1st Annual Report
EASA-JAA/FAA/TCCA Continuous Improvement Team (CIT)
on Implementing and Standardizing
the Changed Product Rule (CPR)

Executive Summary

The CPR CIT is an international (EASA-JAA, FAA, and TCCA) team created to monitor the CPR implementation process.

Since CPR became effective, the CIT has met on three occasions and has documented more than 30 procedural or clarification issues. The most controversial issue is the determination of the level of significance for product design changes. The Authority members noted that the actual number of significant changes since CPR implementation is much smaller than had originally been anticipated. The transition to CPR also has been smoother than anticipated. The issues reviewed by the CIT are largely clarification and lessons learned.

Based on feedback from U.S., Canadian, and European industry representatives, CPR does not appear to be a major burden to the aviation industry. Continued work of the CIT helps ensure that any issues are addressed in an efficient and timely manner.

This interim report briefly describes the progress made by the EASA-JAA, FAA, and TCCA CIT in its first year. This interim report contains conclusions and recommendations to EASA-JAA, FAA, and TCCA as a progress and status check of the initial success of CPR. All CIT members agree on the generic issues contained in this report. Separate cover letters on specific Authority issues will be provided as necessary.

1.0 Introduction

1.1 The principles behind the CPR have been a controversial subject that took approximately 12 years to formulate, and as such it was anticipated that the implementation might be troublesome. CPR is international and requires the continued collaboration of EASA-JAA, FAA, and TCCA to support the desired harmonized implementation. To support the CPR implementation process, the JAA, FAA, and TCCA formally agreed to form an international Continuous Improvement Team (CIT) during the CMT meeting June 10, 2003.

1.2 The FAA chartered a CIT on August 1, 2003 and requested JAA and TCCA participation. The original terms of the charter (Terms of Reference) are attached in appendix 1.

1.3 The role of the CIT is to monitor issues affecting the implementation, standardization, and continued harmonization of the CPR by EASA-JAA, FAA, and TCCA following the simultaneous implementation of the CPR beginning June 2003.

2.0 Summary of CIT Meetings and Related Activity

The international CIT has now met three times (New York in September 2003, Los Angeles in April 2004, and Berlin in August 2004). A brief summary of each meeting is provided in this report, with conclusions and recommendations.

2.1 First CIT Meeting-New York in September 2003

2.1.1 Terms of Reference (TOR). During the first international meeting, the CIT members discussed the approach on achieving international oversight of CPR. They also recognized that, in the interest of efficiency and harmonization, it would be prudent to meet as a single (unified) CIT group. A cooperation arrangement was drafted proposing to unify the efforts of the individual EASA-JAA, FAA, and TCCA CITs into one international team. This team would collaborate as a single body, for the purpose of overseeing the implementation of the CPR process.

2.1.2 Rule Change. During this meeting, the FAA indicated that HQ (Washington) had a project involving the rewrite of the entire 14 CFR part 21, and that they saw this project as an opportunity to amend 14 CFR § 21.101. The FAA explained that this was necessary, as it needed to align the rule with the latest policy. The FAA explained further that a letter from a member of the U.S. aviation industry requested this position, and that the proposed rule amendment would be relatively minor and superficial.

2.1.2.1 EASA-JAA and TCCA expressed surprise that the FAA was already embarking on a 14 CFR § 21.101 amendment three months after the rule became applicable. It had long been agreed by the accountable Directors (for Certification) of all Authorities that a rule amendment would be a difficult and lengthy task without first gaining the necessary experience (perhaps 3 to 5 years) on CPR implementation.

2.1.2.2 EASA-JAA and TCCA commented that a 14 CFR § 21.101 amendment would be premature at this point. They also indicated to the FAA that they would not participate in this FAA activity, but requested the FAA to provide an update at all international CIT meetings. The FAA agreed to report any updates.

2.1.3 Industry Session. Only the U.S. industry was represented (Boeing). Boeing attended for one half-day meeting. Boeing indicated that the FAA had approved its CPR certification process, and the project was essentially working well in these early stages.

2.1.4 Classification Problem. The FAA described an actual project involving an aircraft-level change (A330-300E) where the FAA issued a G1 issue paper to address and highlight a problem. The problem involved differences in how the FAA and EASA-JAA validated the classification of the change.

2.1.4.1 It was agreed by all CIT members that the CIT does not act as an arbiter on specific certifications, but will review classifications presented to the CIT. The CIT will review classifications to identify and resolve potential fundamental implementation problems.

2.1.4.2 It was agreed that it was disappointing that, at this early stage, the JAA team and the FAA disagreed on how to determine significance for a product change. The particular issue related to an A330-300E that had three changes: fly-by-wire rudder, carbon bulkhead, and structural changes in association with a design service goal increase. It was agreed, after much debate, that the certification basis was acceptable, but the rationale and classification should have been better defined and documented at the beginning of the project.

2.1.5 Method of Working. It was agreed that discussion papers (DP) would be raised for any CPR topic that required policy or protracted debate by the CIT. The DPs would be reviewed at all meetings, and updated as necessary between meetings. The administration of the DPs rests with the Authority hosting the particular CIT meeting, unless the DP itself is specific to one Authority. Appendix 2 lists the subjects of all DPs and their current status. It was agreed that the DPs are internal to the CIT authority members, but the CIT can share summaries of the issues with industry during the CIT meetings.

2.2 Second CIT Meeting-Los Angeles in April 2004

2.2.1 Cooperation Arrangement. The cooperation arrangement discussed in paragraph 2.1.1 was signed April 22, 2004. It unifies the efforts of EASA-JAA, FAA, and TCCA to meet as a single body for the purpose of overseeing the implementation of CPR. Appendix 3 is a copy of the cooperation arrangement.

2.2.2 EASA Update. The team leader (TL) provided a short presentation to update the group on EASA developments. It was agreed that similar updates should be provided at future meetings.

2.2.3 Questionnaire. In order to assess the implementation and training on CPR, the EASA TL drafted a survey questionnaire. The EASA TL then sent the questionnaire to all members of the CPR ad hoc working group and all staff that had been through the training. The FAA TL customized and circulated the questionnaire to the U.S. working group and trained staff before this meeting. At this meeting the feedback was reviewed. The CIT concluded that the feedback was generally positive, and issues or concerns raised were already being covered by the existing DPs.

2.2.3.1 At the time of this meeting, the TCCA had not done a similar survey, but agreed to review (with EASA-JAA and FAA) the need for a follow-on questionnaire. The TCCA survey was completed in July 2004 and the results reported at the Berlin meeting (August 2004). The TCCA results were broadly consistent with the feedback received from the EASA-JAA

and FAA surveys. The data and feedback (summarized by EASA-JAA and FAA) suggested that the following is each agency's position on significant changes:

Agency	From the Authority feedback	From the industry feedback
EASA-JAA	252 major changes (including STCs), 4 of them significant.	161 major changes, none of them significant.
FAA	Directorates reported less than 1 percent of the product changes were found to be significant.	There was general agreement that the CPR procedure was working, however, 60 to 70 percent of the modifiers (mostly aftermarket) had not yet applied the new rule procedures. Additional time will be required to determine full rule impact on the industry.
TCCA	Survey not yet completed. See paragraph 2.3.2.	—

2.2.4 Preparation for 2004 FAA/EASA International Aviation Safety Conference in Philadelphia. The respective TLs of the FAA, EASA, and TCCA consulted and agreed on the CPR presentation for this conference. It was further agreed that this should be a single CIT presentation and that, on this occasion, the FAA should present it. Paragraph 2.3.3 summarizes the feedback from this conference.

2.2.5 Classification Problem. A second example of a different interpretation of change classification was discussed. The change and determination was almost identical to the first example described in paragraph 2.1.4 (and again involved the FAA and EASA-JAA). It was decided that in order to best resolve this issue, all the facts should be collected and discussed at the next meeting in Berlin. At the Berlin meeting, the certification team and the applicant could expand on the decision process. A DP was raised in order for the CIT to further review this important issue.

2.2.6 Industry. No Industry representatives were present for this meeting.

2.3 Third CIT Meeting-Berlin in August 2004

2.3.1 Participation by Other Authorities. The Civil Aviation Authority of Israel (CAAI) requested via the FAA to attend this CIT meeting as an observer. The CAAI wanted to improve its understanding of the implementation of CPR. The CIT TLs agreed to Israel's participation before this meeting. The participation by CAAI was very constructive as it is progressing with numerous STC projects and now has some limited experience with the CPR. Other nations (Japan, Australia, and Brazil) have also expressed interest in applying the CPR procedures. It was agreed that, through this interim report, the CIT should be prepared to collectively accept additional membership. Membership would be on a case-by-case basis if it could be beneficial to both parties. See the recommendation in paragraph 5.1.

2.3.2 Update. EASA-JAA, FAA, and TCCA provided an update on CPR developments since the last meeting. The TCCA presented the results of its survey based on a

similar questionnaire used by EASA and FAA. The TCCA reported that of 81 applications for either a supplemental type certificate or an amended type certificate, 3 design changes were reported as being significant.

2.3.3 Feedback from the 2004 FAA/EASA International Aviation Safety Conference in Philadelphia. The presentation on CPR and the activity of the CIT was reportedly well received by participating Authorities and industry. Industry, however, requested more transparency of the CIT's activity.

2.3.3.1 At the conference, the FAA agreed that it could provide a summary of the DPs generated during the CIT activity on its web site. This was discussed at the CIT and the industry session. It was agreed that the CIT should continue to invite industry to attend the "open" session and that the FAA would provide a summary of all closed DPs on its web site. In order to harmonize on this activity, it was agreed that EASA-JAA and TCCA should consider a link to the FAA web site and that the CIT TLs would agree on the material to be posted on the web site. See the recommendation in paragraph 5.2.

2.3.3.2 Industry also requested that it should be invited as full-time members of the CIT and have a copy of the CIT interim and final reports. As above, the CIT has no objection to industry participation, but feels that the added transparency should already meet its needs. It is, therefore, recommended that, as a compromise, this report be copied to industry. See the recommendation in paragraph 5.3.

2.3.4 ICAO Annex 8 Repairs. Prior to this meeting, at the International Aviation Safety Conference on Philadelphia, industry raised concern over the potential applicability of CPR on repairs, based on its interpretation of the latest amendment to ICAO Annex 8.

2.3.4.1 At the request of both CIT and participating industry, a TCCA member familiar with the issue explained the Annex 8 provisions on repairs. The TCCA member explained the provisions during the Berlin meeting. The TCCA stated that it did not share industry's interpretation on the possible use of CPR for repairs.

2.3.4.2 It was agreed by the CIT that CPR was not intended to apply to repairs. The need for repairs to comply with later or the latest airworthiness requirements is the sole discretion of an Authority, and not necessarily an international standard of Annex 8. The CIT agreed that action is needed to clarify the repair requirement with its respective industry. See the recommendation in paragraph 5.6 regarding communication of this policy.

2.3.5 Industry Session. This meeting was well represented by industry (five members in total). Representatives from Airbus (Central and Germany), Lufthansa Technik, and Rolls-Royce Deutschland (representing RR Germany, UK, and the U.S.) attended.

2.3.5.1 Airbus. Airbus provided a presentation on its views about CPR and provided details surrounding the classification problem that now had occurred on two occasions. The presentation was very useful as it clarified the design changes that had caused the debate and provided some actions and lessons:

- Airbus will provide the CIT with a proposal to revise specific related appendix 1 AC examples.

- It was clear that supporting documentation describing the change – and the applicant's rationale for the classification of significant or not significant – greatly assist the CA and VA in their assessment. CAAI (Israel) also raised this issue, and it was agreed that the CIT could propose a procedure that could assist in this process. An action was taken for the CIT to draft such a document in discussion with industry. See the recommendation in paragraph 5.4.

- The CIT concluded that a review of the TVPs might assist in minimizing recurrences of differences in the classification of design changes. Currently the respective Authorities are reviewing the TVPs, and as such the CIT TLs will provide input. See the recommendation in paragraph 5.8.

2.3.5.2 Lufthansa Technik. Lufthansa Technik provided a presentation on its experience with CPR. Essentially it has had no significant changes to date. Its main concern related to access to the recorded certification basis to assess the classification of the design change. It was agreed by the CIT that CPR makes it essential that STC applicants have access to, and the Authorities provide full visibility of, the certification basis. The CIT authorities will each ensure that this is the case via their own specific actions.

2.3.5.3 Rolls Royce. Rolls Royce explained that it had no significant changes since CPR had been introduced, that it has agreed to CPR procedures, and that to date it has no issues to report.

2.3.5.4 Overall, the three European organizations commented that CPR implementation in their organizations was proceeding satisfactorily and expressed satisfaction on the CPR implementation efforts and training provided by EASA-JAA, FAA, and TCCA.

2.3.6 EASA Restricted Type Certificate. With the introduction of the restricted type certificate (not existing in JAR-21) into EASA Part 21, a potential risk to harmonization has appeared in respect of the FAA and TCCA restricted category. See the recommendation in paragraph 5.7.

2.3.7 Potential Revisions to AC. The CIT is collecting draft text that will be reviewed and possibly offered as a future amendment to the AC. The text changes to date are relatively minor, but include lessons learned, differences between JAR-21 and EASA Part 21, more clarification, and additional examples.

2.3.8 Substantial Changes (14 CFR § 21.19). Although 14 CFR § 21.101 has assisted in the process of identifying substantial changes, the lack of understanding about what constitutes a complete re-investigation of compliance remains an area of confusion and potential future conflict. The CIT continues to review this in relation to 14 CFR § 21.101, but are likely to recommend in its final report that a review be made to add AC text pertaining to 14 CFR § 21.19. See the recommendation in paragraph 5.9.

3.0 Training

3.1 Training provided by EASA-JAA, FAA, and TCCA was well received by both Authority personnel as well as industry. The questionnaire feedback included training and was largely very positive. The training material remains available for future use, either as potential

continuation training or training for new staff. The material, however, will need to be amended to take account of differences between 14 CFR part 21 and JAR-21. The CIT does not plan to amend this material at this time, and it is recommended for future EASA-JAA review. Training is, therefore, considered to be complete. However, as Authorities (other than EASA-JAA, FAA, and TCCA) begin to apply the new rule procedures, they will most likely find additional training will be necessary to adequately follow international certification procedures. See paragraph 3.3.

3.2 Use of Training Material. As part of an FAA assessment of CAAI validation of an STC, it was apparent that examples in the training material were used by both parties in order to support their counter arguments. It was agreed by the CIT that it should not be necessary to use the training material to defend a classification. An action was also taken by the CIT to amend the training material to remove any potential conflict. Examples provided in training packages are for illustration of a point. Future amendments to training material should further highlight this issue.

3.3 Training Other Authorities. It is also obvious to the CIT that if bilateral partners are not trained and familiar with CPR, then there is a risk of classification issues and potential delays. The CAAI example was seen as a good test case and demonstrated the need for the respective CIT authorities to assess the need to provide support or training on CPR. The FAA is actively involved in training a number of countries on 14 CFR part 21 certification and offered to include CPR. It is, therefore, recommended that the FAA consider providing the CPR training to other interested Authorities in collaboration with EASA-JAA and TCCA. This ensures that the training materials and any additional support and interpretation reflect the harmonized or agreed implementation. See the recommendation in paragraph 5.5.

4.0 Conclusions

4.1 The number of significant changes has been much lower than had been anticipated during the drafting of the AC and has assisted in a relatively smooth transition into CPR. The fact that the numbers are low removes any urgent action to track such classifications by international databases.

4.2 The CIT activity is progressing very well and is achieving the agreed upon objectives.

4.3 The feedback from the authority members and industry representatives through discussions and the survey questionnaire is generally very positive. However, the number of responses was relatively low. The CIT will review the need for a further questionnaire as it approaches the end of its term.

4.4 The CIT reaffirmed the previous position established by EASA-JAA, FAA, and TCCA that CPR was not intended to be applicable to repairs. The CIT does not plan to utilize any more resources in this subject area.

4.5 Many projects were submitted before CPR's applicability date. Voluntary compliance with CPR should continue to be encouraged.

5.0 Recommendations

5.1 It is recommended that the CIT be allowed to directly accept requests from other regulatory authorities to join the CIT meetings as an observer. The assessment should be on a case-by-case basis, with consideration given to need, knowledge (training), experience, and future interfaces.

5.2 In order for the CIT to be transparent in its activity, the closed DPs should be summarized and added to the FAA web site with links from EASA-JAA and TCCA sites. The CIT TLs must agree on the material content.

5.3 Industry should be provided a copy of this interim report and eventually the CIT final report.

5.4 In order to minimize the potential for classification disputes, it is recommended that the CIT draft a template for documenting the rationale for the classification of the change. When agreed, the template will be included in advisory guidance material and proposed to EASA for introduction into GM for 21A.101.

5.5 It is important that bilateral partners have training in CPR in order to make mutual acceptance as efficient as possible. It is, therefore, recommended that EASA-JAA, FAA, and TCCA make their common bilateral partners aware of the need for training and offer training when requested. In order to minimize duplication, the respective authorities should make each other aware of training requests and seek mutual agreement or participation.

5.6 It is recommended that EASA-JAA, FAA, and TCCA make known their policy that CPR does not apply to repairs.

5.7 It is recommended to amend EASA-JAA Part 21 to give a specific treatment to changes to restricted type certificates. This amendment should be harmonized with 14 CFR and the TCCA's process for certification in the restricted category.

5.8 It is recommended that EASA-JAA, FAA, and TCCA request CIT review of proposed TVPs to ensure procedures fully address CPR and CIT lessons learned.

5.9 It is recommended that a separate activity be chartered by the three Authorities, to clarify the criteria for a substantial change (14 CFR § 21.19) relative to a significant change (14 CFR § 21.101).

FAA CIT Program Manager	EASA/JAA CIT Program Leader	TCCA Standardization Team
..Randall Petersen..... Name	….John McColl..... Name	…Enrico S. Lucas ..... Name
……./ s / .....Signature	……../ s /..... Signature	……./ s /..... Signature
…….12/06/04..... Date	……12/06/04 ..... Date	……12/06/04 ..... Date

APPENDIX 1. (TERMS OF REFERENCE)

Changed Product Rule
Continuous Improvement Team Charter

Sponsor: Aircraft Engineering Division (AIR-100)

Objectives:

The Changed Product Rule (CPR) Continuous Improvement Team (CIT) supports the new certification procedures required by recent changes to 14 CFR § 21.101. This team will support the Aircraft Certification Service goal to implement and oversee the new certification procedures. The CIT is tasked with the following:

- Develop a database to address emerging issues and document new decisions for significant changes to aeronautical products.
- Provide a forum for communication among Headquarters, Directorates, Aircraft Certification Offices, international certification authorities, and industry.
- Evaluate proposed alternate certification processes and methodologies.
- Resolve policy issues addressing proper application of 14 CFR § 21.101.
- Ensure that certification programs continue uninterrupted.
- Provide annual assessments identifying unresolved technical, procedural, and standardization issues.
- Support Directorates and Aircraft Certification Offices with the latest practices, lessons learned, and examples.

Background:

The Changed Product Rule and associated Advisory Circular 21.101-1, Change 1 are harmonized with the Joint Aviation Authorities (JAA) and Transport Canada Civil Aviation (TCCA). The processes for applying and implementing the rule were developed and standardized in the Aircraft Certification Service. Working together to achieve the above objectives will ensure continued CPR process standardization and harmonization with JAA, TCCA, and industry.

Methods and Processes:

These broad objectives define CPR implementation and oversight support. They provide for continued coordination, communication, and harmonization, ensuring successful transition to the new CPR procedures. These objectives are not intended to be all-inclusive, but are considered critical in the proper application of the rule. The CIT will adapt and/or define specific policy to support implementation, track objectives, and document indicators of success. The Advisory Circular and Order will provide the basis for CPR application, procedures and policy.

The budget requirements for the CIT program are supported through the business planning process. The kick off meeting is scheduled September 2003. One domestic as well as one international meeting is scheduled yearly.

Composition:

The CIT membership is intended to provide expertise across Headquarters, Directorates, and Aircraft Certification Offices. CIT representatives include:

Position/Role	Member	Organization
ACMT, ACOMT linking member	David Hempe	AIR-100 Manager
SMT linking member	Nancy Lane	AIR-110 Manger
Policy Representatives	Randall Petersen (PM)	AIR-110
	Chris Gavriel	ANE-141
	Kevin Kendall	AIR-140
	Gerry Lakin	ANM-110
	Sharon Miles	ASW-111
	Bill Timberlake	ACE-112
Aircraft Certification Office Representatives	Ron Atmur	ANM-120L
	Sol Maroof	ANE-170

TCCA and JAA will be invited to participate in the CIT activities and meetings. Additionally, industry representatives will be invited to participate in the CIT meetings. Time will be allocated during each meeting for industry representatives to comment on issues associated with the new certification process and provide input to the team.

Effective date and duration:

This CIT is effective September 1, 2003. The CIT shall remain in existence for 2 years after this date unless sooner terminated or extended.

Charter Approved By: Date: August 1, 2003

Original signed by Susan Cabler

David W. Hempe
Manager, Aircraft Engineering Division,
Aircraft Certification Service

APPENDIX 2. DISCUSSION PAPERS

Discussion Paper	Subject	Status
Administration	Conduct of CIT meetings	Ongoing
01	FAA rule change – Rewriting of 14 CFR § 21.101	Open
02	Clarification on the application of 14 CFR § 21.19	Open
03	The use of issue papers	Closed (FAA only)
04	Documentation and availability of STC certification basis	Open
05	Clarification of secondary changes	Open
06	VFR to IFR update	Closed
07	Request for clarification on examples of cumulative effects	Closed
08	Request for clarification on examples of cumulative effects	Closed
09	Request for clarification on adequacy of special conditions	Closed
10	Request for clarification on the adequacy of certification basis for not significant changes	Closed
11	Request for clarification on treatment of software upgrades	Closed
12	Suggestion for AC improvement on the example of “does not contribute to the level of safety.” Moved to DP-16.	Closed
13	Request for clarification of Level of Safety/Impracticality. Moved to DP-29.	Closed
14	Request for clarification on the sequence of applying the exceptions process	Closed
15	Comments to several items in the advisory material	Open
16	Differences in design classification between Authorities	Open
17	Suggested improvements to advisory material. Moved to DP-29.	Closed
18	Create an FAA project tracking system	Closed (FAA only)
19	Delegation of the classification to a repair station	Open (FAA only)
20	Treatment of ex-Military and Restricted Category aircraft. Moved to DP-28.	Closed
21	Treatment of avionics modifications	Closed
22	Changes in the certification basis on OEM products	Closed
23	Request for further clarification of the 14 CFR § 21.101 “automatic” criteria	Open
24	The intent of 14 CFR § 21.19 for propeller type certificates	Open
25	Determination of regulatory compliance for DERs in support of field approvals	Closed FAA only
26	Life extension (modification vs. re-test or analysis). Incorporated into DP-16.	Closed
27	Placeholder for Berlin meeting issues	Closed
28	Restricted Category – General	Open

APPENDIX 2. DISCUSSION PAPERS, Continued

Discussion Paper	Subject	Status
29	Collection of proposed changes to AC(J) 21.101-1	Open
30	Application of 14 CFR § 21.101 for repairs	Open
DP-A	*Placeholder for certification basis information from EASA TCDS Office*	

APPENDIX 3. COOPERATION ARRANGEMENT

COOPERATION ARRANGEMENT BETWEEN
FAA/EASA/JAA/TCCA
ON THE IMPLEMENTATION
OF THE
CHANGED PRODUCT RULE

The simultaneous implementation of the Changed Product Rule (CPR) on June 10, 2003 by the FAA, JAA (now under EASA) and TCCA now requires a process where issues affecting the harmonized interpretation and application of CPR can be discussed and resolved. The FAA, EASA/JAA, and TCCA have already established within their respective organization a national team that is responsible for overseeing the consistent application of CPR. The FAA and EASA/JAA have formed their respective Continuous Improvement Teams (CIT) under independently approved Terms of Reference (TOR) or Charters, while TCCA has formed their CPR Standardization Team. While these internal bodies are primarily focused on national issues, the implementation of CPR is international in nature and requires the continued collaboration of FAA/EASA/JAA/TCCA to support the desired harmonized implementation.

At the invitation of the FAA, EASA/JAA and TCCA attended the first FAA CIT meeting in September 2003. During this meeting, the Authorities discussed the approach on achieving international oversight of CPR and recognized that, in the interests of efficiency and harmonisation, it would be prudent to meet as a single (unified) CIT group for this purpose. It was accepted that the unified CIT group should:

- Review on a periodic basis the CPR experiences of FAA/EASA/JAA/TCCA and recommend new, or changes to, certification procedures to allow for an internationally-harmonized implementation of CPR;
- Take into account the already-approved TOR or Charter of each member Authority such that participation in this group allows fulfilment of responsibilities under such TOR or Charter;
- Accord participating members equal status and recognition in this joint undertaking and work on the basis of consensus;
- Hold one set of meeting records that will serve to document the proceedings of the unified group and their associated actions;

The conclusion of the September 2003 meeting is a firm support for unifying the efforts of FAA/EASA/JAA/TCCA into one function, and that a document should be established to reflect this collaboration. Therefore, this Cooperation Arrangement is being rendered to permit the FAA, EASA/JAA and TCCA to collaborate as a single body for the purpose of overseeing the implementation of CPR, and to accomplish associated tasks and actions by continued mutual trust and consent.

This Cooperation Arrangement takes effect from the latest date of the signing Authority for a period up to September 30, 2005, unless otherwise agreed.

FAA CIT Program Manager	EASA/JAA CIT Team Leader	TCCA Standardization Team
.....Name	JOHN MCCOLL.....Name	ENRICO S. LUCAS.....Name
.....Signature	.....Signature	.....Signature
04/22/04.....Date	22 April '04.....Date	22 MAR '04.....Date