

EASA
Part 21 Design Organisation Approval
(DOA)
Implementation
&
Product Certification Workshop
- Industry Session -

18-19 November 2015
“RHEINSAAL” HYATT Conference Room
Hyatt Regency Hotel
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Part 21 DOA Implementation & Product Certification Workshop (Industry)

Group 1 Airlines Community

| Name | Airline |
|-----------------------|-----------------------------------------------------------------------|
| Dr. Dagmar ELTEN | Lufthansa Technik AG |
| Alain PETREMENT | Société AIR FRANCE |
| Nabil TAHIRI | Airbus Transport International s.n.c. |
| Glen PEARSON | British Airways PLC |
| Shevantha WEERASEKERA | ETIHAD AIRWAYS ENGINEERING L.L.C. |
| Jari VALKAMA | Finnair Technical Services Ltd. |
| Sigurdur ÁSGEIRSSON | Icelandair ehf |
| Jose ALMEIDA | TRANSPORTES AEREOS PORTUGUESES, S.A. TAP Maintenance & Engineering |



Classification Criteria for Repairs

Interpretation of Major

- 21A.435 (Classification of Repairs)
 - is asking to classify in accordance with the criteria of 21A.91 (Classification of changes in type design)
 - Classification criteria are “appreciable effect on...”
 - GM 21A.91 defines (amongst others) “Complementary Guidance for classification of changes”: ... extent of new substantiation data ...is considerable.
 - GM 21A.435 states: ... Major if the result on the approved type design has appreciable effect on...
 - In particular, a repair is classified as major if it needs extensive static, fatigue and damage tolerance strength justification...



Classification Criteria for Repairs

Interpretation of Major

- Classification Criteria is differently interpreted for products or panels or changes
 - “Considerable” is partly interpreted as “**much** volume of (simple) substantiation data” (Working Hours or Pages) and not as high complexity
- The community shared opinions
 - EASA understood that the volume is not a dominant criteria for classification of MAJOR
 - Complexity, CRI and new standards, materials etc. lead to MAJOR
 - Airlines agree that EASA wants to keep control for complex repairs
 - Harmonization of the interpretation of “considerable” within EASA for products is required (e.g. product engine)



TCDSN change record

- Current change records in the TCDSN documents do not have details of the changes with *Revised* being a common entry
- EASA has a separate excel spread sheet which may or may not be up to date with the TCDSN changes
- The working group requested EASA to put change bars in the TCDSN to identify changes
- EASA will consider this request



Alternative Means of Compliance

- AMOC (FAA and related EASA AD)
 - A specific request for an AMOC was discussed
 - EASA advised to apply for an STC for the change
- However, in the discussed case a reclassification of a major change / STC is proposed by EASA
- Common opinion
 - EASA FAQs should address these cases, where a reclassification could be acceptable



FTOM Requirement (1st flight in 2016)

- Test Pilots and Flight Test Engineers
 - In practice not for CAT 2 flights available for airlines due to minimum experience requirements
 - Practical implementation: Subcontracting to
 - Design suppliers
 - TCH
 - Single persons as CVE / organisations with an FTOM
 - Suppliers (and their FTOM) have to be documented in the DOA System
 - More and more training schools are expected to support the requirements, some have already applied for at EASA
 - EASA is willing to help finding short term solutions in 2016 through DOA TL if required
- “Lead” Flight Test Engineer
 - Coordinates the flight test with the pilots, is only applicable for TCH



Certificaton Memo CS-007

- EASA Proposed CM-CS-007 allows protrusion into the minimum aisle width required by JAR/CS 25.815 during phases of flights other than TT&L
- The allowance is limited to tray tables and front row seats in-arm video systems.
- EASA intends to publish a final CM that will differ in some aspects from the proposed one.
- The final CM will consider:
 - the comments provided by the Public on the proposed CM (detailed answers will be included in the related CRD)
 - Inputs received by Boeing and Airbus in the context of the discussion of MOC CRIs issued by EASA and based on the Proposed CM.
 - Recent discussions with Boeing on specific seat design features
- **No retroactive action is foreseen**



European „PMA“

- PMA's are very helpful for the airlines
 - USA, Canada, Hong Kong, Australia do have regulations to approve PMAs
 - Are sourced from US extensively by airlines
- RMT 0023 – Replacement Parts
 - Included in Rulemaking Program to be started 2016
 - Finalized 2019
- The group request that the Rulemaking Task shall not to be shifted anymore

End slide