

DOA&Certification Workshop 2017

No.	Commenter/s	Comment	Response
1	AIRBUS	Within the next PART21 update, the privilege for approval on certain major changes will be included. What is the current status? What will be the timeline?	The privilege can be used as of the applicability date of the amending Regulation. For the expected timeline, please see the slide presented at the end of the LOI session.
2	ASD	How do you cope with cultural aspects when assessing the certification performance of applicants?	The question is understood in the direction of EASA staff's subjectivity in the assessment. EASA is developing a more standardized feedback for the EASA experts and PCMs which will be used for the quality feedback to certification projects and continued airworthiness performance.
3	XtremeAir GmbH	Will CDIs be only for type certification and major changes? Or also on minor changes?	For minor changes, the certification programme does not need to be broken down into CDIs. The risk assessment can be made for the whole certification project.
4	Leonardo Helicopters	Please, clarify how company have to manage the DOA performance: no-blame culture, no-disclosure, input for improvement...	In order to avoid a blame culture, both (Agency and approval holder) have to ensure that the information exchange are only used for their intended purpose, i.e. to determine the performance and to allow to identify where organizations can improve their performance. To that end, the Agency will sign a MoU with all organizations before sharing detailed performance information.
5	Patria Aviation	Has it been considered that the risk matrix done for LOI purposes, might have an affect also on the minor/major classification?	The LOI risk matrix has no effect on the minor/major classification. But it is true that some criteria are used for both.
6	Terma AS	Who determines the risk class - EASA or the applicant?	The applicant proposes, the Agency determines.
7	Safran Aircraft Engines	How LOI will interact on the existing DOA privileges? LOI assessment takes credit of the DOA performances. Wouldn't it impact them in some particular cases?	Where an organisation has a privilege to approve a change, there is no need to apply for an approval with the Agency. Hence no need to determine Agency's involvement.

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8	Marenco Swisshelicopter AG	Has EASA specified already in which Kind of structured document Should be Used by the Applicant for the CDI?	In the certification programme
9	Thales	With the 4 criteria and the multiple sub criteria; do not you think that you will make very difficult to be in class 1?	No, some statistics show that there are quite a number of CDIs in risk class 1. See the presentation slides on LOI, experience of the advanced application projects
10	AIRBUS	DOA perf, what are the detailed questions and associated ratings used by EASA specialists for the 3 main criteria PPC, ARC, CD? Available in a Certif Memo?	EASA is developing a more standardized feedback for the EASA experts and PCMs which will be used for the quality feedback to certification projects and continued airworthiness performance. This is planned to be introduced in 2018.
11	EMBRAER	Is there any process to avoid personal perceptions about DOAH staff on the LOI determinations?	One of the objectives is to provide a transparent process and applying objective criteria. There should be no room for personal perceptions. Furthermore, the Agency will look at the organization and posts within the organizations not at individual staff members.
12	Patria Aviation	Has EASA considered that the CDI risk-matrix could be used in part for the benefit of minor/major classification?	Although some of the classification criteria are also used to determine the severity in the context of LOI, the risk matrix cannot be used for the purpose of minor/major classification. The risk which is assessed for the classification is a pure technical one. For LOI it is linked to the likelihood of an un-identified non-compliance with the cert basis.
13	EMBRAER	Does EASA plan to provide timely reports showing the trends on LOI determination within the panels?	There will be no report for LOI determination since this information will be included in the certification programme. The performance of the design organization will be shared with the applicants and the performance results are planned to be live in the SEPIAC tool.

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14	Finnair Oyj.	Does EASA also intend to ensure the quality of documentation provided by the DOAs to the airlines and MROs? Even big DOAs/OEMs sometimes provide bad quality	Assessed are data and activities that are retained by EASA for a sample check, i.e. a second verification of compliance demonstration in the frame of initial and continued airworthiness. There will be no report for LOI determination since this information will be included in the certification programme. The performance of the design organisation will be shared with the applicants and the performance results are planned to be live in the SEPIAC tool.
15	Pilatus Aircraft Ltd.	LOI training is already underway @ EASA. In which form this will be made available to applicants, and when?	The Agency plans to organise workshops for applicants to train them and discuss with them the new LOI concepts. They will be organised closer to the adoption of the Part 21 amendment, probably in H2/2018 and beginning 2019.
16	Saab AB	How will it be assured that LOI gives the PCM more time to work with the project? Today the PCM have limited time and approval is delayed	One objective of LOI is to ensure that the PCM (and experts) have sufficient time focussing on those parts of the project which pose highest risks, instead of reviewing, verifying and accepting elements of low risks.
17	BAE Systems Regional Aircraft	DOA dashboard performance is based on PCM and experts feedback. Not all staff are providing feedback so incomplete DOA PERF assessment.	All PCM and experts are required to provide the feedback.
18	Icelandair	Is the EASA LOI determined for the project as a whole, or per individual CDI?	The LOI is determined per CDI. The sum of CDIs shall cover the complete project. In simple projects it may be possible that the whole project is one CDI.
19	PMV ENGINEERING	Will DOAs have the opportunity to challenge/discuss with EASA about Performance rating for each projects?	DOA holders can discuss with EASA in frequent meetings organized by the EASA DOA TL
20	Cargolux Airlines	Will the dashboard from any DOA be published on EASA website?	No, it will be shared with the respective organisation only

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21	AIRBUS	In LOI CM non-critical -> minor. Why should we justify again the non-involvement on a minor change?	If minor changes fall under the privilege of a DOA, there is no EASA involvement. Otherwise, on minor changes, EASA determines the LOI and there is no obligation for the applicant to propose an LOI. A CDI of a major change might be non-critical but this should be justified if not obvious.
22	Fokker Services B.V.	Just for confirmation: LOI only applies to major changes and major repairs on aircraft for which the DOA is not the TCH?	No, LOI applies to all projects but an applicant's proposal is required for major changes, major repairs and STCs.
23	OGMA, S.A.	How does the current part 21 version (which reqts) covers the LOI concept? Only new AMC&GM will be issued or a new revision to part 21 will also be issued?	Current Part 21 does not explicitly mention LOI. It will be changed, so we will receive new rule text and also new AMC/GM.
24	Zodiac Aerospace	Will LOI introduction be considered a significant change to APDOA for ETSO?	As 21.A.247 does not apply to APDOA, the question whether LOI is a significant change is irrelevant for the demonstration of the capability of the organization.
25		Can a DOA with low STC activity decide not to implement LOI processes and continue to operate as before?	No, LOI will become mandatory through the amendment of Part 21 and applies to all projects but an applicant's proposal is required for major changes, major repairs and STCs.
26	CETA	For DOAs with full privilege to classify and approve minor mods (no involvement of EASA on a project basis), why should LOI determination be established?	In such case LOI does not have to be established.
27	Fokker Aerostructures B.V.	When working under privilege, is LOI applicable in any way?	No, in such case LOI does not apply.
28		When considering guidance material for LOI, are you considering (or working with the update of) SAE ARP 4754A?	SAE ARP 4754A is independent from the EASA involvement.

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29		Will the Cert Program template be updated for consideration of LOI?	The certification programme template was developed for General Aviation as a helping mean and is not mandatory. It is planned to be updated to include the LOI approach.
30		If the cert program already includes LOI related to compliance demonstration documentation is this enough to continue without application for significant change?	If your procedures already include / consider LOI. The cert programme alone is not sufficient, as it is project specific.
31	Bucher Leichtbau AG	Will EASA publish the template for the risk assessment on the EASA homepage and under what name?	It will be included in the AMC/GM to Part-21.
32	Heli-One (Norway) AS	For LOI: Will demonstrated technical competency within the DOA be given credit into the performance assessment?	Yes.
33	Aerospace Engineering Solutions Ltd.	Where the LOI is determined as low, will this be reflected in the project specific fees? Is there a reduction?	No, the fees are not affected.
34	Zarybnicky	Administrative burden for small DOAs is huge. Would not it be better to put focus on direct contact and mutual understanding specialists EASA (NAA) / applicant?	The Agency is developing tools to support the application of LOI especially for small DOA holders. The intent is to limit the administrative burden as much as possible, considering that a risk based approach is also necessary for their projects. Direct contact and mutual understanding will complement the proposal.
35		It is also not clear the involvement of ICA and P12 Safety Panel.	The attachments of the LOI certification memorandum, which are related to the respective ICA, apply. Panel 12 has its own attachment.
36		What is the effect of LOI on DOA ToA?	The amendment of the Design Assurance System may constitute a significant change, which may need to be approved. For details see the presentation slide.

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37	Eirtech Aviation Services	In minor changes/repairs is there a requirement for the DOA to specify LoI in their documentation?	No, there is no requirement to propose the Agency's LOI.
38	Marengo Swisshelicopter AG	Responsibility "increase" for industry versus company insurance fees. Fair offer by Agency, to reduce its annual oversight fee to compensate?	No, the fees are not affected. LOI will lead to a refocus of the Agency's resources to where the risks are.
39	Heli Austria GmbH	Will the Performance of AP DOA's be evaluated to gain benefits for organisations thinking of transition to ,real'DOA's?	No, under AP DOA the Agency does not assess the organisation, only agree to the procedure setting design practices etc.
40	Cobham SATCOM	Could ETSO certification program be merged in system certification plan (ARP4754a)?	Process as suggested in ARP 4754A is recommended. Having one unique document, thus not duplicating information is as well welcome. Nevertheless to the question raised there cannot be a generic positive answer. The ETSO article needs an ETSO certification plan that includes the ETSO certification basis and address the ETSO development process and the means of compliance to the ETSO MOPS. When the ETSO article is by itself representing the system, it is very logical to have a unique plan addressing the ETSO certification process and its development according to ARP4754A. When the system (per ARP 4754A) covers much more than the ETSO article, having a more specific document for the ETSO article may be more appropriate.
41	AIRBUS	For LOI determination can applicant proposes alternative criteria when recognised by DOA?	No, Part 21 requires a risk assessment using at least the four criteria. Under specific circumstances there may be a need to consider additional criteria, but not different.

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42	AIRBUS	How will be ensured the proportionality of LOI when considering minor, certain major and major	There is no EASA LOI if the project is part of the DOA holder's privilege. Otherwise, the LOI is risk-based according to the criteria described in the amended Part 21.
43	Marengo Swisshelicopter AG	Failure of test - applies to engineering test to notify to Agency?	The obligation to inform EASA is applicable for the certification phase, i.e. during compliance demonstration. However, engineering tests shall not be abused in the way to declare them as compliance demonstration tests after they are passed.
44	Lufthansa Technik AG	How will the validation (e.g. @FAA) work for an STC approved by the DOA under privilege, if the change is non-basic according to the TIPs?	An STC approvable under DOA holder's privilege should always be basic. However, in the exceptional case of a non-basic STC, which is already approved under privilege, the validation process would not be different.
45	Baines Simmons	Why is 21.A1 and 21.A.2 in Subpart A and not in the General Section 21.1? (After all, it refers to Section A and Section B for all Subparts)	These two points are addressing rights and obligation of applicants / approval holders.
46	CDG, a Boeing Company	For DOAS with the privilege for STCs, will the Agency still issue the STC on completion of the project? Also, will this affect the TIP implementation?	No, if the organisation holds a privilege, the organisation issues the STC.
47	ASD	With digitalisation, is it still meaningful to organise part 21 with sections A et B?: 'tags' could be used to indicate the applicability.	We apply both in the context of the value-added eRules project, in order to allow user to pick the right provisions. For the authentic texts (i.e. the non-digital one), this is in the hands of the Commission. So far, all Irs in the EASA system follow the same split between the organisation requirements and the authority requirements.
48	Lufthansa Technik AG	AMC/GM for LOI „sometime after entry into force“ is too late! What can be done to improve the situation?	We can only consult the AMC/GM after the rule text, which it is implementing, is known. We'll do our best to do this as soon as possible. At the moment it also looks like only few

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			AMC/GM are affected. Implementation of those should not require much preparation and should be feasible within the transition period.
49	PMV ENGINEERING	What would be the delay for DOA to update their Handbook to comply with new revision of Part 21 following its official publication?	There should be no delay and the DOA should have the changes incorporated in the procedures/handbook in time. In case this is not done a finding level 2 would be raised (as it was done in case with the introduction of OSD requirements).
50	Medavia Part 21J Design Organisation	If through the LOI an organisation can issue a STC, will the STC charges still remain applicable	A DOA holder will not issue an STC through the EASA LOI determination but via a privilege for "certain STC". If an organisation holds a privilege to approve STC, no fees are due.
51	Patria Aviation	Is it intended that the production without Form 1 would also be extended to parts identified by STCh, not only TCH?	Yes, for all kind of design approvals. The design approval holder should propose the classification of the parts. If not chosen for something else they automatically will remain with an EASA Form 1.
52	MAP Aircraft Part 21 AS	Will RMT-0230 also include drones for passenger transport?	Yes, the risk assessment required for specific operations will define whether mitigation measures are suitable, or whether drones carrying passengers will fall into the certified category.
53	Airbus	Is EASA ready to support an Industry Standard the purpose of which would be to provide best practices for LOI proposals by applicants for design approvals?	Best practice standards could indeed be useful. To what extent they are suitable as means of compliance to Part-21 needs to be assessed on a case by case basis.
54	Baines Simmons	Why use the emotionally loaded term "Drones". Surely "UAS" is better, consisting of 3 sub-systems: The Product, The Ground Station and the Data Link	The (draft) Regulation and all official documents use the term "UAS". The term "drones" is only used in informal communication, because citizens are more familiar with this terminology.

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55	Lufthansa	Upon reconstruction of Part 21 please make sure that the remaining paragraph references remain unchanged	The remaining paragraphs remain unchanged.
56	Baines Simmons	Michael mentioned that a "tool" will be available for us to compile a consolidated list of applicable Regs. Please advise when and what will it look like?	We plan to have the tool available as of 2019.
57	Leonardo Helicopters	Looking from risk/performance based approach, how was justified/supported the A/C categorization by no. of occupants or weight?	With the introduction of number of people on-board on aircraft a tool was introduced to specify different risk levels. These definitions are not aircraft definitions, but risk tools that can be applied when appropriate. Different protection levels can be applied where the number of people are considered.
58	Leonardo Helicopters	How is this new categorization considered at operation rules level?	The categories are used in airworthiness, not in operational rules. That was not part of the reorganisation of CS-23.
59	Airbus Helicopters	Indirectly applicable to DOA, how is progress on EASA formally recognising/adopting approval of FAA issued STC's & when is it anticipated this will be in place?	The context of the DOA in the question is not understood. TIP rev 6 comes into force on 22 March 2018, and covers the acceptance processes for Basic STCs
60		What is possible way for applicant for potential STC, if the applicable requirements of the original A/C are met by own AMC of the TC Holder ?	Nothing has changed compared to previous certification when using proprietary means of compliance. The applicant for the STC is not forced to use the same MoC as of the TC holder. The applicant can always go for any of the available ones or propose its own subject to an agreement with the Authority.
61	RECARO	Some ETSO refer to the now obsolete CS-23 categories (normal, utility). Any impact on the CS-ETSO now or in the future?	The Agency will amend the impacted ETSO (C127) in the frame of the next regular update of CS-ETSO which is scheduled during 2019.

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62	AIRBUS	Could we use SEPIAC for managing also exchange on change to DOA ? and maybe later on for findings ?	There is an assessment on-going under the umbrella of the CORAL programme. SEPIAC is a candidate for exchanges related to DOA and findings, but other IT initiatives may be as good or better candidates.
63	PMV ENGINEERING	Is SEPIAC intended to be used for Design Assurance System (sharing of DOH, procedures, templates, etc.)?	There is an assessment on-going under the umbrella of the CORAL programme. SEPIAC is a candidate for exchanges related to DOA and findings, but other IT initiatives may be as good or better candidates.
64	Marenco Swisshelicopter AG	How is ensured standardization between Agency and NAA staff when NAA staff is prevented to see other Agency projects? Good reasons for "discrimination"?	In many projects, the team are mixed between EASA and NAA staff, hence there are many opportunities for team work between EASA and NAA staff. The rationale for limiting the access from NAA staff to documents related to projects where they are not involved is directly linked to the confidentiality and security.
65	Aerospace Engineering Solutions Ltd.	Will SEPIAC be applicable to PART 21 audits to find out status of DOA performance, audit findings, closure of reports etc...?	There is an assessment on-going under the umbrella of the CORAL programme. SEPIAC is a candidate for exchanges related to DOA and findings, but other IT initiatives may be as good or better candidates
66		Any plans to extend the use of Sepiac for DOA activities? (Findings, DOH, etc)	There is an assessment on-going under the umbrella of the CORAL programme. SEPIAC is a candidate for exchanges related to DOA and findings, but other IT initiatives may be as good or better candidates
67	EMBRAER	How SEPIAC will permit EASA to manage the restrictions regarding access to some kind of technical data included in the documents uploaded on it?	EASA has selected a workflow engine (Nintex) which will allow to use "item-based permissions" which means in plain English being able to assign permissions to specific documents. By tagging some documents with "confidential", the access will be restricted to given users only

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68	MAZZOCCHI	How SEPIAC can be used for helping to establish DOA rating?	SEPIAC will be used to gather the performance of the applicant during any certification project and display this information to EASA/NAA staff as well as the applicant.
69	Turkish Aerospace Industries (TAI)	We are facing the same three problems that you mentioned in DOA world also. Will it be possible for us to use SEPIAC also?	There is an assessment on-going under the umbrella of the CORAL programme. SEPIAC is a candidate for exchanges related to DOA and findings, but other IT initiatives may be as good or better candidates
70	Cobham SATCOM	Could SEPIAC be used to escalate non responsive from EASA side?	SEPIAC displays an indicator on reactivity to allow users to focus on the tasks that have not progressed since some time. In this sense, it will allow to spot if a task is awaiting action from someone
71	Explicseat	Is SEPIAC applicable right now for ETSOA projects?	SEPIAC is not yet applicable to ETSO, because further customization is needed. SEPIAC will be rolled-out to ETSO projects with the next release, which is expected by the end of March.
72	MAP Aircraft Projects AS	SEPIAC sounds like a great idea! Please ensure proper implementation and user friendliness. Less is more.	Thanks for your support. We have put effort in making the interface as intuitive as possible, but in this domain, there will be a learning curve
73	BAE Systems Regional Aircraft	376/14 & part 21 occurrence reporting are not entirely consistent for a TC holder. PCM have requested different levels of mandatory occ reporting, clarify pls	More details on this would be needed to precisely answer the question for a specific case. However, R376/2014 and Part 21 are aligned on what is mandatory reportable - (potential) unsafe conditions.
74	EMBRAER	Is it possible to clarify the differences on the occurrence reporting format predicted for non EU SoD EASA TC/STC holders?	The occurrence reporting format is the same for both EU and non-EU SoD EASA TC/STC holders. Please refer to https://www.easa.europa.eu/easa-and-you/safety-management/occurrence-reporting/report-an-occurrence for details.

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75	ASD	Why not to use SEPIAC for uploading large EX5 files ?	For upload of files without status management, history versioning, commenting need, etc, there are better tools, such as the EASA filebox.
76	Zodiac Aerospace	Are follow-up and final report mandatory when no answer is received from Authority following initial report of an occurrence?	Yes, they are. On initial report an acknowledgment is provided. EASA is working on the possibilities of providing a feedback to reporting organisations through its evolution processes.
77	AIRBUS HELICOPTERS DEUTSCHLAND GmbH	How is it ensured that the authorities and EU have enough resources to handle and Analyse all the reported potential / unsafe conditions?	It is managed via the split of competencies between EASA and NAA as stipulated in the Basic Regulation and its IR. The standardisation activity will be started in 2018 to harmonise the approach of the R376/2014 implementation in the countries and ensuring the capabilities on analysis and follow up of reported occurrences.
78	British Airways	Regarding the occurrence reporting database. What's the data telling EASA and when will de-identified data be shared with industry.	The present outcomes are visible via safety publications. At strategic level, information through the risk management process end up in the European Plan For Aviation Safety EPAS. There is work started on the Data for Safety (D4S) project, which will provide more tools to collect and analyse data e.g. by the network of aviation safety analysts (NoA). De-identified public access to the database is not foreseen due to confidentiality aspects as described in R376/2014.
79	BAE Systems Regional Aircraft	EU operators are better placed to provide immediate occ reports. TC holders take these reports and evaluate for unsafe condition, takes time	All need to report as foreseen in the applicable regulations - thus ensuring the occurrence information flow and possibility that those who need this information, receive it, assess and propose corrective actions if applicable. It is acknowledged that DAH might get/report design related occurrences identified from in-service occurrences later than operators.

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80	Thales	What are the differences between EU guide and EASA guide?	EASA guide on follow ups is in addition to the EU Guidance Material to provide an interpretation on how EASA reads the requirement to provide follow up reports. This part is not covered in the EU Guidance Material up to now.
81	Cobham SATCOM	What is the current status of bilateral agreement/working arrangement btw. EU and South Africa? We have a strategic design/production partner based in SA.	It is currently not planned to enter into a bilateral agreement. There is also no working arrangement at this stage.
82	Marenco Swisshelicopter AG	Any improvement of WA between EASA and JCAB intended?	The WA with Japan is updated on a periodic basis with regards to the products and organisations covered. EASA supports the Commission in the negotiation of a Bilateral Agreement which will structure and clarify the cooperation with between Authorities and provide for more reliance on each other.
83	OGMA, S.A.	The BASAs should contain information about the fees of the VA related with validation processes.	Comment is well noted; this is already the case for the US-BASA.
84	Marenco Swisshelicopter AG	Strongly recommend to push by Agency to keep UK expertise in the system.	Comment is well noted.
85	Saab AB	Tip rev 6. Will as well major repairs on critical components by accepted?	Yes, all repairs are accepted.
86	Leonardo Helicopters	Does Validation Work Plan include Validation Items list and their aim?	“Validation Work Plan” is the document used for Non-Basic validations that outlines VA level of involvement. See TIP 3.5.5.1.
87	Zodiac Aerospace	In which format will training on EU-US BASA TIP Rev 6 be available? (e-learning?)	E-learning.
88	British Airways	If basic changes do not require acceptance how do we know when they are valid	If they are approved in one system, they are automatically accepted in the other.

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89	Cargolux Airlines	TIP is a great agreement, but unfortunately, the regulations can be different, is there any regulations homogenisation (TCAS 7.1, Low Frequency ULB, ADS-B out)	Regulatory coordination takes place between EASA and the FAA in the framework of the BASA (Cf. Rulemaking Cooperation Guidelines for the Federal Aviation Administration and the European Aviation Safety Agency available on the EASA website: https://www.easa.europa.eu/sites/default/files/dfu/FAA-EASA%20Rulemaking%20Cooperation%20Guidelines_signed%20text_13%20June%202013_Paris.pdf). In addition, some coordination and information exchange takes place on operational topics, such as the examples mentioned in the question. On these issues, due account must be taken (1) of local operational specificities and (2) of ICAO provisions.
90	Shannon Aerospace Consultants	When do you envisage CTSOs will be accepted by EASA?	Assuming CTSO is referring to Chinese TSO - these will be acceptable when covered by an EU/China BASA. All Chinese certificates are within the scope of the BASA, so all certificates can be either accepted or validated by EASA. The detailed process for each certificate will be communicated when the Agreement has become public (and the details will be known when the TIP has been signed by EASA and CAAC)
91	AIRBUS	EASA-FAA TIP issue 6 - by which means/group the regular update of SEI list will be managed? Update of SEI will it become immediately effective?	Each party to the agreement will create, publish and keep up to date their SEI lists.
92	Shannon Aerospace Consultants	Who at EASA will take over from Gregory Lievre?	For the role as section manager in the International Cooperation Department: Fredrik Kampfe (manager SM3.1). For the role as project manager for the BASAs with China and Japan: Sergio Carpe-Garcia (senior officer SM3.1).

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93	OGMA, S.A.	Just for clarification, stc (Basic) need to be submitted to the VA for validation, or is it accepted without validation activities as a minor Change?	See TIP paragraph 3.2 and 3.3.1
94	Leonardo Helicopters	How does EASA recognize CAAC capabilities for rotorcraft?	Details will be specified in the BASA (Annex), the TIP and the level of involvement on project level.
95	Cobham SATCOM	Does ETSO product require any validation exercise when exported to Chinese TCed aircraft under the current draft of the TIP?	The TIP negotiations have not started yet. This question cannot be answered until a mature draft TIP has been agreed between EASA and CAAC.
96	Aircraft Maintenance and Engineering Cooperation, Beijing	Will the repair design and change/alteration design produced by Non-TCHs being considered in the EU-China BASA and future TIP?	Yes, they are within the scope of the BASA.
97	Aircraft Maintenance and Engineering Cooperation, Beijing	In which means, could operator/maintenance organization clearly recognize which exactly kinds of data/manual is part of ICA from TCH/STCH?	All data issued by the TCH/STCH is ICA. Some of it is mandatory, some of it must be used in the maintenance environment, and some of it is guidance.
98	Cargolux Airlines	Is automatic agreement between FAA/EASA per TIP applicable for past STC/past (E)TSO?	Yes, as specified in the TIP.
99	STC Twenty One	When revision 6 of the TIP comes in to force, what happens with the AEG and changes that affect ICA? How does validation with no involvement work in reality?	Changes to ICA that are automatically accepted are automatically accepted. Changes which require validation will be validated as the FAA sees fit.
100	Cargolux Airlines	Even if there is an automatic validation of (E)TSO/STC, will there still be an EASA	No, only the certifying authority's reference.

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		reference and FAA reference for the same modification?	
101	Zodiac Aerospace	Will the EU-China BASA TIP cover recognition of acceptable compliance demonstration documents? issues with CAAC due to misunderstanding on equivalence of data	The TIP does not go into equivalence of compliance documents.
102	E.I.S. Aircraft GmbH	Why having the bilateral in place it is not possible to validate “Approved under FAA authority” against „approved under the authority of DOA EASA.21J.yxz	The question is not understood. Accepted validations will only hold the certifying authority's approval certificate, while non-automatically accepted validations will hold both the FAA and EASA's approval certificate.
103	PRENDEVILLE	Based on the TIP's is it anticipated that a time is near where an EASA DOA can make a statement of compliance with other regulations (eg FARs) on approval cert?	No, this is not the intention. Accepted validations will only hold the certifying authority's approval certificate, while non-automatically accepted validations will hold both the FAA and EASA's approval certificate
104	Heli Austria GmbH	Is there a Part 21 Light (DOA\POA) for STC holders for production of low volume STC and limited failure effects (non HAZ/CAT) planned (not only for GA)?	Yes, see rulemaking task (RMT).0018 (former task number 21.026). The “Part 21 light” concept is a concept related to the GA Roadmap Project and as such will be applicable only to the low-end General Aviation. The question seems related to STC applicable to all products, but considered as simple. This can be addressed today in the context of the actual regulation. The scope of the DOA can be limited to this kind of activity, and the limited scope would lead to a simplified investigation and surveillance activities. Furthermore, the concept of Level of Involvement (LOI) could allow the product certification team to reduce their level of involvement if the level of criticality is low and if the DOA is performing well.

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105	AVdef Aviation Defense Service	Has EASA got a clear definition of what is General Aviation? Is it aircraft size oriented (Small/Large aircraft) or activity oriented (CAT/other than CAT)?	There is no definition for GA. Different OPS/AIR/Certification/FCL regulations apply depending on the design/operation of the aircraft. EASA is using the ICAO definition of GA. It is a broad domain going from balloons to business jets. In term of operations, it is covered by NCO, NCC and some SPO activities.
106	PURSLOW	If EASA are willing to accept PMA parts under an FAA minor change without any further validation, will EASA consider accepting PMA parts under an EASA change?	PMA is an approval under the FAA system, hence EASA cannot accept PMA parts under the EASA Part 21 system.
107	Shannon Aerospace Consultants	With ETSO on DOA, would there be CVE involvement required in appliances approvals?	Yes, the DOA procedures would apply, including involvement of CVEs, ISM etc.
108		DOA fee is based on organisation size. How will ETSO activity under DOA affect the fee?	We realised this and it needs to be checked, could lead to a change in F&C regulation.
109	RECARO	Will the first step (demonstration of compliance also with a doa, but not yet mandatory) be managed through an amendment of the part 21, or only of the AMC/GM?	No, only the last step will be done through a change to Part 21.
110	Cobham SATCOM	Could PMA part management be transferred to (a)DOA capability list? (Apply change process) Also, Possibility of awarding EU type approval to such parts (ETOSA)	No, this is not possible.
111	Marenco Swisshelicopter AG	What is the planned Interval for "J-news" Publications? Will there also cpi included for Trend Analysis?	Depends on the feedback we receive, but the minimum planned is twice a year.
112	Cobham SATCOM	Would ETSO holder be allowed to perform major change under DOA?	That would need a change to Part 21 but could be reviewed.

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113		Can you share the work instruction on findings?	Yes, this should be possible.
114	ESG Elektroniksystem- und Logistik- GmbH	How is the status about Cyber Security implementation in the certification specification? New Appendix? Part of xx.1309? AMC?	Please follow the status of RMT.0648 https://www.easa.europa.eu/document-library/rulemaking-subjects/aircraft-cybersecurity The ToR are published and the NPA is under drafting. More likely EASA will follow the recommendation of ARAC ASISP WG (new 13xx rule).
115	Marenco Swisshelicopter AG	E-Motors: As far as I can recall such is used in wide areas of heavy machines technology. Would it be useful for Agency to exchange w this industry to save time?	For electric aviation EASA has planned to have a look outside aviation into the field of electric applications in transportations like trains, e-busses, etc. This is especially for the high tension which is already there (400 to 600 V) and further expected to come (1500 V and higher) in aviation and how to separate, colour code, install, etc. the systems. However it has to be understood that the application in aviation has very specific needs and issues like weight, cooling, insulation at high altitude (air gaps are no longer suitable for insulation), batteries, which need specific new thinking.
116	Baines Simmons	J-news. Did you say that we would see an example of this newsletter during this conference?	Yes, the first edition was distributed during the workshop.
117	Terma AS	Regarding Electric aviation - does EASA plan to coordinate with the automotive industry with respect to battery handling and safety?	It is not EASA driving the technology but the industry. Certain aspects of ground transportation or the automotive industry might be usable, but this is most probably just a starting point as the needs and conditions for aviation are different.

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118	GE Aviation Czech	The definition of the word APPRECIABLE effect is not clear for the industrial community, can you provide us this definition. Thank you	The appreciable effect is very often a matter of drawing the decision on basis of engineering judgement combined with experience. Of course not all effects can always be quantified. In case of doubt there is always the option to contact the airworthiness authority. We would encourage you to do so!
119	ADSE consulting and engineering	At the root of a good repair is a good damage assessment. Should a CVE approve the damage assessment report, or even witness or perform the damage assessment?	According to part 21 independent monitoring function it would of course be essential to have a second view on the assessment by the CVE. DOA handbook procedures should contain something on that issue.
120	Baines Simmons	“No technical objection” - what does this actually mean? Often these are provided by certain OEM admin staff without going near their engineering department!	"No technical objection" does mean for the airworthiness authorities, that the relevant engineering branches of the OEM made an assessment on the damage and sending out an official opinion on criticality. From authority side we always check if there is a signature of a responsible engineer behind the documentation on an NTO. Pure admin letters trying to cover a technical objection without any risk assessment from OEM side will not be accepted!!
121	Zodiac Aerospace	Can you clarify in which case a Production organization can embody a repair? Does it mean that repairs apply to new products before release?	A "repair" is from OEM side on new products before first delivery of the product normally not called a repair. For brand new products you would encounter a MOD (modification) installed on the product from OEM POA side - of course in line with approved data by the relevant DOA behind it.
122	TAG AViation SA	What about repairs from FAA TSO holders? Are they acceptable without further action or approval?	In case of a minor repair this is acceptable. Do we have a major repair by an FAA TSO approval holder, this it is also depending on the latest issue of the TIP (Technical Implementation Procedures) between FAA and EASA. This subject would have to follow the TIP procedure for a

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			streamlined validation process and technical validation (Chapter 7.12.2 of TIP Rev. 6). <i>"7.12.2 The AA shall accept standard parts exported from the U.S. when accompanied by an FAA Form 8130-3 signed on the left side, if the standard part is eligible for the FAA Form 8130-3. All other standard parts shall be accepted when accompanied by a manufacturer's Certificate of Conformity verifying the part compliance to an officially recognized standard, e.g. a U.S. or EU industry, U.S. or European government or international specification."</i>
123	EMBRAER	Often a client requests repair designs on items out of the airframe; like air ducts. Is it possible to have, in the near future, a similar exposition about it?	In this case one should have a close look to the parts suppliers' documentation for repairs first and then of course, if beyond the limits, you can come up to the authorities with an application for a major repair.
124	Leonardo Helicopters	Is the SRM considered as part of means of compliance to 1529?	The aircraft manufacturers' contribution to the 1529 requirement (Instructions for continued airworthiness) is the Airworthiness Limitation Section (ALS). There you'll find information on safe life and damage tolerance items. The SRM is an approved document for standard repairs (minor) to recover the initial compliance of the aircraft structure. The ALS for 1529 compliance is a living document which covers also changes in cracking scenarios reported by operators.
125	ESG Elektroniksystem- und Logistik- GmbH	What is EASA position of a repair design using a material equivalent, but not equal, to that used on the original airframe?	A re-evaluation of static strength, fatigue properties, corrosion resistance and other relevant parameters for its specific use in a specific location has to be done, to show an acceptable similarity approach by comparison with the original material and exclusion of adverse effects.

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126	VIRGIN ATLANTIC AIRWAYS	Part 145 rules do not allow 'manufacturing' of parts or repairs and EASA. Part 21 does not recognize 'fabrication' of repairs which is allowed under Part 145.	Manufacturing would mean - if it has to be considered doing it up to high number of parts - not being allowed. If it deals about producing those part for performing repairs only, then it would be allowed of course as for part 145. This construct should be preventing that a part 145 develops to a part supplier for an OEM by producing huge numbers of parts. This is something foreseen for POAs with a totally different scope of approval.
127	Baines Simmons	Aging aircraft: Part 26 applies to operators. Does this mean they are obliged to contract DO? (i.e. it is not a DO obligation to do this free of charge?)	You would only be affected by part 26 AASR (Ageing Aircraft Safety Rule) when having a DOA and doing STCs on structure. For those you definitely would have to comply with it. Original airframe will have to be covered by the OEM.
128	Pilatus Aircraft Ltd.	What is the EASA position on ageing aircraft for GA	Ageing in GA, there is indeed not something similar to PART 26 AASR but GA is covering this from TCH side via SSIP (Supplemental Structural Inspection Programs) after having reached the life of the aircraft. And - of course we have a risk based approach for this industry which takes also into account that through the specific ratio for materials on aircraft weight/strength/stiffness, the ageing effect will be less critical for this category of aircraft.
129	easyJet Airline Co. Ltd.	Are any novel NDT technologies are being evaluated in industry to guarantee the integrity of a bonded composite repair?	Good question, that's what we are also looking for. We are chasing the industry to work on this
130	LUFTHANSA	A planned restoration to an airworthiness condition (without accidental case) with no change to form, fit, function, life limit etc should be kept as repair. This prevents inefficient configuration control issues for the operator	If you are going to use original or re-evaluated similar material, such a restaurated aircraft would be getting a restricted type certificate. It would definitely from its extent not any more being just a repair if you think of restaurating

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			for example WWII aircraft. For other cases please consult the Airworthiness Authority to talk about details.
131	Dornier Seawings GmbH	Are standardisation initiatives with NAAs planned to harmonise the approach for transfer of certificates?	The standardisation cannot be in general implemented because the NAAs are competent for certain approval (POA/MOA/MTOA/CAMO) where the rule is not fully equivalent to Part 21 subpart J.
132	328 Design GmbH	If HTAWS requires flight test with close terrain validation how can this be CAT4 based on risk approach?	Please check GM No 1 to Appendix XII to Part-21: CAT 4 is limited to light aircraft or rotorcraft as the flight test is performed in a domain corresponding to the normal operation of the aircraft. On CS-25 aircraft the same flight test would be CAT 2
133	Baines Simmons	If TCH applicant must deliverer OSD data under Part 21, then surely TCH must be obliged (under 21.A.61?) to provide such data upon request.	TC and RTC holders have an obligation according to 21.A.62 "Availability of operational suitability data".
134	STC Twenty One Ltd	DO/MO coordination: In J-News use of GP001 is recommended. This is applicable to prototype installation only. What of the other 99 aircraft being modified?	Once the prototype activities are concluded then the STC/minor change holder can release a consolidate SB in accordance with DOA procedure/privilege. After that any A/C having same pre-mod configuration is eligible to apply the same SB. Any difference in the pre-mod configuration can be treated like a minor change or major change to the STC as relevant
135	MAP Aircraft Projects AS	Obtaining the required data (OSD, Etc.) from TC / ETSO holders is a major problem. EASA should consider requiring such data to be made readily available.	TC and RTC holders have an obligation according to 21.A.62 "Availability of operational suitability data". Specific cases may be reported to EASA.
136		EASA Good Practices: arrangement btw DO and MO, paper is focusing on STC but it is also	Yes, the GP001 can be used with the due adaption, indeed instead of an STC, the TCH will probably apply for a Major Change, then the principle remain valid.

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		applicable to TC holder? Especially for out of production Aircraft.	
137	OGMA, S.A.	Please clarify if the update of a STC applicability can only be done through a major change? A minor Change can be accepted if the STC TD is not affected?	The update of an STC applicability is always a major change since it is like a new STC approval for the additional model.
138	TAG AViation SA	AML STC - What about AML minor changes and repairs?	AML minor changes are already included in the certification memorandum. Minor repairs are under investigation and not included to not delay the issuance of the CM.
139	BODILLY	Looking at TCDS's for our CS-29 operated aircraft e.g. S-92A OSD Cert Basis for SIMD, MCDS and CCD all state reserved.	Noted. The chapter is administratively reserved. In such a case, the content is not applicable.
140	Eirtech Aviation Services	Regarding the abandoned and surrendered STCs, will EASA follow the same guidelines as FAA 8110-120, especially regarding the requirements for FOI?	<p>The FAA 8110-120 does not apply to EASA. Even if there is no extensive series of examples regarding surrendered or abandoned STC, the Agency principle, similar to the TC case, is that in case of surrendered STC, the Agency keeps the responsibility on the TCH holder and will ensure, in the framework of the Continued Airworthiness, the highest level of safety of the products.</p> <p>Moreover, EASA is not bound by the FAA Guidelines 8110-120, regarding FOI. EASA is bound by regulation (EC) 1049/2001 (https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=LEGISSUM:l14546&from=EN) on access to documents, which foresees that any member of the public with residence in the EU (but in practice anyone) can request access to documents held by the Agency. The Agency can then decide on the basis of the</p>

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			<p>regulation whether such access might be granted (there are exceptions foreseen in article 4).</p> <p>Such regulation applies only to already existing documents that the Agency holds (either because EASA is the author or because they have been received by EASA in the framework of its institutional activities).</p> <p>This regulation does not apply to request for information where the Agency has to compile a new document to put together the aforementioned requested data and/or info.</p>
141	Terma AS	Can EASA please specify the content of EPA marking? Part 21 is not very clear on this	<p>This question has been already addressed and inserted into the FAQ available on EASA website:</p> <p>https://www.easa.europa.eu/faq/20095</p>
142	PMV ENGINEERING	Concerning RNP certification: What is the planned timeframe to have AMC 20-27A & AMC20-28 integrated to CS-ACNS?	<p>NPA 2018-02 describes an amendment to CS-ACNS whereby the necessary requirements for RNP APCH certification have been incorporated into Subpart C of this certification specification. Thus, AMC 20-27A and AMC 20-28 are proposed to be cancelled. The consultation phase started in late February and is scheduled to finish on 30 April. If the review of the comments by EASA progresses adequately, an ED Decision could presumably be published by the end of 2018.</p>