



Equipment related questions

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18/11/2004

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European Aviation Safety Agency

Question 12

Q: Are there any working procedures or guidelines to assist United States based companies in applying for ETSO's and describing the procedures for minor and major changes to existing ETSO'd articles?

A: Currently there are no EASA procedures available. But for the time being, the "JAA Practical Working Procedures for US manufacturers..." can be used.

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European Aviation Safety Agency

Question 13

Q: Is there any process or procedure for approving products for which there is no TSO or ETSO, for example SATCOM. The STC procedure is not very practical or cost effective for products with a wide application base. In the past, the UK CAA had a "Miscellaneous Approval" category for such products, is there an EASA equivalent to this category ?

A: No, but the need was identified and is already part of the rulemaking programme.

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European Aviation Safety Agency

Question from EGU/DAeC

➔ **Certification of equipment in sailplanes and motor-gliders**

✦ EASA has been informed on several occasions that not all equipment used in gliders is certified within the type certifications or (E)TSO's. These types of equipment are typical for gliding operations and are now in use since several decades without being cause for safety concerns. Nevertheless according to Part 21 this equipment is not certified and this causes problems now.

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Question from EGU/DAeC

➔ According to Part 21A.303 all parts & appliances that are to be installed in a type-certificated product must be approved.

But.....

➔ According to Part 21A.305 compliance with ETSO standard is required when the part or appliance is explicitly required by Community Law or Agency measure (ie, CS).

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Question from EGU/DAeC

➔ If the Certification Specification does not require the part, ETSO approval is not strictly required (although desirable).

➔ Approval can be part of the installation.

➔ Each such modification is a one-off and has to be assessed separately

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Question from EGU/DAeC

If such changes are classified as Minor (21A.91):

- DOA/Alternative procedures not required
- Minor changes can be approved directly by EASA; 21A.95(a)
- Must also comply with 21A.105 (design records), 21A.107 (Continued airworthiness instructions) and 21A.109 (EPA marking).



Question from EGU/DAeC

→ Equipment that is additional to that required by CS22 (for example, competition devices)

→ 'No Hazard' approach:

CS22.1301(b): "Instruments and other equipment may not in themselves, or by their effect on the sailplane, constitute a hazard to safe operation."



Question from EGU/DAeC

But....problems

- 21A.307 Release of Parts and MA.501 Installation require EASA Form 1
- EASA Form 1 must be issued by an approved organisation



Question from EGU/DAeC

Possible interim solutions

- Part 21 Subpart F (Production without POA) and Part M Subpart F (Maintenance Organisations) do not request quality systems
- Simple organisations can comply
- Part 21 Subpart F: Letter of agreement from Competent Authority 21A.125