

CRD - NPA 01/2005

Comment

Response

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Paragraph

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Add. info:

Cmt. 3 / ACG

Supports with the following comments:

As you know we are supporting the NPA 01/2005 regarding type rating list on the web. Nevertheless the NPA do not contain the structure of the new list.

I suggest to change the structure and content based on the following facts:

The current list in Part-66 AMC App. I is not in line with Part-66.A.45.

66.A.45 requires approved type training for large aircraft (aeroplanes > 5700 and multi-engined helicopters) and aircraft which are defined by the agency as complex.

66.A.45 (h) allows type examination (and group ratings) for aircraft other than large aircraft

The list should be structured für aeroplanes and helicopters as defined in Part-66.A.45 - the criteria above should be added to the headers of the list.

At the moment the list defines the criteria 3175 kg MTOM as border between type training and examination - which is not in line with 66.A.45.

I believe you have all that in mind, I just want to make sure that the list is in line with 66.

By the way: I just saw that Part-66.A.45 (h) has a mistake (which is not covered in NPA 09/2004):

(h) Notwithstanding paragraph (c), ratings on aircraft other than large aircraft may also be granted, subject to satisfactory completion of the relevant category B1, B2 or C aircraft type examination and demonstration of practical experience on the aircraft type, unless the Agency has determined that the aircraft is complex, where paragraph 3 - !!THIS IS A WRONG REFERENCE!! - IT SHOULD READ PARRAGRAPH (C)!!

approved type training is required.

In the case of a category C ratings on aircraft other than large aircraft, for a person qualified by holding an academic degree as specified in 66.A.30 (a), (5), the first relevant aircraft type examination shall be at the category B1 or B2 level. 1. Category B1, B2 and C approved type examinations must consist of a mechanical examination for category B1 and an avionics examination for category B2 and both mechanical and avionics examination for category C. 2. The examination shall comply with Appendix III to this Part. The examination shall be conducted by training organisations appropriately approved under Part-147, or by the competent authority. 3. Aircraft type practical experience shall include a representative cross section of maintenance activities relevant to the category.

The structure of the list will comply with paragraph 66.A.45.

Regarding paragraph 66.A.45(h), comment noted. This was not part of the consultation but will be taken into account in the next revision of the text.

Comment	Response
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Cmt. 4 / *DGAC, France*

We do not have any comment on the proposed amendment to Part 66 AMC Appendix I.

We would just like to recommend to the Agency to have a procedure to amend the 66 list during the Type Certification Process in order to be able to deliver the appropriate approvals to Part 147 organisations and the appropriate rating to AME before entry into service of the new type.

Comment noted.

Cmt. 8 / *AEI*

AEI Fully agrees with the proposed NPA

Comment noted.

Paragraph -

Add. info: AMC Part 66
Appendix 1 - Aircraft type rating for Part66- AML

Cmt. 1 / *Lyon Maintenance*

" Fokker F70 (RR Tay)
Fokker F100 (RR Tay) "

Fokker 28 Mk 0070 / 0100

The proposal has been taken into account.

Paragraph -

Add. info: AMC/GM to Annex III Part 66 of EC No.2042/2003
Appendix I to AMC Part 66, Aircraft Type Ratings for Part 66 Aircraft Maintenance License

Cmt. 5 / *Airbus*

Introductory text, 3rd paragraph, last sentence

Add the underlined words:
...After receiving a change request the Agency will analyze the proposal with the aircraft manufacturer and update the list accordingly.

This is part of the work that will be done following the extension of the scope of the Agency to air operations and flight crew licensing. Task MDM.012 on common flight standards, included in the Agency's 2007/2009 RM Planning, deals with this issue. Interactions between the TC holder and the Agency cannot be addressed for the moment.

Paragraph -

Add. info: Appendix 1 – Aircraft Type Ratings For Part-66 Aircraft Maintenance License

Cmt. 12 / *CAA, UK*

CAA believes that this proposal would be acceptable only if the list published on the website were subjected to the full rigour of document change and configuration control. This is essential to ensure that ratings on an individual's licence can be traced back to an approved version of the published list of ratings.

The list will remain AMC material.

The other aircraft lists published by EASA or the JAA do not always have the same goal. Therefore, the lists do not have to be identical. Amendments of the Appendix are subject to review by the EASA Certification Directorate.

In Addition CAA requests that EASA ensures that the lists of aircraft in Appendix I are consistent with the other aircraft lists published by the EASA Certification Directorate - i.e. A/C transferred; A/C not transferred; and Annex II. Also that the categorisation of types is consistent between these lists and Directorates.

Comment

Response

Paragraph -

Add. info: Appendix I Aircraft Type Ratings for Part-66 Aircraft Maintenance Licence
Appendix I

Cmt. 2 / AEA

The AEA strongly disagrees with the proposal to transfer the list of Aircraft Type Ratings for Part-66 from Acceptable Means of Compliance (AMC) to an informal list on the EASA Website, in order to cater for the need for frequent and quick updates to the list.

In stead, the AEA suggests:

- To have the list of aircraft type ratings for Part-66 referred to as an EASA Decision, which would be binding on NAAs or
- to amend the EASA rulemaking procedures to allow for frequent and quick updates of this kind of acceptable means of compliance (AMC) material,

The list will remain AMC material. It is considered as a permanent rulemaking task for the Agency. The list will be updated three to four times per year according to the rulemaking procedure. However, the consultation period will be reduced to 6 weeks and no regulatory impact assessment will be carried out. Agency Decisions are not binding to Member States. Only Commission Regulations are binding so the proposal made would not reach the goal expressed.

This amendment is a temporary solution. Today the only list is the one in the Appendix and it started to become very outdated. The complete solution will be in depth view of the type training issues that is programmed in RM tasks MDM.012 and 66.011.

Paragraph -

Add. info: General comment

Cmt. 9 / CAA, UK

CAA cannot see why the appendix would need amending frequently or quickly: -

Frequently- how many new types do we expect each year? Surely the 'mature' list would change infrequently.

Quickly- when the list is mature, any addition could be achieved whilst the EASA TC process is being conducted.

The importance of Appendix 1 to AMC – 66 being under the existing rulemaking procedures has not been properly stated.

Cmt. 11 / CAA, UK

This proposal would undermine the standardisation throughout Europe as each Member State would be left to develop their own formal list at which time differences will occur. The proposal is totally unacceptable.

Experience in the JAA shows that new types are added to such a list every three months. The procedure in the JAA was much quicker than the one available in the Agency.

Applying the normal rulemaking procedure on Appendix I would take 9 months. It was therefore agreed with AGNA and SSCC to consider it as a permanent rulemaking task for the Agency. The list will be updated three to four times per year according to the rulemaking procedure. However, the consultation period will be reduced to 6 weeks and no regulatory impact assessment will be carried out.

The list will remain AMC material. It is considered as a permanent rulemaking task for the Agency. The list will be updated three to four times per year according to the rulemaking procedure. However, the consultation period will be reduced to 6 weeks and no regulatory impact assessment will be carried out.

Agency Decisions are not binding to Member States. Only Commission Regulations are binding so the statement made applies also to the present situation.

However, this risk should be minimal under a spirit of cooperation. Member States that would like to use different denominations should notify the Agency for analysing and amending the AMC material.

Furthermore, this amendment is a temporary solution. Today the only list is the one in the Appendix and it started to become very outdated. The complete solution will be in depth view of the type training issues that is programmed in RM tasks MDM.012 and 66.011.

Comment

Response

Paragraph -

Add. info: General comment to paragraphs 6 & 7

Cmt. 10 / CAA, UK

The proposal to informally list aircraft types on the EASA web site without applying proper rulemaking process will create a variety of different group rating concepts across the EU, and also allow each Member State to define aircraft as Complex Types without agreement. This issue is particularly relevant to categories shown in 66 A. 45 (g) 3, as each Member State must be able to determine the extent of the group rating in order that he can accept a person certifying maintenance on aircraft below 5700kg.

This poses scope for divergence and undermines the supporting processes within Part 145 and Part M Subpart F, which rely upon the licence for authorisation purposes. Transparency of qualification is essential to ensure the appropriate competences are met prior to authorisation.

Should the current rulemaking process for Appendix 1 to AMC 66 not be followed, the variety of different type rating concepts that would result would make automatic acceptance of one Member States licence by another impossible.

The list will remain AMC material. It is considered as a permanent rulemaking task for the Agency. The list will be updated three to four times per year according to the rulemaking procedure. However, the consultation period will be reduced to 6 weeks and no regulatory impact assessment will be carried out.

Agency Decisions are not binding to Member States. Only Commission Regulations are binding so the statement made applies also to the present situation. For obvious operational reasons the fact that this list cannot be properly updated has already lead competent authorities to deviate from it.

However, this risk should be minimal under a spirit of cooperation. Member States that would like to use different denominations should notify the Agency for analysing and amending the AMC material.

Furthermore, this amendment is a temporary solution. Today the only list is the one in the Appendix and it started to become very outdated. The complete solution will be in depth view of the type training issues that is programmed in RM tasks MDM.012 and 66.011.

Paragraph -

Add. info: Annex IV to Decision No 2003/19/RM

Cmt. 6 / LBA

Appendix I 'Aircraft type ratings for Part-66 aircraft maintenance licence'

You will find enclosed the spread sheet, which is used by LBA to issue Part-66 aircraft maintenance licences.

LBA would appreciate if this list will become part of the new Appendix I 'Aircraft type ratings for Part-66 aircraft maintenance licence'.

[SEE ATTACHED EXCEL SHEET IN HARD COPY]

The Agency thanks for the list attached to the comment.

The list will be taken into account when amending the appendix.

Paragraph -

Add. info: Part-66 Appendix I Aircraft Type Ratings For Part-66 Aircraft Maintenance Licence”

Cmt. 7 / CAA, Sweden

Comment to the last paragraph:

All new aircraft types to be registered in a Member State will require an EASA Type Certification before registration. We suggest that the new aircraft Type Ratings to be used for Part-66 purpose are defined and established as part of the administrative procedure for the issuing of the Type Certificate.

This is part of the work that will be done following the extension of the scope of the Agency to air operations and flight crew licensing. Task MDM.012 on common flight standards, included in the Agency's 2007/2009 RM Planning, deals with this issue.