

Determination of minor and major impacts on OSD CCD



OSD CCD as basis for cabin crew training at the Operator level

Have you ever experienced this?

You are presenting your design change project to the EASA team and while you assumed there was no impact on Operational Suitability Data (OSD), it is mentioned by an EASA expert, that your configuration has a minor or major impact on the OSD CCD.

Design Organisations must ensure that they can identify whether, or not, their projects impact OSD elements.

Find out how to assess if your project impacts or not the OSD CCD, in two steps.

First step: know the aircraft type TCDS

Some older aircraft types (e.g. Fokker 100; B737Classic; B757; B767; etc), which were no longer in production at the time the OSD (including the CCD) became mandatory, in Feb. 2014, do not have an approved initial CCD.

For potential changes to such configurations, the “old way of doing business” applies, i.e. a CCOM-Supplement can be generated for the benefit of the end-user, without the CCOM-S being part of a CCD approval process. In this case, no impact on CCD exists, because an initially approved CCD does not exist, in the first place.

For some aircraft with a TCDS that includes CC training elements older than CS-CCD, (such as the A320 Classic; A330/-340; A380), there are specific elements included in a CRI-SC-CCD, which are listed in the TCDS. These specific elements are represented by the training requirements contained at the time, in the JAR-

OPS 1, Subpart O-Cabin Crew. They are, largely, the same elements as the ones listed by the CS CCD, only less detailed.

They derive from the CC evaluations conducted under the (Joint) Operational Evaluation Board and were Grandfathered as the initial OSD-CCD for those a/c types.

For the majority of aircraft types, however, the TCDS references the CS-CCD as the certification basis for the OSD CCD.

In these two cases (where the CCD certification bases are represented by the CRI-SC-CCD, or, by the CS CCD), the impact of the aircraft design changes on the initially approved CCD must be considered, for the purpose of the TC Approval.

Second step: check guidance for the determination of impact on OSD CCD.

For the aircraft with a modern certification basis (i.e. CS-CCD), a complete assessment of the impact of a design change on CCD, includes assessing the impact on the elements listed by:

- CS CCD.205/Appendix 1 to CS CCD.200(b)(1)-ADT/CS CCD.305(a)/Appendix 1 to CS CCD.310/CS CCD.400-CASE

When classifying the impact of a design change on CCD, remember that, per AMC/GM to Part 21.A.91(3.5)(c)-Complementary Guidance on the classification of changes to OSD-Cabin Crew Data:

- any change that affects the operation of an element listed by the Aircraft Difference Table-ADT-(App.1 to CS CCD.200(b)(1)), generates a major impact on CCD;
- any change that leads to establishing instructions for Cabin Aspects of Special Emphasis-CASE- (CS CCD.400), generates a major impact on CCD;
- any change to the elements listed by Appendix 1 to CS CCD.310 and by CS CCD.305(a) **other than the ones** listed in the ADT and CASE, generates a minor impact on CCD.

For aircraft with the certification basis using CC training elements older than CS-CCD (i.e. using CRI-SC-CCD), there is no list to detail the broader categories of CC training elements included therein, but it is good practice to use Appendix 1 to CS-CCD.310, for assessing the impact of the design change on CCD.

A case study:

Your customer has asked you to replace the business class seats in the already certified cabin layout of a B737-800, with another seat part number:

- the new seats are an upgrade compared to the original ones, since they enable electrical positioning;
- the overall cabin layout does not change.

First step: The EASA TCDS IM.A.120 mentions that the applicable OSD CCD certification basis is CS CCD at initial issue.

Second step: Appendix 1 to CS CCD.310 section (f)(6) mentions “passenger seat (electrical operation; seat power outlet)”.

Your change is thus constitutive of an impact on OSD CCD. In accordance with the AMC/GM to Part 21.A.91(3.5)(c)- this would be a minor impact on CCD.

For the sake of completeness, please, note that Issue 2 of the CS CCD is applicable as of the 1st March 2021. Compared to the CS CCD, Issue 1, the changes introduced by Issue 2 consist of:

- a new subparagraph (b) in CS CCD.215-Determination of a variant, and an associated GM1 CCD.215(b), which introduce and detail the status of “same aircraft”, in addition to “new type” and “variant”.
- a GM1 CCD.305(b)(2) -Supplementary data provided at the request of the applicant, which describes Training Levels.

Be mindful of your privileges.

Please remember that not all organisations are granted the privileges to work on OSD elements.

The Design Organisation’s Terms of Approval document sums up the scope and the associated privileges. Your EASA DOA Team Leader can clarify in case there is any uncertainty.

Should you have any questions about this topic, please contact EASA Panel 17
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