



EASA
European Aviation Safety Agency

OSD Implementation for STCs - Introduction

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OSD - Operational Suitability Data

- What is OSD
- Applicability
- Status
- Process
- STC Part 21
- FAQ





OSD FAQ - What is OSD?

Reminder:

- OSD is data to support operational aspects for which the design approval holder is responsible
- OSD consists of the constituents MMEL, FCD, CCD, SIMD and MCSD
- OSD has a certification basis
- OSD is referenced from the TCDS
- Not all constituents are applicable to all aircraft
- OSD is made available to the end user



OSD - Applicability

- Basic OSD applicability is defined in the CS for each OSD constituent
- For STCs or changes:
Applicability is defined in the TCDS (Applications for STC and changes received by the agency before 19th December 2016 do not need to address OSD)
- For DOA:
Applicability is defined by the category of products in the TOA



- TCDS's have been updated to incorporate OSD where applicable
- TC-Holders have extended their DOA scope to cover OSD
- Not all DOA's performing STC's or minor changes have extended their scope to cover OSD. Some investigations are still in progress



OSD process

- Application: a separate application is required. This would result in 2 projects being open, one for the TC/STC and one for the OSD.
- PCM would be the same for both.
- Where a quote is requested this will be provided before the project is allocated.
- Process will result in additional panels identified for the OSD constituents that will be reporting to the PCM.



- On completion ESoS provide by expert.
- Normal TV for STC completed by PCM and OSD added to documentation approved by the agency with statement including future revisions.
- Where OSD approval comes after the TC/STC being issued, then closure of OSD project can be used to add OSD references to TC/STC, removing limitations.



OSD Part 21 for STCs

- OSD is introduced by Commission Regulation (EU) No 69/2014 introducing OSD concept by amending 748/2012 (Part 21).
Article 2 – Points 16-34 and point 43 of the Annex shall apply to applicants for the approval of a change to a type- certificate as well as applicants for a supplemental type-certificate from 19 December 2016.
 - Interpretation: applications for STC received by the agency before 19th December 2016 do not need to address OSD.
- **21.A.93 Application (referred to by 21.A.113(b))**
 - (c) **When the change affects the operational suitability data**, the application shall include, or be supplemented after the initial application to include the necessary changes to the operational suitability data.
 - Interpretation: as a minimum a DOA must have ability to assess if a change affects OSD in their scope, in order to be able to apply for an STC from 19th December 2016.



OSD Part 21 for STCs

- 21.A.21 (b) (f) By derogation from point (e), and at the request of the applicant included in the declaration referred to in point 21.A.20(d), an aircraft type-certificate may be issued before compliance with the applicable operational suitability data certification basis has been demonstrated, subject to the applicant demonstrating compliance with the operational suitability data certification basis before the operational suitability data must actually be used.
- Equivalent statement at 21.A.103 for changes, but not in 21.A.115 for STC!
 - Interpretation: 21.A.115 is an omission and this derogation can also be considered for STC (Part-21 will be corrected in next revision).
 - Interpretation: change to OSD only required for EIS in EASA MS under EU operating rules. STC that affect OSD, but where derogation is requested, can be approved without OSD, but including an appropriate limitation.
- Changes to OSD introduced in AMC/GM to Part-21 – Issue 2, Amendment 6, dated 26/04/16



When is the design change affecting OSD?

- Determine applicability by reviewing TCDS.
Note specific certification basis
- Minor changes to TD can only affect MMEL
(GM No 1 to 21.A.93(c))
- Review of OSD constituents for content that might be affected
- OSD affect documented in CP
- AMC/GM OSD Changes
 - 9. A new GM No 1 to 21.A.93(c) (p.17 of 34) for FCD,CCD...
 - 10. A new GM No 2 to 21.A.93(c) (p.21 of 34) for MMEL



When is the design change to an STC affecting OSD?

- Determine applicability by reviewing STC.
- Case 1: STC covers OSD requirements
 - Review of OSD constituents for content that might be affected
 - OSD affect documented in CP
- Case 2: STC does not cover OSD (applicability date)
 - No requirement to assess impact of TD change to OSD
 - Electing to comply would mean a full reassessment of the impact of the STC to OSD



How are changes to the Type Certificate classified?

- Separate classification for the change to the TD and to the OSD
- Higher classification determines the overall change (Minor vs. Major)
- Case 1: Major TD and Minor OSD
 - Applicant can propose no further OSD verification. If the Agency accepts, no F128 required
- Case 2: Minor TD and Major OSD (MMEL)
 - Application for major change to the TC
 - Application for OSD using F128



How is OSD changed?

- Changes to OSD are provided through supplementary information (similarly to e.g. AMM or AFM)
- Supplements can replace certain parts of the original OSD or provide additional information



What is required when OSD is affected?

- Creation of supplementary information
- Demonstration of compliance against certification basis
- Approval
- Provision of supplementary data to end users



How is it applied for?

- STC and Major change applications where the design affects OSD should be supplemented by an application for changes to the OSD (Form 128)





How will the change be approved?

- Although two separate application forms are normally required, only one approval will be issued by the Agency.
 - (A harmonisation of Application Forms is in progress.)





What about validations?

- OSD is equally applicable for validations.
- Discussions ongoing with bilateral partners
 - EU-US: generic references to OSD and validation procedure for MMEL included in TIP revision 5 amndt1.
 - EU-CANADA: generic references to OSD and validation procedure for MMEL included in the TIP revision 2
 - EU-BRAZIL: generic references to OSD and validation procedure for MMEL included in TIP revision 3
- TIP texts to be improved through dedicated discussions on each of the OSD/OPS elements



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Open Discussion Questions

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