

**FAQ n.45116****FAQs:**

[Operational Suitability Data \(OSD\) for flight crew \(FC\)](#), [Aircrew](#), [Regulations](#)

**Question:**

**When should changes to OSD FC provisions be implemented by users to take into account any revised mandatory elements included in a revision?**

**Answer:**

Article 9a of Commission Regulation No 1178/2011 (amended by Commission Regulation No 70/2014) contains a 2 year transition period for the implementation after initial publication of OSD FC report. This allows training providers, such as ATOs and operators time to adapt their training programmes and provide additional training if needed.

Pilot training courses which were approved before the approval of the OSD FC data should contain the mandatory elements not later than 18 December 2017 or within 2 years after the OSD FC was approved, whichever is later.

Implementation of changes to the OSD FC into existing approved training courses should be implemented within a reasonable timeframe following the OSD change. This timeframe is not clearly defined within the aircrew regulation, however a timeframe of 3 months (or 90 days as under the air ops requirements for an MEL) is considered reasonable.

**Last updated:**

06/02/2018

**Link:**

<https://www.easa.europa.eu/bg/faq/45116>