Notice of Proposed Amendment 2017-19

EASA NPA 2017-19 Installation of parts and appliances that are released without an EASA Form 1 or equivalent

Submitted to the European Aviation Safety Agency online at http://hub.easa.europa.eu/crt/.

Submitted by the
Modification and Replacement Parts Association
2233 Wisconsin Ave, NW, Suite 503
Washington, DC 20007

For more information, please contact:
Ryan Aggergaard
VP of Government and Industry Affairs
(202) 628-8947

Who is MARPA?

The Modification and Replacement Parts Association was founded to support PMA manufacturers and their customers. Aircraft parts are a vital sector of the aviation industry, and MARPA acts to represent the interests of the manufacturers of this vital resource before the FAA, EASA, and other government agencies.

MARPA is a Washington, D.C.-based, non-profit association that supports its members' business efforts by promoting excellence in production standards for PMA parts. The Association represents its members before aviation policy makers, giving them a voice to prevent unnecessary or unfair regulatory burden while at the same time working with aviation authorities to help improve the aviation industry's already-impressive safety record.

MARPA represents a diverse group of manufacturing interests – from the smallest companies to the largest - all dedicated to excellence in producing aircraft parts. MARPA members are committed to supporting airlines with safe aircraft components. MARPA members both sell articles to operators of commercial aircraft (as manufacturers) and purchase articles for the maintenance and continued operational safety of their aircraft (as owner/operators). MARPA members manufacture and sell aircraft components that provide equal or better levels of reliability when compared to their original equipment manufacturer competitors.

MARPA's membership has a tremendous interest in manner in which parts and appliances are released from manufacturers into the supply chain, and the documentation required to accompany those parts to their end users. MARPA is happy to support EASA's efforts to improve this process and contribute to aviation safety.

MARPA's members are typically small businesses. Most of them employ between 2 and 20 employees.

MARPA appreciates the opportunity to provide feedback regarding this NPA.

Comments

General Comments

Review and analysis to establish appropriate CL is unlikely to ever occur

Under the proposed NPA, Design Approval Holders are tasked with assigning the CL to every part and article in a design. The default, should they elect not to make such CL

determinations, is to default to CLI. The result of this policy will inevitably be that all parts--even standard parts and "commercial" parts--will be defaulted to CLI, because history has shown that it is unlikely a DAH is going to voluntarily undertake the effort of categorizing every part. The DAHs simply do not have the data, the time, the resources, or the desire to undertake this process. The industry knows this, because the industry has seen a similar effort fail before.

The FAA previously attempted a similar DAH-driven classification for Commercial Parts. The FAA attempted to develop a commercial parts list for those parts that were manufactured without a production approval due to their wide-spread general use, and non-aviation specific intent. This was intended to work around the requirement that persons manufacturing articles that they knew would be installed on a type certificated product were required to manufacture under a production approval. This was intended to be a benefit for Design Approval Holders; the same Design Approval Holders that will be expected to develop CL categories. This group included both US TC holders and European companies holding validated FAA TCs. None of the DAHs took advantage.

There were several reasons for this. First, it required the resources of the DAH to review commercial parts and determine which should be added to the commercial parts list. Second, there was no benefit or profit to the DAH for doing so. The commercial parts were already part of the approved design, and the FAA was not enforcing the regulations with respect to those parts, so there was no reason for the DAHs to expend the time and financial resources to develop the list. Third, the commercial parts list was not made mandatory, just as assigning CLs is not mandatory under the NPA (the parts all default to CLI). And finally, the data to easily and quickly assign parts to the commercial parts list did not exist. That same data would be necessary to make CL assignments, and that same data still does not exist.

If DAHs do not assign CLs to parts and appliances there will be two options left. The first, allow all parts to default to CLI. This would be counterproductive as it would result in even the most non-safety-sensitive parts and articles being treated as the most critical and thus requiring EASA Form 1s. The second option would be for EASA to assign CLs to all parts and appliances, but EASA clearly lacks the substantial resources required for such an undertaking.

Another alternative would be to make the NPA mandatory (although we do not recommend this path). Each design approval holder (and future applicants) would be required to make all appropriate CL designations (and make those designations publicly available). Yet another alternative would be to create objective standards upon which CL designations are based, thus allowing any person to identify the CL level of a given

part without having to rely upon previously assigned designations by the DAH, which may or may not have been made. This is similar to the manner in which export control regimes like the Wassenaar Arrangement function, by establishing objective criteria for categories into which articles fit.

Because of the industry's experience with commercial parts, and the similarities to the CL initiative, we recommend that EASA abandon this NPA.

The term "Criticality Level" is confusing and should be revised

The term "criticality level" is a new designation for four different categories of parts and is used widely throughout the NPA. The history of the use of the words "critical" and "criticality" in aviation regulations is a checkered one that has caused much confusion and headache within the industry. Rather than add yet another use of the word "critical" (and "criticality") to an already confused history, MARPA recommends replacing the term with a different phrase that is 1) clear and 2) not laden with a past history of usage.

We recommend replacing the term "criticality level" with the term "category level." The term "critical" in conjunction with terms like "part" and "component" has been used in a variety of different ways. EASA's website recognizes that a "general definition does not exist" but that there are currently "basically three different definitions." See FAQ n.19013, available at https://www.easa.europa.eu/faq/19013. Adding a new term "criticality level" would likely add to this confusion. This is problematic for two reasons.

First, it may simply add to the confusion that three definitions using the word—one for rotorcraft, one for engines, propellers and APUs, and one in the US-EU bilateral—already creates. Adding a fourth definition further dilutes and muddles the word, and without a single clear and concise definition it becomes difficult for the industry to understand what is expected of them when the word appears.

Second, the distinction of "critical" and "non-critical" with respect to PMA is also sometimes a source of confusion. By assigning the word "critical" (or, more specifically, variant "criticality level") to all parts, there is a very real risk that operators, regulators, and especially competitors may either inadvertently or deliberately misconstrue the categorization of the various "criticality levels" I-IV as meaning that ALL parts are in some way "critical" as they have been assigned a "criticality level." This could cause confusion as to which PMA parts can be accepted under the bilateral and TIP without further showing, and which require an EASA STC (only those PMA parts that are "critical"). It would unfortunately be very easy for someone who is not familiar with the TIP and the bilateral to look at a PMA part that is assigned CL II, CL III, or even CL IV

and assume that because it has been assigned a “criticality level” that it is a “critical” part and thus required an EASA STC under the terms of the TIP.

This is clearly not the intention. Thus we recommend replacing the term “criticality level” with the term “category level.” The revision achieves the same function by categorizing parts into four segments based upon their potential failure modes and effects, but without using the often-problematic word “critical.” The term “category level” also has the benefit of retaining the same “CL” abbreviation (in the English translation).

Finally, there is a benefit to using the new phrase “category level” in place of the term “criticality level.” This effort to categorize parts based on failure modes in order to determine release documentation requirements is a new one. It therefore makes sense to offer a new term, rather than a term that is already in use and brings with it a history of interpretation (especially a problematic history, like “critical”). A new term will allow those using and implementing the new process to embrace it openly without any preconceived notions or deeply seated understandings about what the term “criticality” already means, which could ultimately adversely affect the adoption of the new policy.

We therefore recommend replacing the potentially confusing term “criticality level” with the new term “category level.”

21.A.308 Criticality levels for new parts and appliances to be installed during maintenance

The proposed CL classifications are vague and are subject to varying and disparate interpretations. For instance, the CLI(i) and CLII(i) ask the individual interpreting the classifications to distinguish between a “large reduction” and a “significant reduction” in functional capabilities or safety margin. The words “large” and “significant” can reasonably be interpreted by different persons as having varying degrees of importance or weight.

For instance, one definition (courtesy of Merriam-Webster) of “large” is “exceeding most other things of like kind especially in quantity or size.” A definition of “significant” is “of a noticeably or measurably large amount.” In such a context, it is difficult to determine which word carries greater importance or weight.

Such vagueness is problematic.

Similarly, the CLs ask the individual interpreting the categories to distinguish between “discomfort” and “distress.” As with the terms “large” and “significant,” these terms are vague and could be interpreted differently by different persons. Such vagueness and ambiguity is not desirable for regulations, which need to be predictable and consistently interpreted by both regulators and the regulated public.

Fortunately, EASA has already established within existing regulations and guidance appropriate Failure Condition Classifications that are defined and understood.

Those existing Failure Condition Classifications could be applied to CLI through CLIV as follows:
(1) CL I for parts and appliances whose failure would:
(i) be classified as Hazardous or Catastrophic under CS-23, CS-25, CS-27, or CS-29
(ii) be classified as Hazardous Engine Effects under CS-E
(2) CL II for parts and appliances other than those assigned CL I, whose failure would:
(i) be classified as Major under CS-23, CS-25, CS-27, or CS-29
(ii) be classified as Major Engine Effects under CS-E
(3) CL III for parts and appliances other than those assigned CL II, whose failure would:
(i) be classified as Minor under CS-23, CS-25, CS-27, or CS-29
(ii) be classified as Minor Engine Effects under CS-E
(4) CL IV for parts and appliances other than those assigned CL III, II or I.

Examples of Failure Conditions can be found in the following AMCs
AMC 25.1309 Paragraph 7
(1) No Safety Effect; (2) Minor; (3) Major; (4) Hazardous; and (5) Catastrophic.
AMC E.510 Paragraph 2
(d) Hazardous Engine Effects; (e) Major Engine Effects; and (f) Minor Engine Effects.

Using the existing failure condition classifications would significantly reduce the potential of inconsistent classification arising from vague and ambiguous language as currently proposed.

’21.A.309 Manufacturing standards and release requirements for new parts and appliances to be installed during maintenance

The manufacturing standards and corresponding release documentation requirements appear to greatly relax the current standards that greatly contribute to the aerospace industry’s excellent safety record. The proposed manufacturing standards (such as they are) and release requirements for CL IV parts could be satisfied by nothing more than a piece of paper with a part number or nomenclature and a manufacturer name. As drafted, a CL IV part could fail to conform to the design and still be released under the proposed requirements, because there is not even a standard to which the article is held.

The entire approach to manufacturing standards and corresponding release documentation seems backwards, and appears to prioritize preservation and clarification of documentation over maintaining manufacturing and production quality.

Part of the rationale for the NPA reads as follows:

> Points 21.A.309 and M.A.502 contain the requirements for the release of parts, respectively new and used, to be used during maintenance. The proposed point 21.A.309 allows the manufacturer of the new parts, for which the DAH has assigned CL II, III or IV (see proposed point 21.A.308), to manufacture not under the production system defined in Part 21, but instead according to different manufacturing standards, based on the part's assigned CL. Thanks to this approach, the DAH, by using the classification in point 21.A.308, is indirectly deciding which parts have to be manufactured under a POA and which parts do not need such high manufacturing standards and the consequential CA oversight, as it can be the case for many commercial parts, for instance. This would provide industry with the flexibility it needs for installing certain parts for which an EASA Form 1 is not appropriate.

(emphasis added). The concern here appears to be whether or not a Form 1 would be appropriate for certain parts, and that because the CA may lack the resources to provide oversight, the DAH should be permitted to make determinations as to whether a part should be manufactured under a production approval (under part 21) or whether any person, qualified or not, can simply start producing parts.

While industry-accepted standards play an important role in aviation safety, notably with respect to standard parts, the key to aviation's excellent safety record is tight, well-regulated design and production controls. Removing from the oversight of CAs the production quality systems of manufacturers of aerospace articles in the name of ensuring paperwork uniformity is completely backwards, and threatens safety in the name of fealty to bureaucracy. Rather than reducing the number of parts that require an EASA Form 1 by reducing the manufacturing standards associated with those parts, it would be more appropriate, and more consistent with promoting and improving safety, to retain strict manufacturing requirements and broaden the eligibility for the issuance of Form 1s. We must prioritize safety and sound manufacturing practices over mere paperwork policy and procedure.

We thus recommend that EASA revise and enhance the manufacturing standards and release requirements as follows:

For CLIII Parts and Appliances, revise the Manufacturing standards and release requirements to read:

"Any release document acceptable for parts with assigned CL II; or the part is accompanied by means of a CofC, *stating conformity to the identified design Part*

Number, as well as copy of evidence that the manufacturing source meets a quality management system standard recognised by *the aviation industry as suitable for manufacturing*. ~~the manufacturing industry.~~"

CL III parts, which could cause slight degradation of safety margins and/or physical discomfort to the passengers, should at least have a CoC stating conformity to the part number identified in the product design (or equivalent, such as a PMA). Manufactures of these articles should <u>at least</u> have a quality management system that meets the requirements of an aviation industry standard.

For CL IV Parts and Appliances revise the Manufacturing standards and release requirements to read:

"Any release document acceptable for parts with assigned CL III; or *the part is accompanied by means of a CofC as well as copy of evidence that the manufacturing source meets a quality management system standard recognised by the manufacturing industry.* ~~at least the documentation accompanying the part identifying the part and the manufacturer.~~

CL IV parts should <u>at least</u> require a CoC and have a quality management system that meets a generally accepted industry standard. Under the current language, any part, whether conforming to design or not, could be released into the supply chain and be installed on a passenger-carrying aircraft.

These changes are consistent with a mission of safety and ensure that parts are manufactured in conformance with accepted standards, thus preventing unqualified manufacturers (perhaps those manufacturers who would, or even have, failed to obtain production certificates or approvals) from producing and releasing substandard parts into the supply chain.

Further, the removal of CLII-CLIV parts from CAA oversight appears to be an abrogation of the state duties under ICAO norms. <u>E.g.</u> Chicago Convention, Annex 8, Part II, section 2.2.1.

We would expect greater rigor in any proposal to alter EASA's method of compliance to the ICAO standards. In particular, there appears to be no evidentiary basis for the conclusion that production approval standards need to be altered (not to say reduced), nor is there any discussion supporting a conclusion that the alteration achieves an equivalent level of safety.

The proposal also fails to offer CAAs any alternative practices in order to allow them to ensure conformity for CLII-CLIV parts. This is, once again, an apparent abrogation of state duties under the Chicago Convention.

States also have a duty to set clear standards for compliance. The ability of the DAH to assign CL level and thereby establish the production approval requirements for a

particular part or appliance means that the design approval holder is effectively setting the regulatory compliance standards for other parties. This seems to be an abrogation of the state's obligation to regulate parties, not to mention a fact pattern that is primed for abuse.

Finally, there appears to be a dangerous possibility of misuse of this proposal for competitive gain at the expense of safety. Design approval holders have the authority to assign higher CL levels to parts. This means that a DAH could assign CLI to a standard part, or other very low-level non-safety-sensitive part. This could happen even if the part met the criteria for CLIV. This might effectively put the standard part producer out of business, thus shifting the power to produce that part to the PAH from the standard part producer. It seems unwise to create a mechanism that permits this sort of market manipulation and potential for monopolization.

For these reasons, we would advise dropping proposed changes to production approval standards until these issues could be addressed in a robust manner, and until the EU's compliance with Annex 8 of the Chicago Convention can be considered.

145.A.42 Acceptance of components

The proposed NPA 145.A.42 eliminates the acceptance of Standard Parts based on a C of C and will instead require standard parts either to be designated in an appropriate CL or accompanied by an EASA Form 1. This could be highly problematic because, as discussed elsewhere, it is highly unlikely that DAHs will take the necessary steps to categorize each part and article. Thus, standard parts will default to CLI and require a Form 1.

This means that in the future, all EASA 145 organizations will require an EASA Form 1 on standard parts. For those parts manufactured in the United States or other locations outside of Europe, the parts may not be eligible for an equivalent release certificate (e.g., the FAA 8130-3 tag, for which standard parts are ineligible) or EASA may not recognize the release form on which the standard parts are released as being equivalent to a Form 1.

We therefore recommend retaining language that allows standard parts to be accepted with only a manufacturer's C of C.

Conclusion

We appreciate EASA's efforts to clarify the current documentation issue that confounds the industry. However, we do not believe that safety should be sacrificed in order to achieve paperwork parsimony. MARPA is very happy to work with EASA in achieving

its goals and in improving aviation safety. We thank you for your consideration of these comments.

Respectfully Submitted,

Ryan Aggergaard

EASA Comment Response Tool

You can save this page as HTML and then open it in Microsoft Word for further editing.

Title	Installation of parts and appliances that are released without an EASA Form 1 or equivalent
NPA Number	NPA 2017-19

MARPA (ryan@washingtonaviation.com) has placed **7** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
419	Executive summary	1	<u>Review and Analysis to Establish Appropriate CL is Unlikely to Occur</u> Under the proposed NPA, Design Approval Holders are tasked with assigning the CL to every part and article in a design. The default, should they elect not to make such CL determinations, is to default to CLI. The result of this policy will inevitably be that all parts--even standard parts and "commercial" parts--will be defaulted to CLI, because history has shown that it is unlikely a DAH is going to voluntarily undertake the effort of categorizing every part. The DAHs simply do not have the data, the time, the resources, or the desire to undertake this process. The industry knows this, because the industry has seen a similar effort fail before. The FAA previously attempted a similar DAH-driven classification for Commercial Parts. The FAA attempted to develop a commercial parts list for those parts that were manufactured without a production approval due to their wide-spread general use, and non-aviation specific intent. This was intended to work around the requirement that persons manufacturing articles that they knew would be installed on a type certificated product were required to manufacture under a production approval. This was intended to be a benefit for Design Approval Holders; the same Design Approval Holders that will be expected to develop CL categories. This group included both US TC holders and European companies holding validated FAA TCs. None of the DAHs took advantage. There were several reasons for this. First, it required the resources of the DAH to review commercial parts and determine which should be added to the commercial parts list. Second, there was no benefit or profit to the DAH for doing so. The commercial	

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420	Executive summary	1	<u>The Term "Criticality Level" is Confusin and should be Revised</u> The term "criticality level" is a new designation for four different categories of parts and is used widely throughout the NPA. The history of the use of the	

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			words "critical" and "criticality" in aviation regulations is a checkered one that has caused much confusion and headache within the industry. Rather than add yet another use of the word "critical" (and "criticality") to an already confused history, MARPA recommends replacing the term with a different phrase that is 1) clear and 2) not laden with a past history of usage. After coordinating with other industry colleagues and commenters, we recommend replacing the term "criticality level" with the term "category level." The term "critical" in conjunction with terms like "part" and "component" has been used in a variety of different ways. EASA's website recognizes that a "general definition does not exist" but that there are currently "basically three different definitions." See FAQ n.19013, available at https://www.easa.europa.eu/faq/19013. Adding a new term "criticality level" would likely add to this confusion. This is problematic for two reasons. First, it may simply add to the confusion that three definitions using the word—one for rotorcraft, one for engines, propellers and APUs, and one in the US-EU bilateral—already creates. Adding a fourth definition further dilutes and muddles the word, and without a single clear and concise definition it becomes difficult for the industry to understand what is expected of them when the word appears. Second, the distinction of "critical" and "non-critical" with respect to PMA is also sometimes a source of confusion. By assigning the word "critical" (or, more specifically, its variant "criticality level") to all parts, there is a very real risk that operators, regulators, and especially competitors may either inadvertently or deliberately misconstrue the categorization of the various "criticality levels" I-IV as meaning that ALL parts are in some way "critical," as they have been assigned a "criticality level." This could cause confusion as to which PMA parts can be accepted under the bilateral and TIP without further showing (all non-critical PMA parts), and which require an EASA STC (only those PMA parts that are "critical"). It would unfortunately be very easy for someone who is not familiar with the TIP and the bilateral to look at a PMA part that is assigned CL II, CL III, or even CL IV and assume that because it has	

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421	New 21.A.308	8 - 9	The proposed CL classifications are vague and are subject to varying and disparate interpretations. For instance, the CLI(i) and CLII(i) ask the individual interpreting the classifications to distinguish between a "large reduction" and a "significant reduction" in functional capabilities or safety margin. The words "large" and "significant" can reasonably be interpreted by different persons as having varying degrees of importance or weight. For instance, one definition (courtesy of Merriam-Webster) of "large" is "exceeding most other things of like kind especially in quantity or size." A definition of "significant" is "of a noticeably or measurably large amount." In such a context, it is difficult to determine which word carries greater importance or weight.	

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			to read: "Any release document acceptable for parts with assigned CL III; or *the part is accompanied by means of a CofC as well as copy of evidence that the manufacturing source meets a quality management system standard recognised by the manufacturing industry.* ~~at least the documentation accompanying the part identifying the part and the manufacturer.~~ CL IV parts should <u>at least</u> require a CoC and have a quality management system that meets a generally accepted industry standard. Under the current language, any part, whether conforming to design or not, could be released into the supply chain and be installed on a passenger-carrying aircraft. These changes are consistent with a mission of safety and ensure that parts are manufactured in conformance with accepted standards, thus preventing unqualified manufacturers (perhaps those manufacturers who would, or even have, failed to obtain production certificates or approvals) from producing and releasing substandard parts into the supply chain. Further, the removal of CLII-CLIV parts from CAA oversight appears to be an abrogation of the state duties under ICAO norms. <u>E.g.</u> Chicago Convention, Annex 8, Part II, section 2.2.1. We would expect greater rigor in any proposal to alter EASA's method of compliance to the ICAO standards. In particular, there appears to be no evidentiary basis for the conclusion that production approval standards need to be altered (not to say reduced), nor is there any discussion supporting a conclusion that the alteration achieves an equivalent level of safety. The proposal also fails to offer CAAs any alternative practices in order to allow them to ensure conformity for CLII-CLIV parts. This is, once again, an apparent abrogation of state duties under the Chicago Convention. States also have a duty to set clear standards for compliance. The ability of the DAH to assign CL level and thereby establish the production approval requirements for a particular part or appliance	

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			means that the design approval holder is effectively setting the regulatory compliance standards for other parties. This seems to be an abrogation of the state's obligation to regulate parties, not to mention a fact pattern that is primed for abuse. Finally, there appears to be a dangerous possibility of misuse of this proposal for competitive gain at the expense of safety. Design approval holders have the authority to assign higher CL levels to parts. This means that a DAH could assign CLI to a standard part, or other very low-level non-safety-sensitive part. This could happen even if the part met the criteria for CLIV. This might effectively put the standard part producer out of business, thus shifting the power to produce that part to the PAH from the standard part producer. It seems unwise to create a mechanism that permits this sort of market manipulation and potential for monopolization. For these reasons, we would advise dropping proposed changes to production approval standards until these issues could be addressed in a robust manner, and until the EU's compliance with Annex 8 of the Chicago Convention can be considered.	
424	Proposed amendments to Part-145 – 145.A.42	12	The proposed NPA 145.A.42 eliminates the acceptance of Standard Parts based on a C of C and will instead require standard parts either to be designated in an appropriate CL or accompanied by an EASA Form 1. This could be highly problematic because, as discussed elsewhere, it is highly unlikely that DAHs will take the necessary steps to categorize each part and article. Thus, standard parts will default to CLI and require a Form 1. This means that in the future, all EASA 145 organizations will require an EASA Form 1 on standard parts. For those parts manufactured in the United States or other locations outside of Europe, the parts may not be eligible for an equivalent release certificate (e.g., the FAA 8130-3 tag, for which standard parts are ineligible) or EASA may not recognize the release form on which the standard parts are released as being equivalent to a Form 1. We therefore recommend retaining language that allows standard parts to be accepted with only a manufacturer's C of C.	
425	New GM	14	This GM explains that "[t]he design holder has the	

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	21.A.308(b)		right to assign a lower CL than the CL that would have been assigned when assessed in accordance with the criteria in 21.A.308(a). This means to assign CL I to a part or appliance to which, when assessed in accordance with 21.A.308(a), CL II, III or IV would have been assigned, and so on. This is the prerogative of the design holder whose design contains such part or appliance at the time of obtaining the design approval." This GM illustrates a flaw in the numbering system of the CLs. A "lower" CL is numerically lower, but it is actually a higher level of criticality, a higher level of scrutiny, and a higher level of documentation requirement. In light of the fact that the GM specifies that the highest CL is considered a "lower" CL because it is numerically lower, ther is an obvious confusion that could arise in the future. We recommend inverting the numerical order of 21.A.308, in order to ensure that the highest levels of "criticality" also get the highest numbers. This will reduce confusion associated with references to numerically lower CLs that are actually higher criticality levels.	
428	New GM 21.A.308(c)	15	This GM identifies maintenance personnel and manufacturers as those who are interested persons with respect to CL lists. However, the language uses the permissive "may" with respect to the design approval holder's obligation to allow product owners to make available the CL to interested persons. The provision reads in part, "the design holder may grant permission to the owner of the product to distribute the current CL list to such organisations/persons." We have seen repeatedly in past instances, even with respect to information that is regulatorily required to be provided, certain certificate holders refuse to provide that information to parties entitled to it. This has typically been done for commerical reasons cloaked in the nebulous and often legally specious language of "proprietary" information. If interested persons are not granted access to CL lists/parts lists, then we run the risk that parts could be sold without the right documentation, or only parties with access to the CLs will be able to provide the approrpiate documentation and thus charge monopolistic prices, which will unnecessarily complicate the obtaining and installation of parts for	

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			non-safety reasons. We recommend that the permissive word "may" be changed to the mandatory word "must" to ensure that product owners are permitted to provide CLs to interested persons without having to agree to additional licensing or other consideration. Futher, we recommended that EASA develop a database, accessible through the EASA website, to make publicly available all CLs so that interested parties may access the information without being forced into unnecessary agreements to obtain data that should be publicly available in the interests of safety.	