



European Aviation Safety Agency

Claude Probst • Rulemaking Director

Cologne, 12th April 2006
EASA JAR/ime D(2006) 50965

Mr. J. Helms
TRANSPORT AIRCRAFT TECHNICAL
SERVICES COMPANY, INC.

Per e-mail: jim@tatsco.com

Subject: Your Newsletter January 2006 (volume 24 - issue 1).

Dear Mr. Helms,

EASA would like to react to your Newsletter January 2006 (volume 24-issue 1) about your article: The smart money guys and gals have been saying for years that exporting a large used aircraft to "Euro land"- could be bad for your health and also your pocketbook...

EASA denies the allegations at the end of this article, about the cost it will amount to, to export an aircraft to Europe with major and minor alterations or repairs.

EASA issued Decision n°2004/04/CF of 10 December 2004, relating to the acceptance of certification findings made by the FAA for products designed in the United States of America.

The content of this Decision clears the approval of:

- Type certificate holder's changes and repairs for a major level 2 or minor change to a type design or a repair design;
- Supplemental type certificate holder's change and repairs for a major level 2 or minor change to a type design or a repair design related to a STC;
- Minor changes and repairs designed by other legal or natural persons;
- TC and STC holder's AMOC with an airworthiness directive.

tel: +49 221 899 90 5001 • fax: +49 221 899 90 5501 • claudio.probst@easa.eu.int

Postal address: Postfach 10 12 53 • 50452 Cologne, Germany – Visiting address: Ottoplatz 1 • 50679 Cologne Germany
Tel.: +49 [0]221 8999 0000 • Fax: +49 [0]221 8999 0999 • E-mail: info@easa.eu.int • www.easa.eu.int

To describe the conditions to be met, EASA quotes hereafter some extracts of this Decision:

| | |
|---|---|
| <p>Article 1 <i>Approval of type-certificate holder's changes and repairs</i> An approval is hereby issued by the Agency to an organisation under the regulatory oversight of the FAA for:</p> <ul style="list-style-type: none">- a major level 2 or minor change to a type design, or- a repair design <p>when</p> <ul style="list-style-type: none">(a) such change or repair is of a product whose type-certificate (i) has been issued by the Agency, or (ii) is deemed to have been issued in accordance with article 2.3(a) of the Commission Regulation, or(iii) has been determined by the Agency in accordance with article 2.3(c) of the Commission Regulation, and(b) this organisation is the holder of the type-certificate of the product, and(c) such change or repair has been approved by the FAA in accordance with the procedures of an agreement in force between a Member State and the United States of America <p>Article 2 <i>Approval of supplemental type-certificate holder's changes and repairs</i> An approval is hereby issued by the Agency to an organisation under the regulatory oversight of the FAA for:</p> <ul style="list-style-type: none">- a major level 2 or a minor change to a supplemental type-certificate, or- a repair design related to a supplemental type-certificate of a product whose supplemental type-certificate has been issued by the Agency or deemed to have been approved under the provisions of article 2.3(b) of the Commission Regulation when. | <p>(a) this organisation is the holder of the supplemental type-certificate of the product, and</p> <p>b) such change or repair has been approved by the FAA in accordance with the procedures of an agreement in force between a Member State and the United States of America</p> <p>Article 3 <i>Approval of minor changes and repairs designed by other legal or natural persons</i> An approval is hereby issued by the Agency to a legal or natural person under the regulatory oversight of the FAA for a minor change or a minor repair design of a product for which the United States of America is State of design whose</p> <p>(a) type-certificate:</p> <ul style="list-style-type: none">(i) has been issued by the Agency, or(ii) is deemed to have been issued in accordance with article 2.3(a) of the Commission Regulation, or(iii) has been determined by the Agency in accordance with article 2.3(c) of the Commission Regulation <p>(b) supplemental type-certificate:</p> <ul style="list-style-type: none">(i) has been issued by the Agency or(ii) is deemed to have been approved under the provisions of article 2.3(b) of the Commission Regulation, when such change or repair design has been approved by the FAA in accordance with the procedures of an agreement in force between a Member State and the United States of America |
|---|---|

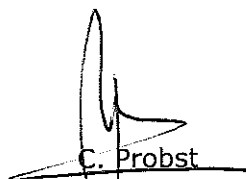
Briefly, articles N° 1 and 2 mean that a majority of the changes or repair performed by the TC/ STC holder under the direct oversight of the FAA are EASA approved. Article n° 3 means that minor repairs or minor changes on US products, performed under the FAA system, are EASA approved.

Consequently, in respect of MA 710 (a)6 when all modifications and repairs applied to the aircraft have been registered and are approved according to either PART21 (EASA) or that here above Decision, there will be no cost at all in order to satisfy the airworthiness review of an aircraft in Europe. Only significant major repair or modifications requiring an EASA approval or repairs/ modifications without any FAA approval traceability, will lead to an additional cost: this will rarely occur.

EASA will appreciate you publishing this reply to your readers.

We thank you in advance.

Yours sincerely,


C. Probst