EASA
European Union Aviation Safety Agency

EASA/FAA TIP Revision 6

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STC WORKSHOP
May 16th/17th 2019

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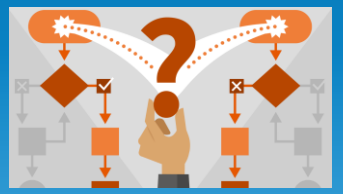
Objective

- EASA/FAA TIP Rev 6 General Concepts
  - Classification
  - Validation Paths
  - Rev 6 Updates
- EASA/FAA TIP Rev 6 Provisions for Implementation
  - Checklists
  - SEIs
  - SSDs
- Compliance with Validation Authority Certification Basis
- Training Available

Classification in TIP Rev 6



- TCs, STCs, changes to TC, changes to STCs are classified by CA as **Basic or Non-Basic**.
- **Criteria** for Non-Basic classification defined in chapter 3.5.3.2 of the TIP:
  - Safety Emphasis Items affected
  - New or amended Deviation, Exemption, SC or ESF
  - Significant Change
  - VA unilateral AD affected
  - New or different MoC
  - New Technology
  - Novel application of existing Technology
  - Non simple acoustic or emission Changes
  - Appreciable effect on OSD
  - Any other change designated Non-Basic by the CA

CA = Certifying Authority
VA = Validating Authority

Validation paths in TIP Rev 6

All design approvals (STCs, Major and Minor Changes) follow now one of these paths:

- **Accepted (not for STCs)**
- **Streamlined validation (Basic)**
- **Technical Validation (non-Basic)**

Validation Path in TIP Rev 6

- **Accepted Changes**: For these changes the VA accepts directly the CA approval, therefore **no application** is needed to VA and **no approval will be issued by the VA**.
- **Streamlined Validation (Basic)**: For these changes the VA will receive an application, including the data package as defined in 3.5.4.2 of the TIP, and the VA will issue an approval **without any VA technical involvement**.

  Streamlined projects are sequential and the CA approval is one of the documents to be included in the data package. The lead time to get the approval is 15 working days after the VA accepts the application package.
- **Technical Validation (non-Basic)**: For these changes the VA will receive an application and will define its **LOI based in the non-Basic criteria**. Data package defined in 3.5.5.1.

CA = Certifying Authority
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TIP Rev 6 Updates

- The TIP Rev. 6.1 included the following changes compared to the Rev 6:
  - Basic accepted design Changes with impact in EASA noise database require the noise data to be sent to EASA.
  - **Regarding SEIs, "as experience is gained, the VA may chose to reduce the application" of SEI for Advisory, IM and MoCs to minimize non-basic applications:**
    - **The criteria for classifying Basic should be mentioned in the VA SEI list otherwise, an specific agreement with the CA should be reached to classify Basic.**
  - Applicable date for environmental requirements corrected to the VA application date.
- The TIP Rev. 6.2 included modifications in the wording about export certificates.

EASA/FAA TIP Rev 6 – Provisions

- The following documents are available:
  - Application forms for Major Change Approval, STC and CSV
  - FAQs and checklists including the checklist for the classification, definition of certification basis and applications data package.
  - Safety Emphasis Items SEIs list for the **classification of the changes**
  - Significant Standard Differences lists **to identify the VA Certification Basis**

EASA/FAA TIP Rev. 6 - Certification bases for Basic Accepted Projects

*3.3 Procedures for **Accepted** Design Approvals*

*3.3.1 Design changes by the TC or STC holder classified as **Basic** per the criteria of paragraph 3.5.3.1 that **do not require the** CA to issue a **new or revised TC, Type Certificate Data Sheet (TCDS), [or] STC**.*

*There is no need for application and the design change will be accepted by the VA without any review. In these cases, **the CA will approve these design changes** in accordance with its own procedures **against the certification bases of both the CA and the VA**. These design changes are considered approved by the VA, and are included in the DAH type design data and shall be made available to the VA upon request to the CA.*

Applicants (DOAs and ODAs) must show compliance with **VA Certification Basis** for any project proposed for acceptance.

EASA/FAA TIP Rev. 6 - Certification bases for Basic Streamlined projects

For **streamlined** projects the application must contain:

- *3.5.4.2(e) A statement that the CA that the product has been examined tested and has been found to meet either:*

  (1) The applicable airworthiness, noise, fuel venting, and emissions requirements of the VA; or

  (2) The CA airworthiness requirements and the VA Significant Standard Differences, special conditions, equivalent level of safety findings/equivalent safety findings and exemptions/deviations the VA has

Applicants (DOAs and ODAs) must show compliance with **VA Certification Basis** for any streamlined project.

EASA/FAA TIP Rev. 6 – Basic Projects: The problem

Spot checks by EASA and the FAA on completed STCs and Major Changes have shown inconsistent application of the TIP for Basic projects

- **Evidence of compliance with VA Certification Basis (CB)** cannot be found for some projects
- Issue probably pre-existed from previous TIPs (e.g. Level 2 Changes and Basic STCs in TIP Rev 5)

Such changes **cannot be considered "approved by the VA"**

EASA/FAA TIP Rev. 6 – Basic Projects: A way forward

Discussions initiated between EASA and the FAA for improvement:

- DAH must show compliance with the VA certification basis too
- EASA and FAA will share cases with DAH holders to improve adherence to TIP requirements
- EASA encourages addressing the topic in the frame of DOA procedures
  - Integration of validation process within relevant DAH procedure
  - Discussion of its definition and implementation as “side activity” during DOA audits

EASA/FAA TIP Rev. 6 – Basic Projects: A way forward

Need for stronger Synergies/Interaction between Certification and DOA

- Implementation of TIP rev 6 obligations within the frame of DOAs
  - Guidance to be part of EASA DOA Handbook?
  - Proposal for a structured approach to be suggested to DOs during DOATL audit? (this would ease the credit given by the Agency to the applicant's declaration of compliance with VA certification basis)
- EASA CT Cert Handbook refinement to cover PCM investigation of the showing of compliance with VA cert basis
  - Develop further the "Validation" part of the investigation of EASA approval of EU design changes

Cases of wrong VA Certification Bases

- ***For a Basic Project, is the showing of compliance with EASA certification basis systematically transposable to FAA certification basis?***

Of course not (FAA potential SSDs, SC, ESFs, Exemptions, Deviations shall be considered) …

Applicants declaring compliance with FAA TCDS shall ensure that they address the applicable and adequate requirements.

FAQs and TE.CSERV.00191 template letter for «*Forwarding application to FAA for EASA Design Change classified as Basic*» has been revised to introduce clear directions on how to consider the FAA certification basis whenever the EASA certification basis is not applied at TCDS level.

Cases of wrong VA Certification Bases

- ***Applicants declaring compliance to FAA validation basis shall ensure that they address the models/variants that are FAA validated.***

For instance, for certain Basic major changes, TCH declaration of compliance to FAA CB included a model not yet validated.

In this case, we will systematically request to remove from the declaration of compliance the model not validated and then deal with the FAA validation process of those modifications separately.

EASA/FAA TIP – *TIP Rev.6 ELG training*

Technical Training

EU-US Safety Agreement – TIP – Rev.6

- EASA Learning Gateway course TT-0058.01 - EU-US Safety Agreement - TIP - Rev.6 has been published and it is available for EASA Staff, NAAs and Industry as of Feb 2019.
- The cost for Externals is 75 Euro (for duration 1,5 hour).
- After completion of all modules (including questions located after videos in modules 1-7) the ELG system generates an e-mail with certificate.
- Please enrol through ELG / (Technical Training Catalogue) or using the following link:

http://xtcgnvwas02.ext.easa.local/easa/servlet/ekp?CID=EKP000001328&TX=FORMAT1&BACKTOCATALOG=Y&DECORATEPAGE=N

EASA
European Union Aviation Safety Agency

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Thank You for your Attention

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