European Aviation Safety Agency

Explanatory Note to Decision 2014/006/R

CERTIFICATION SPECIFICATIONS CABIN CREW DATA

RELATED NPA/CRD 2011-10 — RMT.0107 (21.039(f)) — 31.01.2014

EXECUTIVE SUMMARY

This Decision addresses a safety issue related to Operational Suitability Data (OSD) – Cabin Crew Data as required by an amendment to Commission Regulation (EU) No 748/2012[1].

The specific objective is to achieve a high level of safety by providing end users - national aviation authorities (NAAs), operators, cabin crew members and entities subcontracted by an operator to provide aircraft type training for cabin crew (further referred to as 'training organisations') with access to all relevant information about the aircraft type the operator will include in its fleet and the cabin crew will operate on, and to harmonise the scope, level and quality of information cabin crew members will receive when undergoing aircraft type specific or variant related training at various training providers (operators or training organisations). Further, the objective is to establish a uniform process and criteria for determination of a newly produced aircraft as a new aircraft type or a variant of an existing aircraft type for cabin crew operation.

This Decision comprises information related to aircraft type specific elements for cabin crew, as required under the OSD concept.

The Certification Specifications include the following:

a) A uniform process and criteria for determination of a new aircraft type and a variant of an existing aircraft type for cabin crew operation. The determination process is based on the comparison of the candidate and the base aircraft and identification of all differences in type specific elements related to aircraft configuration, doors and exits, aircraft systems and normal and emergency operations.

b) Aircraft type specific data to be provided by the applicant. Such data is to be used for the development of training programmes for cabin crew, for establishing procedures by operators and as reference information for cabin crew about the aircraft type they are to be qualified on. The data relates to aircraft description, flight crew compartment, cabin compartment and aircraft systems including associated equipment and any other supplementary data related to the aircraft containing information to support the development of the relevant training programmes or establishment of training courses.

The proposed changes are expected to increase safety and to improve harmonisation.

[1] Commission Regulation (EU) No 748/2012 of 03 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations and repealing Commission Regulation (EC) No 1702/2003 (OJ L 243, 27.9.2003, p.6-79). Regulation as last amended by Commission Regulation (EU) 69/2014 of 27 January 2014 (OJ L 23, 28.1.2014, p. 12)

Applicability		**Process map**	
Affected regulations and decisions:	Commission Regulation (EU) No 748/2012	Terms of Reference:	13.09.2007
		Concept Paper:	No
		Rulemaking subgroup:	Yes
Affected stakeholders:	Aircraft manufacturers, air operators, cabin crew members, training organisations conducting aircraft type training for cabin crew, National aviation authorities	RIA type:	Light
		Technical consultation during NPA drafting:	No
		Publication date of the NPA:	2011/Q2
		Duration of NPA consultation:	3 months and 3 weeks
Driver/origin:	Regulation (EC) No 216/2008	Review group:	Yes
Reference:		Focussed consultation:	No

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1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed ED Decision 2014/006/R in line with Regulation (EC) No 216/2008[2] (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure[3].

This rulemaking activity is included in the Agency's 4-year Rulemaking Programme under RMT.0107 (21.039(f)). The scope and timescale of the task were defined in the Terms of Reference (ToR) 21.039 (RMT.0110 (21.039)).

The draft text of this Decision has been developed by the Agency based on the input of the rulemaking subgroup RMT.0107 (21.039(f)) deriving from the core rulemaking group 21.039 (RMT.0110 (21.039)). All interested parties were consulted through Notice of Proposed Amendment (NPA) NPA 2011-10[4]. The Agency received 76 comments from interested parties, including industry, national aviation authorities, professional organisations and private companies.

The Agency, with the help of the review group RMT.0107 (21.039(f)) deriving from the core rulemaking group 21.039 (RMT.0110 (21.039)), has carefully reviewed the comments received on the NPA. The comments received and the Agency's responses are presented in the Comment-Response Document (CRD) 2011-10[5].

The CRD was published on 10th July 2012 and the reaction period ended on 10thSeptember 2012. The Agency received 8 reactions from two national aviation authorities, one aircraft manufacturer, one airline association and one airline (a member of the mentioned airline association).

The final text of this Decision containing Certification Specifications (CSs) and Guidance Material (GM) for Cabin Crew Data has been developed by the Agency. The text as compared to the CRD has not changed in substance, minor editorial changes have been made also based on the reactions received to the CRD 2011-10.

The process map on the title page summarises the major milestones of this rulemaking activity.

1.2. Structure of the related documents

Certification Specifications – Cabin Crew Data is structured as follows:

Book 1 contains Certification Specifications Cabin Crew Data divided into four subparts:

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[2] Regulation (EC) No 216/2008 of the European Parliament and the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1), as last amended by Commission Regulation (EU) No 6/2013 of 8 January 2013 (OJ L 4, 9.1.2013, p. 34).

[3] The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material (Rulemaking Procedure), EASA MB Decision No 01-2012 of 13 March 2012.

[4] http://easa.europa.eu/rulemaking/r-archives.php#npa-2011

[5] http://easa.europa.eu/rulemaking/r-archives.php#crd

Subpart A — 'General' describes the applicability of the CS-CCD and the scope specifications to be fulfilled by the applicant when applying for the OSD approval. This Subpart also includes definitions of guiding terminology within the CS-CCD and classification of individual paragraphs of CS-CCD within the OSD box concept.

Subpart B — 'Determination of a new type and a variant' specifies the process and criteria for determining a new type and a variant for cabin crew operation. This subpart also contains the Aircraft Difference Table to be used by the applicant during the comparison process to identify all differences in type specific areas between the base and the candidate aircraft.

Subpart C — 'Type specific data for cabin crew' specifies all necessary data about the aircraft type to be provided by the applicant to operators and national aviation authorities to support the development of training programmes for cabin crew, establishment of procedures by operators and as reference information for cabin crew about the aircraft type they are to be qualified on and operate on. Subpart C specifies what data is required from the applicant and also supplementary data that may be provided at request of the applicant to support the development of relevant training programmes by end users. Such supplementary data could contain information on elements that may be subject to individual customer configuration or elements that are not manufactured by the manufacturer but can, in the case of the individual customer-configured aircraft, be supplied by the manufacturer (such as galley components, portable safety and emergency equipment, etc.).

Subpart D — 'Cabin aspects of special emphasis (CASE)' would include any information that end users and cabin crew should be aware of, such as information identified during emergency evacuation demonstration test required by CS 25.803 or any other unique elements identified during the aircraft certification process.

Book 2 contains Guidance Material to the relevant subpart of Book 1.

2. Explanatory Note

This ED Decision contains Certification Specifications for Cabin Crew Data to facilitate the implementation of Commission Regulation (EU) No 69/2014[6] on Operational suitability data.

2.1. Overview of the issues to be addressed

The ED Decision addresses Certification Specifications for Cabin Crew Data and comprises information related to the type specific elements for cabin crew, as required under the OSD concept.
The Certification Specifications Cabin Crew Data include the following:

1. A uniform process and criteria for determination of a new type and a variant for cabin crew operation. The determination process is based on the comparison of candidate and base aircraft and assessment of differences in the type specific elements related to aircraft configuration, doors and exits, aircraft systems and normal and emergency operations. An excessive number of differences between aircraft and resulting procedures may lead to confusions and decreased awareness affecting the accuracy of decision-making and performance by cabin crew members that may have an impact on safety. The determination process would lead to an evaluation of all relevant elements and their combined impact, therefore, preventing significant differences to be overlooked or considered irrelevant. The knowledge and awareness of an individual qualified on groups of aircraft would be maintained at a high level, as the focus would be concentrated on a limited number of varieties and modifications. This would preclude incorrect safety related actions arising from confusions resulting from an excessive number of differences.
2. Provision of aircraft type specific data by the applicant to be used for development of training programmes for cabin crew, for establishing procedures and as reference information for cabin crew about the aircraft type they are to be qualified on. The data provision of which is required from the applicant relates to aircraft description, flight crew compartment, cabin compartment and aircraft systems including associated equipment. The data provided at request of the applicant represents supplementary data the applicant may elect to provide to support the development of the relevant training programmes and establishment of training courses.

2.2. Objectives

The overall objectives of the EASA system are defined in Article 2 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Chapter 2. Therefore, the specific objective of this proposal is:

CS-CCD is a part of the OSD concept which was adopted by the European Commission as Commission Regulation (EU) No 69/2014. The objective of the proposal on CS-CCD is to ensure that:

1. In the determination process, conducted by the applicant and the Agency, a thorough comparison is made between the newly produced aircraft – the *candidate*

[6] Commission Regulation (EU) No 69/2014 of 27 January 2014 amending Regulation (EU) No 748/2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (OJ L 23, 28.1.2014, p 12).

aircraft – and the *base* aircraft. It is essential to identify all relevant differences in type specific areas and to thoroughly assess whether a newly produced aircraft should be determined as a variant of an existing aircraft type or rather, due to the nature of differences, a new aircraft type.

2. Provision of type specific data by the applicant will establish harmonisation, as a uniform set of elements will be available to operators of the aircraft type, to training providers, cabin crew members and national aviation authorities to constitute a common basis for the development of training, establishment of procedures by operators and as reference information to cabin crew members. Training with comprehensive content foresees obtaining and possessing required and complete knowledge, which results in cabin crew being competent for the particular aircraft. It is essential that cabin crew have access to technical information about the aircraft type to be able to provide flight crew with accurate information and to have correct knowledge when assisting them with safety related matters, it is crucial that flight crew can rely on information provided by cabin crew in such cases.

2.3. Outcome of the consultation

A. Concerns raised by stakeholders during the NPA consultation process addressed in the CRD:

CS-CC vs. CS-CCD and rule numbering convention

The NPA title Certification Specifications Cabin Crew CS-CC was modified to read as *Certification Specifications Cabin Crew Data (CS-CCD).* The modification was made to prevent possible confusions and to clearly distinguish the airworthiness-related rule CS-CCD from OPS regulatory requirements concerning cabin crew: Commission Regulation (EU) No 290/2012 'Air Crew' and Commission Regulation (EU) No 965/2012 'Air Operations'. Both, with regard to cabin crew, use the acronym 'CC' in the titles of their paragraphs.

The numbering convention of CS-CCD was modified to be consistent with EASA airworthiness regulatory requirements.

Applicability of CS-CCD

Based on a received comment and the agreement of the review group, applicability of CS-CCD has been extended to aircraft with a passenger seating capacity of 19 seats or less required to carry cabin crew. The new inclusion has been made in paragraph CS CCD.100(b).

Determination of a new type

Some operators expressed a concern that the proposed wording of the paragraph CS CCD.210(b) which reads *'…the candidate aircraft is determined a new type if one or more of the type specific elements of CS-CC-205(b)(1) and (b)(2) are neither identical nor similar to the base aircraft.'* would lead to an increased number of aircraft determined as a new type. The comment was taken into account and extensively discussed by the review group. The criteria resulting in determination of a candidate aircraft as a new type by the applicant (manufacturer or design organisation) have been carefully considered. The applicable paragraph has been modified to limit the criteria that would lead to determination of a candidate aircraft as a new type.

Definition of 'similar'

Taking into account the comment received on the interpretation of 'similar' being vague without providing a definition, the approach of *determining similarity* of determination elements has been replaced with *identifying differences* of determination elements. This was based on the fact that it was practically impossible to develop a definition of similarity for the purpose of CS-CCD.

Number of determination elements

Some commentators stated that the four determination elements which are to be assessed by the applicant are beyond the operational requirements and they suggested aligning the determination elements with the operational requirements.

The determination elements referenced in the NPA have been historically used in the Joint Operational Evaluation Board (JOEB)/EASA Operational Evaluation Board (OEB) Cabin Crew (CC) process and address the type specific determination of an aircraft at the level of the applicant and the Agency. Moreover, the decision of the Agency that the determination process is based on four determination elements was presented to the rulemaking group 21.039 at the meeting in December 2010 and also to the rulemaking subgroup 21.039(f) at the meeting in February 2011. The elements referenced in the operational requirements address determination of the operator's individually configured aircraft. Aligning determination elements of CS-CCD with the operational requirements would require a lot more information to be developed and provided by the applicant, such as location and type of portable safety and emergency equipment, type specific emergency procedures, which are not within the scope of activity of an applicant applying for an OSD approval.

Aircraft difference table (ADT)

Some commentators were of the opinion that the content of the aircraft difference table was too detailed and the elements were not type specific. The commentators suggested that the table is downgraded to a GM. The elements listed in the ADT were extensively discussed and agreed on by the NPA 2011-10 drafting group as type specific which cannot be configured on request of any operator. The elements listed in the ADT's part *'Determination elements'* have been revised by the review group, clarified where necessary, some elements have been deleted and other elements have been included as suggested by commentators. The ADT retains the status of appendix, as it complements the requirement CS CCD.200 and is to be used by the applicant; the use of alternative tables is subject to conditions specified in CS CCD.200(b)(2).

Aircraft Difference Table — Impact assessment

The ADT's part *'Impact assessment'* has been subject to extensive discussions within the rulemaking subgroup. The manufacturers represented in the group strongly opposed to be required to highlight to the operators information related to operator's procedures. The manufacturers, however, agreed to provide such information on a voluntary basis (at request of the applicant). The notion of 4-columns, each implying a method of training to be used for cabin crew type specific training has been modified. The part *'Impact assessment'* consists of two columns - (a) and (b) - each consisting of two sub-columns. The applicant marks the corresponding sub-column(s) relevant to the identified difference, as opposed to marking only one corresponding sub-column as proposed in the NPA.

Cabin aspects of special emphasis (CASE)

One commentator suggested that, in order to harmonise CS-CCD with Certification Specifications for Flight Crew Data (CS-FCD), the training areas of special emphasis

(TASE) should be included in CS-CCD as well. In TASE the applicant would identify all type specific knowledge and skills requirements.
As CS-CCD deals with provision of data by the applicant, as opposed to CS-FCD which deals with type specific training requirements, the concept of TASE, as used in CS-FCD, could not be applied to CS-CCD.
However, the idea of a similar concept that would include any information that end users and cabin crew should be aware of, such as information identified during emergency evacuation demonstration required by CS 25.803 or any other unique elements identified during the certification process, was supported by all review group members. Therefore, a new Subpart was included in CS-CCD to address the concept. The new Subpart D is titled Cabin aspects of special emphasis (CASE). The review group agreed to classify CASE in Box 1 and Box 2 of the OSD box concept due to the resulting mandatory and non-mandatory (recommendations) status for the operators which will only be defined by the applicant at the time the results are known.

Appendix 1 to CS CCD.310
Some commentators suggested deleting some data listed in the Appendix 1 to CS CCD.310. This data is, however, already provided by manufacturers today and the Agency is of the opinion that provision of this data should not be discontinued. The Appendix 1 to CS CCD.310 is classified into Box 1 of the OSD box concept. The applicant will provide data, listed in the Appendix, only on those elements which are applicable to the candidate aircraft. The application of the data by end users is mandatory. Operators expressed a concern about the mandatory application of the data, as the list includes some aircraft technical specifications and the operators are of the opinion that not all technical information about the aircraft type has relevance to cabin crew. The data resulting from the referenced Appendix and Subpart D is to be used for developing training programmes for cabin crew, for establishing procedures by operators and is to be included in operator's operations manual as reference information for cabin crew to obtain general knowledge on the type of aircraft they are to be qualified on, so that cabin crew have access to this information, if necessary.

Syllabus for cabin crew training
Some commentators expressed dissatisfaction with the change of the OSD scope with regard to cabin crew. The change is related to the provision of *data* instead of provision of *minimum syllabus* for cabin crew type rating training as initially reflected in the ToR for rulemaking task 21.039. This is the result of an agreement reached in the course of drafting the NPA 2009-01 by the rulemaking group 21.039.

Passenger seating capacity
Based on the received comments and due to inconsistencies with regard to different usage and interpretation of the term in regulatory materials, the rulemaking subgroup agreed that for the purpose of CS-CCD the term *'passenger seating capacity'* is to be used. The term refers to the passenger seating capacity of an aircraft that is subject to initial type certification (TC) process as specified in the relevant type certification data sheet. The term also refers to the maximum passenger seating configuration of an individually configured aircraft.

Passenger deck

Based on the received comments and the agreement of the review group, a definition of 'passenger deck' has been created for the purpose of CS-CCD.

OSD box concept
Some commentators recommended illustrating in the CS-CCD which box of the OSD concept the individual paragraphs belong to. A new paragraph *CS CCD.110 OSD box concept - status of provided data* was created and includes the classification of individual paragraphs of CS-CCD within the OSD box concept. The CS CCD.110 was complemented by Appendix 1 to CS CCD.110 containing a picture-type illustration of the OSD box concept.

Subpart C: Type specific data for cabin crew vs. Type specific data for cabin crew training
Following extensive discussions within the review group on the data of Subpart C and its application by the training provider (operator/training organisation), the word '*training*' was deleted from the title. The title now reads 'Type specific data for cabin crew' which reflects the notion of CS-CCD data and its application by the end user more accurately.

Mandatory and non-mandatory (recommendations) status of data
The terminology related to the status of data has been standardised and reflects the same in Commission Regulation (EU) No xxx/xxx, in CS-CCD and in the CS Flight Crew Data (CS-FCD) and in the CS Master Minimum Equipment List (CS-MMEL).

B. Concerns raised by stakeholders during the reaction period to the CRD:

STC within the OSD concept. Implication of 'non-mandatory (recommendations)' within the OSD concept
One commentator, a member of the drafting and the review group, submitted a general reaction to the OSD concept. The commentator suggested that the practical consequences of the OSD concept were still unclear and that the issue of involving of a Supplemental Type Certificate (STC) was still pending. The commentator also expressed a concern on the implication of 'non-mandatory (recommendations)' within the OSD concept.
The OSD is applicable to TC and STC. The clarification and determination of details when STC is affected by OSD remains open at this stage.
Operator training programmes require approval by the competent authority. ORO.CC.125 and the associated AMC requires an operator to take into account OSD data. AMC is not binding, however, if an operator is not using the non-mandatory data as developed by the applicant, the alternative needs to be justified to the competent authority to enable it to approve the operator's training programme.

GM1 CCD.110 OSD box concept – status of provided data
The Agency has reviewed the status of the picture-support illustration diagram which was in the CRD reflected in *Appendix 1 to CS CCD.110 OSD box concept – status of provided data* and which complemented CS CCD.110. The explanatory content of the appendix has been transferred to guidance material and reads now as *GM1 CCD.110 OSD box concept – status of provided data – OSD BOX CONCEPT DIAGRAM*.

Aircraft door variants
One commentator, a member of the drafting and the review group, suggested modifying CS CCD.210(b)(1) and CS CCD.210(c) to refer to *door variants.* The justification for the

proposal was the text of *[ACJ] OPS 1.1005/1.1010/1.1015/1.1020 Representative Training Devices* and the text of *AMC1 ORO.CC.115(c) Conduct of training courses and associated checking – Training methods and training devices* subparagraph (b)(3) which refer to 'door variants' in relation to representative training devices.
The EASA aircraft certification process does not recognise variants of aircraft doors. Each aircraft door type, including de-rated doors, is classified as a specific door type (see CS 25.807 Emergency exits). The Agency has noted the incorrect reference in the operational regulatory requirements and will consider an amendment in the future rulemaking task.

CS CCD.210 Determination of a new type
One commentator, a member of the drafting and the review group, suggested modifications in paragraph CS CCD.210(c)(1) (previous (b)(1)) to reflect '*additional pairs* of doors/exits of the same type and operation as any type installed on the base aircraft…'. The Agency maintained the text as published in CRD 2011-10, as agreed by the experts of the review group.

The text of paragraph CS CCD.210(e) has been modified to read as follows: 'When identifying differences in accordance with CS CCD.205(b)(2)(i), if the *number*, location *and operation* of doors/exits is the same but the type of installed door/exit is different to the base aircraft,…'. The intention of the paragraph (e) as presented in the CRD was to take into consideration examples of the same aircraft model which has different door types installed, e.g. 8 Type A doors installed or 6 Type A doors and 2 Type I doors installed, which would not necessarily lead to determination of those two aircraft of the same model as two different aircraft types. The Agency has noted that the initial text of paragraph (e), as proposed in the CRD, contradicted the paragraph CS CCD.210(b), therefore, it has been modified now.

Determination elements
One commentator suggested deleting 'aircraft systems' from CS CCD.205, thus not considering this element during the determination process. The commentator believes that comparison of doors/exits is sufficient to determine whether the candidate aircraft is a new type or a variant of the base aircraft. The subject on the number of determination elements had been clarified during the NPA drafting process. The determination elements referenced in the NPA have been historically used in the JOEB/EASA OEB CC process and address the type specific determination of an aircraft at the level of the applicant and the Agency. Moreover, the decision of the Agency that the determination process is based on four determination elements was presented to the rulemaking group 21.039 at the meeting in December 2010 and also to the rulemaking subgroup 21.039(f) at the meeting in February 2011. The NPA drafting group and the review group agreed on the importance of four determination elements; the commentator was a member of both groups.

Classification of Appendix 1 to CS CCD.310
One commentator opposed classifying Appendix 1 to CS CCD.310 in Box 1 of the OSD concept and proposed to split elements of the Appendix to classify them into all four boxes of the OSD box concept. This issue was extensively discussed by the review group prior to publication of the CRD 2011-10. The group concluded that the former and the current regulatory requirements (EU-OPS and Air OPS) did not at this stage provide the possibility to make such division. Furthermore, the opinion on allocation of individual information

from the referenced Appendix in different boxes of the OSD concept may vary from person to person as it would be based on personal professional perception. The review group agreed to classify the Appendix 1 to CS CCD.310 in Box 1. The commentator was a member of the drafting and the review group.

CS CCD.400 Cabin aspects of special emphasis
One commentator proposed deleting examples (2),(3),(5) in CS CCD.400 Cabin aspects of special emphasis and also deleting the reference to Part-21A.15(d)(6) in the introductory sentence of the same paragraph. The commentator was a member of the drafting and the review group. The Agency has taken into account the proposal to delete the reference to Part-21, as the entire CS-CCD results from 21A.15(d). The Agency maintained the referenced points (2),(3),(5) as agreed by the review group for clarity and to differentiate the type of information the applicant would classify as CASE. The current wording of 21A.15(d) is sufficiently open to include these elements in CS-CCD.

Editorial modifications
Some editorial modifications have been made, as also suggested by some commentators, to correct or to improve the text.

The sequence of points (a)-(f) in CS CCD.210 has been modified to follow an order of when differences between the candidate and the base aircraft lead to determination of the candidate aircraft as a new type, when they may lead to such a conclusion and when not. The use of 'and/or' in point (d) (previously (e)) has been eliminated and the text has been amended for clarity.

2.4. Summary of the Regulatory Impact Assessment (RIA)

2.4.1 Safety impact

The existence of OSD elements approved in accordance with Part-21 represents a mandatory use by end users. The CS-CCD aims at harmonising data about an aircraft type that are to be provided to end users. The CS-CCD contains specifications focusing on recognition, thorough consideration, identification and assessment of all relevant differences between base and candidate aircraft that allow a thorough evaluation determining whether a candidate aircraft is a variant of the base aircraft or rather, based on the identified differences and their impact, a new type. The safety interest aims at increasing the level of crew member's awareness and preparedness for the particular aircraft types/variants on which the individual will be qualified and operate on, by reducing the disproportionate number of varieties and differences and, therefore, the risk of errors.
The CS-CCD aims at provision of comprehensive data about the aircraft type, thus cabin crew trained by different training providers would receive the same level and accuracy of information. The provided data supports training providers in development of training programmes, establishing operational procedures and provides reference information to cabin crew members on technical aspects of the aircraft they will operate on.

2.4.2 Economic impact

As with other documentation and information provided by the TC or STC holder, it is expected that the approved elements of the OSD will be provided with the aircraft after its purchase. As the type specific training will be based on the elements approved as part of

the OSD, training providers and their competent authorities should benefit, as there would be a European standard to be used when developing cabin crew training.

Economic impact with regard to the applicant vs. the transfer of the voluntary system into the mandatory status:
No economic impact has been identified for those applicants who made use of the JOEB in the past and continue to make use of the current OEB CC, as today they already provide data for the applicable process and bear the expenses.

Increased economic cost has been identified for those applicants who did not make use of the JOEB and do not make use of the OEB CC, as the decision with the OSD concept is to transfer a voluntary process into a mandatory system.

Economic impact with regard to type specific data:

As today, operators will be responsible for aircraft type/variant related training for their cabin crew. Operator can subcontract an entity to conduct the aircraft type/variant related training on its behalf. The entity will base the development of such training courses on OSD data provided by the operator. No economic impact has been identified with regard to the NAAs, as they would continue to approve the operators' training courses.

Economic impact with regard to determination of a new type or variant:
No economic impact related to the number of determination elements, to be considered in the determination process, has been identified for the applicant.

Regulatory requirement ORO.CC.250 specifies the number of types cabin crew can operate on. Today, each *type* group related to cabin crew within air operations may include a larger number of aircraft models and series and an unlimited number of aircraft variants. This is determined by the operator, subject to approval by the respective NAA, in accordance with ORO.CC.250(b)(2) by comparison of mix of elements – the elements configured on the level of operator (location and type of portable safety and emergency equipment and type-specific emergency procedures) and an element established by the manufacturer (emergency exit operation). Operators having a wide range of aircraft types in their fleet need to comply with ORO.CC.250, their cabin crew can only operate on some aircraft types in the fleet. Today, such operators divide their cabin crew into groups, each group being qualified on certain aircraft types from the operator's fleet. Some negative economic impact has been identified for operators whose fleet includes a wider range of aircraft types, as the resulting determination may, based on differences in type specific elements, limit the aircraft type models and the aircraft type series to belong to the group of *one type family* for cabin crew operation. To be in compliance with the applicable operational requirement regarding the number of types cabin crew may operate on, such operators may need to recruit more personnel to cover their operation.
As it is the case today, depending on the individual customer configuration, the operator and the respective NAA may also decide to consider an aircraft determined as a variant, a new type within their operation. Such cases represent the same economic burden on the operator irrespectively of the proposed options in the CS-CCD under the OSD.

2.4.3 Social impact

End users will be provided with the same data for development of cabin crew training and as additional reference information for cabin crew. This will result in cabin crew members receiving the same level of information and it also aims at achieving a common European

standard for type specific and differences training. A positive social impact may be assumed as this should facilitate free movement of equally trained personnel.

2.4.4 Environmental impact

Not applicable.

2.4.5 Proportionality issues

The proportionality objective is respected as the CS-CCD is foreseen to apply to aircraft with a passenger seating capacity of more than 19 seats, which are required to carry cabin crew, and to aircraft with a passenger seating capacity of 19 seats or less required to carry cabin crew. Any other aircraft with a passenger seating capacity of 19 seats or less may be subject to the evaluation process if voluntarily elected by the applicant.

2.4.6 Impact on regulatory coordination and harmonisation

With regard to regulators outside the EU that have similar OEB evaluations, the harmonisation may depend on the process used (e.g. joint/non-joint evaluation). Therefore, no conclusion can be made at this stage.

2.5. Overview of the amendments

The main concerns of this proposal have already been addressed in CRD 2011-10. Reactions to the CRD resulted in a few minor editorial modifications in this ED Decision. Modifications, as compared to the NPA, have been made as described in chapter 2.3.

References

NPA 2009-01, Opinion 07/2011, NPA 2011-10 and CRD 2011-10.

2.6. Related regulations

Commission Regulation (EU) No 69/2014 on Operational suitability data.

2.7. Affected decisions

This proposal is a newly developed ED Decision.

2.8. Reference documents

Commission Regulation (EU) No 965/2012.
ED Decision 2012/017/R.