NPA 2017-10

Software assurance level requirements for safety assessment of changes to air traffic management / air navigation services functional systems

Commentor:	UK CAA

Page No: 9 to 19

Paragraph No: 3.1. Draft acceptable means of compliance and guidance material

Comment: We believe the proposed text duplicates AMC/GM already published in Regulation (EU) 2017/373. We are of the opinion that this has the potential to lead to inconsistent implementation of the related elements of Regulation (EU) 2017/373 amongst Member States. We strongly urge that the AMC/GM is not published. Instead, we strongly recommend that the approaches foreseen on CRD 2014-13 Issue 2 (see below), should be actively pursued as soon as possible.

- **Response to various comments in 'section 2. Explanatory Note — 2.4. Overview of the proposed amendments — 2.4.2. Proposed amendments to Article 8 'Transitional provision', Article 9 'Repeal' and Article 10 'Entry into force' in the Cover Regulation' (Pgs 97 – 125):** *"The work still to be done on the AMC/GM will address those elements of Regulation (EC) No 482/2008 which are not currently transposed and that contribute to ensuring safety of the software elements of the change. AMC/GM will also be provided in the future on how the rules may be applied in the other disciplines (i.e. hardware, people and procedures)"*

- **Response to comments 186 & 257 in 'section 4. Regulatory Impact Assessment (RIA) — 4.7. Changes affecting software and Regulation (EC) No 482/2008':**
  "It is also acknowledged that the assurance of people, procedures and hardware is not fully covered. This will be tackled in the 2nd NPA and by future additions to the AMC/GM"

Justification: One of the objectives of the Regulation (EU) 2017/373 rulemaking group was to remove the need for Regulation (EC) 482/2008 (see Regulation (EU) 2017/373 - recital 19). It was held that Regulation (EC) 482/2008 gave undue importance (and inappropriate legislative status) to the assurance of software over that of People, Procedures and Hardware, which are responsible for the vast majority of safety occurrences in the CNS/ATM domain.

The 482/2008 content required to instantiate an assurance system that adequately covered People, Procedures and Hardware as well as software has already been included in Regulation (EU) 2017/373 and its supporting AMC and the GM (see Appendix II of NPA 2014-13).

NPA 2017-10 is considered contrary to these objectives. It introduces clauses specifically related to software that imply differences between the assurance of software and the assurance of People, Procedures and Equipment (hardware & software). These differences do not exist and we believe implying that they do is harmful to harmonisation. Consequently the proposals in NPA 2017-10 are unnecessary as they duplicate the IR, AMC and GM already provided with Regulation (EU) 2017/373.

It was recognised that guidance on assurance was insufficiently addressed by NPA 2014-13, however this did not result in a need for more specific software assurance guidance. Instead, guidance appropriate for People, Procedures and Equipment (hardware & software) was required to ensure harmonisation of the approach. See CRD 2014-13 Issue 2 responses to comments 186 and 257, and the explanatory note to Opinion No 03/2014 (*"Based on the consultation, it has been concluded that Regulation (EC) No 482/2008 can be repealed, but certain provisions should be moved to AMC. When the Agency completes the AMC/GM, these aspects will be addressed"*). This does not imply an additional NPA, rather it refers to changes to be made to the draft AMC/GM material prior to the decision (i.e. ED Decision 2017/001/R), which result from addressing comments in the CRD. Consequently these changes have already been addressed.

Additional material duplicating extant AMC/GM confuses the harmonised approach to regulating people, procedures and equipment. It implies differences that do not in fact exist, and encourages divergent local developments (see attached table). Such divergence will result in differences in interpretation and potentially cause disputes between competent authorities and service providers.

Proposed Text: Delete duplicated amendments proposed in section 3.1. Instead it is strongly recommended that EASA should consider the need to establish a rulemaking task to progress the assurance of People, Procedures and Equipment (hardware & software) in a more coherent and harmonised manner as proposed for the 2nd NPA, as described in CRD 2014–13 Issue 2.

Commentor:	UK CAA

Page No: 9 to 19

Paragraph No: 3.1. Draft acceptable means of compliance and guidance material

Comment: We are of the view that placement of Assurance Levels and SWALs at IR/AMC levels is inappropriate. In addition, that both are inadequately and inappropriately defined in the NPA is cause for concern to the UK CAA.

Justification:
Assurance Levels are very complex to define and use. When used correctly they are an expression of the confidence held in an element of a specification. Consequently, an element of a specification would have one or more Assurance Levels associated with it to express the confidence held in the various attributes of the element (e.g. reliability, accuracy, timing, robustness, etc).

As International Electrotechnical Commission (IEC) standard 61508: Functional Safety - 2010 is the only assurance standard that addresses all of the attributes of a specification, the use of any other assurance standards will require multiple types of Assurance Levels to facilitate the cross referencing to different standards (and note that, whilst IEC 61508 addresses all attributes, it does not address how they are related to risk as this is not considered technically possible). Due to the diversity of solutions available this is not a topic for legal material nor does the proposed material in the NPA address the problem adequately.

The requirements for SWALs from Regulation (EC) 482/2008 were deliberately omitted from Regulation (EU) 2017/373 as they were inadequately and inappropriately defined (see justification in Section 6.2. – Appendix II of NPA 2014-13). However, it was accepted that some assurance level material that relates assurance levels to confidence (an undefined concept that this NPA tries to use without defining but needs to address) for People, Procedures and Equipment (hardware & software) and not just software might be introduced as GM in the future and it is this that is proposed to be done in 'NPA 2'.

Furthermore, the argument for the removal of SWALs was challenged but not upheld in CRD 2014-13 Issue 2 and no subsequent evidence has been subsequently provided showing this argument to be flawed. See CRD 2014-13 Issue 2 responses to comments 186 and 257.

Moreover:
- the proposed material does not address the inadequacies described above
- such material should only be considered for GM.
- the meaning of SWALs is unfortunately, and inappropriately, ambiguous. It is unclear whether they are meant to be an expression of confidence in achieving a claim or effort expended in providing evidence.
- SWALs are not associated with any fixed objective or quantitative scale, their relationship to confidence is undefined, consequently they neither benefit harmonisation nor standardisation.

Proposed Text: Delete proposed amendments relating to SWALs and assurance levels proposed in section 3.1 as follows:

Reference to SWALs in the following should be removed:

- AMC5 ATM/ANS.OR.C.005(a)(2)
- GM1 to AMC6 ATM/ANS.OR.C.005(a)(2)
- GM2 to AMC6 ATM/ANS.OR.C.005(a)(2)
- GM3 to AMC6 ATM/ANS.OR.C.005(a)(2)
- GM1 to AMC4 ATS.OR.205(a)(2)
- GM2 to AMC4 ATS.OR.205(a)(2)
- GM3 to AMC4 ATS.OR.205(a)(2)

Reference to assurance levels in the following should be removed:

- AMC5 ATM/ANS.OR.C.005(a)(2)
- GM1 to AMC6 ATM/ANS.OR.C.005(a)(2)
- AMC3 ATS.OR.205(a)(2)

Commentor:	UK CAA

Page No: 9 - 19

Paragraph No: 3.1. Draft acceptable means of compliance and guidance material

Comment: The existing AMC and GM to Regulation (EU) 2017/373 provides a harmonised approach to the assurance of People, Procedures and Equipment (hardware & software). We believe NPA 2017-10 inappropriately identifies the assurance of software as a special case and in doing so conflicts with AMC/GM already published in support of Regulation (EU) 2017/373. Additionally, we are of the view that NPA 2017-10 is ambiguous, inconsistent and incorrect and causes the UK CAA significant concern.

Justification:

A)   NPA 2017-10 does not appear to conform to the concepts established in Regulation (EU) 2017/373, namely:

  1. Procedures are approved prior to change and are intended to cover many changes, consequently they may be approved as part of the MS approval.

  2. Assurance cases are provided for each change and contain arguments about that change only.

  3. Assurance cases argue the product properties not the goodness of the procedures (it is a false argument that claims the product is safe/trustworthy because approved procedures have been followed (process evidence may be used as backing but is not prime).

  4. Service providers other than ATS providers have no view of safety and so cannot use or create safety requirements, safety criteria or assurance levels related to safety. Regulation (EU) 2017/373 states that only ATS providers can actively intervene in an unsafe situation, only they can establish safety requirements and criteria. Other service providers cannot directly intervene in an unsafe situation and hence merely have requirements. This is reflected in the structure of Regulation (EU) 2017/373, namely Annex III and Annex IV, that don't effectively duplicate the regulations for the two groups.

  Consequently, we suggest that the following NPA2017-10 proposals are invalid and/or impracticable:

- **GM2 ATM/ANS.OR.A.045(a)**
  It is impracticable for the CA to agree the depth of safety assurance for every change. We are notified of over 1500 changes per year in UK

- **GM1 ATM/ANS.OR.A.050**
  The assessment of the application of assurance processes (whether for software or any other part of the functional system) is performed as part of the assessment of the assurance cases and is governed by ATM/ANS.OR.C.005. Moreover the assurance case would be invalid if it did not contain all the necessary evidence or the evidence was inconsistent.
  If it were felt necessary to highlight this co-operation it would have to include all regulatory interaction governed by the IR.

- **AMC6 ATM/ANS.OR.C.005(a)(2)**
  We believe this is in the wrong section. Processes are dealt with in ATM/ANS.OR.B.010. This section appears to go against the fundamental philosophy of Regulation (EU) 2017/373, which sets objective criteria for judging the behaviour of the change to the system, as opposed to this AMC, which tries to judge the behaviour of the system from the process followed.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  It is not possible for ANSPs to construct a logical argument as to why their procedures will, in all circumstances, achieve the 5 objectives listed. It adds no value if a valid assurance case has been provided. In addition, this section appears to go against the fundamental philosophy of Regulation (EU) 2017/373, which is to set objective criteria for judging the behaviour of the change to the system, as opposed to this AMC, which tries to judge the behaviour of the system from the process followed.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (a)(2)(ii)**
  We believe this is incorrect. There is no view of safety in Annex III text.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (a)(3)**
  We believe this is incorrect. There is no view of safety in Annex III text.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (c)**
  The evidence and arguments described in (c) cannot contribute to the argument in (a), which is about the software assurance processes.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (f)**
  We believe this is incorrect: There is no view of safety in Annex III text.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (b)**
  This implies a relationship between ATSP and other ANSPs that is not required by the rule text. The rule text does not require the ATSP to provide the ANSP with a SWAL. In fact it deliberately isolates the two parties.

- **AMC4 ATS.OR.205(a)(2)**
  This section appears to go against the fundamental philosophy of Regulation (EU) 2017/373, which sets objective criteria for judging the behaviour of the change to the system, as opposed to this AMC, which tries to judge the behaviour of the system from the process followed.

- **AMC4 ATS.OR.205(a)(2), (a)**
  It is not possible for ANSPs to construct a logical argument as to why their procedures will, in all circumstances, achieve the 5 objectives listed. This is why the safety cases have to be reviewed in addition to the processes that create them.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  We believe this is incorrect. Criticality in Annex III is not related to safety criticality because safety is outside of the scope of Annex III.

- **GM2 to AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  There can be no foreseen criticality of the software as this will depend upon the air traffic service that uses it. Different services of different criticality may use the same software.
  Rules in Annex III can only require the confidence in the software's behaviour to be specified.

- **GM2 to AMC6 ATM/ANS.OR.C.005(a)(2), (b)**
  We believe this is incorrect: the severity of the effect for the user cannot be known by the supplier, to any degree of certainty because by definition they do not have sight of safety.

- **AMC4 ATS.OR.205(a)(2), (b)**
  The evidence and arguments described in (c) cannot contribute to the argument in (a), which is about the software assurance processes.

B) Elements of NPA 2017-10 are considered ambiguous. It uses many undefined terms and concepts. Additionally there are several ambiguous grammatical constructs. Numerous elements can be interpreted in several different ways; consequently, we are of the opinion that the proposals as presented have the potential to result in disparate approaches between ANSPs and Competent Authorities within and across states. Such ambiguities appear as follows:

- **AMC5 ATM/ANS.OR.C.005(a)(2), (b)**
  As SWALs and Rigour are undefined, any judgements made about the behaviour in order to provide such feedback will be subjective and not only vary within an organisation but vary from ANSP to ANSP. Consequently requiring such feedback is meaningless. It would only work if the CA harmonised all ANSP's schemes, an unrealistic expectation.

- **GM2 ATM/ANS.OR.A.045(a)**
  This statement is considered ambiguous. The criteria for measuring the complexity of the change are not defined.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (d)**
  The processes can identify a need that may or may not be satisfied. If unsatisfied the user system will have to be redesigned. It is considered ambiguous because it is not clear whether it relates to the processes or the software itself. Furthermore it is incorrect because if it means software itself, it's inconsistent with (a) and if it means processes, it's impossible.

- **GM2 to AMC6 ATM/ANS.OR.C.005(a)(2)**
  This is considered ambiguous because there are no criteria for (a), (b), (c) or (d) and hence it has no value as GM. Moreover there are no requirements for a SWAL allocation scheme. This undermines harmonisation as each ANSP across Europe will have a different scheme.

- **GM3 to AMC6 ATM/ANS.OR.C.005(a)(2)** This is considered an ambiguous statement. Safety Critical software is an undefined term that has been abandoned since 1990; it is considered impossible to define. It is suggested that it would be unproductive to try to define it as all previous attempts by the safety engineering community have failed to do so.

- **AMC3 ATS.OR.205(a)(2), (b)**
  As the definition of SWALs and Rigour is left to individual service providers, any judgements made about the behaviour in order to provide such feedback will be subjective and not only vary within an organisation but vary from ATSP to ATSP. Consequently requiring such feedback brings no value to the process. It would only work if the CA harmonised all ATSP's schemes, an unrealistic expectation on the CAs, due to the resource required.

- **GM1 to AMC4 ATS.OR.205(a)(2), (a) & (b)**
  Use of the term 'criticality of the software' is meaningless as software criticality is undefined

- **GM1 to AMC4 ATS.OR.205(a)(2), (c)(1)**
  This is considered an ambiguous statement, software criticality is an undefined term

- **GM2 to AMC4 ATS.OR.205(a)(2)**
  This is considered ambiguous because there are no criteria for (a), (b), (c) or (d) and hence it has no value as GM. Moreover there are no requirements for a SWAL allocation scheme. This undermines harmonisation as each ANSP will have a different scheme

- **GM3 to AMC4 ATS.OR.205(a)(2), (a)** This is considered an ambiguous statement. Safety Critical software is an undefined term

C) NPA 2017-10 is considered inconsistent in the following respects:

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (c)**
  This clause implies that multiple SWALs have already been introduced. They have not.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (d)**
  This guidance is inconsistent with itself. It states that 'if processes do not exist use processes'. Moreover, it is generally accepted that there is no evidence that arguments and evidence cannot be provided for these types of software. Confidence does not depend on SWAL so there is no conflict between the requirement for confidence (ATM/ANS.OR.205(a)(2)) and the type of software.

D) NPA 2017-10 is considered incomplete and incorrect. It does not correctly explain the relationship between assurance standards and their use with safety cases and safety support cases. Furthermore the NPA is incomplete as it does not make it clear that the safety assurance standards listed need to be instantiated for the change and the change safety case that uses them. Nor does it make clear that the assurance standards listed do not address all of the attributes that are required to be addressed by Regulation (EU) 2017/373. Incompleteness and/or error has been identified as follows:

- **AMC5 ATM/ANS.OR.C.005(a)(2), (b)**
  Incorrect reference: there is no requirement for SWALS, they are introduced only in GM.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (a)(2)(i)**
  The content is incorrect – tautology. Not specific to software. However, it is covered by: AMC2 ATM/ANS.OR.C.005(a)(2), (d) where it is correct.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (f)**
  Incorrect, this clause is not a requirement as it uses the word 'should' and provides no criteria for 'particularities' or what is to be done for these particularities. This is more appropriate as GM rather than AMC. The rule itself is adequate as it covers this and is not specific to software.

- **AMC6 ATM/ANS.OR.C.005(a)(2), (f)**
  Incorrect, It is not a requirement as it uses the word 'should' and provides no criteria for 'sufficient'. This is more appropriate as GM rather than AMC. The rule itself is adequate as it covers this and is not specific to software.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  Incorrect reference – should be ATM/ANS.OR.C.005(a)(2).

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  Undefined concept (relating confidence to rigour). In addition, **'**Software criticality' is undefined.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  The relationship between rigour and confidence is undefined and in a safety support case rigour does not imply correctness. A SWAL allocation scheme can only provide a link between criticality and assurance processes. The appropriateness of the rigour of process followed and the robustness of the assurance data generated can only be judged for its adequacy with reference to the safety support case that uses it.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (b)**
  It is not clear that in "many changes" the safety support case is written from the perspective of a non-ATS provider being a subcontractor of the ATS provider and, no guidance is provided for the case where the safety support case has been generated without knowledge of the level of confidence required of the specification. Guidance for both cases is already provided in GM Section 3.3. Multi Actor View. The GM in NPA 2017-10 therefore is considered incomplete and incorrect, and it contradicts the guidance already provided. Furthermore, while the confidence in the claim for a property of a service that is assured in a safety support case should be the same as the confidence required of that property in the

safety case, there may be no relationship between the SWAL schemes used for the assurance of safety and the assurance of trustworthiness.

- **GM1 to AMC6 ATM/ANS.OR.C.005(a)(2), (c)**
  We believe this is unworkable as the text allows each ANSP to declare their own SWALS and processes. If SWALS are to be used they have to be harmonised, at the European level, to be useable, as intended by NPA 2017-10, by industry. There is no evidence that rigour relates to correctness and neither is there any evidence that these criteria affect rigour. Rigour is undefined and the need for this is unexplained and is considered unjustified. It is questioned where these three classes have come from – as there appears to be no justification.

- **GM2 to AMC6 ATM/ANS.OR.C.005(a)(2), (a)**
  There is no direct relationship between the rigour required and criticality. This is a false relationship. Rigour should be related to the difficulty in arguing the satisfaction of a requirement to a given level of confidence and not to its criticality. Furthermore, in this instance, a requirement may relate to criticality but this will be unknown to a service provider other than an ATS provider. Whilst SWALs are related to software practices whose aim is to increase confidence, the relationship between rigour and confidence is undefined and may or may not be relevant to the assurance being made.

- **GM3 to AMC6 ATM/ANS.OR.C.005(a)(2)**
  We believe these standards do not satisfy the rule text well and suggest that IEC 61508 Functional Safety 2010 would be far better. It covers the same scope as the regulation and addresses People, Procedures and Equipment (hardware & software). Also as a multi sector standard it is more likely to be used by the ATM/CNS supply chain better.

- **AMC3 ATS.OR.205(a)(2), (b)**
  This is not a correct statement. There is no requirement for assurance levels in (EU) 2017/373

- **AMC4 ATS.OR.205(a)(2), (c)**
  We believe this cannot work in practice as the text allows each ANSP to declare their own SWALS and processes. If SWALS are to be used they have to be harmonised, at least at the state level, to be useable by industry. There is no evidence that rigour relates to correctness and neither is there any evidence that these criteria affect rigour. Rigour is undefined and the need for this is unexplained in NPA 2017-10 and is therefore considered unjustified. The origin of these three classes is unclear, nor are the clauses justified in NPA 2017-10.

- **AMC4 ATS.OR.205(a)(2), (e)**
  It is not possible to define a process that guarantees to provide sufficient confidence for all safety cases. This is why assurance standards have to be instantiated for particular changes. This needs to be argued in the safety case.

- **GM1 to AMC4 ATS.OR.205(a)(2), (a)**
  Incorrect reference – should be ATS.OR.205(a)(2)

- **GM1 to AMC4 ATS.OR.205(a)(2), (b)**
  SWALs are related to software practices whose aim is to increase confidence. The relation between rigour and criticality whilst required by NPA 2017-10 is undefined and may or may not help in providing sufficient confidence for the argument being made.

- **GM1 to AMC4 ATS.OR.205(a)(2), (c)(1)**
  There is no direct relationship between the rigour required and criticality. This is a false relationship. Rigour should be related to the difficulty in arguing the satisfaction of a requirement to a given level of confidence and not to its criticality. Furthermore, the criticality will already have been expressed in setting the requirement as a level of confidence. Whilst SWALs are related to software practices whose aim is to increase confidence, the relation between rigour and confidence is undefined and may or may not be relevant to the assurance being made.

- **GM1 to AMC4 ATS.OR.205(a)(2), (c)(2)**
  We believe this is unworkable in practice as the text allows each ANSP to declare their own SWALS and processes. If SWALS are to be used they have to be harmonised, at least at the state level, to be useable by industry. There is no evidence that rigour relates to correctness and neither is there any evidence that these criteria affect rigour. Rigour is undefined; the need for this is unexplained in NPA 2017–10 and is therefore considered unjustified. It is questioned where these three classes have come from – there appears to be no justification.

- **GM1 to AMC4 ATS.OR.205(a)(2), (d)**
  There is no evidence that arguments and evidence cannot be provided for these types of software. Confidence does not depend on SWAL so there is no conflict between the requirement for confidence (ATM/ANS.OR.205(a)(2)) and the type of software.

- **GM2 to AMC4 ATS.OR.205(a)(2)**
  Incorrect. There is no requirement for SWALs in Regulation (EU) 2017/373.

- **GM2 to AMC4 ATS.OR.205(a)(2), (a) & (b)**
  Neither rigour nor software criticality are defined and neither is the purpose of relating one to the other. There is no direct relationship between the rigour required and criticality. This is a false relationship. Rigour should be related to the difficulty in arguing the satisfaction of a requirement to a given level of confidence and not to its criticality. Furthermore, the criticality will already have been expressed in setting the requirement as a level of confidence. Whilst SWALs are related to software practices whose aim is to increase confidence, the relationship between rigour and confidence is undefined and may or may not be relevant to the assurance being made.

- **GM2 to AMC4 ATS.OR.205(a)(2), (d)**
  This is considered incorrect. Software criticalities for ATSPs are harm based while those for non ATSPs are trustworthiness based. They are not comparable so there can be no notion of consistency. Additionally the rigour and confidence required of the safety case is not dictated by the rigour and confidence provided by the safety support cases.

- **GM3 to AMC4 ATS.OR.205(a)(2)**
  We believe these standards do not satisfy the rule text well and suggest IEC 61508 Functional Safety 2010 would be far better. It covers the same scope as the regulation and addresses People, Procedures and Equipment (hardware & software). Also as a multi sector standard it is more likely to address the ATM/CNS supply chain better.

Proposed Text: It is strongly recommended that the following proposed texts are withdrawn:

- AMC5 ATM/ANS.OR.C.005(a)(2)
- AMC6 ATM/ANS.OR.C.005(a)(2)
- GM1 to AMC6 ATM/ANS.OR.C.005(a)(2)
- GM2 to AMC6 ATM/ANS.OR.C.005(a)(2)
- GM3 to AMC6 ATM/ANS.OR.C.005(a)(2)
- AMC3 ATS.OR.205(a)(2)
- AMC4 ATS.OR.205(a)(2)
- GM1 to AMC4 ATS.OR.205(a)(2)
- GM3 to AMC4 ATS.OR.205(a)(2)
- GM4 to AMC4 ATS.OR.205(a)(2)

We believe there are too many errors, ambiguities and inconsistencies in section 3.1 to allow for individual correction. Additionally the section does not comply with the intent of Regulation (EU) 2017/373 with respect to changes to functional systems. Section 3.1 requires further development work, to which end EASA is encouraged not to proceed with the elements identified above. Further rulemaking activity to develop text addressing assurance of People, Procedures and Equipment (HW & SW) in a coherent and harmonised manner is proposed as the most appropriate course of action.

Commentor:	UK CAA

Page No: 10/11

Paragraph No: AMC6 ATM/ANS.OR.C.005(a)(2) Safety support assessment and assurance of changes to the functional system 'ASSURANCE — SOFTWARE ASSURANCE PROCESSES'

Comment: The draft text jumps from paragraph (a)(5) to paragraph (c). It is questioned whether paragraph (b) is missing or the subsequent paragraphs are erroneously numbered.

Justification: Missing text or erroneous paragraph numbering.

Proposed Text: Renumber paragraphs after paragraph (a)(5)