

# **Group 5 - CHANGES:**

## **Minor–Minor changes or Repairs – lack of definition in current Part 21 & AMC**

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## Regulatory context - **AMC No. 1 to 21.A.263(c)(1)**

### Procedure for the classification of changes to type design and repairs as minor and major

#### ➤ 2.1 Content - The procedure must address the following points:

- ☐ the identification of changes to type design or repairs
- ☐ **classification**
- ☐ **justification of the classification**
- ☐ authorised signatories
- ☐ supervision of changes to type design or repairs initiated by sub- contractors.


.../...

#### ➤ 2.2 The procedure must indicate how the following are identified:

- ☐ major changes to type design or major repairs
- ☐ those minor changes to type design or minor repairs where additional work is necessary to demonstrate compliance with the CS and environmental protection requirements
- ☐ **other minor changes to type design or minor repairs requiring no further demonstration of compliance.**

**“minor–minor” -> other minor changes to type design or minor repairs requiring no further demonstration of compliance.**

## Regulatory context - **AMC No. 1 to 21.A.263(c)(2)** Procedure for approval of minor change to type design or repairs

	2.3.1 - Minor with additional work to demonstrate compliance	2.3.2 - Minor with no additional work to demonstrate compliance
Identification and brief description of the change or repair and reasons for change or repair	X	X
Applicable CS or environmental protection requirements and methods of compliance	X	<b>NO CS identified, NO CVE needed, Single signatory</b> 
Reference to the compliance documents	X	
Effects, if any, on limitations and on the approved documentation	X	
Evidence of the independent checking function of the demonstration of compliance	X	
Evidence of the approval under the privilege of 21.A.263(c)(2) by an authorised signatory	X	X
Date of the approval	X	X

# Proposed Clarification / way forward

- **Activity to justify the Classification [(c)(1)] is not additional work to demonstrate compliance with applicable certification basis [(c)(2)].**
- **Proposal**
  - add in chapter [(c)(1)] 2.2 “other minor changes to type design or minor repairs requiring no further demonstration of compliance.”
    - ❑ **Criteria for classification with no additional work to demonstrate compliance**
    - ❑ **List of typical change or repair falling under this category**
    - ❑ **Statement to clarify that change or repair documentation should record the justification of classification.**
  - add in chapter [(c)(2)] 2.3.2 “through appropriate procedures of the DOA holder’s design assurance system”.
    - ❑ **Statement to clarify that authorised signatory approval also endorses the privilege of Classification.**

## Examples **Minor changes** with no additional work to demonstrate compliance

1. Editorial change to type design Data
2. Introduction of alternative standard part. E.g change from straight to elbow greasing adapter
3. Installation of placards and decoration not required by airworthiness requirements inside/outside of the aircraft when operational requirements are not impacted
4. Repositioning or duplication of existing identification markings on tubes, lines, wiring without changing the installation process.
5. Modifications made to drawings that have no effect on the final type design.

## Examples **Minor repairs** with no additional work to demonstrate compliance

1. Repair that is covered by the previously approved certified Type Design,
  - The post repair dimension is within tolerances of the dimension on the Type Design drawing and meets all other Type Design drawing requirements, e.g. surface finish, protective treatment...
2. A Repeat Repair of a previously approved “baseline” repair.
  - A Repeat Repair must be the same as, or enveloped by, or a reissue of, a previously approved single “baseline” repair.
3. Editorial correction to already approved repair.

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