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|  | <p style="text-align: center;">Aeronautical Services</p> <p style="text-align: center;">Advisory Memorandum</p> <p style="text-align: center;">(ASAM)</p> <p style="text-align: center;">Focal Point: ANSP</p> | <p style="text-align: center;">ASAM</p> <p style="text-align: center;">No: 38</p> <p style="text-align: center;">Issue 4.0</p> <p style="text-align: center;">Date 15.06.20</p> |
| <p>Title</p> | <p>Changes by a service provider certified in accordance with the requirements of Commission Regulation (EU) 2017/373 that affects the functional system</p> | |

1. Introduction

This material outlines the procedures to enable a service provider (SP) to implement a change to the functional system, with or without prior CA (CA) approval in accordance with the regulatory requirements of Commission Regulation (EU) 2017/373.

A functional system means a combination of procedures, human resources and equipment, including hardware and software, organised to perform a function within the context of ATM/ANS and other ATM network functions.

1.1. Scope

This ASAM applies to all SPs certified by the Irish CA in accordance with the requirements of Commission Regulation (EU) 2017/373.

Changes to enable a service provider to implement a change to the provision of service, the service provider's management system and/or safety management system, that does not affect the functional system, with or without prior CA approval is not included in this scope. Those changes are covered under a separate ASAM No 39. Hereunder is a link to the IAA website where it can be found

[ASAMs.](#)

1.2. Responsible Person

The Safety Regulation Division (SRD) of the Irish Aviation Authority (IAA) is the CA (CA) for Ireland regarding Regulation (EU) 2018/1139, and Commission Implementing Regulation (EU) 2017/373.

The Assistant Director, Aeronautical Services Department (ASD) of SRD has overall responsibility for this advisory material.

2. References

- Regulation (EU) No. 2017/373;
- Regulation (EU) 2018/1139;

3. Planned changes to the functional system

3.1 ATM/ANS.OR.A.045 Changes to a functional system

(a) A service provider planning a change to its functional system shall:

(1) notify the CA of the change;

(2) provide the CA, if requested, with any additional information that allows the CA to decide whether or not to review the argument for the change;

(3) inform other SP and, where feasible, aviation undertakings affected by the planned change.

3.2 For planned and unplanned changes that affect the functional system the service provider shall notify the CA of the proposed change using the Notification of Change (NOC) form on the IAA web site [online form](#) as follows

Planned Changes – 3 Categories

- 3.2.1 **Complex;** no later than 90 working days (18 weeks).
Can be classified by some ATS SPs as major changes under their approved change management process. The likelihood of regulatory review is high, and approval required is high/medium.
- 3.2.2 **Non-complex;** no later than 35 working days (7 weeks). Can be classified by some ATS SPs as major changes under their approved change management process. The likelihood of regulatory review is medium/low and approval required low.
- 3.2.3 **Routine;** notification no later than 10 working days (2 weeks) in advance of the proposed change (see section 11 of this ASAM). Routine changes are those which are conducted in accordance with SP organisational change procedures approved by the CA i.e. where the SP has documented the scope of changes and associated procedures and has received written approval from the CA. These are sometimes classified by some ATS SPs as minor changes under their approved change management process. The likelihood of regulatory review is low, and approval required low/zero.

Unplanned Changes - 1 category

- 3.3.3 **Unplanned;** notification sent to the CA in line with timeframes as documented under SP procedures which are approved by the CA. An unplanned change is any change that the SP has safety assessed as being necessary to carry out in less than 10 working days. They are conducted in accordance with SP organisational change procedures approved by the CA i.e. where the SP has documented the scope of changes and associated procedures and has received written approval from the CA.

4. Complex and Noncomplex changes

- 4.1 A complex change can be the combination of the likelihood of the argument being complex or unfamiliar to the service provider (and indeed the CA) and the severity of the possible consequences of the change is significant. Severity of the consequences of the change may be determined as a result of the Preliminary Safety Assessment conducted in accordance with GM1 ATM/ANS.OR.A.045(a) 'Changes to a functional system'.

Unlike a complex changes the noncomplex change has been made before, is familiar to the SP and the CA, and is not a high risk or impact on service provision.

- 4.2 For air traffic services (ATS) providers, the consequences of the change specified in 4.4 (6) hereunder, should be expressed in terms of the harmful effects of the change, i.e. the effects of the hazards associated with safety risks. These could be the result of a preliminary safety assessment, if available, or an early hazard analysis that concentrates on the service level effects. For SP other than air traffic services providers, the consequences should be expressed in terms of what aspects of the performance of the service are impacted by the change.
- 4.3 Complex and noncomplex changes need to be notified as early as possible to prevent any delay in their implementation. Therefore, it is advisable that the NOC form is completed as soon as possible, and the description of the change will include the necessary level of detail in order to have an initial understanding of the change to be implemented. Wherever necessary, additional information should be provided by means of references to documents and attached to the NOC form.
- 4.4 Regarding detail within the notification, the SP should place emphasis on inputting as much detail as possible on
- (1) Purpose of the change;
 - (2) Reasons for the change;
 - (3) Place of implementation;
 - (4) New/modified functions/services brought about by the change;
 - (5) High-level identification of the constituents of the functional system being changed, and what is modified in their functionality;
 - (6) Consequence of the change, i.e. the harmful effects of the hazards associated with the change — see 4.2 above and the definition of 'risk' in Annex I (80).
- 4.5 Useful information can be found in
1. GM1 ATM/ANS.AR.C.035(b) Decision to review a notified change to the functional system: Selection criteria for reviewing a notified change to the functional system
 2. GM1 ATM/ANS.AR.C.035(c) Decision to review a notified change to the functional system: Other selection criteria.
- 4.6 The decision to review a change will be based, in most circumstances, on the notification data. Exceptions to this are cases where the CA is not familiar with the type of change or the complexity of the change requires a more thorough consideration.

- 4.7 The service provider should consider that an early, clear and accurate change notification will assist the CA in making its decision to review the change or not and may prevent any inconvenience such as:
- (1) the CA having to ask for more information about the change in order to make its decision as required in ATM/ANS.OR.A.045(a)(2);
 - (2) the CA deciding to review a change unnecessarily because the NOC is not clear enough; or
 - (3) the delay in the CA deciding whether to review a change, caused by the lack of information, having an impact on the proposed date of entry into service.

5. Notification – Complex and non-complex changes

- 5.1 For a planned change to the functional system the service provider shall notify the CA using the NOC form on the IAA web site [online form](#) in advance of the proposed change no later than
- 5.1.1 Complex - 90 working days (18 weeks)
 - 5.1.2 Non-complex - 35 working days (7 weeks).
- 5.2 From the service provider the CA shall receive at a minimum;
- A completed online NOC form.
- and if appropriate
- Each management system document that is amended, and
 - an ASD.F.243 compliance matrix if required to be updated; and
 - any other compliance matrix updated because of the change.
- 5.3 SP shall provide the CA with all relevant documentation which are affected by the change. The service provider's most recent version of the compliance matrix ASD.F.243 and other relevant affect matrixes, which assists in tracking organisational compliance with the regulatory requirements, shall be updated where appropriate and forwarded to the CA. Where a management system/ organisational document changes it shall be submitted also clearly showing where the change(s) have been made, and the excel sheet titled 'Doc list' in the compliance matrix ASD.F.243 etc. shall be updated.
- 5.4 Where information required to be filled in on the form is not available at the time of notification submission, SPs will insert a note in the appropriate field indicating when that information will be available.
- 5.5 The service provider should notify the CA when the information provided in the previous notification is no longer valid or when the information previously missing becomes available.
- 5.6 They should send an updated NOC form using the same reference number but with a new version number.

- 5.7 When additional information is supplied at the CA's request, (i.e. outside of the NOC information) then no update of the notification is required.
- 5.8 As a contingency, where there are issues with the online form an organisation may use the PDF form ASD.F.254 available on the IAA website [ASD.F.254 form](#) and attach it to an email and send to ansdinfo@iaa.ie to notify of the change.
- 5.9 For non-complex changes the SP may plan to implement the change on or after the date it has stated the change will take place once it has received the automated email. If there is a lack of clarity regarding the notification of change (i.e. unclear or missing information) then the CA may contact the SP and push the implementation date out until it has all required information to determine if a review is needed or not. Therefore, the onus is on the SP to be as accurate and complete with its notification information at the time of initial submission. The CA reserves the right to review any submission and delay its implementation if the change and its impact are not clear.
- 5.10 For complex changes as the likelihood of CA review is high and the probability of prior approval being required being also high, the SP should plan for the introduction of the change but in the knowledge that as the CA will most likely carry out a review there could be an impact on the date of change implementation if submissions are not complete and clear. Also, if the change is new to the service provider and/or to the CA this may also have an impact on the implementation date so SPs should not rely on the minimum date for notification submission but rather submit it in enough time to ensure there is contingency included for any unknowns.
- 5.11 For both types of change should the SP wish to introduce the change sooner than notified, it should not do so until it has updated its notification with the same reference number; a new version number; with the new date and the reason/justification for the earlier introduction of the change. The change cannot be introduced until correspondence is received in writing directly from ANSD stating that the earlier introduction can proceed.
- 5.12 The CA may prescribe the conditions under which the service provider may operate during such changes, which may include not allowing the organisation to make the change or only make a partial change whilst the regulatory review is ongoing.

6. Notification to users of the service

- 6.1 Having notified a change, the service provider should:
- (a) individually inform all known SP potentially affected by the notified change; and
 - (b) inform all aviation undertakings potentially affected by the change either individually or via a representative body of aviation undertakings or by publishing details of the planned change in a dedicated publication of the service provider or aeronautical information publications such as an aeronautical information circular (AIC).
- 6.2 Having notified a change, the service provider shall inform the relevant SP and aviation undertakings whenever the information provided in accordance with point 6.1 is materially modified.

- 6.3 When a change affects other SP and/or aviation undertakings, as identified in point 6.1, the service provider and these other SP, in coordination, shall determine:
- (1) the dependencies with each other and, where feasible, with the affected aviation undertakings;
 - (2) the assumptions and risk mitigations that relate to more than one service provider or aviation undertaking.
- 6.4 Those SP affected by the assumptions and risk mitigations referred to in point 6.3 (2) shall only use, in their argument for the change, agreed and aligned assumptions and risk mitigations with each other and, where feasible, with aviation undertakings.

7. Action upon receipt of notification

- 7.1 Upon receipt of a notification in accordance with point ATM/ANS.OR.A.045(a)(1), or upon receipt of modified information in accordance with point ATM/ANS.OR.A.045(b), the CA shall through its 'NOC Check' and 'Decision to Review' processes decide on whether to review the change or not. The CA shall request any additional information needed from the service provider to support this decision.
- 7.2 The CA shall acknowledge receipt of the notification in the form of an automated email response which will include a copy of the NOC. The organisation shall keep a copy of this email as evidence of notification to the CA.
- 7.3 If for some reason it doesn't receive the automated email the SP should contact ANSD directly via email at ansdinfo@iaa.ie for a response. ANSD shall reply within 05 working days from the date it receives this notification. The change should not take place until a response is received.
- 7.4 Once the SP has notified the CA of its change in accordance with the procedures of this ASAM it can implement the change as notified unless
- A) it receives a notification from the CA that it has determined the need to conduct a review of the change; or
 - B) through the NOC check process the CA indicates the SP cannot proceed with the change.

8. The CA 'NOC Check' process

- 8.1 The NOC check process will identify
- a) what changes will not need review (will fall within the annual safety oversight audit scope); or
 - b) what needs further examination to determine if a review is needed (step 1.2 in the review process flow diagram at appendix B); or
 - c) what is definitively needed to be reviewed* (step 1.3 in process flow diagram appendix b)

8.2 When the SP has submitted its NOC, ANSD will check the submission for correctness and completeness. The NOC must contain enough detail about the change and its impact, for ANSD to decide on whether to review the change or not.

8.2.1 If the NOC is complete and the safety argument is accepted*, ANSD will close the internal check on its database and the SP can implement the change as notified.

* Note - The exception to point 8.2.1 is where the combination of the likelihood of the argument is complex or unfamiliar to the service provider (or the CA) and the severity of the possible consequences of the change is significant. ANSD is mandatorily required to conduct a review. Therefore, ANSD will notify the SP and will conduct a review (step 1.3 in the process flow diagram appendix B) before the SP can implement the change.

8.2.2 If the NOC is complete but the safety argument lacks clarity, ANSD will go to step 1.2 in the process flow diagram (appendix B) i.e. the process to determine whether to conduct a review or not. If it determines a review is required, the SP shall be notified.

8.2.3 If the NOC is incomplete, (not enough information provided in the information fields) or the associated documentation is incorrect, inaccurate or incomplete such that it places the safety argument in doubt, ANSD will require the SP to provide the missing information or to change the material. This may result in a delay to the change date.

The SP shall only resubmit the requested info (and/or attached) through the NOC process retaining the original reference number but with a new version number (include section 14 also);

8.2.4 In follow up to an initial NOC submission, if ANSD does not receive the information it requests in a timely manner, the SP runs the risk of ANSD rejecting the notification and advising that the change cannot go ahead¹. The SP will be notified by email that a new NOC submission is required which shall reset the notification timelines².

Explanatory note 1;

If this is the case it is because the flow of information is impacting on review and notification timelines and ANSD will not be able to remain inside the published process. Therefore, some control is required to keep discipline and structures of notification in place for the benefit of all SPs and ANSD.

Explanatory Note 2

ANSD works within the timelines for notification of a review to the SP and that time period from notification to assess whether a review is needed or not is impinged on if the initial check following notification identifies deficiencies in the NOC. Remember the timelines are minimum to allow the SP to prepare its case and undertake its change as soon as possible but also allowing ANSD meets its regulatory monitoring and oversight requirements. Therefore, when working to minimums there is little room for maneuver, so it is incumbent on the management systems of a SP to ensure that material submitted is quality, compliance and safety checked (at a minimum) before submitted for regulatory check.

9. CA decision to review a notified change (ATM/ANS.AR.C.035)

- 9.1 Following the NOC check process the decision to review process is the next step to determine whether a review will be undertaken.
- 9.2 The CA shall determine the need for a review based on specific, valid and documented criteria that, as a minimum, ensure that the notified change is reviewed if the combination of the likelihood of the argument being complex or unfamiliar to the service provider (or the CA) and the severity of the possible consequences of the change is significant. Other reasons for review are continuous oversight sampling, training of CA staff or other reasons which will be provided if requested at the time of review.
- 9.3 It's important to note for a correct and proper functioning change process where review and prior approval is required, the SP must ensure the CA is provided with mature safety arguments c/w relevant supporting documentation in a timely manner. These documents must have evidence of organisational review and approval at the appropriate management level to indicate to the CA that they are in compliance with the regulatory and organisational requirements and as such are being presented as being fit for regulatory approval.
- 9.4 It is not appropriate for submissions to be received by the CA which lack organisational review, compliance or which require extensive CA comment. This, in some cases, can call into question the effectiveness of an SPs management system or systems (e.g. quality, safety, compliance etc.) If it's apparent from an initial review due care and attention was not given to the submission the SP runs the risk of the CA rejecting the argument submission outright and the change not being approved and implemented in the timeframe requested.
- 9.5 When the CA reviews the argument for a notified change, it shall:
- (1) assess the validity of the argument presented with respect to point ATM/ANS.OR.C.005(a)(2) or ATS.OR.205(a)(2);
 - (2) coordinate its activities with other competent authorities whenever necessary. (Note this must be done before issuing a change approval if one is issued)

10. The CA Review and Approval/Rejection Process

- 10.1 Should the CA decide to review a change it shall inform the SP of its decision by email;
- for non-complex changes - within 5 working days of receipt of the notification.
 - for complex changes - within 20 working days of receipt of the notification. (See appendix B for process flow diagrams)

The CA will provide the associated rationale to the service provider upon request.

- 10.2 The CA shall review the proposed change within 30 working days after receipt of all evidence supporting the proposed change. SP must ensure the CA is provided with

mature safety arguments c/w relevant supporting documentation in a timely manner after being notified of the CAs decision to review.

10.3 It's important to emphasis the CA is not mandated to approve a change within 30 days nor start its review within 30 days of receipt of notification. But rather the regulatory requirement on the CA is to review the proposed change '*within 30 working days after receipt of all the evidence supporting the proposed change*'. AMC1 ATM/ANS.AR.C.025

10.4 For review of submissions which are not complete SPs should factor in their timelines the time needed for follow up action following an initial CA review and consequently for any further CA review needed.

10.5 Where all evidence isn't provided the CA may indicate that it will start its review but reserves the right not to start the 30-day count until it has all evidences needed to evaluate the argument for the change. Irrespective the CA will always indicate the beginning of the 30-day review period by sending an email to the POC on the NOC.

10.6 The following (1), (2) or (3) are the possible outcomes following an initial review.

(1) The CA will close its review and without delay indicate the change can go ahead as planned and as soon as practical will issue an approval letter outlining any conditions or limitations.

Or

(2) The SP will receive a notification via email that the CA will continue its review and, if not already attached, will forward a Common Response Document (CRD) in due course. The SP can continue to plan to implement the change on or after the date it proposed. This is on the understanding that the SP will get all matters outlined in the CRD resolved in the time before operational ('O') date. Therefore

a) If all matters are resolved, the CA will close its review and indicate the change can go ahead as planned and as soon as practical issue an approval letter outlining any conditions or limitations.

Or

b) If the CRD (ASD.F.260) review reaches the threshold numbers outlined hereunder, the CA may suspend its review and send back the CRD. This is on the understanding that enough issues have been identified that demonstrates the submission is not ready for regulatory approval and warrants being readdressed by the SP. The SP shall address the CRD comments and demonstrate that it has carried out a full review* to ensure no other issues are contained within its submission that could affect the regulatory approval letter being issued. This obviously may affect the implementation date and the SP should plan accordingly.

CRDs may not extend to more than the following before being addressed by the SP;
3 major or
2 major and 3 minor or
6 minor.

(See appendix A for definition of each classification)

The SP will resubmit the CRD and updated docs (with organisational review/approval evidence*) using the NOC form with the same reference number but with a new version number. If matters are not being resolved to the CAs satisfaction e.g. a second or third CRD review is suspended, then the CA may stop its review and issue a rejection letter (with justification). The change as proposed shall not go ahead. See point 10.7.

*Note - Updated documents with a record of the chapters reviewed, the changes made to each and the name of the person who carried out the review, is one way the SP can declare demonstrates evidence that a full review was carried out.

Or

(3) The CA will close its review and issue a rejection letter (with justification). See point 10.7.

10.7 Regarding point 10.6 '(2) b)' and '(3)' where a rejection letter is issued: Should the SP wish to resubmit the change it must first address the issues outlined by the CA and then start the process again by sending in a new NOC form with a new reference number and a new version number. The process will start again from the beginning as if it is a first-time submission.

10.8 The CA may prescribe conditions under which the service provider may operate during such changes, which may include allowing the organisation to make a partial change whilst the regulatory review is ongoing.

10.9 Depending on the change the approval may take the form of a new or amended certificate, a new or amended approval letter, or an electronic mail, setting out terms of approval if appropriate.

10.10 The CA may, as part of the change process, conduct audits and inspections including, as appropriate, unannounced inspections of the service provider prior to, during and/or after implementation of a change.

10.11 Where it is found that the service provider implements changes requiring prior approval without having received CA approval, referred to in ATM/ANS.OR.A.040(a)(1), the CA will take immediate and appropriate action, without prejudice to any additional enforcement measures. Note; Appropriate action by the CA may include suspension, limitation or revocation of the service provider's certificate.

11. Routine Changes

(conducted in accordance with change procedures approved by the CA)

- 11.1 In accordance with ATM/ANS.OR.B.010 (b) , the SP shall *'use procedures to manage, assess and, if necessary, mitigate the impact of changes to its functional systems in accordance with points ATM/ANS.OR.A.045, ATM/ANS.OR.C.005, ATS.OR.205 and ATS.OR.210.'*
- 11.2 The SP shall submit these change procedures for CA approval prior to implementation of any change using these procedures. Where the CA approval has not been received the SP shall follow the procedures as outlined earlier in this ASAM for a planned noncomplex change.
- 11.3 The SP shall notify the CA using the NOC form on the IAA web site no later than 2 weeks (10 working days) in advance of the proposed change. For routine changes, the notification to the competent authority may be less detailed than for other changes (i.e. as specified in AMC1 ATM/ANS.OR.A.045(a)). Therefore, the minimum sections of the NOC to be filled in are sections 1,2,3,4,6,7,8,9,13,14. The rest of the form is optional, and the SP may use its discretion to fill in these i.e. sections 5,10,11*, and 12. (* Check box 'no' is required).
- 11.4 The CA will acknowledge receipt of the notification in the form of an automated email response. The organisation shall also receive a copy of the NOC in a separate email. The SP shall keep a copy of this email as evidence of notification to the CA. The SP can plan to implement the change on or after the date it has stated the change will take place once it has received the automated email.
- 11.5 If for some reason it doesn't receive the automated email the SP should contact ANSD directly for a response at ansdinfo@iaa.ie . ANSD shall reply within 05 working days from the date it receives the notification. The change should not take place until a response is received.
- 11.6 Should the SP wish to introduce the change sooner, it should not do so until it has updated its notification with a new version number, with the new date and the reason/justification for the earlier introduction of the change. The change now falls into the unplanned change category and the SP should follow the process under section 11.0 of this ASAM.
- 11.7 Where information required to be filled in on the form is not available at the time of notification submission, SPs will insert a note in the appropriate field indicating when that information will be available.
- 11.8 The service provider shall notify the CA when the information provided in the previous notification is no longer valid or when the information previously missing becomes available.
- 11.9 They should send an updated NOC form using the same reference number but with a new version number.
- 11.10 When additional information is supplied at the CA's request, (i.e. outside of the NOC information) then no update of the notification is required.

- 11.11 However once notified the CA may decide for various reasons to carry out a review and if so, it shall inform the SP and prior approval maybe needed. Therefore, the change may not take place until the review has been concluded.
- 11.12 The CA may prescribe the conditions under which the service provider may operate during such changes, which may include not allowing the organisation to make the change or only make a partial change whilst the regulatory review is ongoing.
- 11.13 The CA may, as part of the change process, conduct audits and inspections including, as appropriate, unannounced inspections of the organisation prior to, during and/or after implementation of a change.
- 11.14 In the continuous oversight process, the CA may assess the information provided in the notification to verify whether the actions taken comply with the approved procedures and applicable requirements. In case of any non-compliance, the CA shall:
- (1) notify the SP of the non-compliance and request further changes;
 - (2) in case of level 1 and level 2 findings, act in accordance with point ATM/ANS.AR.C.050.
- 11.15 The list hereafter indicates the type of changes that could fall under the SP scope of other planned changes which the CA could approve the change procedures for
- Changes to maintenance routines, except those that impact on service provision.
 - Equipment modifications/manufacture's upgrades that do not affect the operating parameters.
 - Document changes, typos, formats etc. that do not impact on the content of management systems, change management systems or service provision. (Note; where a management document has been changed it should be sent to the CA as an update to previously submitted documents under an approved NOC process.)

12. Unplanned changes

An unplanned change is any change that the SP has safety assessed as being necessary to carry out in less than 10 working days. These include responding immediately to a safety problem as required in ATM/ANS.OR.A.060 or when an emergency arises in which the service provider must take immediate action to ensure the safety of the services.

An unplanned change must still follow an SPs process for change, i.e. at a minimum a safety assessment of the change is carried out before the change is introduced and a notification sent to the CA in line with approved timeframes as documented under SP procedures.

The safety assessment should demonstrate the need for the change to be implemented and justify why

- it cannot adhere to the CA minimum notification period of 10 working days for a planned change. This type of change significantly reduces the time for the CA to assess whether to review the change or not before implementation thus reducing the effectiveness of oversight.
or
- where a notification has been sent in line with a planned change; the SP has subsequently determined the introduction of a planned change needs to be brought forward in a time frame less than the notified minimum 10 working days.

Important: The procedure(s) for unplanned changes must be submitted by the service provider and approved by the CA prior to implementation.

13. Further Information

Any queries or requests for further information should be addressed to the following CA email address: ansdinfo@iaa.ie

The online form and the ASD.F.254 Form (pdf contingency form) can be found on the IAA website under 'Aeronautical Services' under the 'Commercial Aviation' tab (top of the home page) www.iaa.ie

Appendix A

Re section 10.6 (2) b) remarks in CRDs classified to the following categories:

- **Major:** A comment on a critical issue ANSD considers significant enough to prevent regulatory approval of the proposed change(s) unless resolved by the service provider (e.g. a non-conformity to applicable regulatory requirements, or non-adherence to an organisation's own requirement, or an important problem that shall be resolved by the organisation).
- **Minor:** A comment on other issues indirectly affecting the compliance demonstration, which ANSD considers are necessary to address before proceeding. Whilst not solely preventing regulatory approval of the proposed change(s) the accumulation of these issues can lead to the prevention of regulatory approval of the proposed change(s).
- **Question:** The question may be associated to an issue that requires clarification. However, upon receipt of further information the CRD question classification will change to a Closed, Minor or Major classification.
- **Editorial:** Observations on missing information or editorials of a nature which are needed to provide clarity or ensure no ambiguity exists by the absence of that information.

CA Oversight of Change Flow Process – **Complex** / **Non Complex** / **Routine** / **Unplanned**

