

# ATO's view on Operational Suitability Data (OSD)



**Thomas Leoff**  
IAAPS Chairman

- ATO perspective on OSD
  - Legal Frame(s)
  - Interfaces between stakeholders
  - Data availability and related needs
  - Legal and procedural questions

- There are at least two legal frames related to OSD:
  1. Part 21 as legal frame for OEMs interacting with EASA
  2. Regulation Aircrew as legal frame between NAAs and ATOs -

and actually a 3<sup>rd</sup> frame:

3. Regulation Air Operations, when ATOs provide training modules for CAT operators that are combined with “FCL related training” (e.g. type rating training combined with OCC)

# Interfaces between stakeholders:

---



- 1<sup>st</sup> Interface: OEM – EASA:
  - Governed by Part 21,
  - defines i.a. mandatory and non-mandatory OSD items and TASE elements
  
- 2<sup>nd</sup> Interface: ATO – NAA:
  - Governed by Reg. Aircrew (1178/2011)
  - Requires implementation and “maintenance” of OSD
  - Approval of OSD-related updates in ATO manuals
  - Oversight regarding OSD



- 3<sup>rd</sup> Interface: ATO – Customer
  - Individual customer
  - CAT Operator
  
- 4<sup>th</sup> Interface: ATO – OEM
  - Access to OSD
  - Actuality of OSD
  - Responsibility for actuality of OSD

- The OSD implementation process in ATOs is closing in to the deadline in December 2017
- Variations in effective cooperation between ATOs and the different OEMs
- Uncertainty regarding the future updates of OSD and the timelines for updates at the ATOs

# Legal and procedural issues

---



- The establishment of OSD is a process between the OEM and EASA during the type certification process. 
- OEMs obviously have the option to apply for the approval of mandatory and non-mandatory items at their own discretion
  - How can other stakeholders get involved before binding requirements or credits, that can supersede IRs and AMCs in Part FCL , are established? 

- AMC-character of non-mandatory items without the regular involvement of all stakeholders
- In other words:  
*OSD-content shall obviously be treated similar to Aircrew Regulation content, but without applying Aircrew Regulation development and application rules.  
That does not work for the industry!*





# Important questions from ATOs:

---



- How will ATOs learn about new or amended OSDs and which timelines apply for their implementation?
- How will ATOs stay enabled and motivated to develop more efficient, effective or target population focused training and methods?
- How is pan-European standardisation of NAAs regarding the implementation, interpretation and application of OSD ensured?

- How can we clarify and improve the interfaces between the NAAs and ATOs governed by Reg. Aircrew, OEMs and EASA governed by Part 21 AND the cross-sectional interface between all stakeholders?
- How can we avoid a “Monopoly” of OEMs for training content and methods as well as development thereof which may result from their ownership of OSD?

- Is EASA aware of the fact, that OSDs partly but heavily interfere with ATO's didactic and pedagogical competence regarding training (e.g. 9x3 hours; why not state 27 hours?)
- Is EASA aware of the fact, that OSD partly describe training devices to be used, that are not defined by CS-FSTD?
- Is EASA aware of the fact, that it is partly unclear, if hours are meant "per crew" or "per pilot"?

# ATO's Questions cont.:

---



- Is EASA aware of the fact, that OSD are in some cases in conflict with Aircrew Regulation hard rules (e.g. TRI-extension to another type)

# Thank You!

---



## Discussion and Comments welcome!

# Supplemental issues:

---



- Short-term, Medium- and Long-term measures
- Risks and Benefits
- ATO Requirements
  - Part 21.A.15(d) and related GM (only EASA/OEMs)
  - Part 21.A.62 (availability of and access to OSDs)
  - FCL.710(a)
  - FCL.720.A
  - FCL.725(a)
  - FCL.915(d)

# Legal references for ATOs like LAT:

---



- Part 21.A.15(d) and related GM (only EASA/OEMs)
- Part 21.A.62 (availability of and access to OSDs)
- FCL.710(a)
- FCL.720.A
- FCL.725(a)
- FCL.915(d)
- FCL.910.TRI(b)
- ORA.ATO.125(b)
- AMC2 ORA.ATO.125