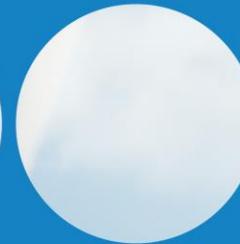


Working with EASA: Industry Feedback

Ian Devine - IAMA



**Certification
Conference**

*October 24, 2023
Cologne*

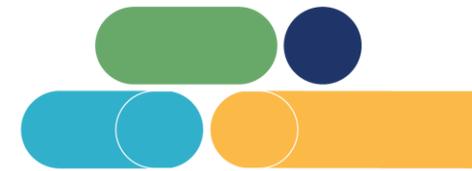
Certification Conference

October 24, 2023
Cologne

Summary

- Feedback Capture
- Feedback Overview
- Areas of Consideration
 - Incl. Recommendations

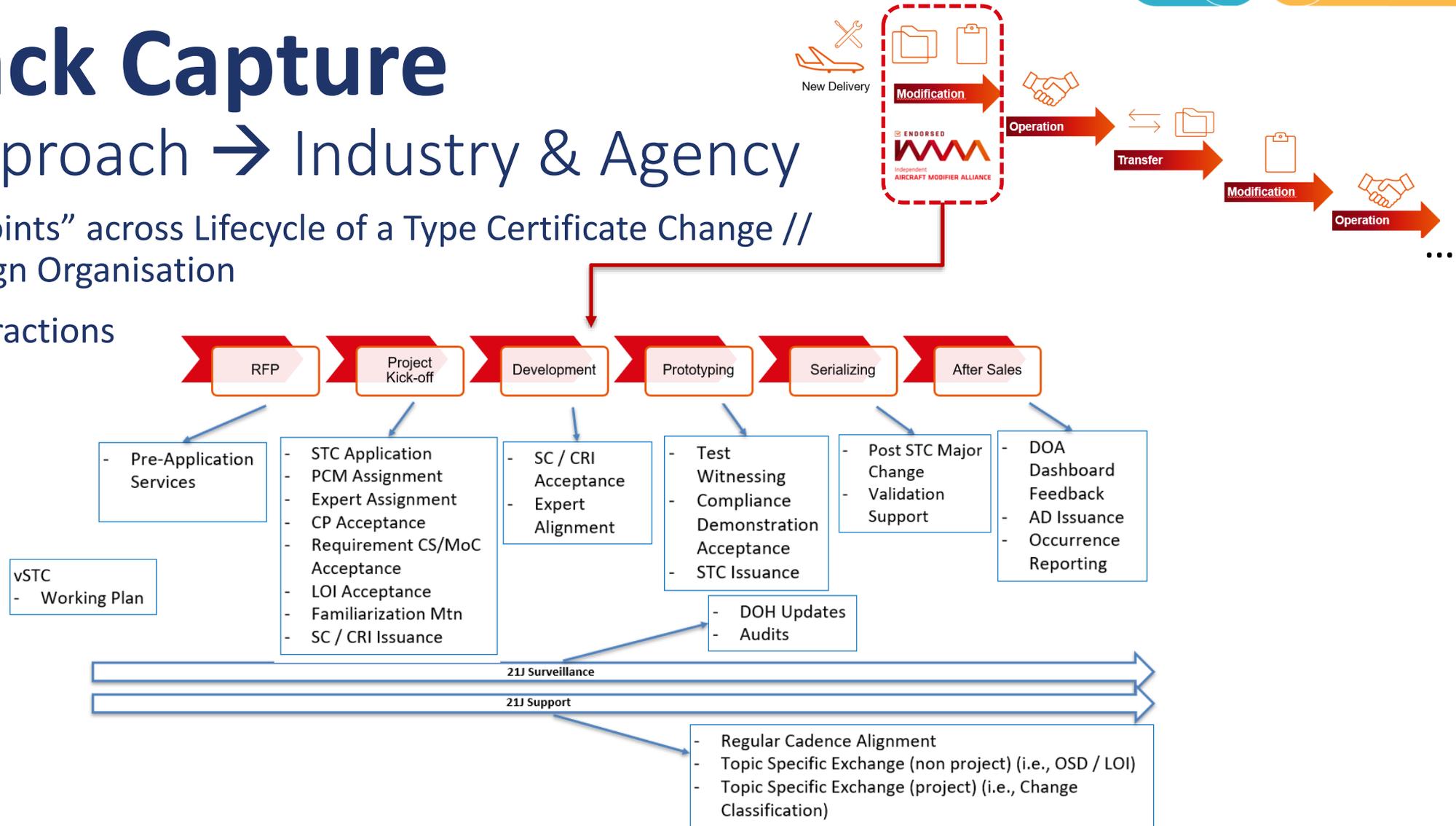
"Coming together is a beginning. Keeping together is progress. Working together is success." – Henry Ford

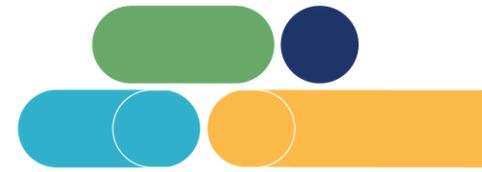


Feedback Capture

Holistic Approach → Industry & Agency

- EASA “Touch Points” across Lifecycle of a Type Certificate Change // Lifecycle of Design Organisation
- Total of 25 Interactions
- Survey Created

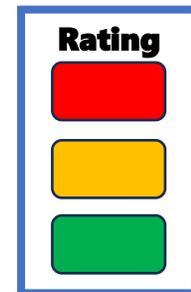


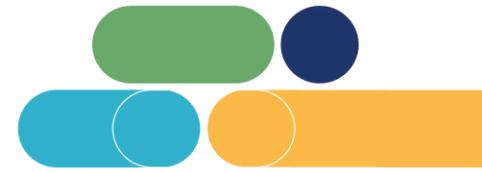


Feedback Capture

Holistic Approach → Industry & Agency

- Global reach of IAMA Network surveyed
 - Coverage from SME EASA 21Js to multi-approval holders (21G/21J/P145)
- Rating objectively defined // Explanations & Improvement also requested
 - Good
 - **Interaction supports the needs of the business**
 - No negative impact on **Project schedule / budget or customer perception**
 - Minor Recommendations possible
 - Medium
 - Interaction **not standardized** across projects and subject to individual mitigations
 - Risk of impact on either Project schedule / budget or customer perception
 - Major Recommendations / Changes required
 - Bad
 - **Repeated instances** of issues with interaction
 - Definite impact on either Project schedule / budget or customer perception
 - Immediate Changes required
 - **Practical implementation of interaction not meeting intent**

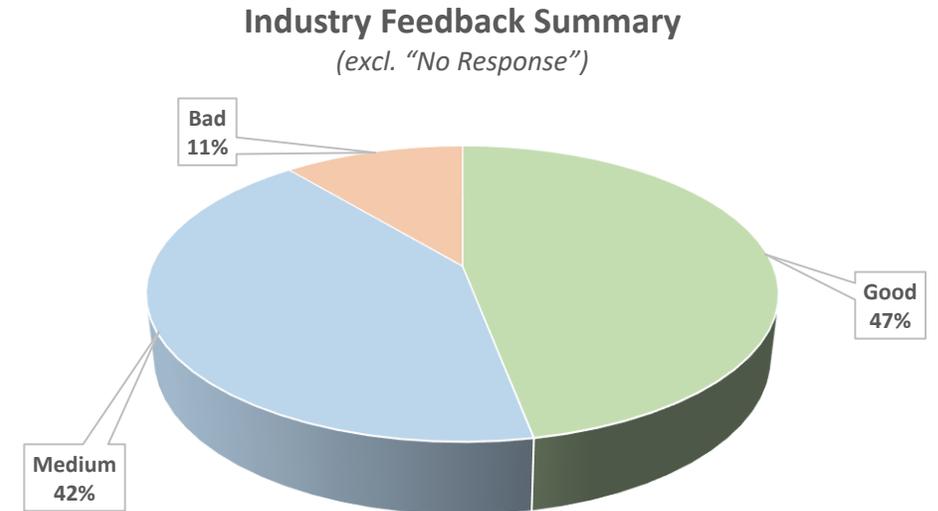
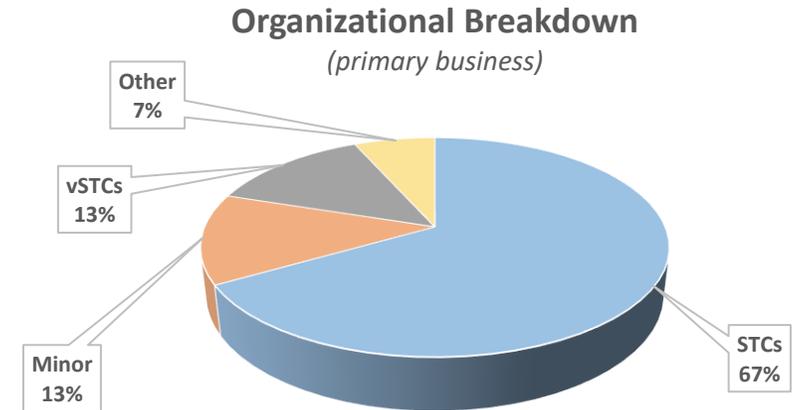




Feedback Overview

Organisations & Output

- Organisations requested to outline where “majority of business” is performed w.r.t. EASA Interactions
- Majority responses rated Good
 - All interactions averaged ratings of Good or Medium
 - However large variation between individual responses seen
 - i.e., 50/50 Split for SC / CRI Issuance
- For all organizations' feedback → Thank You 



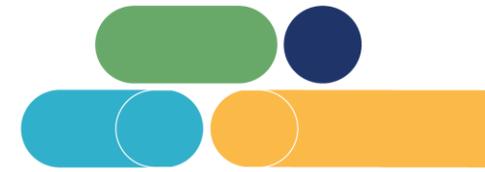


Feedback Overview

Detailed Summary

- Additional consideration warranted in 5 selected areas (highlighted Gold)
 - CP Acceptance
 - LOI Acceptance
 - SC/CRI Issuance
 - DOA Dashboard Feedback
 - DO Handbook Changes / Updates
- Additional consideration driven by variation (i.e., % Good/Bad) or severity of feedback (i.e., repetitive feedback)
- Valuable Feedback received across the questioned interactions and more

| Project Lifecycle | EASA Interaction | Good | Medium | Bad |
|---------------------------|--|-------|--------|-----|
| RFP | Pre-application services | Green | | |
| Project Kick-off | STC application | Green | | |
| Project Kick-off | PCM assignment | Green | | |
| Project Kick-off | Expert assignment | | Yellow | |
| Project Kick-off | CP acceptance | | Yellow | |
| Project Kick-off | Requirement (CS2x.xxxx) & MoC acceptance | Green | | |
| Project Kick-off | LOI acceptance | | Yellow | |
| Project Kick-off | Familiarization meeting | Green | | |
| Project Kick-off | SC/CRI issuance | Green | | |
| Development | SC/CRI acceptance | | Yellow | |
| Development | Expert alignment | | Yellow | |
| Prototyping | Test witnessing | | Yellow | |
| Prototyping | Compliance demonstration acceptance | | Yellow | |
| Prototyping | STC issuance | Green | | |
| Serializing / Rollout Out | Post STC major changes | Green | | |
| Serializing / Rollout Out | Validation support | | Yellow | |
| After Sales | DOA dashboard feedback | | Yellow | |
| After Sales | Occurrence reporting | Green | | |
| After Sales | AD issuance and exchange | Green | | |
| Other - 21J Surveillance | DO Handbook changes / updates | Green | | |
| Other - 21J Surveillance | Surveillance audits | Green | | |
| Other - 21J Support | Regular Cadence Alignment | Green | | |
| Other - 21J Support | Project Specific Exchange (pre RFP) | Green | | |
| Other - 21J Support | Non-Project Specific Exchange (pre RFP) | Green | | |
| Other - EASA as VA | Working Plan | | Yellow | |



Areas of Consideration

Certification Program (CP) Acceptance

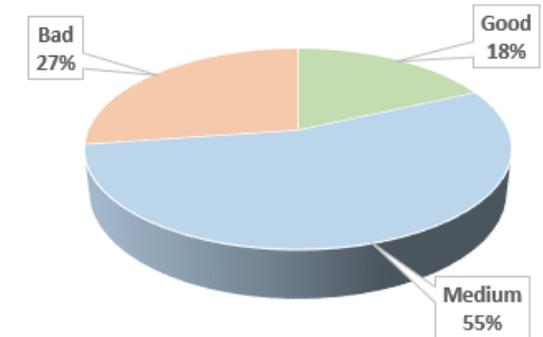
Specific Feedback:

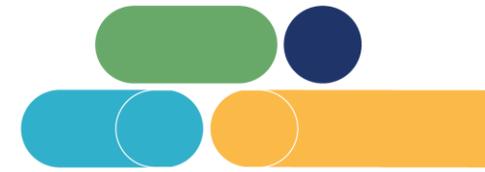
- CPs not being formally approved, and if so, not at the required time
- Feedback to CPs is not always in common format
 - i.e., feedback via commented PDF / Excel / SEPIAC
- Lack of standardization driving varying feedback incl. long turn-around-times

Recommendations:

- Standardize feedback communication means / format and turn-around-times
- Formally approve CP at correct time such to set Project Baseline → subsequent link to LOI
 - Fully appreciated schedules within CP sometimes need bilateral alignment (NB: EASA Witnessing)

Industry Feedback - CP Acceptance
Ave. Rating = Medium





Areas of Consideration

Level of Involvement (LOI) Acceptance

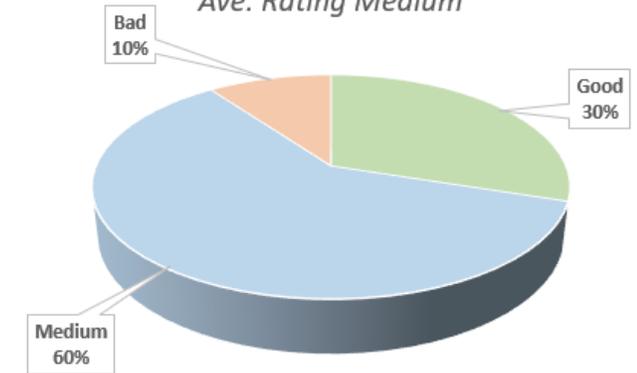
Specific Feedback:

- LOI expectations not equaling requested documentation from EASA
- If CP accepted, LOI sometimes subsequently raised by EASA during project
- Not reducing efforts in EASA expert alignment during project
- DOA Performance Link-in → See “DOA Dashboard Feedback”

Recommendations:

- PCM to play more active role in agreeing, and enforcing LOI within EASA
- DOA Performance impact on LOI to be addressed – lack of DOA Dashboard input can quickly drive added “perceived” risk // lack of closed projects in last years can also negatively impact DOA’s LOI

Industry Feedback - LOI Acceptance
Ave. Rating Medium



Areas of Consideration

SC / CRI Issuance

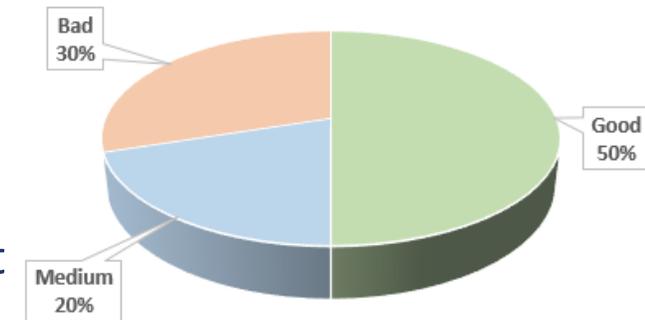
Specific Feedback:

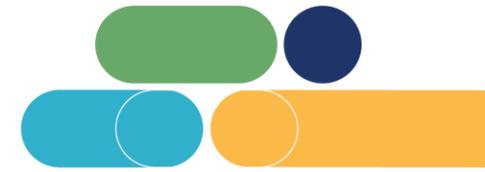
- Agreement of SC / CRI applicability not always maintained throughout project
 - SC / CRIs defined as N/A at FAM Meeting sometimes being issued
- Applicant proposal of SC / CRI based on past experience, or “common knowledge”, being utilized
 - Sometimes results in additional discussions and exchanges before required CRI is issued
- Closure of SC / CRIs not always at the required time in project
- Common / Standard SCs / CRIs quickly aligned

Recommendations:

- Continue to provide increased access of SC / CRI to industry → TCDS Annex or generalized listing

Industry Feedback - SC/CRI issuance
Ave. Rating Good





Areas of Consideration

DOA Dashboard Feedback

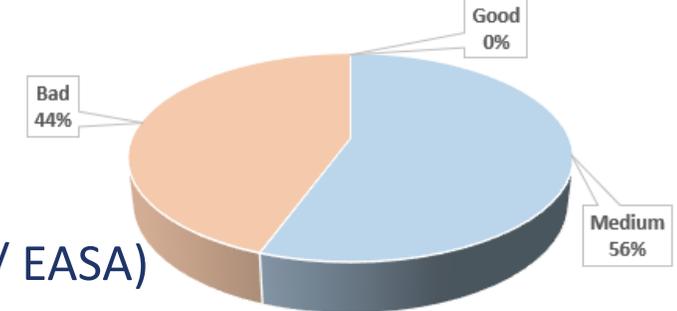
Specific Feedback:

- Only STCs and Major Changes being accounted for → No CAW activities (w/ EASA)
- High levels of individual subjectivity in feedback
- Lack of feedback / washout after projects closed
- Lack of feedback negatively impacts future DOA LOI

Recommendations:

- Empower PCMs to reinforce transparency and feedback after project closure & with all stakeholders
 - Mandatory Feedback Input // Washout Session
- Assess DOA input feasibility → “2-way street”

Industry Feedback - DOA Dashboard
Ave. Rating Medium



Areas of Consideration

DO Handbook Changes / Updates

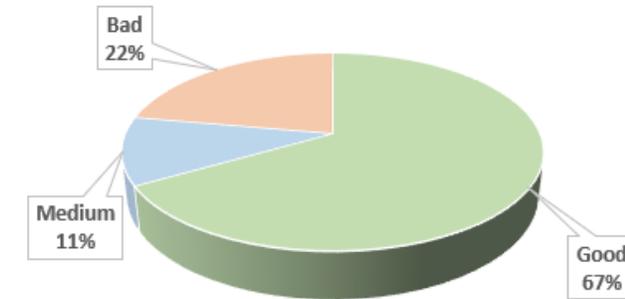
Specific Feedback:

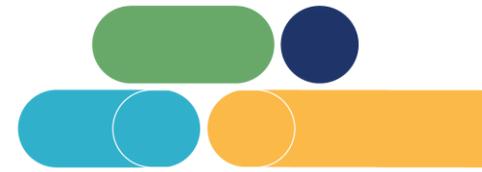
- DOATLs very supportive with positive relationships developed and maintained
- Long turn-around-times driving low feedback for more complex changes
- Perception that DOATLs highly overloaded

Recommendations:

- Continue positive culture instilled at DOATL / DOA Level
- Increase DOATL Resource & Availability

Industry Feedback - DO Handbook
Ave. Rating Good





In Closing

- Working Relationships will always be influenced by the personal nature of our interactions
 - These interactions and alignments need not always be subject to large variability
- Striving for predictability in these interactions, through standardization or otherwise, will improve industry's ability to adapt and complete in the changing commercial, regulatory and innovation landscape
 - Appreciation of customer perception and impact on Design Organisations important
 - Proportionality between larger and smaller Design Organisations applicable
- Feedback shared today covers the relationship and interaction with EASA
 - Independent Modifier input on Rulemaking just as important → EASA Stakeholder Advisory Body
- Appreciate EASA's openness for feedback
- Thanks to all IAMA Members' involvement, especially the CAA WG, and all who input to this Survey
 - To provide feedback and contribute to the Independent Aircraft Modifier Alliance (IAMA) visit us online

Certification Conference

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Cologne

Thank you!

“Talent wins games, but teamwork and intelligence win championships.” – Michael Jordan