



Part 21 Design Organisation Approval (DOA) Implementation Workshop

Questions and Answers Session

Subject	Reply
<b>QUESTIONS RAISED BEFORE THE WORKSHOP</b>	
<b>Status of NPAs:</b> <ul style="list-style-type: none"><li>• NPA/CRD 2008-12 Repairs to ETSO Articles - AMC and GM for changes and repairs to ETSO parts;</li><li>• NPA No 2006-16 Concept of approved Certification Programme, Approval of minor changes to AFM.</li></ul>	Agenda item Rulemaking
<b>NPA16/2006</b> (Part 21 J DOA privileges): <ul style="list-style-type: none"><li>• EASA next actions and timeframe.</li><li>• Including extension to the ALS of the DOA privilege related to the minor changes to the AFM</li></ul>	Agenda item Rulemaking
<b>Consolidated versions of EASA regulations, implementing rules GM, AMC</b>	EASA plans to produce consolidated versions and make them available for a fee. Consolidated versions of regulations are already available on EUR-Lex website ( <a href="http://eur-lex.europa.eu/">http://eur-lex.europa.eu/</a> ). Please note that the DOA check-list is a consolidated version of Part 21 and associated AMC and GM. It is available on request.
<b>AMC and GM for changes and repairs to ETSO parts</b> The rulemaking process intended to enable DOA's to design and approve minor changes and repairs stopped. This result is very	There is a new GM to 21A.611 "Design changes" included in ED Decision No 2009/011/R of



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unsatisfactory. The CRD stated that additional AMC and GM would be provided to address the needs of the DOA's however this information is currently not available.	24/08/2009; AMC/GM to Part-21 amendment 21/5.
<b>ODA:</b> benchmark of the new FAA regulation on ODA (Organization Designation Authorization) : European Industry should be eligible to DOA privileges equivalent/similar to the potential FAA delegations to an ODA	EASA coordinate on these issues on a regular basis. The ODA system is significantly different from DOA and, for the future CDO (Certified Design Organization); we have yet to see concrete rules.
EASA activity on <b>PMA Parts</b>	Agenda item Rulemaking
<b>Acceptance of non-EU NAA's approvals without further investigation or additional validation</b> Latest guidance concerning the acceptance of TSO/FAA and other NAA approved data, documentation and airworthiness approvals without further investigation or additional validation	Acceptance of data without further investigation or additional validation can only be done through bilateral agreements between the foreign country and EU and provided these agreements contain the appropriate provisions. EASA is currently reviewing the issue.
<b>Sub-tier DOA</b> Will the so called Sub Tier DOA be subject of the The 1st Workshop on Part 21 Design Organisation Approval (DOA) Implementation on 4th of Dec. in Cologne and if not would it be possible to put it on the agenda.	Agenda item Rulemaking
<b>Sub-tier DOA</b> EASA next actions further to Airbus latest letter sent to the EASA executive director	Agenda item Rulemaking




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<p><b>Delegation of tasks / responsibilities</b> between DOA and equipment designer</p>	<p>See question on EPA marking below and reply to AEA.</p>
<p><b>DOA working outside their scope of approval</b> Recently our operation engaged a part 21 approved company in the UK to provide us with AOG support for Aircraft damage This was based on previous use of the same company. Damage was dis-bonding to a flight control, a primary composite structure. The company has a robust process to carry out the assessment and classification but it appears they did not follow this. This has been taken up in their Quality Department. They supplied previous release paperwork to demonstrate past experience for a similar, not identical flight control. They were unable to provide the supporting data from the OEM to demonstrate a time limited unrepaired release to service. We contacted the OEM and they rejected the proposed time limited repair advising that it was not structurally acceptable. During the waiting time between contacting the OEM and receipt of their alternate repair we investigated the company approvals and procedures. It was noted that they could not approve unrepaired damage to Composite and Primary Structures. This company has previously released Aircraft with similar damage for numerous operators. Many of our Approved Technicians thought the data was acceptable as it came from an EASA Part 21 company. I have a concern that the release of such time limited repairs have become the norm within Part 21 approval holders and are also being accepted at face value by industry. Whilst a valuable lesson has been taught to many people involved in this event.</p>	<p>Agenda item Issues reported</p>



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<p>I feel the lack of knowledge of many experienced people highlighted what is probably a bigger industry issue that should be addressed by EASA and industry.</p>	
<p><b>Acceptance of test house</b> for commonly used test (flammability, DO160 etc)            Currently DOA's have to fully controlled subcontract commonly used tests such as flammability DO160 etc. . A system should be established that allows DOA's to accept the results of tests (or previously completed tests) without further witnessing or controlling, when these tests were conducted under a controlled system and there are no indications for further supervision. For this purpose the EU accreditation system as well as the FAA list of approved test houses should be considered as acceptable for the DOs' design assurance system.</p>	<p>Industry is encouraged to set up a system for certification of these kinds of suppliers similar to ICOP as used for production. EASA can give credit to such system.</p>
<p><b>Use of Test facilities</b>            Some form of independent approvals / accreditation for test facilities used by DOA's</p>	<p>There is no rulemaking activity planned. EASA would like to rely on industry initiatives similar to ICOP in production field.</p>
<p>Obligation and <b>EPA marking</b> requirements            There is a need for guidance material that allows DOA's to integrate existing parts without the need for EPA marking. The guidance material should also include guidance to fulfill the Part-21 Obligations related to these parts in a practical manner and consider the use of foreign parts and already approved parts by third parties.</p> <div style="text-align: center;">               Obligations_EPA_Marking           </div> <p>See AEA letter + file embedded</p>	<p>EPA marking is a requirement related to production of parts that are not designed by the TC holder. Guidance material cannot allow deviations from this requirement.</p>




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<p><b>Changes to ICA</b> EASA seems to consider that minor adaptations (minor) to TC holder manuals (AMM CMM IPC) if they are not related to the safety of the design (MRB CMR etc) should not be handled by the DOA but by EASA 145 organisation or local authority. This is not reflected in 145 rules and needs design engineering decisions.</p>	<p>Please indicate where this EASA view is reflected.</p>
<p><b>The oversight of DOA subcontractors</b></p> <ul style="list-style-type: none"><li>• What is the expected level of oversight for <b>test houses</b> in the EU and overseas (including those with government recognised approval) undertaking work on behalf of DOAs?</li><li>• Is the Agency applying a consistent position when it approves a <b>minor change involving the use of a test house</b> to that expected when a DOA is approving the change?</li></ul> <p>In light of the recent Agency advice regarding the level of control that a DOA is expected to show when <b>subcontracting work to another Part 21 DOA holder</b>, what is the exact intent of GM 21A.239(c)? Specifically, what does the phrase "may take this into account in demonstrating the effectiveness of this integrated system" actually mean? As the concept of the sub-tier DOA is currently moribund, it is essential that we all have a clear understanding of the Agency's intentions in this area.</p>	<p>Agenda item Control of subcontractors</p> <p>Situation under review.</p> <p>Intent is to take credit of some aspects of the other DOA, for instance the existence of procedures, organisation and independent system monitoring. It does not allow direct use of data produced by the other DOA without control and integration in own DOA.</p>
<p><b>Unintentional Deviations</b> DOA requirements to address the classification and approval of manufacturing unintentional deviations (not adequately addressed in Part 21)</p>	<p>No action plan on this issue. It must be covered with existing requirements.</p>



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<p><b>DO/PO arrangements:</b> need for more detailed interpretation of Part 21 requirements relevant to the DO and for a consistent implementation at all DO and PO</p>	<p>A set of questions and answers on this topic has been produced end of 2007, following a SBAC/EASA workshop. They will be put on the EASA website, together with the material presented today. (See document embedded below).</p>  <p>DO-PO Q&amp;A_SBAC workshop 17102007</p>
<p><b>Guidance material</b> The majority of A/C currently in use are certified iaw FAR 25. As an example: Learjet Model 35A; Certification basis has been chosen to be equal to the Cert. Basis in FAA TCDS A10CE. In similar previous projects, EASA PCMs requested to use the guidance in JAA TGM/21/07 "Electrical Wiring Policy for certification of large Aeroplanes, Engines and Propeller". The EASA guidance published as AMC20-1. AMC20-21, 20-22 and 20-23 contain references to the new CS25 §§ 17XX and should be only applicable to STC projects with a Certification basis CS25 Amdt. 6 or higher.</p> <ul style="list-style-type: none"><li>• What is the guidance material to be used by DOA in a <b>STC process for the aspects of electrical wiring</b> when the Certification Basis for the project is not CS25 Amdt.6?</li><li>• Does the EASA intend to publish guidance material to define the essential <b>documents and contents for a STC project</b> (standardisation) or will it forever this forever depends on the decision of the PCM and/or specialist?</li></ul>	<p>Agenda item EWIS</p>



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<p><b>EWIS:</b></p> <ul style="list-style-type: none"><li>• Is it possible to obtain the word format of the EZAP template (Appendix of AMC 20-21)?</li><li>• In which format comes the EWIS ICA of TC holder?</li><li>• Will the EWIS ICA of TC holder be published?</li><li>• As a STC holder, where can we find the EWIS ICA of the TC holder?</li><li>• Does EASA have in mind to create working groups by technical subject linked with EWIS i.e. Cabin, Avionics?</li></ul> <p>Does EASA have a training centre and if so, can an organisation send its personnel to be trained there (for example, on EWIS)?</p>	<p>Agenda item EWIS</p>
<p><b>PART 25: How to certify a stretcher?</b></p> <p>Problem: a stretcher is not permanently installed within an aircraft. For installation all requirements regarding the emergency issues have to be taken into account. A certification as ETSO is not suitable, because this item could be bought later than the certification of the A/C and - this is the second very important issue – it could be installed in a various number of airplanes where a lot of different allowable loads have to be taken into account, which are not part of the ETSO. On the other hand a STC is not as simple as this, because the integration has to be considered. This is a problem, because of the amount of different A/C and the customized cabin layout; this means that a general certification could not been done.</p> <p>Since 2 years we try to certify a stretcher and there are a lot of problems and misunderstandings; maybe this workshop will provide a basis to solve several problems.</p> <p>Our last meeting in Cologne was attended by Mr. Simon as well; so maybe this is really an issue.</p>	<p>EASA is promoting the approach of one STC per aircraft type, to facilitate installation aspects. Compliance data related to the stretcher itself can be re-used for various STC, as relevant.</p> <p>The project which was subject to the meeting in Cologne is meanwhile closed.</p> <p>Please visit Certification/General Aviation – FAQ page on EASA webpage.</p>



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<p><b>Audit</b> (EASA's?!): Will the current Audit schedule (every 6mths) be continued? How does this coincide with the complaint of manpower shortage?</p>	<p>Frequency of audit is not the same for all DOAs and is related to several elements, for instance scope of company, size, issues reported.</p>
<p><b>EASA Webpage:</b></p> <ul style="list-style-type: none"> <li>• a lot of information is provided but pages are very overloaded=&gt; very hard to identify area one is looking for;</li> </ul> <p>The STC Listing is (presently) only available in pdf-format (2100+ pages);</p> <ul style="list-style-type: none"> <li>- some kind of search function would be very helpful (similar to TCs listing);</li> <li>- the listing is not kept up-to-date (look-up date = 30 Oct 2009, publication date=2July2009);</li> <li>- some (older) STCs are not listed at all;</li> </ul>	<p>EASA is currently reviewing the layout of the web, for further improvements.</p>
<p><b>Regular DOA workshops</b></p> <p>Is it EASA intention to hold regular Part 21 Design Organisation Approval (DOA) Implementation Workshops in the future</p>	<p>Yes. The frequency has still to be defined. What is Industry view?</p>
<p><b>QUESTIONS RAISED DURING THE WORKSHOP</b></p>	
<p><b>Status of Rulemaking activities affecting Part 21</b></p> <ul style="list-style-type: none"> <li>• Parts not needing EASA Form 1: will Industry be consulted?</li> <li>• Any intention to publish the non-controversial parts of NPA No 16-2006?</li> </ul>	<ul style="list-style-type: none"> <li>• Planned rulemaking task 21.026; Industry will be invited to the associated working group, as usual, via associations (ASD, AEA etc).</li> <li>• Task put on hold; on-going internal EASA discussion on certification and DOA system, before further decision; a workshop on conclusions will be held before the summer 2010. EASA will also explore how certain non-controversial issues could be further processed.</li> </ul>





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<ul style="list-style-type: none"><li>• ICA rulemaking task</li><li>• Any planned actions on changes to ETSO articles in Subpart O, as well as in related AMC &amp; GM?</li><li>• Sub-tier DOA's</li><li>• STC's on avionics installation on CS 23 a/c approved by FAA – any rulemaking activity planned for their acceptance?</li><li>• Update on EU – USA Bilateral Arrangement (BA)</li><li>• DOA privileges vs. ODA concept</li></ul>	<ul style="list-style-type: none"><li>• Industry is invited to participate to the ICA workshop planned for 19 January 2010, to provide inputs.</li><li>• No. The recent ED Decision 2009/011/R amending the AMC/GM to Part-21 introduced new guidance related to the approval of design changes to ETSO articles.</li><li>• Rulemaking activity is stopped; on-going internal EASA discussion on certification and DOA system, before further decision; a workshop on conclusions will be held before the summer 2010.</li><li>• No. For STC's on multiple TC's issue, please visit Certification/General Aviation – FAQ page on EASA webpage. Acceptance of FAA STC's is not covered by EASA rules, but by bilateral arrangements.</li><li>• For the time being, the BA is blocked due to political discussions in USA.</li><li>• There is a regular informal gathering between EASA, TCCA and FAA in order to exchange views on design organisation issues.</li></ul>



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<p><b>EWIS and FRM</b></p> <ul style="list-style-type: none"><li>• What about EWIS for minor changes? Is reclassification needed if EWIS impacted?</li><li>• Is the CRI defined for STC the final version for the included special conditions?</li><li>• What is the regulatory basis for EWIS audits?</li></ul>	<ul style="list-style-type: none"><li>• Today, EWIS approach does not apply to minor changes. When the related Special Condition will be introduced into the Certification Basis, EWIS will become applicable to minor changes also.</li><li>• Yes, this is the generic format.</li><li>• EASA letter based on Part 21A3B(c)(1).was used as a tool to implement EWIS aspects; AD could be used if organisations refuse to act; need to comply anyway with FAA rules, in most of the cases.</li></ul>
<p><b>Environmental Protection (EP)</b></p> <ul style="list-style-type: none"><li>• Progress on EASA – FAA harmonization</li><li>• What about the maintenance side?</li></ul>	<ul style="list-style-type: none"><li>• Both regulators (including EASA and FAA) and industry are members in ICAO Committees with responsibilities in drafting technical requirements; further, as part of the negotiation of the new EU/US bilateral agreement, a confidence building exercise has been performed and concluded in October 2009. Under the future agreement, each party will take benefit of the other system.</li><li>• A deterioration of EP characteristic of the product during maintenance activities or due to repairs is recognized, but subject is not fully covered yet.</li></ul>



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<p><b>Control of subcontractors</b></p> <ul style="list-style-type: none"> <li>• Accepted test houses controlled by NAA's: can it be recognised by EASA?</li> <li>• How to avoid the burden that each DOA may have to exercise control on the very same organisation, that could then be subject to multiple audits?</li> <li>• The tested and conformed article may come under Part 145 organisation?</li> <li>• Is it possible for a DOA to accept data generated and approved by another DOA?</li> <li>• Is it possible to accept test houses under AP to DOA?</li> </ul>	<ul style="list-style-type: none"> <li>• Not under the current regulatory framework.</li> <li>• An approach will be proposed for POA, based on a well elaborated and established scheme managed by Industry. Ideas can be derived from it, for application in DOA context.</li> <li>• Yes, should the design approval applicant/holder has appropriate procedures in its DOA (Part 145 approval is not relevant for this activity).</li> <li>• Not under the current regulatory framework; EASA recognise that there is an issue and is working on it; DOA's are legally responsible to show compliance for the work of their subcontractors and must demonstrate control to a certain defined extent (doing nothing is not acceptable).</li> <li>• No, as design activity is needed for eligibility.</li> </ul>
<p><b>Independent checking function and independent system monitoring</b></p> <ul style="list-style-type: none"> <li>• Is CVE supposed to sign compliance documents whether EASA is verifying or not the project?</li> <li>• Please clarify "CVEs must not create the compliance data but can work in conjunction with the individuals who prepare the compliance data".</li> </ul>	<ul style="list-style-type: none"> <li>• Yes.</li> <li>• CVE's must remain independent; however he should not be isolated, but permanently in</li> </ul>



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	contact with people working on the project and creating the data.
<p><b>Questions and Answers Session</b></p> <ul style="list-style-type: none"><li>• PMA vs. replacement parts</li> <li>• Sub-tier DOA's: sequence of events?</li> <li>• Sub-tier DOA's and test houses</li>  <li>• EPA marking</li></ul>	<ul style="list-style-type: none"><li>• This is covered by rulemaking task 21.046, which is starting now. It is an agency task but a review group with industry may be set up to review the comments on the NPA.</li> <li>• After further internal discussions EASA management will make a decision and afterwards this decision will be shared and discussed with industry via a workshop on how to best implement the decision.</li> <li>• In Sub-tier DOA concept, test houses could be eligible only if producing compliance data; this is not the case for all test houses. Industry has been invited to develop a scheme to cover the so-called Specialty Service Suppliers and give them some kind of accreditation. Example of ICOP, developed for production, could be used.</li> <li>• Guidance proposed by AEA is beyond the present regulation; it is recognized that we have to look further into the issue, especially on use of approved data.</li></ul>