

Table showing where NPA 2017/010 text is already covered in EC 373
Together with additional comments

| NPA 2017/010 text | Equivalent coverage in EC 2017/373 text | Comments |
|--|---|---|
| Annex III | | |
| GM2 ATM/ANS.OR.A.045(a) | GM1 ATM/ANS.OR.A.045(a) (b), (c), (d) (e) & (f) General GM – 3.2 | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Covered in GM1 and General GM – 3.2 to a much greater depth. |
| GM1 ATM/ANS.OR.A.050 points (a) & (b) | ATM/ANS.OR.A.045 (c) ATM/ANS.OR.B.010 (a) ATM/ANS.OR.C.005 (a)(2) & (b)(2) | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. This section is out of context. Content and application of assurance cases is covered in AMC/GM associated with ATM/ANS.OR.C.005(a). The approval of processes is covered in ATM/ANS.OR.B.10 and its associated AMC/GM If the evidence required by (b)(2) is necessary but not included in the assurance case then the assurance case would not be valid and could not be approved – see ATM/ANS.OR.C.005(a)(2) and its associated AMC/GM Co-operation between the service provider and the CA during change is covered, in detail, in section 3 of the General GM. If it were felt necessary to highlight this co-operation it would have to include all regulatory interaction governed by the IR. |

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| AMC5 ATM/ANS.OR.C.005(a)(2) | | <p>Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE.</p> <p>Most of these points (see below) are covered by AMC/GM related to ATM/ANS.OR.B.005, B.010 & C.005</p> |
| AMC5 ATM/ANS.OR.C.005(a)(2), point (a) | <p>ATM/ANS.OR.B.010 (a) ATM/ANS.OR.C.005 (a)(2)</p> | <p>SW is part of a functional system. Before changing any part of a functional system the service provider must ensure that the procedures to be used are approved by the CA. This is covered in ATM/ANS.OR.B.010.</p> |
| AMC5 ATM/ANS.OR.C.005(a)(2) point (b) | <p>ATM/ANS.OR.B.005 (a)(4), (c) & (d) ATM/ANS.OR.B.010 (b) & (c)</p> | <p>The management system rules cover the reporting, analysis and correction of failures of the functional system and adequate performance of procedures. They cover the complete functional system and change management procedures and therefore, by definition, cover software.</p> |
| AMC6 ATM/ANS.OR.C.005(a)(2) | | <p>Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE.</p> <p>Most of these points (see below) are covered by AMC/GM related to ATM/ANS.OR.C.005</p> <p>This section is out of context. Processes are dealt with in ATM/ANS.OR.B.010 and its associated AMC/GM. This section of the IR and its associated AMC/GM deals with the criteria for safety support assurance cases and not the processes that created a safety support case.</p> |

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| <p>AMC6 ATM/ANS.OR.C.005(a)(2), point (a)(1)(i)</p> <p><i>See also: #</i></p> <p><i>AMC4 ATS.OR.205(a)(2), point (a)(1)(i)</i></p> | <p>AMC2 ATM/ANS.OR.C.005(a)(2) (b), (c), (d)</p> | |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2), point (a)(1)(ii)</p> | <p>ATM/ANS.OR.C.005(a)(1)(v)</p> <p>GM3 ATM/ANS.OR.C.005(a)(2) (a)</p> | |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2), point (a)(2)(i)</p> | <p>AMC2 ATM/ANS.OR.C.005(a)(2) (d)</p> | |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2), point (a)(2)(ii)</p> | <p>AMC2 ATM/ANS.OR.C.005(a)(2) (d)</p> | |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2), point (a)(3)</p> | <p>N/A</p> | <p>Incorrect: There is no view of safety in Annex III text</p> |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2) point (a)(4)</p> | <p>ATM/ANS.OR.C.005 (a)(1)(ii)</p> <p>AMC1 ATM/ANS.OR.C.005(b)(1) (h)</p> | |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2), point (a)(5)</p> | <p>ATM/ANS.OR.C.005 (a)(2), (b)(1)</p> <p>AMC1 ATM/ANS.OR.C.005(b)(1)</p> | <p>The procedures for verification are covered in ATM/ANS.OR.B.010 and its associated AMC/GM and will have been agreed with the CA prior to their use.</p> |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2) point (c)</p> | <p>AMC2 ATM/ANS.OR.C.005(a)(2) (f)</p> | |
| <p>AMC6 ATM/ANS.OR.C.005(a)(2) point (d)</p> <p><i>See also:</i></p> <p><i>GM1 to AMC6 ATM/ANS.OR.C.005(a)(2) points (a) (b) & (c)</i></p> <p><i>GM2 to AMC6 ATM/ANS.OR.C.005(a)(2) points (a), (b), (c) & (d)</i></p> | <p>N/A</p> | <p>The concept of rigour is not used in the IR, confidence is used. Assurance levels are used in Regulation (EC) No 482/2008 to determine 'the rigour to which the assurances are established'. This can only be understood as a means to provide the required level of confidence. Hence this clause is incorrect.</p> |

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| AMC6 ATM/ANS.OR.C.005(a)(2), point (e)(1) | ATM/ANS.OR.B.030 (a), (b) & (c). AMC2 ATM/ANS.OR.C.005(a)(2) (f) | |
| AMC6 ATM/ANS.OR.C.005(a)(2), point (e)(2) | ATM/ANS.OR.B.005 (a)(4), (c) & (d) ATM/ANS.OR.B.030 (a), (b) & (c) | The management system rules cover the reporting, analysis and correction of failures of the functional system. |
| AMC6 ATM/ANS.OR.C.005(a)(2), point (e)(3) <i>See also:</i> <i>AMC4 ATS.OR.205(a)(2), point (d)(3)</i> | ATM/ANS.OR.B.030 (a), (b) & (c) | |
| AMC6 ATM/ANS.OR.C.005(a)(2), point (f) | N/A | Incorrect. The requirement for assurance (ATS.OR.205(a)(2)) applies to all parts of the functional system and therefore includes software, no matter whether it is bespoke, COTS or previously developed. This is GM not AMC. The rule itself is adequate, it covers this and is not specific to software. |
| GM1 to AMC6 ATM/ANS.OR.C.005(a)(2) <i>See also:</i> <i>AMC6 ATM/ANS.OR.C.005(a)(2) point (d)</i> <i>GM2 to AMC6 ATM/ANS.OR.C.005(a)(2) points (a), (b), (c) & (d)</i> | N/A <i>SWALS as defined in EC 482 cannot be applied to the software covered by Annex III.</i> <i>The ATM IR does not define assurance levels. It allows their use but points out that there can be many different types and that their use does not imply satisfaction of requirement ...</i> | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Assurance levels can be used in other fields as well e.g. DALs, HWALS The relationship between confidence and SWALS is not defined and so introducing SWALS should not be done until there is some solid underpinning evidence for such a relationship |

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|--|---|--|
| <p>GM2 to AMC6 ATM/ANS.OR.C.005(a)(2) <i>See also</i> <i>AMC6 ATM/ANS.OR.C.005(a)(2) point (d)</i> <i>GM1 to AMC6 ATM/ANS.OR.C.005(a)(2) points (a) (b) & (c)</i></p> | <p>N/A <i>SWALS as defined in EC 482 cannot be applied to the software covered by Annex III.</i> <i>The ATM IR does not define assurance levels. It allows their use but points out that there can be many different types and that their use does not imply satisfaction of requirement ...</i></p> | <p>Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Assurance levels can be used in other fields as well e.g. DALs, HWALs The relationship between confidence and SWALS is not defined and so introducing SWALS should not be done until there is some solid underpinning evidence for such a relationship</p> |
| <p>GM3 to AMC6 ATM/ANS.OR.C.005(a)(2) point (a)</p> | <p>N/A</p> | <p>Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. This section is out of context. The approval of processes is covered in ATM/ANS.OR.B.10 and its associated AMC/GM</p> |
| <p>GM3 to AMC6 ATM/ANS.OR.C.005(a)(2) point (c)</p> | <p>N/A</p> | <p>Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. This section is out of context. The approval of processes is covered in ATM/ANS.OR.B.10 and its associated AMC/GM</p> |
| <p>Annex IV</p> | | |
| <p>AMC3 ATS.OR.205(a)(2)</p> | <p>ATS.OR.205 (a)(2)</p> | <p>Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Most of these points (see below) are covered by AMC/GM related to ATM/ANS.OR.B.005, B.010 & ATS.OR.200 & 205</p> |

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| | | |
|--|---|---|
| AMC3 ATS.OR.205(a)(2), point (a) | ATM/ANS.OR.B.010 (a) ATS.OR.205 (a)(2) | SW is part of a functional system. Before changing any part of a functional system the service provider must ensure that the procedures to be used are approved by the CA. This is covered in ATM/ANS.OR.B.010. |
| AMC3 ATS.OR.205(a)(2) point (b) | ATM/ANS.OR.B.005 (a)(4), (c) & (d) ATM/ANS.OR.B.010 (b) & (c) ATS.OR.200 (3) | The management system rules cover the reporting, analysis and correction of failures of the functional system and adequate performance of procedures. They cover the complete functional system and change management procedures and therefore, by definition, cover software. |
| AMC4 ATS.OR.205(a)(2) | | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Most of these points (see below) are covered by AMC/GM related to ATS.OR.205 This section is out of context. Processes are dealt with in ATM/ANS.OR.B.010 and its associated AMC/GM. This section of the IR and its associated AMC/GM deals with the criteria for safety assurance cases and not the processes that created a safety case. |
| AMC4 ATS.OR.205(a)(2), point (a)(1)(i) | AMC2 ATS.OR.205 (a)(2) (b), (c), (d) | |
| AMC4 ATS.OR.205(a)(2), point (a)(1)(ii) | ATS.OR.205 (a)(1)(v) GM3 ATS.OR.205(a)(2) (a) | |
| AMC4 ATS.OR.205(a)(2), point (a)(2)(i) | AMC2 ATS.OR.205(a)(2) (d) | |
| AMC4 ATS.OR.205(a)(2), point (a)(2)(ii) | AMC2 ATS.OR.205(a)(2) (d) | |
| AMC4 ATS.OR.205(a)(2), point (a)(3) | ATS.OR.205 (a)(2) & (b)(2)(ii) AMC2 ATS.OR.205 (a)(2) (a) & (c) | |

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|---|---|--|
| AMC4 ATS.OR.205(a)(2) point (a)(4) | ATS.OR.205 (a)(5)(ii) AMC2 ATS.OR.205(a)(2) (c) & (e) | |
| AMC4 ATS.OR.205(a)(2), point (a)(5) | ATS.OR.205 (a)(2), (b)(1) AMC1 ATS.OR.205 (b)(5) | The procedures for verification are covered in ATM/ANS.OR.B.010 and its associated AMC/GM and will have been agreed with the CA prior to their use. |
| AMC4 ATS.OR.205(a)(2), point (b) | AMC2 ATS.OR.205 (a)(2) (f) | |
| AMC4 ATS.OR.205(a)(2) point (c) <i>See also:</i> <i>GM1 to AMC4 ATS.OR.205(a)(2)</i> <i>(Text identical to GM1 to AMC6</i> <i>ATM/ANS.C.005(a)(2))</i> <i>GM2 to AMC4 ATS.OR.205(a)(2) points (a), (b)</i> <i>& (c)</i> <i>(Text the same as GM2 to AMC6</i> <i>ATM/ANS.C.005(a)(2))</i> | N/A | The concept of rigour is not used in the IR, confidence is used. Assurance levels are used in Regulation (EC) No 482/2008 to determine 'the rigour to which the assurances are established'. This can only be understood as a means to provide the required level of confidence. Hence this clause is incorrect. |
| AMC4 ATS.OR.205(a)(2), point (d)(1) | ATM/ANS.OR.B.030 (a), (b) & (c) AMC2 ATS.OR.205 (a)(2) (f) | |
| AMC4 ATS.OR.205(a)(2), point (d)(2) | ATM/ANS.OR.B.005 (a)(4), (c) & (d) ATM/ANS.OR.B.030 (a), (b) & (c) | The management system rules cover the reporting, analysis and correction of failures of the functional system. |
| AMC4 ATS.OR.205(a)(2), point (d)(3) <i>See also:</i> <i>AMC6 ATM/ANS.OR.C.005(a)(2), point (e)(3)</i> | ATM/ANS.OR.B.030 (a), (b) & (c) | Not specific to software. |

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| | | |
|--|--|---|
| AMC4 ATS.OR.205(a)(2), point (e) | None | Incorrect. The requirement for assurance (ATS.OR.205(a)(2)) applies to all parts of the functional system and therefore includes software, no matter whether it is bespoke, COTS or previously developed. This is GM not AMC. The rule itself is adequate, it covers this and is not specific to software. |
| GM1 to AMC4 ATS.OR.205(a)(2) <i>(Text nearly the same as GM1 to AMC6 ATM/ANS.C.005(a)(2))</i> <i>See also:</i> <i>AMC4 ATS.OR.205(a)(2) point (c)</i> <i>GM1 to AMC4 ATS.OR.205(a)(2)</i> <i>(Text identical to GM1 to AMC6 ATM/ANS.C.005(a)(2))</i> | N/A <i>The ATM IR does not define assurance levels. It allows their use but points out that there can be many different types and that their use does not imply satisfaction of requirement ...</i> <i>See GM2 ATS.OR.205(a)(2)</i> | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Assurance levels can be used in other fields as well e.g. DALs, HWALs The relationship between confidence and SWALs is not defined and so introducing SWALs should not be done until there is some solid underpinning evidence for such a relationship |
| GM1 to AMC4 ATS.OR.205(a)(2) points (a) | ATS.OR.205(a)(2) | Incorrect ref – should be ATS.OR.205(a)(2) Tautology – This simply says that the assurance should be provided with the required level of confidence. |
| GM1 to AMC4 ATS.OR.205(a)(2) points (b) | GM2 ATS.OR.205(a)(2) | |
| GM1 to AMC4 ATS.OR.205(a)(2) points (c) | None | |
| GM1 to AMC4 ATS.OR.205(a)(2) points (d) | None | |

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|---|--|---|
| GM2 to AMC4 ATS.OR.205(a)(2) | N/A <i>The ATM IR does not define assurance levels. It allows their use but points out that there can be many different types and that their use does not imply satisfaction of requirement ...</i> <i>See GM2 ATS.OR.205(a)(2)</i> | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. Assurance levels can be used in other fields as well e.g. DALs, HWALs The relationship between confidence and SWALs is not defined and so introducing SWALs should not be done until there is some solid underpinning evidence for such a relationship |
| GM2 to AMC4 ATS.OR.205(a)(2) point (a) | N/A | |
| GM2 to AMC4 ATS.OR.205(a)(2) point (b) | N/A | |
| GM2 to AMC4 ATS.OR.205(a)(2) point (c) | N/A | |
| GM2 to AMC4 ATS.OR.205(a)(2) point (d) | None | Out of scope/context. This section deals with ATSPs only. |

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|---|------------|---|
| GM3 to AMC4 ATS.OR.205(a)(2) point (a) | N/A | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. This section is out of context. The approval of processes is covered in ATM/ANS.OR.B.10 and its associated AMC/GM |
| GM3 to AMC4 ATS.OR.205(a)(2) point (c) | N/A | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. This section is out of context. The approval of processes is covered in ATM/ANS.OR.B.10 and its associated AMC/GM |

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|-------------------------------------|---|---|
| GM4 to AMC4 ATS.OR.205(a)(2) | General GM Section 2.4 & 3.3 | Not specific to software. Removal of the SW related terms would have no effect on the meaning of the text and would broaden it to include PPE. All of this is covered to a greater depth in the general GM- on multi actor changes – Section 2.4 and Service provider centric view – Section 3.3 |
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