSD constituent = significant



Approval of changes: use of DOA

- If both design change and OSD change are minor: use DOA privilege to approve
- If design change major:





- How to deal with design changes automatically approved through bilateral after 19-12-2016?
 - Need for provisions in Technical Implementation Procedures



Implementation of OSD changes

- Are operators required to comply with OSD changes?
 - If linked to design change they implement: Yes
 - Stand-alone OSD change: No
- How are OSD changes for safety reasons implemented by operators / training org.?
 - Part ORO.GEN.155 (ADs)
 - SMS of the operators/training org.



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Thank you!

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