DASR Transition – Our story, … so far

A Part 21 Perspective

Airbus Group Australia Pacific

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Overview

- Airbus Group AP context
- Journey pre DASR
- Opportunities offered by DASR
- Complexities to be understood and managed
- Way ahead
Airbus Group AP context

Support 4 platforms for the ADF:
• C130J
• P3
• MRH90
• ARH Tiger

Due to different legacy there was a strong, specific and distinctly different influence from each sponsor AEO on each platform AEO.

Hence 4 separate AEOs
Airbus Group AP – journey prior DASR

Objective – single EMS

Phase 1: Rotary wing
• ARH and MRH
  • Similar contract scope
  • Similar OEM
  • Same customer
• Significant reduction in processes, forms
• Outcome:
  • Reduced EMS maintenance and audit burden

Phase 2: Rotary wing + fixed wing
• Suspended when DASR introduction announced
Airbus Group AP – long term efficiencies of DASR

Regulated activity scope reduced
- Limited to certification basis activities: pure functional/performance not regulated
- Minor changes: Compliance finding done in-house (no direct sponsor dependency – CVE on behalf of Authority)

There are also potential increase in activity scope:
- Major changes: Compliance finding on behalf of Authority (depending on level of Authority involvement agreed in Certification Program Plan)

Other potential efficiencies:
- Recognition of NMAAs
- Recognition of OEMs / FMS sources
- …
MTCH delegate

• Appears to be a Form 4 position
  • How does this relate to Head of Design – is there role clarity?
  • Airbus position: HoD is accountable for system generating designs in accordance with the scope defined in the Exposition.
• DASR / EMAR appears to introduce scope for multiple type certificate holders
  • Need for in-country MTCH understood
  • Who is accountable for TC Holder obligations?
• Airbus understanding:
  • Local MDOA to enact OEM (actual TCH) continued airworthiness support
  • Local MDOA to manage continued airworthiness of local Major changes / MSTCs
  • Local MDOA to manage other obligations including occurrence reporting
MTCH delegate

• What duties will be delegated to MTCH delegate?
  • Part 21 Compliance oversight: No
  • Approvals of Major changes: ?
  • Attendance to mandated system engineering reviews associated to major changes: MTCH-delegate personally in attendance?
  • Issuing of ADs: ?
Contemporary certification standards – Major changes

DASR 21.101 – requires contemporary standards to be applied to changes to type certificate, unless the change is not significant according to the product change rule

• To what extent will this be enforced in the transition period, given the current context?:
  • Changes to legacy platforms certified against the certification standard in effect at initial certification
Permit to fly

- Current TAREGs allow for trial mods to be given IA / LSR for purposes of:
  - generating evidence in support of certification.
  - Operational Test and Evaluation prior to full SR
- Who will have authority to provide flight clearance / permit to fly for minor changes that are required to be flight tested?
- Note: for purposes of minor changes scope of permit to fly assumed to be limited to requirements in the Certification Program Plan
Competence in compliance verification

CVE verifies, on behalf of NMAA, that certification requirements are met:

- Requires experience in certification requirements for the domain (technical discipline as defined by e.g. ATA code) in question – why is CPENG an adequate requirement?

For major changes:

- CVE / Office of Airworthiness liaises with NMAA: who is the counterpart in the NMAA for a specific project certification program?
Various topics

• Overlap between ADO and CAMO/CAMO services;
• Multiple ADOs within same company
• SW Compliance finding
• Managing system components that are not *products*, *parts* or *appliances*
Phase 1 plan

- Draft DOE to DGTA end of May 2016
- Signed DOE to DGTA end of July 2016

- Schedule for MDOA certification to be agreed
Questions / discussion