

OSD and the Authority point of view.

With introduction of PART 21 and requirements for OSD data, the Authority are faced with a number of challenges.

- Availability of OSD data
- Requirements to use mandatory and non-mandatory items
- Legal and operational aspects when the Authority holds OSD data and the training provider does not

Most problems occur when a training provider is unable to get a hold of updated OSD data on a specific aircraft type, in most cases due to unrealistic high costs. The regulation requires the use of these data in generating training documentation making the OSD indispensable and therefore leaves the training provider in an impossible situation.

In many cases the OSD holders are willing to supply OSD data to competent Authorities free of charge. This creates a situation, where it will be very difficult for a training provider who does not hold this OSD, to know what items are required in the training manual. Legally the Authority would not be able to supply this information to the training provider, unless authorized by the OSD holder.

With EASA working in a direction where most training requirements will be moved to soft law, AMC and GM, the Authority face a very difficult situation, where the mandatory training requirements only are available to OSD holders. If this situation arises a completely uneven market situation could develop, where monopolistic states occur.

The Danish Authority suggest that EASA either provides an OSD structure that makes this data available to all interested parties without unrealistic high costs or they make the OSD part of the hard law. This would give an even playing field for all training providers and ensure the highest safety level.