

11. Operational Suitability Data GAMA Perspective

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OSD – Three Topics

- General Aviation
- Third Country OEMs
- Future Work on Changes



OSD – Non Complex GA

- Impact Expected to be Minimal
 - Main Change: EASA Points to MMEL for All New Applications for Other-Than-Complex Aircraft
 - Historically Not Required → New Requirement
 - Generic MMEL Compromise
 - Guidance Needed: Other-Than-Complex Assumed Not to Require OSD for CS-Pilot Element
 - Currently Not Subject to OEB, unless...
 - OEM Proposes: Example – TBM-850
 - EASA Proposes due to Unique Features: Explanatory Note Provides Some Guidance → Need Clearer Guidance on When...



OSD – Third Country OEMs

- EASA Met with FAA and TCCA in February 2011 at Toronto
 - Issues Identified
 - Near Term: Working Processes and Technical Arrangements to Be Established, but Awaiting Final EASA Requirements
 - Longer Term: Addressed within Safety Agreements
 - Current Status
 - Airbus and Dassault Conducting Joint-OEBs (FAA AEG / EASA OSD)
 - Lessons Learned?
- Recommendation: Joint Authority Processes Development Prioritized Following Publication of OSD in Official Journal and Relevant CS / AMC / GM Available

OSD – Changes

- EASA Called for Experts in May 2013 to Develop AMC / GM for OSD Including Changes to OSD (RMT.0607)
- Notional Approach: Did the Change Previously (prior to OSD) Result in Change to Equivalent OSD Element; such as OEB Report or MMEL?
 - If no, AMC / GM should result in *de minimis* impact on TC applicant including for assessment of the change
- Also, OSD Change Remains Separate from Type Design Change and Only Required for First EU Registry Aircraft (see Initial Application)

OSD – Changes

Element	Impact – No	Impact – Yes, likely...
MMEL	?	Additional Dispatch Item or Equipment
Flight Crew	?	Install CPDLC
Cabin Crew Data	?	Install New Emergency O2 System
MX Cert. Staff	?	Install Nitrogen Generation System
Simulator Data	?	New Engine; Major Change to FMS

Opportunity for efficiencies?



Conclusion

- *“When you have completed 95 percent of your journey, you are only halfway there.”*
 - Rulemaking Group formed 2006
 - EASA Opinion 2011
 - Implementing Rule Expected Early 2014
 - Effective (New Applications): December 2016
- **Recommendations for Next Year(s)**
 - 1) Working Procedures / Technical Arrangements between EASA and Validating Authorities (ANAC, FAA, TCCA) Need to be Developed, Published and Communicated
 - **Stated Goal = Process the Same...**
 - 2) EASA Workshop Modeled after Successful Joint-RAG-TAG-SSCC FCL Requested for 2014 to include EASA, National Authorities, Third Country Authorities AND Industry