



### Questions and Answers Session

Organisation	Subject	Reply
<b>QUESTIONS RAISED BEFORE THE WORKSHOP</b>		
	<b>N/A</b>	
<b>QUESTIONS RAISED DURING THE WORKSHOP</b>		
	<b>Status of BA</b>	
	Does EASA have an opinion on which countries should have a BASA with the EU on the basis of the involved work?	The Agency has its point of view on the subject and there are a lot of work with countries like China, Russia and Japan. Nevertheless, only a reduced number of countries in the world (approximately 10) are prepared for the challenges of a bilateral. A bilateral is a long time effort with acute political implications in some steps. The process is complex and based on a mandate prepared by the European Commission and approved by the Council. It involves various rounds of negotiations, a signature and a ratification process verified by each party. In addition, once the bilateral is signed and ratified, it has to be implemented. For the USA the process took from 2002 to 2011. It is a long and difficult process which is of a very political nature at some points. In some cases a more pragmatic tool is to use a working arrangement between Authorities which is easiest.
	Are working arrangement limited to specific projects or can they be generic in nature, e.g. repairs?	Working arrangements are very open in their scope, but it must be taken into account that mutual recognition of certificates can only be achieved by means of a BASA, and this concept cannot be included in a WA. Nevertheless, aspects related to validation are acceptable elements to be included in



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		a WA, as well as other topics not directly related to certification like SAFA, continued airworthiness, etc.
	When is expected that Switzerland can benefit from the BASAs signed by the EU?	<p>Art. 66 of the Basic Regulation establishes that EASA is open to third countries that want to implement their system, so in a certain way it can be considered that Switzerland is an EASA country. Nevertheless, the BASAs include only the countries that are members of the EU. For the rest of EASA countries the following approach has been taken:</p> <ul style="list-style-type: none"> <li>- For Canada, a cover letter will be added to the BASA, meaning that those countries will be part of the BASA without having to go through a long and painful process.</li> <li>- For US, a separate agreement with each country will be needed. There is no target day for such agreements.</li> </ul>
	<b>Accepting test data</b>	
	The GM on Part 21 establishes that a CVE approves compliance data. Why cannot we take the DER approval as a similar process?	In theory the activities are comparable, but in our system there is no formal approval of compliance documentation. This means that today we do not have the necessary elements to include mutual recognition in the BASA, because the bilateral is based on the comparison of both systems, and in the EU we do not have a system to approve compliance data. In our system, approvals are granted to changes, repairs, etc. containing compliance data, but not to the compliance data itself.
	Recognition of TSO & ETSO. Could it be possible to be addressed in a similar way?	<p>Position was published this year; topic to be addressed in BASA: mutual recognition of tests.</p> <p>It is possible with Canada</p>



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	<b>Permit to fly</b>	
		<p>Topic was identified with FAA very early in the negotiations. There were some attempts to cover it in the BASA, but they were not successful. The subject is in the list of recognized problems, but there is a need to collect data and examples of the problems. FC are related to aircraft registered in the EU. It is acknowledged that if the aircraft is not registered in the EU, there can be problems. In the past it was suggested to the main TC holders outside the EU to apply for a limited DOA to cover FCs and PtFs but at that time nobody applied.</p> <p>Industry is invited to submit examples of typical problems, for further review by EASA.</p>
	<b>Reissue of EASA Form 1 for prototype parts after STC</b>	
	<p>It is a requirement for Part 145 to work with approved data. How does this match with the proposal?</p>	<p>This is a known problem. There is a rulemaking task that is starting in October 2013 to deal with this. In the meantime there are some options with the current rule, allowing the re-issuing of the F1 without removing the component from the aircraft. When there is a modification of a part with unapproved data it should be removed for recertification after approval of the data. If the modification is done in a P145 no removal is needed. The P145 has a work order where it must be stated that data is not approved. It is accepted to leave an empty space in the work order and fill it in later. Box 12 in form F1 allows the organization to establish that the approval of the design data is pending. Then the P145 can release the aircraft because it is released with uncompleted maintenance, and if tested successfully, there will be a statement from the DOA saying that the data has not been changed in the approval process. Even with the current rules there is no need</p>



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		to remove the component, but as a minimum the F1s have to be reissued.
	New aircraft coming from factory are not delivered with F1s for each and every component. In fact, they are delivered without any F1. Furthermore, the FAA does not require reissue of F1s after STC approval. Why is EASA requesting to reissue F1s that in a major aircraft modification can involve 3000 or 4000 documents? There should be a way to certify this without the need of a pure administrative act that is not realistic	New aircraft components are delivered without F1s because the whole aircraft is released with a Form 52. FAA system cannot always be followed in Europe, because we have different rules and practices.
	When the modification is fully under the control of a P145 working iaw approved procedures, and the whole process is controlled by the P145, why there is a need of an extra layer of reissuing documentation when everything is traceable and under control?	The current rule does not allow having a F1 plus a statement from the DOA as equivalent to a complete F1. A rule change will be required to allow it.
	What about the different treatment between POA and MOA? Does a POA have to issue a F1 for a component manufactured for a STC not approved yet?	Yes, and then the P145 will reissue the F1 that the POA issued originally when the STC is approved.
	<b>STC-Operator viewpoint</b>	
	Why is EASA late in the validation cases? Is the delay before or after the Technical Visa? From the total time on ground, do you have data about the percentage of the delay due to EASA delay?	The delay is generated in the Certification Directorate, usually before the TV, probably due to heavy workload of the allocated PCM. We do not have data about this.



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	<b>Instructions for Continued Airworthiness-AEA concerns</b>	
	If a procedure for removing a component from the aircraft is not included in the Maintenance Manual, can a DOA issue such procedure?	If it is in the scope of the DOA, this should be possible. Nevertheless, the information will be passed to the working group on ICA.
	<b>Previously approved design data</b>	
	A letter with examples of the concept has been sent to EASA. Any feedback?	The letter was been discussed internally but no feedback has been provided yet. The topic will be re-launched. This activity could be merged with the future working group on classification of cabin changes.
	For DOAs already having a procedure for reusing already approved data. Are we allowed to continue using the procedure?	If it is an approved procedure you can continue using it until there is a clear position on the subject.
	<b>Airworthiness approval for RFID/GPS/GPRS devices</b>	
	How was the modification that has been presented (passive RFID) approved?	As a minor change approved by a DOA. Nevertheless a CM on this topic will be highly appreciated by the industry.
	Cargo container with active RFID. What certification is applicable?	It must be approved at aircraft level.
	Nowadays many airlines are asked by passengers to have connectivity in the cabin. It will certainly help is the airplane is originally certified to accept any of these mobility devices. In example, we have an STC to do this which has a very demanding ICA. There is a need for a simplified way.  The issue is that mobility devices change continuously due	Message will be passed to our colleagues of Certification.



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	to technological improvements. What is needed is a global effort from the side of the Authorities to introduce as a requirement for manufacturers to make the complete airplane compatible with any electronic device	