

Type Validation Issues

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Type Validation for DAS and DOA programs

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Type Validation

- A certification process that establishes compliance with the importing country's airworthiness requirements based on the exporting country's certification
 - Exporting country = certificating authority (CA)
 - Importing country = validating authority (VA)

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Validation Basis

- Set of airworthiness regulations used by the CA and VA to ensure compliance with the VA certification basis

Validation Basis = CA Cert. Basis +
VA Regulatory differences + VA
Exemptions + VA Special Conditions

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Validation Basis

Validation Basis
(FAA as CA)

**FAA
Basis**

CAA Basis

Regulatory differences, exemptions,
& special conditions

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Validating Authority Roles

- Define regulatory differences and validation items
- Ensure any retention of involvement in compliance determinations is justified
- Maintain open communication with CA team

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Certificating Authority Roles

- Act as agent of VA and support VA familiarization
- Accept delegation of compliance determinations from VA
- Obtain clear understanding of VA differences and validation items
- Maintain open communication with VA

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Delegated Organization Roles

- Understand CAA compliance requirements
 - monitor issue development and resolution as directed by ACO
- Respect the regulatory differences
- Determine compliance with CAA differences and validation items as directed by ACO

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Use of DAS/DOA

- Attend meetings, participate as needed to support understanding of VA requirements
- Respect the communication guidelines
- Provide qualified staff for making compliance findings to foreign requirements

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Communication Flow

- Authority to authority
 - CAA to ACO† ACO to DAS/DOA
 - Clarification of CAA requirements will come from ACO
 - CAA will not contact DAS/DOA directly, without participation or consent of ACO

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Typical STC Validation Steps

Scenario: A DAS wants to obtain and FAA STC and an STC in another country

- Step One: OMT receives application package
- Step Two: OMT forwards data package to VA
- Step Three: OMT communicates with VA and DAS
- Step Four: DAS finds compliance and OMT issues compliance statement
- Step Five: VA issues its STC/approval

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STC Validation Steps:

- **Step One: Receive application package:**

OMT reviews package for completeness.
STC application (description of change, copy of any issued STC, proposed certification/validation basis, description of novel design features, and identifies any exemptions or equivalent level of safety findings believed necessary)
Compliance checklist

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If STC already issued...

- AFM supplements
- Master documentation list
- Master drawing list (manufacturing and installation instructions drawings)
- Maintenance/Repair manual supplements
- Weight and balance data
- Instructions for Continued Airworthiness

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STC Validation Steps:

- **Step Two: Forward data package to VA:**
ACO forwards STC data to CAA office.

- **Step Three: Communicate with VA:**
ACO communicates with VA to determine whether there are additional requirements and ensure they are communicated to the DAS

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STC Validation Steps:

- Step 4: DAS makes FAA and foreign compliance findings. ACO issues compliance statement to VA (FAA acts as the VA's agent)**
 - If there is a bilateral agreement in place and FAA and CAA conduct concurrent certification
 - or
 - If there is a bilateral agreement in place and the VA has additional requirements

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Post Type Validation

- Changes to designs that have been validated
- Design approval holder is seeking CAA approval for change
- Changes categorized as Level 1 or 2
 - Level 1 = Major that require VA involvement
 - Level 2 = Major (and all minor) changes that that can be approved by CA without VA involvement

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Criteria for Level 1

- Change that effects the certification basis, or involves new interpretations of requirements, new special conditions, new equivalent level of safety findings, or novel methods of compliance
- Changes that impact a VI and that involve a change to the MOC established in the VI
- Changes that impact a VI for which the VA retained the associated compliance determination during the original certification
- Changes that involve significant revisions to Approved Manuals

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In Summary

- DAS and DOA can be delegated to make findings to foreign authority requirements in support of a foreign design approval
- Requires additional staff authorization
- Requires more OMT involvement and coordination

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