

# Deviation – DPO's request and EASA assessment process

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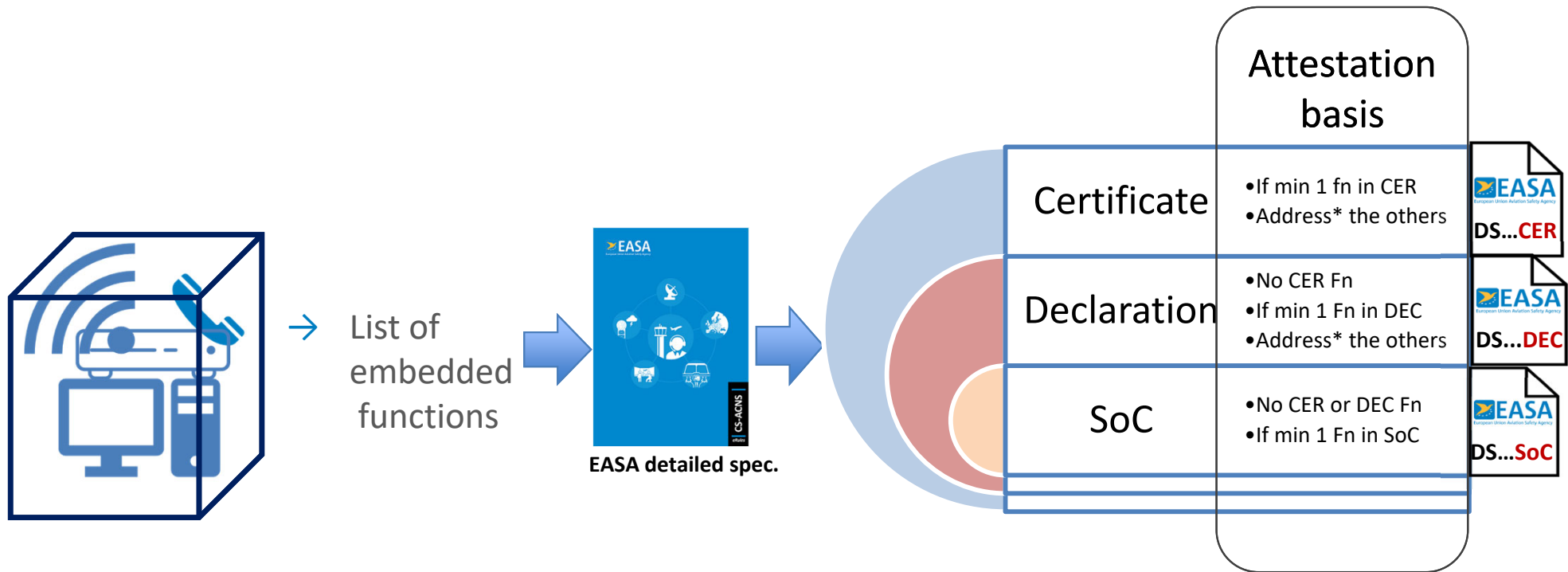
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23<sup>rd</sup>&24<sup>th</sup> June 2025



# Agenda

- Introduction to deviation
- Possibility to deviate per 1768
  - And propose alternate means of compliance
- Deviation request from DPO
- EASA Deviation assessment process

# Attestation Basis – recap the concept



- Equipment definition : List all the functions
  - \*Declare the function is included and is compliant to applicable DS.
  - Declare existence of additional functionality (beyond DSs)
- Attestation basis : list all DSs sections applicable to each embedded function
- **One attestation to cover One equipment PN by One organization (DPO or ANSP)**

# Definition of a deviation

- The term “deviation” is introduced
  - in (EU)2023/1768 Annex II CERT, in Certification basis,
  - in (EU)2023/1768 Annex III DDC with list of applicable deviations
  - in (EU)2023/1768 Article 6 SOC and its AMCs
- Deviation : refers to the fact to deviate from the applicable attestation basis to not apply the applicable attestation basis and instead propose some other alternative.
  - “alternative to a determined detailed ... specification that cannot be complied with, for which compensating factors have been found that provide an equivalent level of safety or to ensure equivalence with the applicable ... specifications;”

# EASA approach for ATM/ANS Equipment deviation

- Currently Detailed Specifications only contain very high level requirement, attestation basis is associated to the DS functions and includes AMC to DS requirements
- To assess alternate requirements or alternate means of compliance, EASA has set 2 types of deviation request:
  - Deviation to a DS requirement
    - When assessed and accepted, allows to modify a DS requirement from the attestation basis.
  - Deviation to an AMC to DS requirement
    - When assessed and accepted, allows to amend use of an AMC (or a section of ) to a DS requirement from the attestation basis.

# Request for Deviation to DS / to AMC to DS

- Applicants formally requests for deviation to applicable Cert.basis , as part of initial CP or along demonstration of compliance
- Technical letter from DPO to request deviation and provide arguments & alternate requirements, and demonstrate equivalent level of safety a,nd interoperability with the deviation
- EASA investigates, publish for comments & final decision

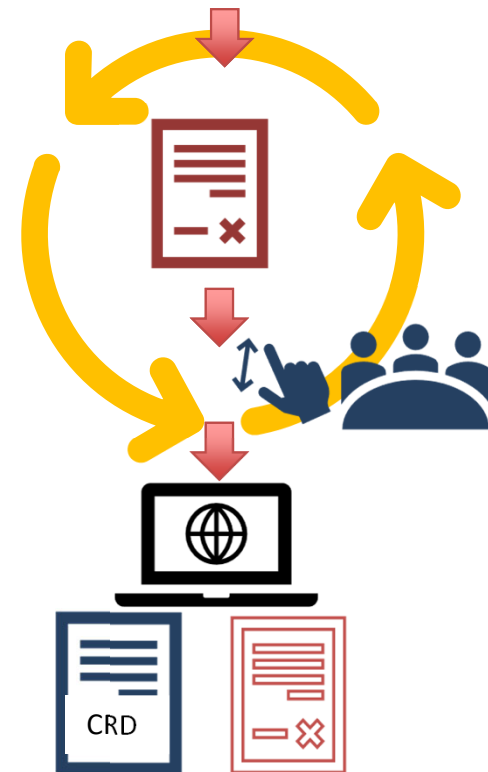


# Deviation request from the DPO to EASA

- Technical letter to request a deviation
  - What requirement or AMC is the subject of the deviation?
  - What is the rationale for asking the deviation? technical analysis and arguments for deviating
  - What is proposed instead ? Which alternate requirement/AMC or section in the standard referred in AMC
  - Demonstrate Equivalent level of safety @ equipment level  
i.e. performance/characteristics /security/interoperability
    - What compensating factors helps to conclude on equivalent level?

# EASA assessment of the deviation

- EASA understanding of the context /rationale
- EASA assessment of equivalent level of safety
  - Feedback to applicant / additional information might be required
- EASA constitutes a deviation request 'document' to be published
  - EASA PCM uses a template, no proprietary information is included
  - Draft deviation undergoes internal EASA consultation first.
- Deviation published for comments with accept/reject status
  - No comment → EASA conclusion remains valid. No CRD
  - Any comment → EASA assesses the comments → publish CRD
    - Update the deviation request only if needed, DPO informed.





# EASA Deviation request- template for publication

- From the DPO's technical letter to request a deviation, EASA assesses and constitutes a Deviation request to be published for comments
- 2 similar templates used
  - for DS requirement
  - for AMC to DS requirement

## Deviation Request CER./DEC.Axxx.vi.AMCi#n for an ATM/ANS Equipment Attestation for AMCI to Detailed Specifications DS-GE.CER/DEC applicable to enter DS function title (CER./DEC.Axxx.vi) Consultation Paper

### 1 Introductory Note

The hereby presented deviation requests is subject to public consultation, in accordance with EASA process PR.CERT.00164-000.

### 2 CER./DEC.Axxx.vi.AMCi#n enter DS function title

#### 2.1 Summary of Deviation

Deviates from AMCI to DS requirement XXXX ... (has to be less than 255 characters) to instead use YYYY

#### 2.2 Original AMC to DS Requirement

State in which document the original AMC to DS requirement is formulated and then cite the complete AMC text. \$xxxx

#### 2.3 Industry

// no name of manufacturer  
//reworked by EASA to remove private design data

#### 2.4 Equivalent Level of Safety

//DPO expressed ELOS, reworded by EASA according to EASA understanding and acceptability.

#### 2.5 EASA position

EASA agrees/disagrees with the statements in section 2.4 above.

EASA accepts/rejects the deviation.

# EASA Deviation request by example

- No published deviation
- 1 draft under internal review/discussion
  - Recording capability in ATS equipment
- Be clear and specific on what is under deviation, clear alternate requirement or AMC



Microsoft Word  
ro-Enabled Docun

## **Example on airborne side**

(Aircraft Audio Systems and Equipment)

*Deviate from RTCA/DO-214, Section 2.3.1.1 and provide a response within a maximum total 12dB-wide window over the frequency range of (350 Hz to 3kHz).*

# Where to find on EASA website

- On EASA website → go to “Public consultations”
- No published deviation by now!

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**EASA Pro**

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**test ATM ANS Equipment Consultations and Publication**

Starting date of initial consultation: 20 Jun 2025

**Details**

Reference: 243243  
Past reference: N/A  
Consultation status: **CONSULTATION OPEN**  
Validity: Not superseded  
Closing date of consultation: 20/06/2025

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**Thank you**

Any question?

**Or scan**



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