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# ETSO Airbus/Navblue/Thales/AvioBook/Dassault-aviation position

# About ED 273

- As of today, no application supplier applied for ETSO 2C521 (as such ED 273 not applied).
- Actual use of ED 273 given in the detailed presentations
  - Proposed methodology to conduct safety risk assessment receive a very positive feedback from users
  - Complement or detailed explanation to IR AIR OPS requirement are appreciated
  - Some technical requirements could be discussed

# ETSO-A process and associated organisation requirement

- Current ETSO-A process, despite proportionality, could be not adequate for EFB matter.
  - While ED 273 fulfil the expected objectives, its association to ETSO is found non adequate
- The community expresses concern to comply with POA requirement
  - Not suitable for all software application suppliers
- Alternative Procedure to DOA has to be discussed with additional detailed guidance
- Risk: current optional ETSO-A process not embraced by any player due to too strong competitiveness impacts in a very challenging EFB market
  - Fear to lose the efficient work to produce ED 273

# NIE proportionate process

- As of today, the strong link between NIE process and ETSO leads to consider a DOA/ADOA/POA organisation. This has to be discussed
  - Link to Ops regulation is a first necessary step
  - Community is interested in « EASA to provide an optional certification for non required NIE »
  - Industry concern: will it still be possible to allow EFB software providers to use the ETSO/ED 273 specification without having organisation agreement/approval?

# Manufacturer Questions (1/2)

- Deeper explanation needed on : *What are the criteria to determine if a product evolution requires ETSO? From Slide 22 from EASA presentation EFB ETSO 17 may 2018*
- EFB software could be issued from a certification process, an ETSOA process, A FSB/OEB process or a compliance matrix from OPS regulation. Depending on the origin of the process, is the EASA envisaged for a grand-fathering process?
- Having multiple processes and requirements allowing the use of EFB Software by operator leads often to deal with the shorter/simplest/costless solution, how the EASA will deal with this side effect?

# Manufacturer Questions (2/2)

- If ETSOA obtained, what will be the perimeter to be demonstrated by the operator regarding IR AIR OPS requirements (in particular Risk assessment)?
- What is the level of flexibility at the operator level from the ETSOA EFB manuals in their own EFB operational approval? For instance, regarding the safety risk assessment from the ETSOA EFB and regarding the training requirements from the ETSOA EFB?
- How do NAA intend to consider the ETSOA EFB manuals when dealing with the EFB operational approval of an operator?
- How could the ETSOA EFB supplier report efficiently occurrences to the competent authorities as per (EU) 376/2014, AMC 20-8 Occurrence reporting, (EU) 2015/1018) without knowing the various operator operational approval contexts?