

## Operational Suitability Data

**Can a "Nice to have" Operational Suitability Data change be classified as Major ? If yes, do you have an example ?**

### Answer

The “nice to have” OSD changes, often referred to as stand-alone changes need to be classified as any other changes to the type certificate, as part of the certification process. The guidance provided in Part-21 GM to 21.A.91 paragraph 3.5 provides additional details regarding classification criteria for the various OSD constituents.

### Last updated:

19/10/2019

### Link:

<https://www.easa.europa.eu/en/faq/104975>

**How should an STC holder handle TC holder (TCH) MMEL rework to remove TGL26 "As required by regulation" impacting the CS-MMEL?**

### Answer

Items covered in the TCH MMEL reflect the configuration installed on the aircraft by the TCH and may be updated through revisions process. In particular, to retain the level of relief on some items previously indicated as “As required by regulations” in the JAA/EASA MMELs, TCH have updated their OSD MMEL.

GM to ORO.MLR.105 indicates the Operators are allowed to use the CS-MMEL guidance only if no OSD MMEL exists for the aircraft type. Should the level of relief not be applicable to the STC installation applied for approval to EASA after 19 December 2016, the STC holder should address the necessary changes to the OSD MMEL through a supplement creation or update

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<https://www.easa.europa.eu/en/faq/104976>

**Cabin Crew Data (CCD) related to VIP interior (such as Boeing Business Jet): is EASA expectation that it would be a VARIANT? It seems logical however the Aircraft Difference Table (ADT) questions would lean towards NEW TYPE.**

### **Answer**

Within the OSD-CCD technical investigations, the use of the ADT serves the following purposes:

- identify the differences between the “baseline” aircraft and the “candidate”, in order to establish the Cabin Crew Data that needs to be provided by the applicant as basis for the operator to develop their customized Cabin Crew training, to be approved by the Competent Authority (CA);
- establish the status of “new type” or “variant” for the “candidate”, by assessing the identified differences in light of the appropriate “Difference Levels”( see Difference Levels as defined in OSD-CCD);
- determine the classification of the change to CCD as “minor” or “major” (see GM 21.A.91 §3.5. c).

Whether it applies to the VIP or to airline-type configurations, a change to the CCD will render the “candidate” aircraft as a “variant” (with 3 Levels of complexity regarding Cabin Crew associated training), or, as a “new type”, if Level 4 applies.

“Same aircraft” applies when the design change involves stretched fuselage and the only CCD change resides with increased numbers of cabin occupants/PSU/etc. Its associated Difference Level is Level 1.

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