



EASA
European Aviation Safety Agency

Product Certification and Design Organisation Approval Workshop

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TE.GEN.00409-001



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Input from Side Meetings *STC Holders - Small organisations-*

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23.11.2016

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Group Composition-Industry

Name	Title	Company
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Guillaume Perez	Design Organisation Manager	21J.512 - TAG Aviation S.A (Switzerland)
Dominik Kreutzer	Head of Aw.O	21J.469 – P3 engineering GmbH (Germany)
Reiner Herrmann	Head of Design Organization	21J.353 - Rheinland Air Service GmbH (Germany)
Giacomo Giovangrossi	Head of Design Organization	21J.584 - Aero Sekur S.p.A. (Italy)
Romain MBWANG SEPPOH	Head of Aw.O	21J.053 - EAD Aerospace (France)
Paul Salt	Head of Aw.O	21J.477- PALL Aerospace (UK)
David Bodilly	Avionics CVE	21J.135 - Bristow Helicopters Ltd (UK)
Andreas Becker	Head of Aw.O	21J.489 - Swiss Air Ambulance, Ltd. (Switzerland)
Wolf-Godart von Drachenfels	Head of Design Organization	21J.611 - Safran Engineering Services (France)

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Group Composition-Industry

Name	Title	Company
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Keith McKerchar	Head of Design Organization	21J.452 - EIRTECH AVIATION SERVICES LTD (Ireland)
Camille THIRIEZ	Head of Aw.O	21J.492 - Altran Lab (Trading as AIRCAD) (France)
Johannes Clementi	Head of Aw.O	21J.040 – Aerodata AG (Germany)
Alastair Erskine	Head of Design Organization	21J.198 - STC Twenty One Limited (UK)
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STC Holders – Small DOAs

1. STC Projects. Coordination and practical aspects
2. Level of Involvement
3. Rulemaking aspects of discussion
4. OSD joint meeting for Airlines community (group-1) and STC Holders-Small DOAs (Group-4)
5. DOA Subcontracting



STC Projects. Coordination and practical aspects

- Feedback from EASA to applicant on CP acceptance is not always happening. Acceptance of CP is Key.
- To have early agreement on deliverables between PCM and applicant.
 - Linked to future Lol concept.
- Time expectations shall be shared. Different speeds between EASA / Applicant.
- STC covering multiple A/C types. EASA is reviewing for harmonisation with FAA AC20-180.
- It is asked to EASA to publish the excel sheet with guidance for cabin safety classification of changes (*DOA Workshop 2014-Cabin Safety*)



Level of Involvement

- Benefit for small DOAs, specially if volume of STC activity is low, could be dubious.
- Feedback on the DOA performance from certification shall be transparent and right after STC approval.
- Advance implementation phase. Early and transparent feedback from EASA to participating companies will be highly appreciated.



Future new privileges in Part-21 (Approval of *STCs*)

- On the request for this privilege, there is concern about potential inequalities on the approach to Small DOAs with low volume of activity w.r.t. “big” DOAs.



Rulemaking aspects of discussion

- FAA validation of EASA STCs, even for *basic STC*:
 - Long validation times experienced with FAA.
 - Lack of communication through the process, both with EASA / FAA
 - FAA is requiring documentation in hard copy.
- EASA comments that these aspects have been addressed with FAA, and situation should be improved.
 - TIP_rev06 should reflect further additional improvements.



Rulemaking aspects of discussion

- DOA-POA interface. About the *Direct Delivery Authorisation*.
 - This DDA shall be documented in the DO/PO interface. Use of separate references, quoted in the DO/PO arrangement, is accepted approach.
 - To include in EASA FAQ practical arrangements on the interpretation of this aspect by DOAs.

- EPA Marking.
 - Intent of the rule is explained. However, benefit of it is not fully shared between EASA / Industry
 - Also on FAA STCs validated by EASA, EPA marking (or similar) is not enforced.



OSD joint meeting for Airlines community (group-1) and STC Holders-Small DOAs (Group-4)

- Investigation of extension / level of support of scope has been handled in different manner by different DOATLs.
 - This has caused in some cases late applications/no application.
- It is anticipated that deadline 19/12/2016 would not be met in most of the cases.
 - “Plan-B” on each case to be discussed between company and DOATL (investigation on-going, finding, other)
- Observation of OSD aspects in Bilateral agreements is under discussion, but situation not clear yet to industry.
- Access to OSD data from TCH is seen a concern for non-TCH DOAs.



DOA Subcontracting

- Demonstration competencies and capabilities in case of extension of DOA scope, could be achieved through subcontracting.
- Further to the current FAQ <http://www.easa.europa.eu/faq/20115>, It is demanded additional guidance on how to deal with equipment suppliers in the frame of 21.A.239(c) and 21.A.243(b).
 - Particularities on COTS
 - Qualification of supplier is necessary?



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End slide

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