



Federal Aviation  
Administration



Transport  
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## “Reciprocal Acceptance” Frequently Asked Questions (FAQs)

### Q1) What is reciprocal acceptance?

Acceptance actually has two parts. First, “acceptance” is when an importing authority acknowledges an exporting authority’s issuance and treats it with the same validity as if they had made the issuance. Because of this, the exporting authority’s issuance can be used within the importing authority’s jurisdiction without further action. As such, the importing authority will no longer issue a validation approval letter (or similar).

In plain language, FAA will accept a TCCA CAN-TSO design approval (DA) for articles from Canada and will no longer issue a letter of TSO design approval (LODA) for the same article. Likewise, TCCA will accept the FAA’s TSOA for an article from the United States (U.S.) without issuing a CAN-TSO DA for the same article. Additionally, FAA will accept an EASA ETSOA for an article from the European Union (EU) and will no longer issue a LODA for the same article, while EASA will accept the FAA’s TSOA for an article from the U.S. without issuing an ETSOA for the same article. Similarly, FAA will accept an ANAC CPAA/OTP “Certificado de Produto Aeronáutico Aprovado/Ordem Técnica Padrão” (Portuguese for Certificate of Aviation Product Approval / Technical Standard Order) and will no longer issue a LODA for the same article, and ANAC will accept an FAA TSOA with no further issuances.

“Reciprocal acceptance” is simply when each authority agrees to do this mutually with the other’s same type of issuances.

**NOTE: For the purposes of these FAQs, the general term “Implementation Procedures (IP)” will be used to consolidate the terms implementation procedures for airworthiness (IPA) and technical implementation procedures (TIP) when needed.**

**NOTE: The only exception to reciprocal acceptance of TSO articles between the U.S. and Brazil is TSO-C77/CS-APU auxiliary power units imported from Brazil which require FAA validation. See Table 2 in the U.S.-Brazil IPA. ANAC OTPs for APUs will still require an FAA LODA to be issued per the process outline in FAA Order 8150.1.**

### Q2) How is reciprocal acceptance conducted?

As with all agreements, the procedures between authorities are identified in the applicable Implementation Procedures under a bilateral executive agreement. These procedures will identify exactly which issuances will be accepted by each authority and the processes to be followed between the authorities.

### Q3) What started this whole idea of reciprocal acceptance?

For many years, industry has requested that FAA, ANAC, TCCA, and EASA each accept an exporting authority’s TSO approval and eliminate the importing authority’s validation approval

and issuance activities. It has been believed that no additional safety to the article is achieved by the importing authority's approval action.

As a result, the FAA, ANAC, TCCA, and EASA have acknowledged industry's concerns and have mutually worked toward this goal. Based on more than a decade of experience between the FAA and these authorities, enough confidence in each other's systems has been developed to support the reciprocal acceptance of TSO articles.

#### **Q4) What is the regulatory basis to allow reciprocal acceptance between the FAA TSOAs, ANAC CPAAs, and TCCA CAN-TSO DAs?**

The FAA regulatory justification is provided in the following references:

##### **Basis for Acceptance of Articles**

- 14CFR 21.1(b)(2): *Article means a material, part, component, process, or appliance;*
- 14CFR 1.1: *Approved, unless used with reference to another person, means approved by the FAA or any person to whom the FAA has delegated its authority in the matter concerned, or approved under the provisions of a bilateral agreement between the United States and a foreign country or jurisdiction.*
- 14CFR 21.8(d): *If an article is required to be approved under this chapter, it may be approved—  
(d) In any other manner approved by the FAA.*

**NOTE: The reciprocal acceptance of imported articles is NOT an FAA TSO approval under 21.8(b).**

##### **Basis for Acceptance of Articles**

- 14CFR 21.502 Acceptance of articles.  
An article (including an article produced under a TSO LODA) manufactured in a foreign country or jurisdiction meets the requirements for acceptance under this subchapter if—
  - (a) That country or jurisdiction is subject to the provisions of an agreement with the United States for the acceptance of that article;
  - (b) That article is marked in accordance with part 45 of this chapter; and
  - (c) An export airworthiness approval has been issued in accordance with the provisions of that agreement for that article for import into the United States.

##### **Regarding Marking of Articles**

- 14CFR 45.10 Marking.  
**No person may mark a product or article in accordance with this subpart unless—**
  - (a) **That person produced the product or article —**
    - (1) Under part 21, subpart F, G, K, or O of this chapter; or
    - (2) **For export to the United States under the provisions of an agreement between the United States and another country or jurisdiction for the acceptance of products and articles;** and

(b) That product or article conforms to its approved design, and is in a condition for safe operation; and, for a TSO article; that TSO article meets the applicable performance standards.

**NOTE: The reciprocal acceptance of imported articles is NOT an FAA TSO approval, so TSO marking per 45.15 does NOT apply.**

The ANAC regulatory justification is provided in the following references:

**Basis for Acceptance of Articles**

- RBAC 21.1 (b)(2): Article means a material, part, component, process, or appliance.
- RBAC 1.1: Approved means, unless used in reference to another person, approved by ANAC or any person whose competency for approval is recognized by ANAC, on the matter, including other civil aviation authorities.
- RBAC 21.8 (d): If an article is required to be approved by ANAC, it may be approved—
- (d) In any other manner approved by ANAC.

The TCCA regulatory justification is provided in the following references:

**Basis for Acceptance of Articles**

- CAR 521.455 as supported by the FAA/TCCA Implementation Procedures allows TCCA to accept FAA TSO articles without further approval.
- Since 1987, FAA TSOs have been automatically accepted in Canada because TCCA adopted FAA TSOs as their national standards for issuing approvals for articles and appliances.

The EASA regulatory justification is provided in the following references:

**Basis for Acceptance of Articles**

- INTERNATIONAL AGREEMENTS in conjunction with related TECHNICAL IMPLEMENTATION PROCEDURES FOR AIRWORTHINESS and ENVIRONMENTAL CERTIFICATION
- COMMISSION REGULATION (EC) No 748/2012, Cover Regulation
  - Article 8(2) Design organisations and Article 9(2) Production organisations
- COMMISSION REGULATION (EC) No 748/2012, Annex I (Part 21)
  - §21.A.305 Approval of parts and appliances
  - §21.A.606 Requirements for the issuance of an ETSO authorisation.

**Q5) How will reciprocal acceptance of TSO articles be implemented?**

The reciprocal acceptance of TSO articles between the ANAC, FAA, EASA, and TCCA is implemented in accordance with the terms of the unique Agreements in place between the U.S., Brazil, the EU, and Canada as applicable.

**Q6) Have all of the appropriate FAA and foreign authority's regulations, policy, and guidance been reviewed to address how reciprocal acceptance will be implemented?**

The FAA AIR and AFX policy offices have spent years in discussion with their TCCA and EASA counterparts reviewing and preparing this path. Since its initiation, we have seen no issues related to regulation, policy, or guidance.

**Q7) What are the marking requirements for TSO articles under reciprocal acceptance?**

The articles will be marked in accordance with the marking requirements of the exporting authority, and those markings are deemed to meet the Importing Authority's marking requirements. There is no requirement for dual marking.

An FAA TSO article will be marked as required by the TSO minimum performance standards (MPS) and the TSO regulations and policy; there will be no corresponding "ANAC CPAA," "TCCA CAN-TSO DA marking," or "EASA ETSO marking."

For articles which had been approved by European National Authorities prior to foundation of EASA (Sept. 28, 2003) the article is marked with the appropriate national marking.

For articles which have been approved by TCCA as an appliance type certificate prior to the introduction of CAN-TSO DA (December 2009) the article is marked with the appropriate national marking.

For articles which have been approved by ANAC as an CPAA, the article is marked with the appropriate marking as required by the RBAC 45.15 (b).

**Q8) How will an FAA TSO approved article be exported under reciprocal acceptance?**

An FAA TSO approved article will be exported under normal exportation rules and regulations and in accordance with the applicable Implementation Procedures. The article must be marked according to its approved design (i.e., TSO MPS) and it must be accompanied by an FAA Authorized Release Certificate (8130-3) or Authorized Release Document (see Note below) completed for export per the requirements the applicable Implementation Procedures.

**NOTE: When a production approval holder issues an authorized release document for the purpose of export, the production approval holder must comply with the procedures applicable to the export of new and used aircraft engines, propellers, and articles specified in § 21.331 and the responsibilities of exporters specified in § 21.335.**

**Q9) How will a foreign CAA approved article be exported to the U.S. under reciprocal acceptance?**

An approved article will be exported to the U.S. under normal exportation rules and regulations and in accordance with the appropriate Agreement. The article must be marked according to its approved design and it must be accompanied by an Authorized Release Certificate Form completed for export per the requirements of the appropriate Agreement.

Articles which had been approved by European National Authorities prior to foundation of EASA (Sept. 28, 2003) are marked with the appropriate national marking and must be accompanied

by an EASA Authorized Release Certificate (Form 1) completed for export per the requirement of the U.S.-EU Agreement.

Articles which had been approved by TCCA prior to the introduction of CAN-TSO DA (December, 2009) are marked with the appropriate national marking and must be accompanied by a TCCA Authorized Release Certificate (Form One) completed for export per the requirement of the U.S.-Canada Agreement.

Articles which had been approved by ANAC must be accompanied by an ANAC Authorized Release Certificate (Form F-100-01) completed for export per the requirement of the U.S.-Brazil Agreement.

**Q10) Is there a difference under TSO reciprocal acceptance between EU member states and non-EU states that have working agreements with EASA or use EASA as their Technical Agent?**

Yes. Only EU member states, under the terms of the U.S.-EU Agreement, are eligible for operating under TSO/ETSO reciprocal acceptance agreement.

Countries where EASA acts as the technical agent (currently Switzerland, Norway, Iceland and Liechtenstein) will continue to follow the provisions of their applicable bilateral agreements and their associated Implementation Procedures. ETSOAs issued by EASA to non-EU member authorities are *not* eligible for operating under this reciprocal acceptance agreement (i.e. this applies to ETSOAs issued to China, Switzerland, etc). Non-EU manufacturers are required to use the prefix “EASA.xxx” in their Production Organisations Approval (POA) reference number, which is listed on the EASA Form 1. The “EASA” indicates that the article was produced in a non-EU country.

The FAA does not issue TSOAs to non-US applicants, but FAA letters of TSO design approval (LODAs) may be issued to applicants in other countries wherein the Authority has an applicable Agreement with the FAA. These articles are not eligible for reciprocal acceptance under the U.S.-EU Agreement.”

Under the Canada –EU Safety Agreement, EASA and TCCA share a common TSO list that identifies all TSO approvals automatically accepted by each other. Furthermore, in addition to accepting ETSO approvals from EU member States under the Safety Agreement, EASA and TCCA also agreed to accept those ETSO approvals from the following non-EU but EASA Member States: Norway, Iceland, and Switzerland. ETSO approvals issued by EASA outside of these recognized EASA Member States are not accepted and are ineligible for import to Canada. EASA has formally notified all ineligible States of this restriction

**Q11) What happened to the “old” TSO article validation process?**

The old validation process no longer exists for articles moving between ANAC, the FAA, TCCA, and EASA’s aviation systems. In the case of reciprocal acceptance, applications for the validation of TSO article design approval are no longer accepted by the authorities.

**Q12) Can the old validation processes be used after reciprocal acceptance is implemented?**

As of the signing of TIP, Revision 6 dtd: 09/22/2017 (with entry into force on 03/22/2018), there are no longer any exceptions between the FAA and EASA for TSO/ETSO reciprocal acceptance. There have never been any exceptions for TSO/CAN-TSO DA reciprocal acceptance as of the signing of FAA/TCCA IPA, Revision 2 dtd: 11/10/2016. However, there are provisions within the FAA/TCCA IPA that speak to the scenario for when TCCA hasn't updated their list of CAN-TSO DAs to match the current FAA TSOs. In this case TCCA may request a LODA on behalf of their applicant to gain an approval to the newer version of the TSO which doesn't exist yet in TCCAs system.

**NOTE: The only exception to reciprocal acceptance of TSO articles between the U.S. and Brazil is TSO-C77/CS-APU auxiliary power units imported from Brazil which require FAA validation. See Table 2 in the U.S.-Brazil IPA. ANAC OTPs for APUs will still require an FAA LODA to be issued per the process outline in FAA Order 8150.1.**

**Q13) What happens to previously “validated” TSOA, ANAC CPAA, CAN-TSO DA and EASA-ETSOAs?**

The previous TSOAs, ANAC CPAA, CAN-TSO DA, and EASA-ETSOAs, as well as previously issued TCCA Article Type Certificates remain valid. However, major changes to these TSO articles will require the reciprocal acceptance process to be used. Minor changes to existing TSOAs, ANAC CPAAs, CAN-TSO DA, and EASA-ETSOAs will continue to be managed through the process under which they were originally approved. Nevertheless, for articles where the exporting authority issues a revised certificate based on a minor change the reciprocal acceptance process shall be used.

**Q14) How does reciprocal acceptance work when the FAA has a TSO for which there is no foreign equivalent?**

In this case, the 'reciprocal' aspect of the agreement does not apply per se, but FAA TSO articles are eligible for acceptance in the EU and Canada. If a European applicant wanted an approval for an FAA TSO that doesn't exist in EASAs system, then EASA could approve that article against the FAA TSO using the provisions of the TIP. Typically there is close alignment between FAA TSOs and CAN-TSOs, but if a Canadian applicant wanted an approval for an FAA TSO that has not been revised yet in TCCA's system, then TCCA may request a LODA on behalf of their applicant to gain an approval to the newer version of that TSO. Note: this is an exceptional situation that does not arise very often.

**Q15) How does reciprocal acceptance work when a foreign CAA has a TSO for which there is no FAA TSO equivalent?**

When the FAA does not have a corresponding TSO to that of a partner CAA, partner TSO articles are eligible for acceptance by the FAA. For U.S. articles that meet a partner TSO that has no FAA equivalent the provisions of 14 CFR 21.8(d) may be employed by the FAA to issue an approval against the ANAC, EASA or TCCA standard, similar to current process. See the applicable Implementation Procedures for the specific process.

**Q16) Is there a common listing or comparison chart of the different FAA TSOs and ANAC OTPs, TCCA CAN-TSO or EASA ETSOs?**

No. There are no official listings detailing the similarities or differences between TSO and foreign design standards as all TSO articles manufactured and approved to those standards are accepted.

**Q17) Is FAA/TCCA reciprocal acceptance the same as EASA/TCCA reciprocal acceptance?**

Yes. However, this is qualified with the understanding that the agreement between EASA and TCCA is based on “commonality” between their respective technical standards. Under that process, only ETSO and CAN-TSO design approvals identified in the Common TSOs List are reciprocally accepted. The FAA/TCCA IPA, Revision 2 introduces full reciprocal acceptance of TSOA/CAN-TSO DA articles between Canada and the U.S. based upon the approval(s) issued by the authority of the exporting State.

**Q18) Are the end users ready to accept a TSO approved article that has one label (FAA TSOA, TCCA CAN-TSO DA, ANAC CPAA, or EASA-ETSO) and airworthiness tag (FAA 8130-3 or Authorized Release Document), TCCA Form One, ANAC Form F-100-01 or EASA Form 1)?**

While this is no longer a new concept, there may still be end users who may need to adapt their systems to deal with potential differences (if any) between the articles approved under a TSOA versus a CAN-TSO DA, ANAC-CPAA, or EASA-ETSOA as it pertains to installation into an approved type design.

**Q19) How will FAA field offices, FAA designees, ODAs, repair stations, airlines, etc. be informed on the TSO reciprocal acceptance process? Will training/education be provided prior to the release of the revised TIP?**

Yes. AIR and AFX are both working on a series of general and targeted notifications along with training opportunities for our various field offices slated to be released just prior to or concurrently with the signing of the TIP and the TCCA IPA amendment. Both EASA and TCCA are planning to do the same within their organizations and their geographical jurisdiction(s).

**Q20) For repair stations that mainly focused on repairing/overhauling TSO components/equipment, how will this impact their ops spec and other line of business?**

There is corresponding guidance in FAA Order 8900.1 issued by AFS-300 to notify the field inspectors of the AIR policy change. Reference the online directive information at <http://fsims.faa.gov/PICDetail.aspx?docId=8900.1,Vol.4,Ch14,Sec16>.

**Q21) Will the authorities be required to notify each other of design changes to an approved TSO article?**

There are no notification requirements moving forward under reciprocal acceptance or previously validated TSO articles unless specifically identified as remaining under the validation process.

**Q22) How does reciprocal acceptance account for non-TSO functions?**

Non-TSO functions are processed in the same manner as they always have been, reciprocal acceptance does not alter that in any way.

**Q23) Are deviations also covered by the reciprocal acceptance?**

Yes. Deviations are covered as part of the reciprocal acceptance of FAA-TSO/CAN-TSO/EASA-ETSO/ANAC-OTP approvals for articles (or appliances). Partner authorities have evaluated the system of the bilateral partner to assess deviations and found their systems to be equivalent.

**Q24) How will reciprocal acceptance be reviewed to ensure confidence in each authority's certifying statements to their TSOs?**

Our respective bilateral agreements require a process to be in place for continued maintenance of confidence. The FAA, EASA, ANAC and TCCA are currently working to develop and refine this process.

**Q25) Our company is the holder of FAA TSOAs for several articles, none of which have received the equivalent approval (with either TCCA or EASA). These articles are part of a major type certificate (TC) project where the TC applicant has requested us to pursue an approval from TCCA or EASA. Will these articles be grandfathered under the reciprocal acceptance agreement so there is no need to pursue an approval?**

With the signing of these new procedures, validation of U.S. designs for either a CAN-TSO DA or EASA-ETSOA and validation of EU or TCCA designs for an FAA LODA will not be required or allowed. Previously issued FAA-TSO/EASA-ETSO/CAN-TSO approvals for articles (or appliances) that did not receive the corresponding approval from the importing authority will now be recognized by the importing authority as approved articles under reciprocal acceptance.

**Q26) As a TSOA holder, if we make a major change for only one of the TSOs applicable to a given multiple-TSO article, and therefore do not upgrade to the latest versions of the rest of the TSOs applicable to the article, does reciprocal acceptance apply only to the affected TSO? How does this affect the article marking?**

If a TSOA holder makes a major change to their article that has been approved to multiple TSOs, the design change is processed in accordance with the guidance in FAA Order 8150.1 and the holder is issued a new TSOA listing all applicable TSOs. The article under the new TSOA is subject to reciprocal acceptance under the provisions of the implementation procedures and the marking requirements of the applicable TSOs.

**Q27) I have a question that wasn't answered. Where can I submit additional questions to the FAA, ANAC, EASA and TCCA on reciprocal acceptance?**

Applicants can submit additional questions to:

- for TCCA: [TC.InternationalArrangements-Ententesinternationales.TC@tc.gc.ca](mailto:TC.InternationalArrangements-Ententesinternationales.TC@tc.gc.ca)
- for EASA: [etsoa@easa.europa.eu](mailto:etsoa@easa.europa.eu)
- for FAA: [9-AVS-TSO-Questions@faa.gov](mailto:9-AVS-TSO-Questions@faa.gov)
- for ANAC: [air.agreements@anac.gov.br](mailto:air.agreements@anac.gov.br)

The FAA, ANAC, EASA, and TCCA will jointly review your question and provide you a coordinated reply. If we believe your question will benefit others, we will add it to this FAQ.

**Q28) Will EASA now recognize FAA TSOs for industry standard parts (i.e. TSO-C148, -C149, -C150, and -C171 articles)?**

No. EASA will continue to recognize only the industry standards and not the FAA TSOA articles.

**Q29) What other concerns/areas might be a problem out in the field?**

While it is not possible to address every scenario beforehand, unforeseen issues will be addressed as they occur and raised to the appropriate CAA's policy office. The FAA, ANAC, TCCA, and EASA will continue to improve the process based on feedback from within our respective organizations and from the aviation community.