Operational Suitability Data (OSD) for flight crew (FC)

What is the content and purpose of the EASA type rating and licence endorsement lists?

Answer

Two separate EASA type rating and licence endorsement lists - flight crew are published by EASA (one for helicopters and one for all other aircraft): Type Ratings and Licence endorsement lists .

These lists constitute the class and type of aircraft categorisations in accordance with definitions of category of aircraft, class of aeroplane, and type of aircraft and paragraph FCL.700 and GM1 FCL.700 of Annex I (Part-FCL) to Commission Regulation (EU) No 1178/2011.

The lists also indicates if operational suitability data (OSD) for flight crew are available. EASA type certificate data sheets (TCDSs) and the list of EASA supplemental type certificates contain further references to OSD. Complete current OSD information is held by the relevant type certificate (TC) or supplemental type certificate (STC) holder.

Furthermore, the lists provide aircraft-specific references relevant to flight crew qualifications and air operations, including references to (non-OSD) documents, such as (J)OEB reports or Operational Evaluation Guidance Material (OE GM).

Explanatory notes for these lists are found at the same website location.

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06/02/2018

Link:
https://www.easa.europa.eu/ga/faq/45113

Why do the EASA type rating and licence endorsement lists not contain references to the latest applicable version of an OSD FC document?

Answer

The EASA type rating and licence endorsement lists indicate whether an OSD FC document for

a relevant aircraft exists. OSD FC documents are certification documents which are held and maintained by TC/STC Holder and are subject to Annex I to Commission Regulation No 748/2012 (Part-21) provisions. Consequently, changes to OSD are handled in accordance with Part-21 procedures in the same way that e.g. changes to aeroplane flight manual (AFM's) are dealt with. This includes the principle of delegation of privileges to DOAs based on which minor changes to OSD FC are approved under DOA privileges.

The responsibility of tracking the OSD FC document version resides therefore with the TC/STC holder and referencing that in the TR and licence endorsement list could potentially generate inconsistencies.

Users should consider establishing a process to ensure the regular receipt of OSD FC updates, similarly to what might exist for holding current AFM and quick reference handbook (QRH) documents.

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https://www.easa.europa.eu/ga/faq/45114

Are ODR tables available as part of the operational suitability data (OSD) for flight crew (FC) document?

Answer

ODR tables which have been established as part of an OSD FC operational evaluation, are part of the OSD FC data, approved under the type certificate (TC)/ supplemental type certificate (STC) and owned by the TC/STC holder. These ODR tables are original equipment manufacturer OEM generic and must be customized for use by operators to their specific aircraft configurations.

Such ODR tables should therefore be requested directly from the TC/STC holder which has an obligation according to Part-21 to make OSD FC documents available to users.

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https://www.easa.europa.eu/ga/faq/45115

When should changes to OSD FC provisions be implemented by users to take into account any revised mandatory elements included in a revision?

Answer

Article 9a of Commission Regulation No 1178/2011 (amended by Commission Regulation No 70/2014) contains a 2 year transition period for the implementation after initial publication of OSD FC report. This allows training providers, such as ATOs and operators time to adapt their training programmes and provide additional training if needed.

Pilot training courses which were approved before the approval of the OSD FC data should contain the mandatory elements not later than 18 December 2017 or within 2 years after the OSD FC was approved, whichever is later.

Implementation of changes to the OSD FC into existing approved training courses should be implemented within a reasonable timeframe following the OSD change. This timeframe is not clearly defined within the aircrew regulation, however a timeframe of 3 months (or 90 days as under the air ops requirements for an MEL) is considered reasonable.

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What is the status of non-mandatory items in the OSD FC? How should users proceed if deviating from non-mandatory items in the OSD FC?

Answer

The data contained in OSD FC documents are identified as either 'mandatory' or 'non-mandatory' elements. While mandatory elements have the status of a rule, non-mandatory elements have the status of Acceptable Means of Compliance (AMC).

In order to provide some flexibility to users, non-mandatory elements typically address such items as training devices, training duration, previous experience, or currency. In line with the general principles for AMCs, these elements are non-binding provisions established as a means of compliance with the Aircrew Requirements.

Users may choose Alternative Means of Compliance (AltMoC) to use alternatives to the OSD-FC non-mandatory parts by following the dedicated process for AltMoCs described in the implementing rules for aircrew licensing and air operations. Further details on the AltMoC process can be found on EASA's website.

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https://www.easa.europa.eu/ga/faq/45117

What aspects should be considered when substituting a training level or device described in the OSD FC by another training level or device?

Answer

The data approved in the OSD FC are linked to the minimum training syllabus for a pilot type rating. An evaluation of differences (e.g. for aircraft modifications or between variants) identifies minimum training levels and associated training devices, if required.

With regard to the acquisition of knowledge through theoretical training, some elements may be validated as Level A and can be adequately addressed through self-instruction, whereas other elements may require aided instruction and are identified as Level B. Training organisations may find it more practical to combine Level A and Level B elements into one module of the higher level (such as computer-based training or instructor-led sessions).

With regard to the acquisition of skills through practical training, the OSD FC minimum syllabus identifies elements requiring Level C, D or E practical training and these elements are usually associated in the OSD FC document with specified training devices.

In principle, the devices described in the OSD FC document and the devices used in pilot training should be of the same training level. The use of a more complex device requires additional considerations, regarding the capabilities and characteristics of the device and the impact this may have on the training objective(s).

As an example, the OSD FC may refer to an FMS desktop trainer for Level C training. FMS training in an FTD, an FFS (without motion or vision) or in the aircraft (static, on power) may provide the same training objectives. However, the more complex training environment introduces elements which may affect the focus of the training, the time required, or other factors and these should be taken into consideration.

The same principles apply for the substitution of an FTD. To replicate the characteristics of an FTD Level I with an FTD Level II, to replicate an FTD Level I with an FFS (without motion or vision), or to replicate an FTD Level II with an FFS (without motion or vision) require different considerations to preserve achievement of the training objective.

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How can I get access to OSD FC documents?

Answer

Contrary to Operational Evaluation Board (OEB) reports which were owned and published by EASA, OSD documents are certification documents which are held by the TC/STC Holder within the framework of Annex I to Commission Regulation No 748/2012 (Part-21).

Paragraph 21.A.62 of Part-21 establishes requirements for the owner of the data (type certificate (TC)/supplemental type certificate (STC) holder) on making these OSD data available. It reads as follows:

21.A.62 Availability of operational suitability data
The holder of the type-certificate or restricted type-certificate shall make available:

(a) at least one set of complete operational suitability data prepared in accordance with the applicable operational suitability certification basis, to all known EU operators of the aircraft, before the operational suitability data must be used by a training organisation or an EU operator; and

(b) any change to the operational suitability data to all known EU operators of the aircraft; and

(c) on request, the relevant data referred to in points (a) and (b) above, to:

1. the competent authority responsible for verifying conformity with one or more elements of this set of operational suitability data; and
2. any person required to comply with one or more elements of this set of operational suitability data.

Consequently, users should request OSD data from the relevant owner, when required.

To assist users in contacting the relevant owner of the document, EASA provides some information on its website for OSD, in particular an OSD contact list based on feedback from manufacturers.

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