

EASA
Part 21 Design Organisation Approval
(DOA)
Implementation
&
Product Certification Workshop
- Industry Session -

18-19 November 2015
“RHEINSAAL” HYATT Conference Room
Hyatt Regency Hotel
Cologne, Germany

Part 21 DOA Implementation & Product Certification Workshop (Industry)

TCH of Out-of-production aircraft: Consistency and cost effectiveness required

BAE Systems / 328 Design / Fokker Services / SAAB

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18 November 2015

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Consistency and cost effectiveness required

➤ Level of annual TCH fees

- Significant concern for the small fleets of out-of-production aircraft types
- The introduction of revised F&C without adequate notification prohibited business financial planning

➤ Recommendations

- Re-evaluate weight and number of aircraft in the fleet (why: less than 50, instead of gradual decrease?) and propose improved model for new basic regulation
- Provide transparency that the EASA effort is in line with the fees

Consistency and cost effectiveness required

- MMEL catchup for non JAA MMEL
 - Unforeseen costs due to new rulemaking on OSD (light catch-up has not shown up to be as light as advertised)
 - Abrupt introduction with no clear signal well in advance disturbs financial planning
 - “Frozen” CAA approved MMEL is not in line with well-considered rulemaking process
- Recommendation
 - Ensure smoother transition in future new rulemaking in other areas (e.g. Part 26); improve consultation process

Consistency and cost effectiveness required

- OSD (not out-of-production TCH specific)
 - Some EASA staff require OSD (MMEL) parallel application through form 128, why not one STC application – project control / financial reasons?
 - The process for the handling of the application for OSD approval is not very clear as yet (just an MoC?)
 - Recommendations
 - Improve transparency of what is exactly required under OSD
 - Have PCMs to apply consistent interpretation

Consistency and cost effectiveness required

➤ Occurrence reporting

- Encountered significant differences in PCM expectation on report numbers and timeliness
- New 376/2014 regulation does contain elements that do interfere in a complicated way (or are even contradictory) with the current Part 21 requirement

➤ Recommendation

- Ensure standardization in the PCM group (through the large aircraft PCM meeting), on the required time for analysis before reporting potential unsafe conditions
- Remove the contradiction between Part 21 and 376/2014 requirements (RMT.0681)

Consistency and cost effectiveness required

➤ DOA & PCM arrangement

- Change to EASA PCM & frequent PCM changes
- Delayed agreement on certification plan
- Expectation from industry for EASA to provide to an appropriate service level

➤ Recommendations

- Do recognize the importance of, and ensure PCM responsiveness and focus for our business
- Include responsiveness and commitment of panel experts (PCM to resolve project priorities and specialist availability)
- Set a standard for PCM performance!

Consistency and cost effectiveness required

- Major stand alone AFM changes
 - Some of our companies have encountered that EASA has effectively eliminated major stand alone AFM changes (ref form 36)
 - Others still quite regularly apply for such major stand alones and get them approved
 - Recommendation
 - Ensure consistency in PCM position considering stand alone major AFM change applications

Consistency and cost effectiveness required

- Pending aging requirements (DT/WFD)
 - No clarity on when the regulation will be issued and whether there will be really full harmonization
 - For the older aircraft types and diminishing fleets there is a strong need for a tailored compliance (full compliance could be out of proportion from a cost – safety benefit perspective)
- Recommendation
 - Ensure that the final rule does not effectively force these aircraft types out of operation due to an unjustified rise in cost of ownership

Consistency and cost effectiveness required

➤ Summary

- EASA to apply consistency in the provision of regulatory interpretation and guidance at PCM level
 - EASA to establish a cost effective oversight of our Aircraft types
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- Out-of-Production TC holder group has approximately 250yrs of Aviation Experience
 - The group wishes to continue to work with EASA to secure an even longer safe future

Our History



Thank you

Any Questions?