



EUROPEAN AVIATION SAFETY AGENCY
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE
EUROPÄISCHE AGENTUR FÜR FLUGSICHERHEIT

Changes to OSD

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- Principles
- Rule
- Further rulemaking
- Objectives for AMC/GM
- Other issues



Principles

- OSD is included in TC
Therefore: changes to OSD need approval
- Two kinds of OSD changes
 - Linked to a design change
 - Stand-alone change
- Main questions:
 - When does a design change require changing OSD
 - How to combine design change + OSD approval
 - How to classify OSD changes in minor/major

- 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 EIS



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 for 3 years
- Dedicated RMT started to develop AMC/GM



Objectives for AMC/GM (1)

- When does a design change affect OSD?
 - Majority of changes does not affect OSD
 - Develop criteria and or examples allowing an easy determination, reducing burden for majority of changes
 - Ideas:
 - Allow pre-filter by non-experts
 - For FCD use training and checking levels



Objectives for AMC/GM (2)

- Classification minor/major
 - How to integrate into classification of design change
 - Criteria for classification



Other issues (1)

- Certification basis for OSD changes (applicability of Part 21.A.101)
- MMEL is special case
 - Because it is an alleviating document
 - Relief for new equipment can come later
- How to deal with voluntary OSD changes in the mean time
- How to deal with design changes automatically approved through bilaterals



Other issues (2)

- Are OSD changes mandated by AD a different category? 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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QUESTIONS?

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