European Union Aviation Safety Agency

Notice of Proposed Amendment 2019-13

Regular update of the Certification Specifications for Cabin Crew Data (CS-CCD)

RMT.0508

EXECUTIVE SUMMARY

The objective of this Notice of Proposed Amendment (NPA) is to update the operational suitability data (OSD) requirements for cabin crew that are comprised in the Certification Specifications for Cabin Crew Data (CS-CCD) in order to reflect, in the scope of regular updates, the state of the art, best practices and experience gained since its implementation (CS-CCD Initial Issue published on 31 January 2014).

To this end, this NPA proposes the following amendments to CS-CCD:

— Item 1: Update of Appendix 1 to CS CCD.200(b)(1) *Aircraft difference table*, as regards the item 'design-related elements impacting normal and/or emergency operations';

— Item 2: Clarification of the understanding of 'design-related elements impacting normal and/or emergency operations' to be provided by the applicant for the determination process of a new type or variant against the base aircraft (CS CCD.205 *Determination elements*);

— Item 3: Clarification of the terminology used for 'door and exit types', and in particular the understanding of 'type of exit' as per CS 25.807 for the purpose of CS CCD.205 *Determination elements*;

— Item 4: Clarification of the definition of 'type' in 'doors/exits' for the purpose of CS CCD.210 *Determination elements*;

— Item 5: Clarification of one element of the type-specific data content to be provided by the applicant in accordance with Appendix 1 to CS CCD.310 *Type-specific data content*;

— Item 6: Editorial review of CS-CCD.

The proposed amendments are expected to update the OSD requirements for cabin crew that are included in CS-CCD to reflect the state of the art of certification while ensuring that the regulatory framework establishes standard means to demonstrate compliance with the airworthiness requirements. Overall, the proposal provides for additional clarity by streamlining the assessment of new types or variants against the base aircraft as well as by better defining the data required for the development of cabin crew training programme(s) by operators.

The proposed amendments are expected to have a moderate safety benefit, and they would have no social or environmental impact.

Action area:	Regular updates		
Affected rules:	CS-CCD		
Affected stakeholders:	Type certificate(TC)/supplemental type certificate (STC) holders to which CS-CCD applies for their products and changes to them		
Driver:	Efficiency/proportionality; safety	**Rulemaking group:**	No
Impact assessment:	None	**Rulemaking Procedure:**	Standard

10.9.2019	**17.12.2019**	**2019/Q4**

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1. About this NPA

1.1. How this NPA was developed

The European Union Aviation Safety Agency (EASA) developed this NPA in line with Regulation (EU) 2018/1139[1] ('Basic Regulation') and the Rulemaking Procedure[2]. This rulemaking activity is included in the European Plan for Aviation Safety (EPAS) for 2019–2023[3] under rulemaking task (RMT).0508. The text of this NPA has been developed by EASA. It is hereby submitted to all interested parties[4] for consultation.

1.2. How to comment on this NPA

Please submit your comments using the automated **Comment-Response Tool (CRT)** available at **http://hub.easa.europa.eu/crt/**[5].

The deadline for submission of comments is **29 January 2020**.

1.3. The next steps

EASA will review all the comments received, and will develop a decision amending CS-CCD (Initial Issue published on 31 January 2014), as defined in the related ToR[6].

The comments received on this NPA and the EASA responses to them will be reflected in a comment-response document (CRD). The CRD will be published together with the decision.

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1 Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139).

2 EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure).

3 https://www.easa.europa.eu/document-library/general-publications/european-plan-aviation-safety-2019-2023

4 In accordance with Article 115 of Regulation (EU) 2018/1139, and Articles 6(3) and 7 of the Rulemaking Procedure.

5 In case of technical problems, please contact the CRT webmaster (crt@easa.europa.eu).

6 https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0508

2. In summary — why and what

2.1. Why we need to change the rules — issue/rationale

The aviation industry is complex and rapidly evolving. The corresponding rules need to be updated regularly to ensure that they are fit for purpose, cost-effective, and can be implemented.

The scope of this rulemaking task is to update the OSD requirements for cabin crew that are included in CS-CCD in order to reflect the state of the art and best practices.

This NPA aims to achieve the objectives by addressing the issues outlined in Section 2.2, within the scope of regular updates, by proposing amendments to the CS-CCD subjects that are considered non-complex, non-controversial, and mature.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Section 2.1.

The specific objective of this proposal is to clarify the existing certification requirements for cabin crew in order to facilitate applicant compliance when determining aircraft types and variants for cabin crew as well as establishing cabin crew type-specific data to support the operators' further development of customised cabin crew training programmes. The clarifications address elements pertaining to the determination criteria for aircraft types and variants, as well as elements pertaining to the type-specific data content. The objective meets the requirements of the scope of regular updates while contributing to the ultimate goal of increasing safety.

2.3. How we want to achieve it — overview of the proposals

Item 1: Appendix 1 to CS CCD.200(b)(1) *Aircraft difference table*

The guidance provided for the understanding of 'design-related elements impacting normal and/or emergency operations' used in CS CCD.205(b)(4) also applies to the elements contained in Appendix 1 to CS CCD(b)(1) *Aircraft difference table*.

Item 2: CS CCD.205(b)(4) *Determination elements*

Clarification of the understanding of 'design-related elements impacting normal and/or emergency operations' as a requirement of data to be provided by the applicant when identifying differences of a new type or variant against the base aircraft. The clarification was needed in order to show that 'design-related elements impacting normal and/or emergency operations' addressed by CS-CCD include not only novel/unusual design elements, but also design elements that although already existing on the market might be considered as new features when installed on certain types or variants.

Item 3: Development of Guidance Material for CS CCD.205 *Determination elements*

The clarification of the term 'door and exit type', as defined in CS CCD.205 compared to the definition of 'exit type' in CS-25, was necessary in order to make reference to the respective definition 'types of exits' in CS 25.807, and highlight that in addition to the classification provided by CS-25, further criteria are being considered when comparing doors and exists as per CS CCD.205(b)(2).

Item 4: CS CCD.210 *Determination of a new type*

For the purpose of the OSD requirements for cabin crew, CS CCD.210 lists the criteria for a candidate aircraft to be determined as a new type. 'Door and exit types' represents one criterion. Consequently, the clarification of the term 'door and exit types' of CS CCD.205 applies to CS CCD.210(c) and (e).

Item 5: Appendix 1 to CS CCD.310 *Type-specific data content*

Clarification of one element of the type-specific data content to be provided by the applicant in accordance with Appendix 1 to CS CCD.310 *Type-specific data content* in order to highlight that the data to be included in the aircraft description is the required and additional number of flight crew and cabin crew stations installed in the aircraft, and not the minimum required number of flight crew and cabin crew members (the later being included in the EASA type certificate data sheets (TCDSs)).

Item 6: Editorial review.

2.4. What are the expected benefits and drawbacks of the proposals

The proposed amendments are expected to facilitate applicant's compliance with the OSD requirements for cabin crew by providing the necessary clarifications and guidance material within the scope of regular updates. Overall, they are expected to provide a moderate safety benefit, and would have no social or environmental impacts.

3. Proposed amendments and rationale in detail

The text of the amendment is arranged to show deleted, new or amended text as follows:

— deleted text is ~~struck through~~;

— new or amended text is highlighted in blue;

— an ellipsis '[…]' indicates that the rest of the text is unchanged.

3.1. Draft Certification Specifications (draft EASA decision amending CS-CCD)

Appendix 1 to CS CCD.200(b)(1) Aircraft difference table

Appendix 1 to CS CCD.200(b)(1) is amended as follows:

Aircraft difference table						
Base aircraft						
Candidate aircraft						
Determination elements	**Existing difference from base aircraft**	**Description of identified differences**	**Impact assessment**			
			(a)		**(b)**	
	Yes		**1. Impact on description of the element**	**2. Impact on operation of the element**	**1. Potential impact on procedures**	**2. Combined impact on operation of the element and potentially on procedures**
[…] ~~Design-related element(s) impacting on either normal operations or on emergency operations or on both normal and emergency operations relevant to aircraft type~~ Any design-related element new to the respective type or variant that could impact normal and/or emergency operations and that would require						

additional knowledge, new roles and/or tasks for the cabin crew […]						

CS CCD.205 Determination elements

CS CCD.205(b)(4) is amended as follows:

(a) […]

(b) When identifying differences of the elements specified in (a), the applicant assesses the following:

(4) ~~in normal and emergency operations,~~ any design-related element new to the respective type or variant that would impact ~~either on~~ normal ~~operations~~ and/or ~~on~~ emergency operations ~~or on both normal and emergency operations.~~ and that would require additional knowledge, new roles and/or tasks for the cabin crew.

The following GM1 CS CCD.205(b)(2)(i) is added:

GM1 CS CCD.205(b)(2)(i)

'Types of doors and exits should be understood as the 'types' defined in CS 25.807 'Emergency exits'. All other criteria listed in CS CCD.205(b)(2) must be considered when assessing doors and exits for the purpose of compliance with CS-CCD.

CS CCD.210 Determination of a new type

CS CCD.210(a) is amended as follows:

(a) The candidate aircraft is determined as a new type:
[…]

The following GM1 CS CCD.210(c) and (e) is added:

GM1 CS CCD.210(c) and (e)

When addressing 'types of doors and exits', the term 'types' should be understood as per GM1 CS CCD.205(b)(2)(i).

CS CCD.215 Determination of a variant

CS CCD.215(a) is amended as follows:

(a) The candidate aircraft that has not been determined as a new type is determined as variant of the base aircraft.

[…]

Appendix 1 to CS CCD.310 Type-specific data content

Appendix 1 to CS CCD.310 is amended as follows:

Type-specific data content

[…]

General

[…]

(j) ~~required~~ number ~~of flight crew, number~~ and location of both flight crew and cabin crew stations (required and additional);

[…]

Aircraft systems including associated equipment

[…]

(m)

(4) cabin signs — location (door/exit area; passenger cabin; crew station; crew rest compartment(s); galley; ~~LSU~~ lavatory service unit); type (e.g. fasten seatbelt/no smoking/return to seat/ lavatory occupied/exit signs); aural/visual indication;

[…]

CS CCD.400 Cabin aspects of special emphasis

CS CCD.400(b) is amended as follows:

[…]

(b) other unique elements identified during the certification process, e.g. direct view, trolley-lift barrier, external viewing means, remote cabin areas, etc.

4. Impact assessment (IA)

The review of CS-CCD is performed in the context of regular updates and includes subjects that are non-complex, non-controversial, and mature. Consequently, no IA is required.

5. Proposed actions to support implementation

n/a

6. References

6.1. Affected regulations

n/a

6.2. Affected decisions

Decision 2014/006/R of the Executive Director of the Agency of 31 January 2014 adopting Certification Specifications and Guidance Material for Cabin Crew Data ('CS-CCD — Initial Issue')

6.3. Other reference documents

n/a