

	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>Proposed Special Condition A-MCSD-01 (Maintenance Certifying Staff Data)</b>

**Comment # 1: Dassault Aviation:**

1. Type rating determination

1.1. Type rating included in the TCDS: DA concurs with this proposition

1.2. Criteria for type rating determination: DA concurs with the list of criteria proposed

(on a voluntary basis these criteria were previously used for the F8X type rating determination (through EASA CRI-A-MCSD-01 dated 31-Jan-2016 ))

2. Minimum Syllabus content

2.1. Box 1: “The base aircraft configuration relevant to maintenance type training”:

2.1.1. As a TCH DA does not agree with this concept.

Instead of “base aircraft configuration relevant to maintenance type rating training “as a TCH Dassault-Aviation proposes: “base aircraft configuration relevant to maintenance certifying staff involvement (MCSi).

The idea is the following: The TCH is not qualified for developing or suggesting any training program syllabus and for providing the level of training required regarding different ATAs and MCS B1,B2,C (out of the scope of the TCH activities).

However the TCH is in charge of developing the A/C maintenance (AMM, MPD etc etc) and as a consequence the TCH is able to evaluate the “maintenance certifying staff involvement” for each ATA/sub ATA of the AMM.

On a voluntary basis and based on the CRI A-MCSD -01 for the Falcon7X M1000 , DA issued mid 2106 OSD MCS DATA for F7X/F8X. including the “base aircraft configuration relevant to maintenance certifying staff involvement (MCSi).

2.1.2. The concept of the “Maintenance Certifying Staff involvement” is the following:

Based on the AMM and for each ATA and sub ATA (when necessary), the “MCS involvement” defines the type of task that must be performed by B1 and B2 (type of tasks : INSP, LUB, FOT, R/I, T/S, SGT, MEL) . Of course we can also add MCS C.

Based on this “MCS involvement” the TCH is then able to define the “LEVEL OF TECHNICAL ABILITY” required for the MCS (based on the AMM task and for each ATA and sub ATA).

DA proposes 3 “LEVEL OF TECHNICAL ABILITY” LTA1, LTA2, LTA3 each substantiated by the “MCS involvement” (separation between MCS B1 /MCS B2/MCS C)

For example DA considers that to perform a Troubleshooting or a funct/ops test a LTA3 (maximum of Level of technical ability is required)

Other example: ATA 27

for a classic/hydraulic flight control system the MCS B2 will be certainly minimum namely LTA 1 for the whole ATA 27 .

Conversely for a Fly by wire flight control system the MCS B2 will be LTA3 for some subchapter of ATA 27(computers, interaction with ATA 22 etc, etc).

2.1.3. To ease the training providers, the definition of the different LTA 1/2/3 is the response/ symmetry of the 3 levels of training of the PART 66.

In addition the TCH can provide for each ATA (BOX 2 or BOX 4):

- The design specificities of the a/c system ATA by ATA
- Additional Information of maintenance specific task related to the ATA . e.g.: eddy current, borescop insp, preservation/ depreservation

2.1.4. Conclusions:

The concept of Maintenance Certifying Staff Involvement (MCSi) and Level of Technical Ability (LTA1/2/3) provides a bridge between TCH activity and Training activity.

The TCH provides only information related to the base aircraft configuration maintenance (involvement and level of technical Ability) without any involvement or reference to the “maintenance training “ because the training elaboration is out of the scope of the TCH responsibilities.

The TCH provides to the Training Provider the information directly available for a TNA (Training Need Analysis).

2.2. Box 2: Student Prerequisites: DA concurs with this proposition.

2.2.1. The logical sequence:

- 1- In order to clarify DA suggests renaming the logical sequence by adding the word training: “logical training sequence”
- 2- DA disagrees with the location in BOX 2. The logical training sequence should be in BOX1 or BOX 3 if the TCH considers that there is no alternate means to comply with.

### **EASA Position**

Point 1.1 and 1.2: Noted

Point 2.1.1: Not Accepted

Regulation (EC) 216/2008 Art.5.5(e)(iv) and Part-21 21.A.15(d)3 require that TCH provide the minimum syllabus for the MCS type rating training.

The Special Condition A-MCSD-01 (Maintenance Certifying Staff Data) does not ask the TCH to provide the required level of training but the technical information to be addressed in the training.

Points 2.1.2, 2.1.3 and 2.1.4: Partially accepted

The maintenance certifying staff involvement (MCSi) and the “Level of Technical Ability (LTA)” are Dassault’s concepts that have been accepted by EASA as equivalent means of compliance for the 7X/8X project. They cannot be extended, as a standard, to other Applicants.

Point 2.2: Noted.

Point 2.2.1: Partially Accepted

-1: Accepted

-2: Not Accepted

The logical training sequence is requested at recommendation level because the end-user (Part-147) should have the possibility to change the modules sequence due to their organizational structure (facilities, instructional equipment, synthetic devices, access to the a/c, ..).

Part-147 organization, of course, have to justify that such change has no impact on the training final goal.

**Comment # 2:**

***non***