

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147 - General	FOCA	029	No fundamental objections.		Comment noted; no action required.
147 - General	CAA-UK	118	Reference is made to " <i>Member State</i> " and " <i>competent authority</i> " in a number of the paragraphs contained in this Part. In all cases this should refer to the "competent authority" as they are responsible for issuing the approval.		Agreed. Text changed.
147 - General	Rolls-Royce plc, UK	176	In order to remain consistent with other IR documents, a contents page is required, listing paragraph numbers and titles.		Part-147 will be an Annex to the Commission Regulation. Under EU law, tables of content are not used for Annexes.
147 - General	CAA, Ireland	154	<p>The requirement for approvals and certificates of unlimited duration in accordance with the "Continued validity paragraphs of Part M, M.A.618, M.A.715, Part 145.A.90, Part 147.A.80, Part 21.A.181 and 259 is a practice in some states of the EU but has not been a general practice in Europe. It is entirely unreasonable to expect an NAA to introduce such a concept immediately where not already in effect.</p> <p>A time-limited certificate is a conservative regulatory mechanism where the privileges conferred on an organisation or individual by such a certificate constitute public safety functions. In principle such privileges should not be indefinitely conferred through unlimited certificates. Time limits should be placed on certificates to permit a formal review of its status and reissue by the relevant authority at the time of each review. This is not contrary to the Regulation 1592/2002 which, for example, allows for the termination of a certificate of airworthiness (Article 5).</p>		Commission policy has stated that all approval must be unlimited. Text not changed.
147 General	Lufthansa / Lufthansa Technik, Dipl.-Ing. Ulrich Henze	021	No Comment.		No action required.
147 general	Lufthansa Technik AG, Ralph Schütte	025	No Comment		No action required.
147.1	Rolls-Royce plc, UK	176	The paragraph refers to 'Member States'. It is not clear whether these states are members of the Agency, or of another body such as the EU. Clarification is therefore requested.		This is general EU terminology : no need for clarification. No text change.
147.A.1	LBA	056	The meaning of the wording "principal place of business" should be given.	Because some European approved organisation have their main legal entity at a place where no maintenance training may be done.	Will be clarified in the AMC.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.10	DGAC, France	162	1. "Except for State education department school, a training organisation shall be an organisation or part of an organisation registered as a legal entity".	<u>Implementation problem</u> : As exemptions for State education department school of 147.B.195 are permanent it is better to include them in the requirement and not mix them with real exemptions according article 10 of Regulation 1592/2002.	There is no need for such a change as this is already covered by 147.B.195.  There is no relation with Article 10 of the Basic Regulation (immediate reaction to safety problems).
147.A.20	CAA-UK	118	Does not include a requirement for payment of any charges to the competent authority. This suggests the applicant has a right to approval without payment.  <i>Add to (b) 'subject to the payment of any required charges to the competent authority'.</i>		There is no need for such a change as this is already covered by the Basic Regulation (Article 53).
147.A.20(a)	CAA-NL	099	CAA-NL Suggests to expand this paragraph with the following: ", and shall include the information required by 147.A.65 and the terms of approval requested to be issued."		There is no need for such a change as this is already covered by Subpart B.
147.A.30(b)(1)	CAA-NL	099	Extend the max number of students undergoing training to 32 (more in line with national practice)		147.A.30 (b)(1) is based upon existing JAR 147 text and there is no objective reason to change this existing requirement. No text change.
147.A.30(c)	CAA-UK	118	JAR-147.30(c) specified that the environment must be considered for humidity, temperature, light, and noise. This was an important aspect of classroom standardisation and has been omitted from the revised Regulation.  (c) The paragraph (b) accommodation environment shall be maintained at a light, noise, and temperature/humidity level such that students are able to concentrate on their studies or examination, without undue distraction or discomfort.		No change needed. Without the specific criteria for light, noise, etc, the proposal encompasses generic requirements.
147.A.30(e)	ERA	079	The phrase "In the case of a aircraft" should be replaced with "In the case of an aircraft".		Agreed. Change incorporated.
147.A.30(e)	ERA	079	The comma (,) should be removed after the word "access".		Agreed. Change incorporated.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.30(f)	ALAE	036	The number to students undergoing practical training during a training course shall not exceed - "15" add "6" per supervisor or assessor.	Reason for above amendment to 6 students. It is assumed that practical training will include the 'A' Certifier. The 'A' Certifier must be seen to carry out the task at least 3 times; it must be hands on and 15 is just too many to carry out the task for the Assessor to judge the result. Remember, when task is added to the 'A' Certifier's Licence he can sign the CRS. The Assessor must be sure the task will be carried out correctly.	147.A.30 (f) is based upon existing JAR 147 text and there is no objective reason to change this existing requirement. No text change.
147.A.30(f)	CAA-NL	099	Allow half of the students per instructor during practical training. (more in line with national practice)		147.A.30 (f) is based upon existing JAR 147 text and there is no objective reason to change this existing requirement. No text change.
147.A.35	Rolls-Royce plc, UK		The paragraph refers to instructors having 'experience and qualifications established as an officially recognised standard'. This is a new requirement when compared with JAR 147, and it is unclear what is meant by 'officially-recognised', and therefore unclear which organisations (nationally or internationally) are those required to endorse the standard.		Defined in the AMC.
147.A.35	DGAC, France	162	I – Modify paragraph (a) as follows:  “(a) The organisation shall appoint an accountable manager who has corporate authority for ensuring that all training commitments can be financed and carried out to the standard required by the competent authority. This is not applicable to State education department school if the department appoint a senior person to manage the training organisation and such person has a budget sufficient to operate the organisation to the standard of Part-147.”  II – Modify paragraph (h) as follows:  “(h) Instructors and knowledge examiners shall undergo a minimum of 35 hours updating training at least every twenty-four months relevant to current technology, practical skills, human factors and the latest training techniques appropriate to the knowledge being trained or examined”	<u>I - Implementation problem:</u> As exemptions for State education department school of 147.B.195 are permanent it is better to include them in the requirement and not mix them with real exemptions according article 10 of Regulation 1592/2002.  <u>II – Implementation problem:</u> Experience shows that this point (which is today in AMC to JAR 147) needs to be reinforced.	I - No change needed: already covered by 147.B.195.  There is no relation with Article 10 of the Basic Regulation (immediate reaction to safety problems).  II - No change needed: covered by the AMC.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.35 Personnel Requirements	CAA-UK	118	Allows instructor to examine his own students.  (e) Add after assessor, 'but may not compile examinations for students in the same subject which he has taught those students'		147.A.35 is based upon existing JAR 147 requirement. Proposed text change would introduce a new requirement but no justification is given for such a change.
147.A.35 Personnel Requirements	CAA-UK	118	(f) The standard to measure competence of staff referred to in this paragraph is not specified and will create variations between each Member State. A lack of specification will have an impact on the quality of staff employed and consequently the quality of training delivered by the Part 147 organisation. Until an EASA agreed standard is produced the standard shall be set by the Member State authority.  Propose: (f) The qualification of instructors, knowledge examiners, and practical assessors shall be established in accordance with procedures acceptable to the Member State authority.		Will be clarified in the AMC.
147.A.35(a)	LBA	056	The definition of the "accountable manager" should be harmonised with Part M(.....	The definition should be done in a equivalent manner. A standardisation for the definition of the accountable manager is needed for Part M, Part 145 and Part 147.	Agreed: definitions harmonised.
147.A.35(e)	Airbus MTO	015	Proposal to change: cant' to carry out Pre (e) Any person may cant' out any combination .... Post (e) Any person may carry out any combination.	Clarification of the text.	No change needed: text already as suggested.
147.A.35(f)(g)	Finnair	072	(f) The standard recognised by whom? (g) The acceptance by whom?		(f) Will be clarified in the AMC (g) Clarification is given in the AMC.
147.A.35(h)	ALAE	036	Add another sentence to existing sentence to read:- "such training to be recorded as required by 147.A.40(a).		No change needed: covered by 147.A.40(a) (duplication).
147.A.45	LBA	056	add new subparagraph: "The maintenance training organisation shall have an approved procedure by the competent authority to assure that instructional components shall not be permitted to re-enter the component supply system."	This subparagraph is necessary to reduce the risk of un-airworthy components in the supply chain (comparable to 145.A.42(d)).	This is not a training requirement and this is already covered by 145 and M. No text change.
147.A.60 Training procedures and quality system	CAA-UK	118	Typo. Missing word first sentence. Propose: (a) <i>The organisation shall establish procedures acceptable to <u>the</u> competent authority to ensure proper training standards and compliance with all relevant requirements in this Part.</i>		Agreed. Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.60(b)	DGAC, France	162	<p>“(b) The organisation shall establish a quality system including:                      (1) an independent audit function to monitor training standards, the integrity of knowledge examinations and practical assessments, compliance with and adequacy of the procedures, and                      (2) a feedback system of audit findings to the person(s) and ultimately to the accountable manager referred to in 147.A.35(a) to ensure, as necessary, corrective action.                      This is not applicable to State education department school if the department operates an independent schools inspectorate to audit the maintenance training organisation at the frequency required by this Part..”.</p>	<p><u>Implementation problem:</u> As exemptions for State education department school of 147.B.195 are permanent it is better to include them in the requirement and not mix them with real exemptions according article 10 of Regulation 1592/2002.</p>	<p>No change needed: Already covered by 147.B.195.</p> <p>There is no relation with Article 10 of the Basic Regulation (immediate reaction to safety problems).</p>
147.A.63 Examinations	CAA-UK	118	<p>Where behaviour of the student or the examiner invalidates the process and requires this to be notified, (b) refers to notifying the competent authority, (c) refers to notifying the Member State. Both examples should require the same reporting channel.</p> <p>Suggested text: (c) Replace – The second sentence - “The Member State” and replace with “<i>competent authority</i>”.</p>		<p>Agreed. Text changed.</p>
147.A.65	LBA	056	<p>change the headline to “Maintenance training organisation exposition”</p>	<p>This is the common title of this exposition and it will prevent confusion with expositions of other training organisations (e.g. pilots training organisation).</p>	<p>Agreed. Text changed.</p>
147.A.65	LBA	056	<p>add the following sentence:                      “When the accountable manager is not the chief executive officer of the organisation then such chief executive officer shall countersign the statement.”</p>	<p>This statement is also used in 145.A.70(a)(1) and shall be added in this paragraph because of the experiences done under JAR-145. It is also an item for standardisation.</p>	<p>The “chief executive officer” position is not defined in the requirement. No change needed to 147. For consistency reason change will be made to Part-145 by deleting the corresponding requirement.</p>
147.A.65(5)	Finnair	072	<p>A separate list of the training instructors, knowledge examiners and practical assessors should be acceptable if referred in the manual.</p>	<p>A separate list is easier to keep up to date as in bigger organisations changes will be frequent.</p>	<p>Will be clarified in the AMC.</p>
147.A.65(a)	LFV-S	105	<p>(a) Misprint. Replace (k) with (11).</p>		<p>Agreed. Text changed.</p>
147.A.65(k)	ERA	079	<p>This paragraph has been mis-numbered and should, I believe, be (11).</p>		<p>Agreed. Text changed.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.70	LBA	056	change "non training organisation" to "non maintenance training organisation" change "the training organisation" to "the maintenance training organisation"	This is the common title of this organisation and it will prevent confusion with titles of other training organisations (e.g. pilots training organisation).	Agreed. Text changed.
147.A.70	DGAC, France	162	I -Add at the beginning of paragraph (a): " Subject to compliance with paragraph (e)" and add a new paragraph (e): " (e) the organisation may exercise the privileges of this paragraph provided it remains in compliance with this Part" II – Modify sub-paragraph (a)(4) as follows: "(4) the issue of certificates, in accordance with appendix 3, following successful completion of the approved basic or aircraft type training courses and examinations specified in subparagraphs (a)(1), (a)(2) and (a)(3), as applicable"	<u>I - Implementation problem:</u> 147.A.70 should not only gives the privileges of an approved organisation, but also the conditions under which such privileges may be used (See also comment to 147.A.80).  II – For mutual recognition of certificates issued by 147 organisations	I - Proposed text is redundant. Text not changed.  II - Agreed. Text changed.
147.A.70 and 147.B.195	IAAG	158	An approved maintenance training center can subcontract parts of the training and relevant examinations to a non-approved training center. No indication is made that the non-approved training center will have to abide by the procedures, references, programmes, set by JAR-147. There seems to lay an important risk that the JAR-147 is bypassed.		This is covered by the AMC.
147.A.70(a)(3)	LFV-S	105	(a) (3) Clarify the difference between aircraft type training course and type examination only. (a)(3) the conduct of examinations on behalf of the competent authority, including the examination of students who did not attend the basic training course at the maintenance training organisation. Renumber (4) to (5) After (a) (3) insert: (4) the conduct of examinations on behalf of the competent authority, on aircraft type where type training course is not required. Aeroplanes below 5700 kg and helicopters below 3175 kg will require type examination only.		Part-147 is not designed to allow organisations to conduct examination on aircraft type they do not teach. Who may conduct type examination only (when a type course is not required) is covered by Appendix 3 to Part-66. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.70(a)(3)	Airbus MTO	015	<p>“The conduct of examinations on behalf of the competent authority, including the examination of students who did not attend the basic or aircraft type training course at the maintenance training organisation.”</p> <p>It is understood that the Airbus MTO can handle examination for type training for people who have not attended the type rating course in the Airbus MTO. If this statement is wrong please precise the requirement.</p>	Requirement clarification.	Understood as it should be. No change needed.
147.A.70(a)(4)	Airbus MTO	015	<p>“The issue of certificates following successful completion of the approved basic or aircraft type training courses and examinations specified in subparagraphs (a)(1), (a)(2) and (a)(3), as applicable”.</p> <p>It is understood that the Airbus MTO can issue different types of certificates (Theory, full,...)If this statement is wrong please precise the requirement.</p>	Requirement clarification	Understood as it should be. No change needed.
147.A.70(d)(1)	Airbus MTO	015	<p>“The maintenance-training organisation may subcontract the conduct of basic theoretical training, type training and related examinations to a <b>non-training organisation</b> only when under the control of the training organisation quality system.</p> <p>Proposal:”</p> <p>To change <b>non training organisation to third party</b></p>		Agreed. Text changed, although not as proposed.
147.A.70(d)(3)	Airbus MTO	015	<p>The subcontracting of type training and examination is limited to powerplant and avionic systems.</p> <p>Proposal: To add “theoretical part” after type training.</p>	The sub-contracting of all the practical training shall be possible	Theoretical <u>and</u> practical training may be subcontracted. Text not changed.
147.A.75(b)	ALAE	036	<p>Delete all words after "changes".</p> <p>There is no requirement to add suspension of approval. The first few words of the sentence are quite sufficient to cover the requirements of the competent Authority.</p>		On the contrary the competent authority may need to suspend the approval in this case (see Section B). Text not changed.
147.A.75(c)	ERA	079	<p>This paragraph could have severe ramifications on any students that may have undertaken training and examinations in the period from which the changes took place until the Authority was notified. How does the Agency plan to ensure that any such students are not forced to repeat the training?</p>		The student may have indeed to repeat the training if the changes had an impact on the acceptability of the training course. Text not changed.
147.A.80	CAA-UK	118	<p>Does not include a requirement for payment of any charges to the competent authority. This suggests the applicant has a right to continued approval without payment. Propose: Add 'd) <i>any required charges being paid to the competent authority in connection with the approval</i>'.</p>		This is already covered by the Basic Regulation (Article 53). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.80	DGAC, France	162	Amend the text as follows and transfer paragraphs (a) and (b) in section B as conditions for suspension "An approval remains valid until surrendered, superseded, revoked, suspended or expired "	<p><u>Impracticable</u></p> <p>Paragraph (a) is more appropriate as a condition to exercise the privileges of an approved organisations. According the proposed text if the internal audit system of the organisation find a non calibrated tool, as this is non in compliance with the Part-M, the complete approval becomes invalid. What's more if the tool had to be calibrated 10 days before the audit, it mean that retroactively the approval was invalid since 10 days ! A privilege associated with the approval (see comment to 147.A.70) would only mean that the organisation is not authorised to release aircraft for the maintenance operations where this tool is needed until it is properly calibrated, but it can continue releasing other operations.</p> <p>Paragraph (b) is more appropriate as a condition to suspend the approval.</p> <p>Although we can understand the rationale to have unlimited approvals, it has to be recognised that today oversight of approved organisations is partly based on renewal. It should be acknowledged that it is often easier to put pressure on an organisation at the time of renewal rather than suspending an unlimited approval. In addition, it is not rare, when an organisation is raising concern to give a very limited approval and thus have a reinforced surveillance. Switching to unlimited approvals would thus necessitate a major change in the enforcement system which does not seem absolutely necessary at this stage.</p> <p>See comment 91 on 147.B.235</p>	Text is needed to provide legal basis for revocation. Text not changed.
147.A.80, 147.B.200	CAA, Denmark	121	Conflict between these two paras. If renewal add to Part 147.A.80 a (d) valid only if renewed.	Clarification needed if renewal is needed. Conflict between Part 147.A.80/ 147.B.200.	No renewal is needed as certificates are issued for an unlimited period of time. 147.B.200 and subsequent paragraph are amended accordingly.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.85	CAA, Denmark	121	Combination course B1/B2 not included in the new set up.	Need clarification. Our basic training is based on a combined course with duration of 4½ years, this will come in conflict with adoption period (2 years).	No changed needed. Already in the AMC.
147.A.85 - The approved basic training course	CAA-UK	118	<p>The reference to paragraph 2 is erroneous. This should refer to training defined in (b). Proposal: (c) The knowledge examination element shall cover a representative cross section of subject matter from the paragraph (b) training element.</p> <p>(g) The duration of the conversion courses between (sub)-categories is not specified. Since this training will be acceptable in all member states a minimum duration ought to be specified. Proposal: An appendix to AMC material required defining all permutations of conversion.</p>		<p>Agreed. Text changed accordingly.</p> <p>This is already in the AMC.</p>
147.A.85(g)	ALAE	036	An addition is; needed after "acceptable to". Suggest the additional words should be "The competent Authority who will inform the member state of such acceptance".		In fact the requirement for the competent authority acceptance is redundant as the training course must be approved. Text is changed accordingly.
147.A.95	CAA, Denmark	121	JAA Question database: Question database to be used?		This is not relevant to the present consultation.
147.A.95(b)	DGAC, France	162	Add at the end "and calculators "	<u>Implementation problem</u> : Today's questions are based on simple calculations without calculator.	Agreed but already defined in 66.B.135 and Appendix 2. Text not changed.
147.A.XYZ	Belgian CAA	016	<p>There should be a requirement in the line of:</p> <p>147.A.XYZ Training and examination standards All training and examination shall be carried out in accordance with the requirements of this part, part 66 and the Training organisation exposition, at all times.</p>	<p>- In our opinion, the statement asked for, in 147.A.65 ,(a),(1), is not sufficient to put a legally binding obligation on the organisation to use the manual.</p> <p>- To be consistent with Part M and part 145.</p>	No change needed. 147.A.85, 95, 105 and 110 provide the necessary legal basis.
147.A.100(b)	LBA	056	change "in respect of the criteria specified" to "as specified"	In 147.A.85(e) are no criteria specified. It is a description of skills.	Agreed. Text changed.
147.A.105	CAA-NL	099	JAR-147 had the option to split the type training in Airframe, Powerplant and Avionics. This also gave the possibility to split Theoretical and practical training between 147 and 145 approved organisations. A welcomed flexibility.		The rule does not prevent such flexibility. This is also clarified in the AMC.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.A.105	Rolls-Royce plc, UK		Proposed inclusion in 147.A.105: "Aircraft type training may be sub-divided into aircraft type training, engine type training or avionic system training. A IR147 approved maintenance training organisation may be approved to conduct aircraft type training only, engine type training only or avionics system training only if acceptable to the competent authority".	The JAR-147 sub-paragraph 105(b) has not been included in the proposed text. This paragraph was originally inserted at the request of engine type certificate holders because it was recognised that the type certificate holder is best placed to provide appropriate training in his products. The ability of a type certificate holder to be approved in his own right to IR 147 must be maintained. This should not be regarded as a sub-contract task from the aircraft type certificate holder. This paragraph must be retained within IR 147.A.105 with 'powerplant' replaced by 'engine' as a 'powerplant type' does not exist.	The rule does not prevent such flexibility. This is also clarified in the AMC.
147.A.105	DGAC, France	162	2. Add a new sub-paragraph as follows:  " Aircraft type training may be sub-divided in airframe type training, powerplant type training, or avionic systems type training. A Part 147 approved maintenance training organisation may be approved to conduct airframe type training only, powerplant type training only or avionics systems type training, if acceptable to the Authority. For the purpose of this paragraph,  (1) Airframe type training means type training including all relevant aircraft structure and systems excluding the powerplant. Powerplant type training means type training on the bare engine, including the build-up to a quick engine change unit. The interface of the engine/airframe systems should be addressed by either airframe or powerplant type training  (2) Avionic systems type training means type training on avionics systems covered by but not necessarily limited to ATA chapters 22,23,25,27,31,33,34,45,46,73 and 77 or equivalent."	<u>Implementation problem:</u> JAR147.1 allowed the sub-division of the type training in airframe, powerplant or avionic type training. This shall be kept in Part 147 in order to increase the quality of the training by using specialists when necessary.	The intent of this text is included in the AMC. Text not changed.
147.A.110	LFV-S	105	Task and assessment missing 147.A.110 Aircraft type/task examinations/assessment A maintenance training organisation approved in accordance with 147.A.105 to conduct aircraft type/task training shall conduct the aircraft type/task examinations and/or assessments specified in Part-66 subject to compliance with the aircraft type and/or task standard specified in Part-66.A.45		Agreed. Text changed accordingly.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.185	CAA-NL	099	CAA-NL suggests to delete the word renewal, since all approvals will be granted without a time limit.		Agreed. Text changed.
147.B.185(a)	LFV-S	105	147.A. 185 (a) reads: "The Member State shall establish an adequate authority....." It should read: "The Member State shall establish a competent authority....."		Agreed. Text changed accordingly.
147.B.185(a)	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.
147.B.190	DGAC, France	162	Approval certificate and exposition may need to be kept more than four years	<u>Implementation problem</u> : We probably need these documents in order to process to an efficient control of the PART 66 licence (we may need to check the validity of a training years after).	Nothing prevents the competent authority from keeping the documents for more than 4 years. Text not changed.
147.B.190 Record keeping	CAA-UK	118	<i>Comment:</i> (c) Add datum for records to be kept.  <i>Suggested text:</i> (c) The minimum retention period for paragraph (b) records shall be four years after the date of surrender or cancellation of the approval.		Nothing prevents the competent authority from keeping the documents for more than 4 years. Text not changed.
147.B.190(a)	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.190/210	A Kalshoven / CJAA	030	<p>The various Implementing Rules or the AMC material refer to the numbering of Organisation Approval Certificates. The CJAA group tasked to develop EASA procedures identified that there is the need for a clear and common numbering system which differentiates between the various Organisation Approvals which are to be issued. This will also be needed to feed the registers of Organisation Approvals to be maintained by EASA. Thus the Agency should define the form and manner for the numbering system in detail.</p> <p>It was identified that a proposal for such a numbering system should be made during the consultation process of the applicable Rules or AMC material. Thus it is proposed to define the system as following :            AAAA.RRR.XXXX            AAAA = Country designator (EU abbreviation issuing member state, EASA when issued directly by EASA)            RRR = Applicable Rule (example: 21G; 145; 147; MG; MF)            XXXX = Sequential number (1234, with note that this number may never be used again when is not used anymore due to Organisation Approval cancelled, revoked etc.)</p>		Agreed. Text changed.
147.B.195	CAA-NL	099	<p>Please reword the statement, in line with JAR-147 to say that the school can be exempted for more than the specific items here e.g. when National school laws have a different, higher, maximum number of students undergoing knowledge training, this constitutes a problem.</p>		Proposal is not in line with existing JAR 147. No text change.
147.B.195 Exemptions	CAA-UK	118	<p>The term exemption in respect to the Regulation and its use in this Part are different. This paragraph should be considered as a derogation as defined by Article 10,5. Exemptions are for unforeseen situations not covered by the requirements. This paragraph is obviously predicted.</p> <p>Typo. "States" should be singular.            Proposal: Suggested text:</p> <p><b>New title. 147.B.195 Derogations</b></p> <p>(b) All derogations granted in accordance with Article 10,5 of the Basic Regulation shall be recorded by the Member State.</p>		Article 10 of the Basic Regulation also uses the term "exemption" Text not changed.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.195(a)	Finnair	072	The competent authority may exempt a school <b>controlled by</b> the State education department from:	Vocational schools in Finland are municipal but controlled by the State education department.	This is not the intent of the original JAR 147 requirement and there is no justification for granting such exemption to such schools.
147.B.195(a)	ALAE	036	Suggest that a sub paragraph 4 be added. It should read:-(4) Such exemptions as mentioned in sub paragraphs 1, 2 & 3 will not preclude the National Competent Authority from ensuring that the subjects being taught are meeting the requirements of JAR 147.		There is no exemption in the original JAR 147 for the competent authority on auditing the organisation. No text change needed.
147.B.200	CAA-UK	118	Typographical errors. Proposal: In (a) 'an maintenance training organisation' should be 'a maintenance training organisation'. In (b) 'principle' should be 'principal'.		Agreed. Text changed.
147.B.200 and subsequent	CAA-NL	099	CAA-NL suggests to delete the word renewal, since all approvals will be granted without a time limit.		Agreed. Text changed.
147.B.200(a)	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.
147.B.200(a)(c)	CAA-NL	099	CAA-NL suggests to delete the word renewal, since all approvals will be granted without a time limit.		Agreed. Text changed.
147.B.200(b)	LBA	056	The meaning of the wording "principal place of business" should be given	Because some European approved Organisation have their main legal entity at a place where no maintenance training may be done.	Will be clarified in the AMC.
147.B.200(c)	ERA	079	The phrase "an maintenance training organisation" on line two should be replace with phrase "a maintenance training organisation".		Agreed. Text changed.
147.B.200(c)	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed Text changed.
147.B.205	LBA	056	delete "renewal", four times	The certificate is unlimited, so no renewal will be done.	Agreed Text changed.
147.B.205	CAA-NL	099	CAA-NL suggests to delete the word renewal, since all approvals will be granted without a time limit.		Agreed Text changed.
147.B.220	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed Text changed.
147.B.220	CAA-UK	118	It is unnecessarily restrictive in carrying out audits. States may wish to carry out audits more frequently in certain circumstances (eg where there has been previous issues with the organisation). Proposal: (a) Delete 'every two years or over' and replace with 'at intervals no greater than two years or, if a staged audit programme is carried out, a full audit must be completed within '.		Text changed, although not exactly as proposed.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.225	CAA-UK	118	Typographical error. Proposal: Add 'as shown in' before Appendix 2.		Text changed although not exactly as proposed.
147.B.225	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.
147.B.230	LBA	056	The definition of findings and recommendation should be copied from Part M and adapted to the requirements of a maintenance training organisation. The description of the Finding levels should be standardised with Part M and Part 145.		Definitions cannot be standardised as the safety impact of non-compliances are not equivalent.
147.B.230	Rolls-Royce plc, UK		This paragraph was not previously contained within JAR-147 and has not been adequately reviewed with interested parties or subject. The proposed words are open to a very wide interpretation with potentially damaging consequences to applicants. The criteria for rectification are inconsistent with those proposed in IR 21, IR M and IR 145.		The text was originally included in JAA A&GM Part 2 Section 2 Chapter 27 and is therefore considered as mature text. There is no need to harmonise the text with Part-M and Part-145 as the risks are not equivalent.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.230	DGAC, France	162	<p>“(a) When during audits or by other means evidence is found showing non-compliance of the approved maintenance training organisation with the Part-147 requirement, any finding shall be classified as follows:            1 - Shall constitute a level 1 finding one or more of the following :            (1) any significant non-compliance with the examination process which would invalidate the examination(s),            2 - Shall constitute a level 2 finding any non-compliance with the training process other than level 1 findings.            (b) The competent authority shall confirm the findings in writing            (1) within 3 working days for a level one finding            (2) within 14 working days for a level two finding.            (c) The competent authority shall ensure that the non compliance is corrected by the organisation within a period appropriate to the nature of the finding:            1- For level 1 finding, corrective action shall be required immediately.            2- For level 2 findings, the corrective action shall be required within three months. In certain circumstances, at the end of this first period, and subject to the nature of the finding the competent authority can extend the 3 month period subject to a satisfactory corrective action plan.            (d) The competent authority shall consider limitation, suspension or revocation of the approval in case of            (1) a level 1 finding, or            (2) failure to comply within the time scale granted by the competent authority, or            (3) numerous or repetitive findings.”</p>	<p><u>Impracticable</u>            An automatic link between a level 1 finding and suspension of the approval may incite inspectors to only declare level 2 findings.            As there is in the legal system a separation between police findings and justice punishment decisions, there should be at the administrative level a separation between inspectors findings and authority's suspension decision.            The audit should is just a picture of the system, and the conclusions should only be drawn by the initiator of the audit.            A decision to limit, suspend or revoke an approval comes more often from a body of findings rather than from an individual finding.            Depending on the understanding, a finding on its own may be considered as a level 1 finding by the inspector but may not necessitate limitation, suspension or revocation of the approval because it was an isolated case and not a systemic problem.            Under the national legal system, it is not always possible for an inspector to immediately suspend an approval, but it is possible to initiate the procedure (the decision being taken by authorised bodies in due time).            147.B.230(a)(2) and (a)(3) are rather conditions for suspension than level 1 findings            (a)(4) is too vague            See comment on 147.B.235            Partial harmonisation with Part 21 (<i>Note: Part 21 is based on three level findings. The Agency should, in the near future, evaluate whether these two different systems are justified</i>)</p>	<p>The text was originally included in JAA A&amp;GM Part 2 Section 2 Chapter 27 and is therefore considered as mature text. Experience shows there is no need to change the procedure. Furthermore there is no need to harmonise the text with Part-M and Part-145 as the risks are not equivalent.</p>

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.230	LBA	056	delete "renewal"	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.
147.B.230 Findings level	CAA-UK	118	<p>Editorial. An approval should be suspended following non-rectification of a level 1 finding, not revocation as stated. (b) should be amended in the same manner. Proposal: (a) A level 1 finding shall constitute one or more of the following:</p> <p>Failure to complete the rectification of any level 1 finding within three days of written notification shall entail suspension, by the competent authority, of the approval in whole or in part.</p> <p>(b) A level 2 finding shall constitute any non-compliance with the training process other than level 1 findings.</p> <p>Failure to complete the rectification of any level 2 finding within the time period set by the competent authority, shall lead to suspension of the approval in whole or in part.</p>		Agreed. Text changed.
147.B.230(a)	ERA	079	This paragraph, in my opinion, does not make grammatical sense. The word "Shall" at the beginning of a sentence would imply it is a question.		Agreed. Text changed.
147.B.230(a)	Finnair	072	Failure to complete the rectification of any level 1 finding within <b>thirty</b> days of written notification shall entail revocation,.....	Three days is too tight when there is no direct and immediate safety effect.	Three days is the original requirement from Chapter 27. Text not changed.
147.B.230(a)(2)	ERA	079	Replace the word "to" with "by" on line 1.		Agreed. Text changed.
147.B.230(a)(2)	ALAE	036	Some error in the sentence. Suggest it be written: "Failure of the Competent Authority to gain access to the Organization's Facilities etc. etc".		Agreed. Text changed.
147.B.230(a)(2)	CAA-NL	099	Typo: This should read failure to gain access "by" the competent authority, instead of "to" the competent authority.		Agreed. Text changed.
147.B.230(b)	ERA	079	This paragraph, in my opinion, does not make grammatical sense. The word "Shall" at the beginning of a sentence would imply it is a question.		Agreed. Text changed.
147.B.235	CAA-NL	099	CAA-NL suggests to delete the word renewal, since all approvals will be granted without a time limit.		Agreed. Text changed.
147.B.235	CAA-UK	118	There is no renewal of the approval – see 147.A.80. Proposal: Delete renewal from the header. Delete from b) 'or refuse to renew'.		Agreed. Text changed.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
147.B.235	DGAC, France	162	<p>“ The competent authority may suspend, revoke, limit or refuse to renew an approval if</p> <p style="padding-left: 40px;">the organisation is not able to ensure compliance with Part 147; or</p> <p style="padding-left: 40px;">the organisation does not remain in compliance with the conditions of approval, in particular the provisions included in the maintenance organisation manual; or</p> <p style="padding-left: 40px;">the organisation has gone beyond its scope of approval; or</p> <p style="padding-left: 40px;">the competent authority has not been granted access to the organisation to determine continued compliance with Part 147.”</p>	<p><u>Impracticable</u>: It is not appropriate to render a sanction mandatory. The regulation just needs to specify the administrative sanctions which may be taken by the authority and in what circumstances.</p>	<p>The sanction should be made mandatory in certain safety related cases. Text not changed.</p>
147.B.235 headline	LBA	056	delete “renewal”	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.
147.B.235(b)	LBA	056	delete “or refuse to renew”	The certificate is unlimited, so no renewal will be done.	Agreed. Text changed.
<b>APPENDICES</b>					

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix 1	DGAC, France	162	<p>1.1 Minimum duration of complete basic courses</p> <p>Basic Course Duration in hours Theoretical training ratio in %</p> <p>A1 800 30 to 35</p> <p>A2 650 30 to 35</p> <p>A3 800 30 to 35</p> <p>A4 650 30 to 35</p> <p>B1.1 2400 50 to 60</p> <p>B1.2 1000 to 1200 50 to 60</p> <p>B1.3 2400 50 to 60</p> <p>B1.4 1000 to 1200 50 to 60</p> <p>B2 2400 50 to 60</p> <p>1.2 Minimum duration of conversion basic course</p> <p>Conversion course (x is 1,2,3 or 4) Duration in hours Theoretical training ratio in %</p> <p>Ax→B1.x Ax→B2 1600 to 2200 60 to 70</p> <p>B1.x→B2 B2→B1.x 600 80 to 85</p> <p>B1.x→B1.x 200 50 to 60</p>	<p>3. Reason(s) for proposed text/comment</p> <p><u>Impracticable:</u></p> <p>- Compared to the requirement for large aircraft, the number of training hours is too high for B1.2/B1.4. The relevant syllabus should be reviewed to decrease this requirement to a level of about 1000/1200 hours. This is enough for the level of knowledge necessary. Cat A2 and A4 should be reduce accordingly</p> <p>- It is necessary to have duration and theoretical training ration for conversion course in order for Part 147 approved organisation, to establish accurate training syllabus.</p>	<p>1. The courses duration proposed are not consistent with the course syllabus as specified in Appendix 1 to Part-66. Text not changed.</p> <p>2. Conversion courses duration are specified in the AMC. Text not changed.</p>

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix 2	DGAC, France	162	See comment for changes form		Agreed. Text changed.
Appendix 2	CAA-UK	118	The example includes reference to type training approval for Category A. As the cat A is not type rated this entry is incorrect. Proposal: Delete reference to A and T3 on approval certificate		T3 refers to task training on a given aircraft type. Text changed to read: "type/task".
Appendix 2	LBA	056	change "[Member State]" to "[Member State/EASA]" "EASA" has been forgotten to add at this place in the certificate. Use "Part 147, Part 145, Part M" or "PART-147, PART-145, PART-M" in the certificates. It shall be used one way to make a reference to a Part in a certificate.		Text changed to read "competent authority", which also includes the Agency.
Appendix 2 Type Training Certificate	LBA	056	Change twice in the third box: "AIRCRAFT TYPE" to "AIRCRAFT TYPE INCLUSIVE ENGINE TYPE"	This is necessary because in the licence the engine type shall be mentioned, too.	Type designators are specified by AMC to Part-66 and include the engine type.
Appendix 3	DGAC, France	162	See attachment to comment	<p><u>Implementation problem:</u></p> <p>Surname, name and date of birth on the certificate, permits to have a complete identification of the holder of the certificate. Faking of documents and namesake problems should be considerably reduced. Address is only putting additional burden. AMTO face problems to obtain the address of the trainee from the customer (airline/maintenance organisation), in addition this is a changing information. This certificate is not a leaving document, like a licence, but a once and for all document like a diploma. Reference shall not be made to EU States but EASA States, which should include non EU States. Recognition of this certificate does not have to be put on the certificate, the regulation gives it its status.</p> <p><i>NOTE : the forms given in the appendix should clearly identify the text which does not change from one certificate to another (such as its title), from the text which has to be filled in each certificate (such as the name of the course)</i></p>	Agreed. Text changed.

## Part-147 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix 3 - Certificate of recognition	CAA-NL	099	For mutual recognition the certificates should refer to subcategory and type ratings as listed by the regulations. (e.g. A training institute might call a type course "F228/AE/T-3" indicating that it is the third theoretical Airframe and Electrics course for a Fairchild SA 228. The certificate should then state it covers the theoretical airframe and electrics elements of the Fairchild SA 226/227/228 (Allied TPE 331) as per JAA AGM CHAPTER 22 APPENDIX 3).		Type designators are specified in the AMC to Part-66. Text not changed.