



EASA
European Aviation Safety Agency

OSD Rulemaking update

Jean-Louis Ammeloot
Certification policy officer
25 May 2016

Your safety is our mission.

An agency of the European Union 

TE.GEN.00409-001



- Principles
- Rule
- AMC & GM (ED Decision 2016/007/R)
- Other issues



Principles

- OSD is included in TC

Therefore: changes to OSD need approval

- Main questions:

- When does a design change require changing OSD
- How to classify OSD changes in minor/major
- How to apply 21.A.101 Changed Product Rule
- How to combine design change + OSD change approval
- How STC related OSD constituents are made available



Principles

- Two kinds of OSD changes
 - Linked to a design change
 - Stand-alone change

- Special case: MMEL
 - Alleviative document
 - Design change does not necessarily require MMEL change



Rule

- 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 Entry into Service
- Implementation of rule postponed till 19-12-2016



- Decision on AMC/GM related to OSD changes published on 26 April 2016
- GM No 1 to 21.A.112B specific to STC: it describes when a DOA is required and when alternative procedures could be used.
- DOA or AP-DOA procedures must include OSD changes by 19/12/2016

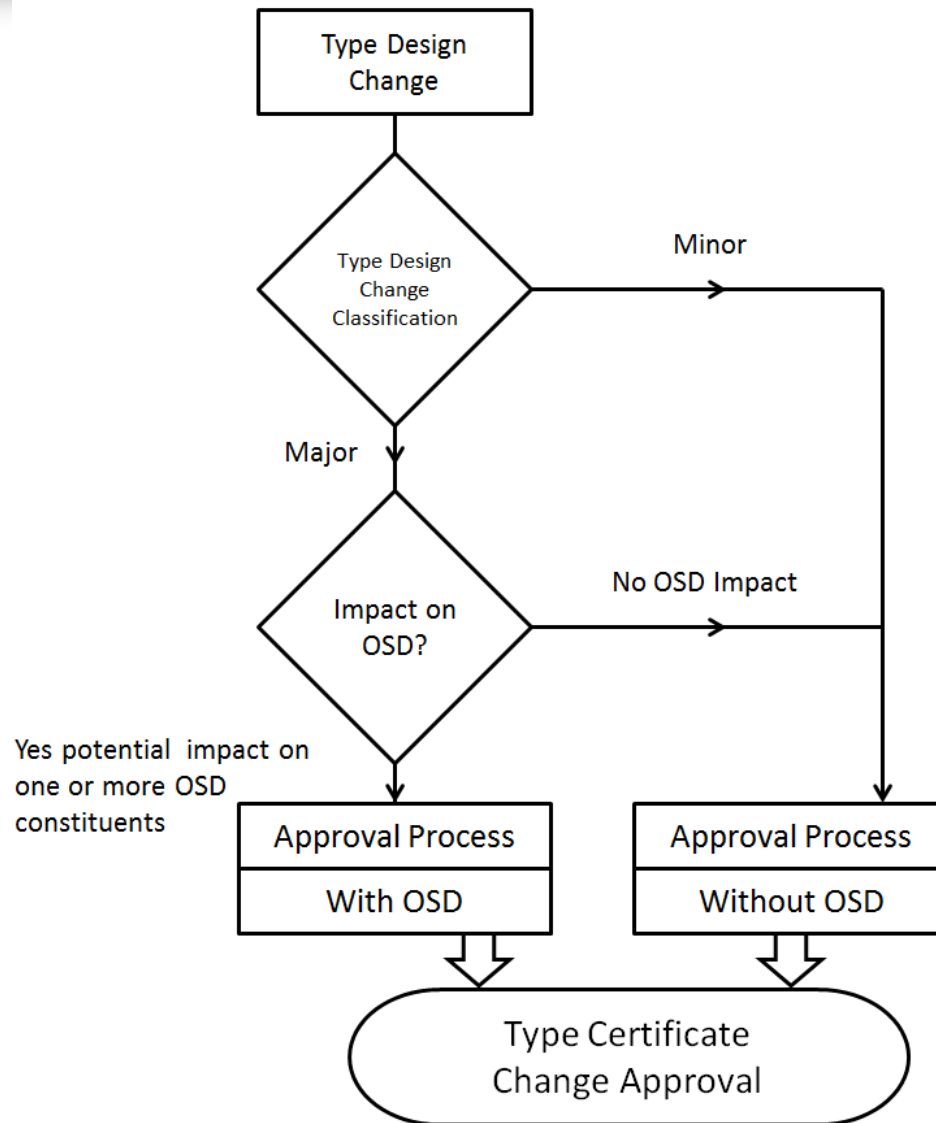


Design changes requiring OSD change

- When does a design change trigger the need to change OSD? (other than MMEL)
 - Majority of changes does not affect OSD
 - Minor design changes do not affect OSD
 - If certain constituent not included in catch-up OSD: change cannot require OSD unless applicability threshold is passed
 - E.g. > 19 pax for CCD



Design changes requiring OSD change





Classification minor/major

- Classification can be done separately from design change classification
 - However: in the end the whole change (design + OSD) has only one classification
- General criteria for minor OSD changes
 - 'documentary changes'
- Specific criteria for each OSD constituent
 - Except MCSD > RMT.0106 (21.039(e)), which will also produce CS-MCSD



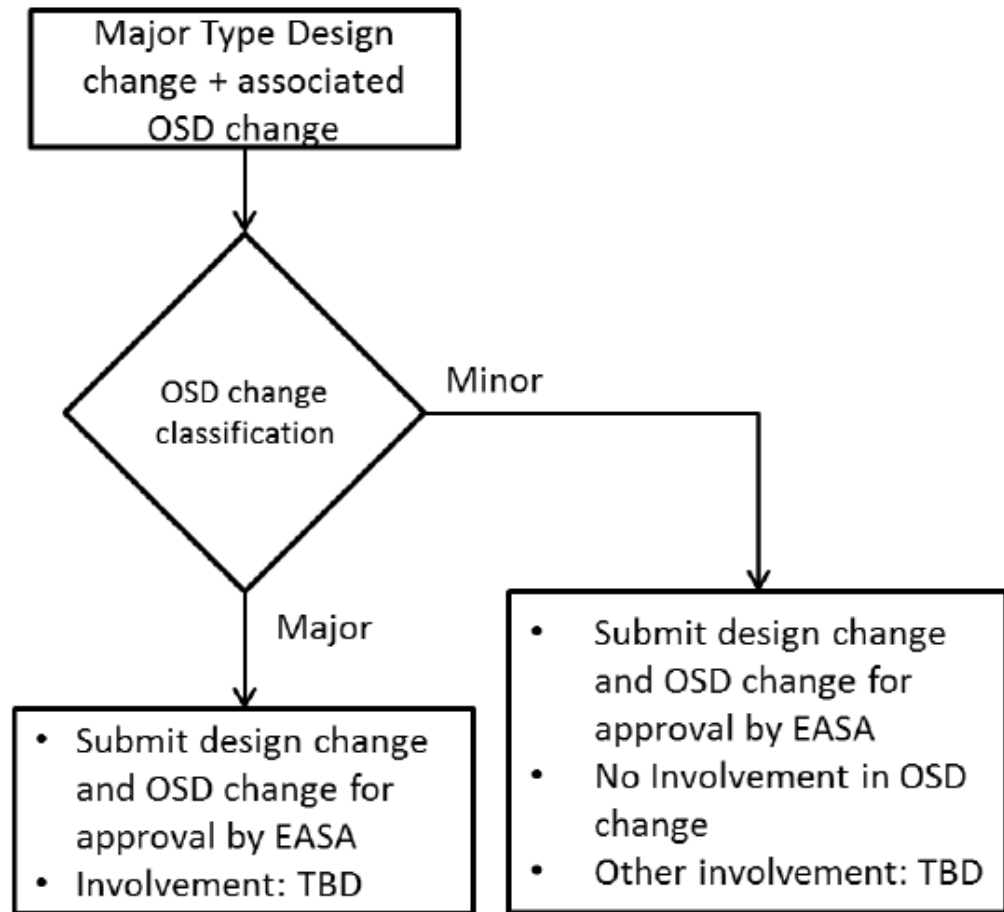
Certification Basis; CPR

- 21.A.101 CPR also applicable to OSD changes
- However less important due to short history
- Simple criteria proposed:
 - If associated design change is significant; then OSD change should comply with latest CS
 - Minor OSD change = not significant
 - Stand-alone OSD = not significant



Approval of changes: use of DOA

- If both design change and OSD change are minor: use DOA privilege to approve
- If design change major:





STC related OSD constituents

- OSD constituents related to STCs , if any, are listed in the STC Certificates as associated technical documentation
- They are indicated in the STC list available on the EASA website



EASA
European Aviation Safety Agency

Questions ??

Your safety is our mission.

An agency of the European Union

