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SB Validation

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- Can I install any Service Bulletin (SB)?
- SB based on Design Change
- Validation required? -> EASA/ FAA TIP
- Recommendation



Can I install any Service Bulletin (SB)?



Question: - How can an installer know if he is allowed to install a Service Bulletin into a US Product when it is registered in Europe?





SB based on Design Change



- The content of a Service Bulletin (SB) is normally based on a Design Change
E.g. install a newer Version of Coffeemaker XYZ.
- The SB itself is just the «Container» how the Type Certificate Holder is transmitting the change information to you.
E.g. How to install an test the new Coffeemaker XYZ.
- So you need to find out if the baseline design change is accepted by EASA or only by the FAA.





Validation required? -> EASA/ FAA TIP



- The EASA – FAA TIP defines if a FAA Design Change is accepted by EASA:

3.2 Acceptance

The FAA and EASA conclude that certain approvals can benefit from mutual acceptance. There are specific CA approvals (further described in paragraph 3.3) that will be accepted by the VA without issuance of its own approval, and therefore no application for validation is required for:

- 3.2.1 Any design change by the TC or STC holder classified as Basic per the criteria of paragraph 3.5.3.1 that does not require the CA to issue a new or revised TC, Type Certificate Data Sheet (TCDS), Type Certificate Data Sheet for Noise (TCDSN) or STC;

3.3 Procedures for Accepted Design Approvals

- 3.3.1 Design changes by the TC or STC holder classified as Basic per the criteria of paragraph 3.5.3.1 that do not require the CA to issue a new or revised TC, Type Certificate Data Sheet (TCDS), Type Certificate Data Sheet for Noise (TCDSN), STC.

There is no need for application and the design change will be accepted by the VA without any review. In these cases, the CA will approve these design changes in accordance with its own procedures against the certification bases of both the CA and the VA. These design changes are considered approved by the VA, and are included in the DAH type design data and shall be provided to the VA on a regular basis.



Validation required? -> EASA/ FAA TIP



- While certain «Basic» changes are automatically accepted if the Design Holder (TC or STC) did it, you as installer can't say for sure if the change is Basic, because first you would need to check all the non Basis Criteria of the TIP are not met and then you would need to go through the SEI List:

[Import and Export Validation — European Aviation Safety Agency \(EASA\) | Federal Aviation Administration \(faa.gov\)](#)

Long story short, it is complicated!





Recommendation



- ⇒ Insist on a Statement in the SB of the TC or STC holder that the content of the SB was either automatically accepted by EASA
or
a specific validation approval was issued for the design change.

APPROVAL

Textron Aviation received FAA approval for the technical data in this publication that changes the airplane type design.

Textron Aviation received EASA approval for the technical data in this publication that changes the airplane type design.



Links:

[FAA-EASA TIP Revision 7 - Marked up version of changes from Revision 6](#)



FOCA

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