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EUROCAE EUR 065-26 / WG72-194

RTCA, Washington DC, 12-Dec-25

EUROCAE WG-72 Meeting #83 / RTCA SC-216 Meeting #74 Joint Plenary	
SC216-WG72 Plenary Meeting	
Plenary Date	Friday, December 12, 2025 9am-1pm EST, 15h-19h CET, 6am-10am PST
Working Sessions	December 8-11, 2025 (09:00-17:00 EST)
Place	RTCA, 1150 18th Street NW, Washington, DC 20036
Venue	Webex and RTCA
Hosted by	RTCA and Eurocae

Attendance:

Rebecca Morrison (RTCA)	Tumminelli, Mike(Gulfstream)	Stefan Schwindt (GE Aerospace)
Gavin Davis (Delta)	Logan Cummings (GE Aerospace)	Alain Combes (Airbus)
Bernard MARGELIN (Airbus)	Joe Reisinger (Astronautics)	Mark Kelley (Belcan)
Anup Raje (Honeywell)	Marshall Gladding (Boeing)	Patrick Morrissey (Colins)
Christiano Sadock (EMBRAER)	Doug England (Collins)	Daniel Quiroz (Honeywell)
Matthieu Willm (Dassault)	Isidore Venetos(FAA)	Thuan T Nguyen (FAA AIR)
DURANDEAU Nicolas (EASA)	Mitch Trope (Garmin)	Lee Howard (Honeywell)
Philip Windust (FAA)	Mila Obradovic (DND)	Billy Ogunsola (UKCAA)
Nikita Johnson Needle (RR)	Mike McCartney (FAA)	Andrew (NetJets)
Pierre vanHuissteen [FAA]	Kevin Meier (Textron Aviation)	Ryan Kuo (ALPA)
Xylene Gonzalez-Pelayo (ALPA)	Garrett Armentrout (A4A)	Cascio Andrea (Leonardo)
Olivia Stella (Southwest Airlines)	Hugo Teso (Silicon Bird)	Florin GRAFU (ROMATSA)
Geir Loitegard (Avinor)	Jeff Burkey (FAA)	Britney Boler (DAL)
Abi Schmidt - United Airlines	Michael MAZARD (Air France)	Marcie Wise (DAL)
Shakir Ahmed (Pratt & Whitney)	Lionel Robin (Safran)	Sheila Liddle (SWA)
Alexis Ulliac (Thales)	Aaron Renshaw (AAL)	Sanjiv Pimple (Panasonic)
Esha Vasdev - DND (Canada)	Christopher Pritchard (AAL)	Johannes Krämer (LH)
Vic Patel (FAA)	Johannes vanHoudt (FAA)	Darius Ashtari (Dassault Aviation)
Britney Boler (Delta)	Aharon David (AFuzion)	Doug England (Collins / RCI ODA)
Patrick McTernen (Shift5)	Kanwal Reen (Collins)	Jen Miosi (United)
Slade Greg (Leonardo)	Katharina Vitzthum (Lufthansa)	Peter Tsagaris (TCCA)
Anna GUEGAN (EUROCAE)	Sankruth, Aneesh (Gulfstream)	Sarah Stern (Boeing)

Mélanie ROGER (Airbus)	Alessandro Oteri (Leonardo)	Mario Lenitz (Austro Control)
David Harvie (ERAU)	Siobvan Nyikos (Boeing)	Peter McNeely (Astronautics)
Edwin van de Sluis (NLR)	Nicolas Syssoieff (Airbus)	Olivia Stella (Southwest)
Sofian Abbasi (Boeing)	Sparapano Daniele (Leonardo)	Daniel Salter (UKCAA)
Esha Vasdev DND (Canada)	Rosemberg Silva (ANAC)	Diego Palma (ANAC)
Gavin Davis (Delta)	Thomas Parmer (FAA)	Sheila Liddle (Southwest Airlines)
Bonaccorso Roberta (Leonardo)	Oteri Alessandro (Leonardo)	Marcus Santos (Embraer)
Sébastien Longuy (AIRBUS)	Kevin Meier (TXTAV)	Michael Welch (FAA)
		Graham Nightingale (United Airlines)
Ali Raza (Southwest Airlines)	Jakub Cunat (EGIS)	Chris Gorton (UK CAA)
Chris S Kendrick (FAA AFS)	Adam Smith (Southwest)	Michelle Bielen (Delta)
Tumminelli, Mike (Gulfstream)	Ben Nagel (CyberBen)	MARTINI Davide (EASA)
Baso Leonardo (Leonardo)	Phil Windust (FAA)	Nicolas Syssoieff (Airbus)
Michael MW Davis (FAA)	Hagop Kazarian (Bombardier)	KANTHA CHIKKEGOWDA (Honeywell)
		Cyril Marchand (THALES LAS)
Yannick Nkengsa (ACA)	Rahul Rohra (DND)	Ted Kalthoff (Archer Aviation)
Salzedo Simone (Leonardo)	Matt Stark (Astronautics)	Hannes Griebel (CGI)
Adam Patrick (RR)	Judicael Gros-Desirs (Airbus)	Ted Patmore (DAL)
Patrick McTernen - Shift5	Liz Lippie Rimmer (Shift 5)	Semih Özcan (tubitak)
Baroncini Nicolò (Leonardo)	Adrien Lapointe (Canada DND)	Emerson Cunha (Embraer)
Patrick Morrissey (Collns)	Thomas Parmer (FAA)	
Michael MAZARD (Air France)	O. Courchesne (Gov. Canada)	
Yutaka Ikeda (JAMSS)		
Michael Vanguardia (Boeing)		
Chris Kendrick (FAA AFS)		
Philippe Robert (PMV)		
Jeffrey Shen (Boeing)		
Niv Siva (UK CAA)		
Chris Sargeant (BAE Systems)		
Philip Watson (Panasonic)		
Michal JÁCHIM (ERA a.s.)		
Isidore Venetos (FAA)		
Lillian Baker (Boeing/Wisk)		
Rosemberg Andre da Silva (ANAC)		
Andrea Cascio (Leonardo)		
Leonel Medina (AS)		
Daniel Salter (UKCAA)		

This document covers important discussions from Monday as well as the plenary meeting minutes from the plenary session on Friday.

Monday December 08, 2025

SC-216 & WG 72 - Meeting minutes

No regulatory updates were shared by the regulators on Monday Dec-8, 2025. All regulatory updates were a part of plenary session. Hence the meeting summary for Monday is only restricted to generic notes prior to the start of DO-356A FAQ discussions.

- Meeting started with general introductions by Rebecca.
- Pat discussed the agenda for the week and shared his expectations.
- Anup discussed the Vienna Plenary meeting minutes (Sept-26, 2025) and asked the team to report any final comments during the week. Two gaps were discussed
 - Physical participation list from Vienna (sign sheet). Mario took an action to provide electronic record.
 - Actions identified from Vienna plenary (see yellow highlight in Vienna meeting minutes) discussed to be logged to master TO-DO list for tracking and closure. See plenary meeting minutes action.

Friday December 12, 2025

SC-216 & WG 72 – Plenary Meeting minutes

Rebecca Morrison and Anna Guégan presented the RTCA and EUROCAE plenary meeting mandatory slides including the RTCA and EUROCAE anti-trust, IPR, GDPR, recording, AI use, participation and membership policies. Rebecca included an export compliance policy slide.

Following were the important decisions and minutes from the discussion

- Meeting minutes for the EUROCAE WG-72 Meeting #82 / RTCA SC-216 Meeting #81 meeting held in Vienna on Sept-26 were approved by all members. The official approved meeting minutes were uploaded to both RTCA and EUROCAE sharepoint sites.
- **Action:** Anup has an action to extract actions from plenary meeting minutes to SG-0 action list.
- With Sam Masri's upcoming retirement, Lee Howard volunteered to take on the RTCA SC216 secretary role. Both RTCA and EUROCAE groups approved his application as a secretary. Lee will officially start his secretary role from 2026 RTCA meetings.

Subgroup updates:

- SG-3 ISEM (DO-392/ED-206)
 - Adrian volunteered to be secretary for SG-3
 - Abi and Adam introduced GSE/GSIS logging and reporting issues faced by operator industry.
 - Adam covered the regulatory requirements related to this topic.
 - Discussion on timeline of various sections of the document in development.
 - Actions: Were covered in SG-3 summary slide.
 - Biggest action was to ensure alignment to ER-013A with terminology

- changes/clarifications.
 - Next virtual meeting series for 2026. This will be scheduled after discussion with Rebecca.
 - Alain C: interface with 356 and ED-ISMS both. Risks from logging - need to be looked at from Safety standpoint as well in addition to security.
- SG-8 DO-355B/ED-204B)
 - STC presentations from 2 air operators (Air France, Southwest) and one supplier (Honeywell)
 - FAA AFS presented their interpretation of 355 requirements on operators.
 - MVP definition has not yet been framed. There is still more work to be done to finalize the scope. Overall plan is to establish the MVP scope by end of Q1 plenary.
 - Parking lot items from working sessions were reviewed.
 - Alain congratulated team (OEMs, Suppliers, Operators) on all attempts made to converge since Vienna.
 - Adam congratulated Michael Davis for going through all the checklist expectations from 355A compliance expectation.
 - Airlines emphasized the struggle to secure GSE and GSIS (lack of hardening, access control, incident management, EOL vulnerabilities).
 - Following the FAA AFS presentation during SG-8 day, it was evident that DO-355A/ED-204A is used very differently between EASA and FAA. EASA reiterated that ED-204A is a collection of proposed measures that should be applied only if requested by OEM. On the contrary, quote from FAA slide: "FAA expects completed DO-355A Checklist with initial AISP (ANSP) submission".
 - No more meetings 2025. Olivia took an action to work with Rebecca to schedule 2026 series.
- SG-4 ISMS
 - Discussions on right sizing large and small organizations for ISMS.
 - Mr Nightingale leading ARINC811p2 update presented the forthcoming update of this ARINC which will include a methodology/guidance on how to conduct risk assessment for operators. The methodology is based on NIST 800-30 and 800-37. One point of debate was the fact that Likelihood of Threat is based on capability only and not on evolution of technology. This is mainly due to the fact that risk assessment has to be rerun every 6 months on operator side leaving less room for technology step up.
 - Davide Martini was connected remotely to offer support and in particular highlight that EASA is currently probing the risk assessment process offered by ER-040 internally and he offered the group to make a presentation on pros and cons.
 - Actions specifically for small orgs to achieve compliance were discussed.
 - Tailoring/additions for competent responsible persons (tasks and syllabus modifications)
 - Alain reminded group on countdown for regulatory timelines for PART-IS. ISMS document update timelines need to map with the regulatory timelines. There is just 1 year left and many open topics not yet converged.
- SG-6 DO-356A/ED-203A Report
 - Rebecca reminded all NOT to call this document a FAQ. FAQ is no longer a term. It will be "Supporting Information" going forward.
 - A section was added on SAL-DAL by Pat based on latest guidance from FAA.
 - Ben to verify all comments closure and to start editing the document.
 - Nikita explained the strategy for 2026 for FAQ, considering the changing policies

- at RTCA (with regards to FAQ type document): Scenario 1 Mar publish. Scenario 2 gives a longer time for publish to June. Then starts 356B formal development.
- Mathieu - It's too aggressive. Wants this to be treated like a standard with open consultation/FRAC as EASA may reference it.
 - Pat mentioned he feels it is not a good idea to change/pivot program plans based on notional and not finalized changes.
 - Nikita - mentioned currently no change in plans. WG Plenary in person in Q1 is where we make a guided and formal decision.
 - Anna expressed concerns with TAC timelines.
 - Stefan - Has concerns with Legacy/STC given the tight timelines. Wants to take more time to discuss legacy/STC. Use time till late-April.
 - Sarah - introduced the legacy/STC and that Anup will initiate a tiger team to make an update for this section.
 - Aneesh – For existing content use more time to work with regulators to make sure they are okay with it and be referenced in their CAIs is a higher priority than taking parking lot items.
 - Olivia - Is there a master schedule looking at all other document development as there are 3-4 deliverables at the same time.
 - Siobvan showed all the TOR items and document timelines showing impacts of several deliverables running in parallel.
 - Anup expressed strong requirement to have legacy/STC topic. Requested those who have concerns/interest to be in tiger team. Jan-Mid Feb to finalize a position. 2 weeks to write it. Mar plenary to decide go/no go.
 - There was a presentation from Honeywell on various types of triggers leading to STCs and on the general confusion about application of DO326/356 or ED202/203 at the TSO level. EASA acknowledged that cyber in TSO context should be done on a voluntary basis if there is no mandated threat condition in the ETSO itself (like for C-159e or C-195c not yet recognized in Europe). EASA also acknowledged that the credit for having security measures in an ETSO product is difficult to obtain because a lot of objectives are called at aircraft level. EASA highlighted that OEM/Supplier industry is more than welcome to propose ways to gain credit with an ETSO product. (with methods for credit for objectives at system and item level).
 - EASA also reminded that TSO approved on US side are automatically recognized on EASA without any additional investigation.
 - Nicolas - can the tiger team can pick up COTS topic. Nikita took an action to review why this section was removed. It was advised during the meeting that scope of the tiger team was to publish guidance on previously certified systems only vs COTS topic applies to new and previously certified systems hence needs a different tiger team. EASA expressed that guidance on COTS is critical as applicants have very varied approaches such as service history, common criteria etc. No formal COTS-topic tiger team was established in Dec, though it remains an action. This is added to SG-0 action log.
 - Aneesh - Strong feelings about home for STC topic. Report/ARC parking lot. Nikita clarified, FAQ goes to all, ARC is important but FAA centric. Hence, we must do both - FAQ + influence in ARC. The creation of tiger team for addressing previously certified systems will partially address this topic. ARC recommendations will be taken up in ARC meetings.
 - Thuan - STC process confusion. Thuan took action to explain STC process with cyber special conditions. She requests EASA to also do a similar position.
 - Rebecca - WE all participants cannot say SC216 said X, Y, Z to ARC. We must let Rebecca know and she will represent RTCA-SC216s view to ARC.
 - Nicolas - reminds all FAQ is not new requirement. Just clarification. So doesn't need to be DO/ED.

- Mar Q1 plenary to make a formal decision on Nikita's proposed options for FAQ strategy.

Meeting locations

- 2026 clean list for hosting sites.
 - March 2-6 at Southwest in Dallas (*outdated. The venue has changed)
 - June 8-12 at EASA in Cologne
 - September 21-25 at RTCA in WDC
 - December 7-11 at EUROCAE in Paris

Regulatory Updates

- FAA US
 - Late Q1 2026 plan for 1319 rule go-live. Due to govt shutdown.
 - AC20-200 will have references to logging. NPRM does not talk about logging requirements.
 - 1319 delegation workshop was in 2025 but now in 2026. No dates confirmed yet.
- EASA EU
 - No major updates since Vienna.
 - AIR 7368 is more tuned to Engine certs for AMC but currently is not mature enough to be recognized in AMC 20-42.
 - PART-IS
 - Issued PART-IS Easy access rule. Includes updates to regulation, and latest GM.
 - PART-IS TF working again now on diff topics, e.g. proportionality and testing the risk assessment methodology and ER-040 guidance.
 - Mapping of EU cybersecurity rules applicable to aviation sector (AVSEC/PART-IS/NIS2). EU Commission controls the publishing.
 - Another PART-IS workshop planned in June 2026. Dates TBD.
 - On going NPA on AI currently only covers rules. Does not cover cybersecurity. Consideration is to adapt the security aspects for AI/ML - specifically activities to be done on data set used for modeling.
 - NPA-1: commenting period is till Feb. AIA to participate
 - NPA-2: expands to include organizational requirements. Hence no IS related requirements.
- UK CAA
 - CS is Resilience Bill -
 - AI strategy & Portfolio hub - it will shape regulatory activities on AI. Provides area for engagement - industry, public, regulatory.
 - Manned Aviation Related - safety and engagement of ground handling service providers (GHSP) opportunities to improve cooperation
 - Stefan - coordination required. How can A811 help for coordination.
 - Unmanned Aviation Related - Joint authority for rulemaking of unmanned system (JARUS). Current version 2.5 is published by JARUS. UKCAA has adapted and adopted SORA 2.5 (Specific Opp Risk Assessment)
 - UKCAA has taken SORA 2.5 and developed AMC/GM. called as CAP-3098 <https://www.caa.co.uk/CAP3098>
 - Bi-lateral when PART-IS goes into effect - UKCAA is aware of the potential impacts when PART-IS goes into effect.

- DND Canada
 - Continuing to mandate continual airworthiness requirements to all contracts.
 - Cyber mission requirements are over and above these requirements.
 - Adopted CIA for changes to any legacy fleets.

- TCCA Canada
 - Airworthiness requirements are very close to US Federal regulations. With 1319 rule, they will be absorbed in Canadian airworthiness manual for part 25,33,35.
 - Actively participating in ARC.
 - Currently alignment with EASA AMC20-42 for guidance to applicants. When AC 20-200 and 1319 rule is published this may be updated to point to US side documents.
 - Once FAA updated rules are published, timeline to adopt it on Canada TCCA side may use an express path for speedy update. (Half a year or less)
 - Would like to participate in Tiger team for STC discussion.
 - Stefan TSO discussion in Canada - Will it be aligned to CS ETSO or TSO C0? - Whatever evolution occurs will be adopted in Canada.
 - Mitch - FAA's policy paper to use F3532 for part 23, 27,29. What would be TCCA's plans. TCCA - Unknown at this point.
 - Jeff Burkey - Regarding Mitch's comment on the FAA's acceptance of ASTM F3522-2 as an acceptable means of compliance to § 23.2510 Equipment, systems, and installations, it can be seen in the compliance tables of "Accepted Means of Compliance (MOC); Airworthiness Standards: Normal Category Airplanes" on the Federal register, released 05/09/2024. Link: <https://www.federalregister.gov/documents/2024/05/29/2024-11596/accepted-means-of-compliance-moc-airworthiness-standards-normal-category-airplanes>

- ANAC Brazil
 - Regulation related - working on regulation related to cyber incident reporting mandatory or otherwise. Progressing steadily. Date not available yet.
 - Currently ANAC will continue to use special conditions. When FAA rule goes live, they will consider adopting it.

Other Updates

- Virtual Flight Recorder Data Recovery Systems EUROCAE WG-118.SG4
Presentation provided by Hannes Griebel. Virtual recorder - near real time, immutable, authenticated, assurance and provenance-controlled protections.

- A-ISAC – ACFWG subgroup
Mike Vanguardia presented the ASCENT framework developed by ACFWG group. Aviation Security Catalogue of Existing and New Threats.

- WG-63 Security Group report
This report aims to report Safety-Security interactions.

- End of Plenary